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ACCESS TO KNOWLEDGE AS A HUMAN RIGHT: COPYRIGHT, ACCESSIBILITY, AND PERSONS WITH DISABILITIES IN INDIA

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1. Introduction

Access to knowledge is closely connected with equality, education, freedom of expression, cultural participation and human dignity. For persons with disabilities, however, access to a published work may depend not merely on whether the work is available, but on whether it can be perceived, navigated and used through an accessible format. A printed textbook, for example, may be inaccessible to a person who is blind, has low vision, has a print disability or cannot physically handle a conventional book. Digital text, Braille, audio, large print and other appropriately designed formats can remove some of these barriers, but their creation and distribution may involve the reproduction or adaptation of copyrighted works.[532]

Copyright law therefore occupies an important position in the relationship between the rights of creators and the ability of persons with disabilities to access knowledge. Copyright protection serves legitimate interests by recognising authors' and other right holders' control over the use of their works. At the same time, an inflexible system can create obstacles where an accessible copy is unavailable in the market and permission cannot be obtained promptly or on reasonable terms. The legal question is not whether copyright should be displaced, but how copyright can accommodate accessibility while preserving a fair balance between right holders and users.[533]

In India, the Copyright (Amendment) Act, 2012 introduced a specific exception for accessible-format uses under section 52(1) (zb) and a compulsory-licensing mechanism under section 31B.[534] India also became the first country to ratify the Marrakesh Treaty to Facilitate Access to Published Works for Persons Who Are Blind, Visually Impaired or Otherwise Print Disabled, on 24 June 2014. This article evaluates these developments and argues that their practical success depends on implementation, institutional capacity and the integration of accessibility into the production and distribution of works.[535]

[532]Constitution of India, arts. 14, 19(1)(a), 21 and 21A. The Constitution does not expressly name a freestanding 'right to access knowledge'; the argument is developed through the interconnected guarantees and constitutional values identified in the text.

[533] The Copyright Act, 1957, No. 14 of 1957 (India), ss. 14, 16 and 52. Section 14 defines the exclusive rights comprised in copyright; section 16 addresses the absence of copyright except as provided by statute; section 52 identifies acts that do not constitute infringement.

[534] Copyright (Amendment) Act, 2012, No. 27 of 2012 (India), which, among other changes, inserted s. 52(1)(zb) and s. 31B into the Copyright Act, 1957.

[535]World Intellectual Property Organization, Notification No. 1, Marrakesh Treaty (recording India's deposit of its instrument of ratification on 24 June 2014); WIPO, 'India Ratifies Marrakesh Treaty' (30 June 2014). The latter is the date of WIPO's announcement, not the deposit date.

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2. The historical problem: the book famine and the right to read

The expression "book famine" describes the substantial shortage of books and other published works available in formats usable by persons with print disabilities. A work may be commercially available in conventional print while remaining inaccessible to a reader who requires Braille, accessible digital text, audio or another format. The problem is particularly serious in education, where delayed access to prescribed texts can place students with disabilities at a disadvantage compared with their peers.[536]

Before the 2012 amendment, the Copyright Act, 1957 did not contain the present, express disability-access exception in section 52(1)(zb). Consequently, organisations seeking to convert protected works into accessible formats could face uncertainty about whether reproduction or adaptation required the right holder's authorisation. This uncertainty, combined with the cost and delay associated with obtaining permission, could discourage the production and circulation of accessible copies. The difficulty was not simply a matter of copyright doctrine: it affected the practical ability of persons with disabilities to participate in education and cultural life.[537]

Advocacy by persons with disabilities and organisations working on access to information contributed to the debate surrounding copyright reform. The Right to Read campaign and related advocacy highlighted the need for a statutory exception broad enough to accommodate evolving assistive technologies and formats. The Parliamentary Standing Committee's consideration of the Copyright (Amendment) Bill, 2010 formed part of the legislative process that preceded the 2012 amendment. The reform should therefore be understood not only as a technical change to copyright law, but also as a response to barriers identified by the disability community.[538]

3. Constitutional and international human-rights foundations

The Constitution of India does not expressly use the phrase "right to access knowledge" as a standalone fundamental right. Nevertheless, access to information and education for persons with disabilities can be examined through the guarantees of equality under Articles 14 and 15, the protection of life and personal liberty under Article 21, and the constitutional commitment to education reflected in Article 21A and the Directive Principles. The precise constitutional claim should be framed carefully: accessibility is supported by the broader constitutional commitments to equality, dignity, non-discrimination and meaningful participation, rather than by assuming that every copyright-access dispute automatically gives rise to an independent fundamental-right claim.[539]

India is a State Party to the United Nations Convention on the Rights of Persons with Disabilities (CRPD). The Convention is relevant to accessible information and education. Article 9 addresses accessibility, including access to information and communications; Article 21 concerns freedom of expression and access to information; and Article 24 recognises the right to inclusive education. These provisions support the principle that persons with disabilities should be able to obtain information and educational

[536]World Intellectual Property Organization, Study on Copyright Limitations and Exceptions for the Visually Impaired, WIPO Doc. SCCR/14/7 (15 May 2006). The expression 'book famine' is used in policy literature to describe the shortage of works available in accessible formats.
[537]Copyright Act, 1957 (as originally enacted), read with the Copyright (Amendment) Act, 2012. This note concerns the absence, before the 2012 amendment, of the present express disability-access exception in s. 52(1)(zb); it should not be read as suggesting that no other copyright exception could ever have applied.
[538]Parliament of India, Rajya Sabha, Department-related Parliamentary Standing Committee on Human Resource Development, Twenty-Second Report on the Copyright (Amendment) Bill, 2010 (2011).
[539]Constitution of India, arts. 14, 19(1)(a), 21, 21A and 41. Article 41 is a Directive Principle and is not independently enforceable in the same manner as fundamental rights; it informs the constitutional context.

materials on an equal basis with others. The CRPD does not replace domestic copyright legislation, but it provides an important interpretive and policy framework for assessing whether legal and institutional arrangements enable effective participation.[540]

The Rights of Persons with Disabilities Act, 2016 further strengthens the domestic framework. Its provisions concerning equality and non-discrimination, inclusive education, accessibility and access to information are relevant to the responsibilities of public authorities and educational institutions. Copyright exceptions and disability-rights legislation perform related but distinct functions: the former addresses whether specified uses of protected works constitute infringement, while the latter establishes broader obligations concerning accessibility, accommodation and inclusion.[541]

4. The Copyright Act, 1957 after the 2012 amendment

4.1 Section 52(1)(zb): accessible-format exception

Section 52(1)(zb) provides that specified acts involving the adaptation, reproduction, issue of copies or communication to the public of a work in any accessible format do not constitute copyright infringement. The provision covers two categories: first, any person acting to facilitate access by persons with disabilities, including sharing an accessible-format copy with a person with a disability for private or personal use, educational purposes or research; and second, an organisation working for the benefit of persons with disabilities where the normal format prevents those persons from enjoying the work.[542]

The breadth of the expression "any accessible format" is important because accessibility is not confined to one technology. Depending on the work and the needs of the intended user, an accessible format may include Braille, large print, accessible electronic text, audio or other formats that enable the person with a disability to access the work. The provision is capable of accommodating technological change; it should not be read as limited to formats that existed when the amendment was enacted.[543]

The exception is subject to express safeguards. Copies must be made available to persons with disabilities on a non-profit basis, although the cost of production may be recovered. An organisation must ensure that accessible-format copies are used only by persons with disabilities and must take reasonable steps to prevent their entry into ordinary channels of business. The Explanation to section 52(1)(zb) identifies categories of organisations that may qualify, including certain registered or recognised organisations, organisations receiving government grants for facilitating access, and recognised educational institutions, libraries or archives. These conditions should be stated accurately: the provision is not an unrestricted licence to reproduce and circulate copyrighted works to the public at large.[544]

[540] Convention on the Rights of Persons with Disabilities, adopted 13 December 2006, 2515 UNTS 3, arts. 9 (accessibility), 21 (freedom of expression and access to information) and 24 (education). India ratified the Convention on 1 October 2007.
[541] Rights of Persons with Disabilities Act, 2016, No. 49 of 2016 (India), including ss. 3 (equality and non-discrimination), 16–17 (education), 40 (accessibility) and 42 (access to information and communication technology).
[542] Copyright Act, 1957, s. 52(1)(zb). The provision covers adaptation, reproduction, issue of copies and communication to the public of a work in an accessible format, subject to its terms and safeguards.
[543]Copyright Rules, 2013 (India), r. 77, including its explanation, read with Marrakesh Treaty to Facilitate Access to Published Works for Persons Who Are Blind, Visually Impaired or Otherwise Print Disabled, art. 2(b) (definition of 'accessible format copy').
[544]Copyright Act, 1957, s. 52(1)(zb), provisos and Explanation; Copyright Rules, 2013, rr. 76–78. These provisions should be read together when describing eligible organisations, records, safeguards and permitted distribution.

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The provision is also not accurately described as requiring every individual user to obtain a compulsory licence or as conferring an unconditional right to distribute accessible copies. Its operation depends on the statutory purpose, the person or organisation undertaking the activity, the nature of the accessible-format use and compliance with the provisos. A careful application of the section is therefore necessary in each case.

4.2 Section 31B: compulsory licence for the benefit of persons with disabilities

Section 31B establishes a compulsory-licensing route for a person working for the benefit of persons with disabilities on a profit basis or for business. Such a person may apply to the Commercial Court for a compulsory licence to publish a work for the benefit of persons with disabilities in a case where section 52(1)(zb) does not apply. The statutory text requires the Commercial Court to dispose of the application as expeditiously as possible and to endeavour to do so within two months of receipt.[545]

Section 31B should not be presented as an automatic permission to commercialise accessible copies. It is a licensing mechanism subject to an application and the Court's consideration under the Act and applicable rules. Its significance lies in providing a route where the non-infringing exception in section 52(1)(zb) is unavailable, while recognising that accessible works may need to be produced and distributed through business or commercial arrangements. The provision seeks to reconcile access with the legitimate interests of copyright owners through a legally supervised process.[546]

The current statutory reference to the Commercial Court is important. The original article's description of an application to a generic "designated authority" is imprecise and should be replaced. Any discussion of the institutional consequences of the abolition of the Intellectual Property Appellate Board should also be supported by specific procedural evidence; it should not assume, without evidence, that the transfer of jurisdiction has necessarily made the process slower or less specialized.[547]

5. The Marrakesh Treaty and cross-border exchange

The Marrakesh Treaty was adopted under the auspices of the World Intellectual Property Organization on 27 June 2013. It requires contracting parties to provide limitations and exceptions in their copyright laws to facilitate the availability of works in accessible formats for defined beneficiary persons. It also establishes a framework for the cross-border exchange of accessible-format copies by authorised entities, subject to the Treaty's conditions. The Treaty addresses the duplication of conversion work across countries and seeks to expand the range of accessible books available to eligible readers.[548]

India deposited its instrument of ratification on 24 June 2014 and was the first country to do so. This was an important international development, but it is necessary to distinguish the Treaty's scope from that of India's domestic law. The Marrakesh Treaty is directed to persons who are blind, have visual impairments or other print disabilities, as defined in the Treaty. It does not establish a general international exchange regime for every disability-related adaptation, such as all forms of captioning

[545] Copyright Act, 1957, s. 31B(1)– (4), as amended. The section provides a compulsory-licensing route for qualifying persons working for the benefit of persons with disabilities on a profit basis or for business, in cases where s. 52(1)(zb) does not apply.
[546]Copyright Rules, 2013, rr. 17–22, concerning applications and procedure for compulsory licences, read with s. 31B of the Copyright Act, 1957.
[547]Copyright Act, 1957, s. 31B, as amended by subsequent legislation. The applicable forum and procedure should be checked against the current consolidated text and rules at the date of submission; the current statutory text refers to the Commercial Court.
[548] Marrakesh Treaty to Facilitate Access to Published Works for Persons Who Are Blind, Visually Impaired or Otherwise Print Disabled, adopted 27 June 2013, arts. 2, 4–6, 9 and 10.

or sign-language access. India's domestic section 52(1)(zb) uses the broader expression "persons with disability"; the domestic exception and the Treaty therefore do not have identical personal and material scopes.

Cross-border exchange is not simply a matter of uploading any accessible file to an international platform. The Treaty provides conditions governing authorised entities, beneficiary persons, accessible-format copies and the exchange of copies between contracting parties. In India, the effectiveness of this framework depends on the capacity of authorised entities to identify eligible users, maintain suitable records and metadata, and cooperate with counterpart organisations in other countries. The Accessible Books Consortium and its Global Book Service may assist in this work, but the availability and usefulness of particular titles and languages should be assessed through current repository data rather than assumed.[549]

6. Judicial developments: relevance and limits

Indian judicial decisions concerning education and disability rights provide important context for the interpretation and implementation of accessibility obligations. However, it is essential to distinguish decisions directly interpreting the disability-access exception in copyright law from decisions addressing education, reasonable accommodation or physical and digital accessibility under other legal provisions.

6.1 The Delhi University Photocopy Case

In The Chancellor, Masters & Scholars of the University of Oxford v. Rameshwari Photocopy Services, the Delhi High Court considered whether the preparation and distribution of course packs for university instruction fell within the educational exception in section 52(1)(i) of the Copyright Act. The Division Bench decision of 9 December 2016 addressed the relationship between reproduction in the course of instruction and the purpose of copyright law. The dispute was not a case about section 52(1)(zb), nor did it determine the legal rights of persons with disabilities under the accessible-format exception. It may be cited as an illustration of judicial consideration of education and copyright limitations, but it should not be described as directly confirming or defining the scope of section 52(1)(zb).[550]

The publishers subsequently decided in March 2017 not to pursue a further appeal before the Supreme Court. That procedural development should not be confused with a Supreme Court judgment affirming the Delhi High Court's reasoning. The distinction matters when describing the precedential status of the decision.[551]

6.2 Disabled Rights Group v. Union of India

In Disabled Rights Group v. Union of India, the Supreme Court considered issues relating to the rights of students with disabilities in higher education, including the implementation of statutory obligations and accessibility measures. The decision is relevant to the broader duty to make educational opportunities

[549]Marrakesh Treaty, arts. 2(c) (authorised entity), 5 (cross-border exchange of accessible-format copies) and 6 (importation of accessible-format copies). The Treaty's conditions and safeguards remain relevant to cross-border exchange.
[550]The Chancellor, Masters & Scholars of the University of Oxford v. Rameshwari Photocopy Services, CS(OS) 2439/2012, judgment dated 16 September 2016 (Delhi High Court, Single Judge); affirmed in relevant part on appeal in RFA(OS) 81/2016, judgment dated 9 December 2016 (Delhi High Court, Division Bench). The litigation concerned the educational-use exception in s. 52(1)(i), not the disability-access exception in s. 52(1)(zb).
[551]'Publishers decide not to pursue Supreme Court appeal in photocopy case', The Indian Express (9 March 2017). The decision not to pursue a further appeal is a procedural development, not a Supreme Court ruling on the merits.

meaningful for persons with disabilities. It should not, however, be represented as a ruling on the interpretation of sections 52(1)(zb) or 31B unless a specific passage directly supports that proposition.[552]

6.3 Rajive Raturi v. Union of India

Rajive Raturi v. Union of India concerns accessibility for persons with disabilities, particularly in relation to public infrastructure and the obligations arising under disability-rights law. It supports the wider proposition that accessibility is a substantive requirement for equality and participation. Its relevance to accessible books and copyright is contextual rather than direct: it does not determine the scope of the Copyright Act's accessible-format exception.[553]

Taken together, these decisions demonstrate that education and accessibility are matters of legal obligation, not merely charity or administrative preference. Nevertheless, the article should avoid suggesting that courts have already resolved the practical and doctrinal questions surrounding accessible-format copyright exceptions. A more accurate conclusion is that disability-rights jurisprudence supplies a supportive constitutional and statutory context, while the specific operation of sections 52(1)(zb) and 31B remains governed by their text and applicable rules.

7. Continuing implementation challenges

7.1 Digital rights management and technological protection measures

Digital Rights Management (DRM) and other technological protection measures may prevent users from copying, converting or using digital publications with assistive technologies. Section 65A(1) criminalises circumvention of an effective technological measure where the person acts with the intention of infringing rights conferred by the Copyright Act. Section 65A(2)(a), however, preserves the ability to do an act referred to in the preceding subsection for a purpose not expressly prohibited by the Act. Where a person facilitates circumvention by another for such a purpose, the proviso requires the facilitator to maintain a complete record of the other person and relevant particulars, including the purpose for which assistance was provided.[554]

The statutory exception is significant, but legal permission does not itself remove practical barriers. A student may lack the technical ability to make a protected e-book compatible with a screen reader, and a library may not have the tools or expertise required to provide accessible copies. Publishers and technology providers should therefore build accessibility into digital products and ensure that technological restrictions do not unnecessarily prevent uses permitted by law. The article should avoid saying that section 65A creates an unqualified right to "crack" any digital lock: the statutory language is tied to the purpose of the act and the intention to infringe.

7.2 Born-accessible publishing

A system that relies mainly on converting inaccessible works after publication is inherently slower and more expensive than one in which accessibility is incorporated during production. Born-accessible

[552]Disabled Rights Group v. Union of India, W.P. (C) No. 292 of 2006, judgment dated 15 December 2017, 2017 INSC 1244 (Supreme Court of India). The case addressed disability rights and accessibility in higher education; it did not directly interpret s. 52(1)(zb) of the Copyright Act.
[553]Rajive Raturi v. Union of India, W.P. (C) No. 243 of 2005, judgment dated 15 December 2017, 2017 INSC 1243 (Supreme Court of India). The decision concerns accessibility obligations under disability-rights law, particularly in relation to the built environment and public facilities.
[554]Copyright Act, 1957, s. 65A(1)–(2). Section 65A criminalises circumvention of effective technological measures subject to the statutory terms and exceptions; the analysis should be read with the Act's permitted uses, including s. 52.

publishing involves designing digital works so that they can be navigated and used with assistive technologies from the outset. Features may include semantic structure, properly tagged headings, accessible tables, alternative text for meaningful images, navigable mathematics and compatibility with screen readers. Section 52(1)(zb) facilitates accessible-format uses, but it does not itself create a comprehensive obligation on every private publisher to publish every work in an accessible format at the time of release. Relevant duties may arise under other disability and accessibility laws, depending on the entity, service and applicable standards.[555]

7.3 Language, technology and regional access

India's linguistic diversity creates a further challenge. Optical character recognition, text-to-speech systems and digital publishing tools do not perform equally well across all Indian languages, scripts and technical subject areas. Mathematical notation, diagrams, tables and complex layouts may also require specialist remediation. The existence of a legal exception does not guarantee that an accessible version can be produced accurately or promptly. Investment in language technologies, accessible publishing standards, trained personnel and quality assurance is therefore essential.

7.4 Institutional capacity and awareness

Educational institutions, libraries, archives, publishers and disability organisations may lack awareness of the statutory framework or may be uncertain about the conditions attached to it. Such uncertainty can lead to unnecessary refusals or delays. At the same time, organisations must understand and comply with the safeguards in section 52(1)(zb), the requirements of the Copyright Rules, 2013 and any relevant data-protection and confidentiality obligations. Clear institutional protocols, staff training, accessible request mechanisms and cooperation between libraries and authorised entities can improve implementation.[556]

7.5 Cross-border exchange and the limits of the Treaty

The Marrakesh framework is valuable, but it does not guarantee that every title, language or format will be available through international exchange. The Treaty's beneficiary-person definition is focused on print disabilities, and its exchange mechanisms operate within specified conditions. Domestic law may provide a broader disability-access framework, but that broader scope should not be attributed to the Treaty itself. Efforts to improve cross-border exchange should include multilingual catalogues, reliable metadata, partnerships between authorised entities and practical guidance on eligibility and permitted uses.

8. Criminal liability and the boundaries of the exceptions

The original article's discussion of criminal penalties requires careful qualification. Section 63 of the Copyright Act addresses knowingly infringing or abetting the infringement of copyright, subject to the statutory language and applicable exceptions. The provision prescribes imprisonment and a fine, but it does not make every unauthorised or disputed use automatically criminal, nor does it require the prosecution to prove that the accused acted for financial gain in every case. The statutory proviso also

[555]Rights of Persons with Disabilities Act, 2016, ss. 40, 42 and 44. 'Born-accessible' publishing is advanced here as a policy and procurement recommendation; it should not be stated as a universal statutory duty imposed on every private publisher by these provisions.
[556]Copyright Rules, 2013, rr. 76–78, read with Copyright Act, 1957, s. 52(1)(zb).

permits the court, for adequate and special reasons, to impose a sentence below the stated minimum in the circumstances specified there.[557]

Section 63A concerns a subsequent conviction for an offence under section 63 and provides enhanced punishment, subject to its own terms and proviso. It should not be described simply as a penalty for any "repeat offence" without reference to the statutory requirement of a previous conviction. Likewise, section 65A requires circumvention of an effective technological measure with the intention of infringing rights. A circumvention undertaken for a purpose not expressly prohibited by the Act is addressed by section 65A(2)(a).[558]

Most importantly, conduct that falls within section 52(1)(zb), when all statutory conditions are satisfied, is not infringement of copyright. The legal analysis must therefore begin by asking whether the accessible-format activity is protected by the exception. It would be inaccurate to say that any sale, online upload or sharing outside a narrow private circle automatically constitutes a criminal offence without examining the statutory conditions, the nature of the activity, the relevant rights and the elements of the alleged offence. The distinction between an activity outside the exception and a criminal offence must be maintained.

9. Recommendations

First, public authorities and educational institutions should issue clear, accessible guidance explaining the scope and safeguards of section 52(1)(zb), the application process under section 31B and the relevant provisions of the Copyright Rules, 2013. Guidance should be designed for librarians, publishers, disability organisations, teachers and students, not only legal practitioners.[559]

Second, accessibility should be integrated into the publishing process. Public procurement and publicly funded educational publishing can require accessible digital source files and compliance with recognised accessibility standards. Publishers should be encouraged, and where legally required directed, to provide accessible versions at the same time as conventional editions.[560]

Third, institutions should invest in accessible library infrastructure, assistive technologies, trained personnel and quality assurance. Conversion should address not only the text but also tables, diagrams, mathematical content and navigational structure. Regional-language tools and specialist support should be prioritised so that accessibility is not limited to English-language materials.

Fourth, publishers and technology providers should review DRM practices to ensure that technological measures do not unnecessarily obstruct lawful accessibility uses. Practical arrangements for accessible delivery, technical support and secure access can protect legitimate copyright interests while enabling users with disabilities to exercise their rights.

[557]Copyright Act, 1957, ss. 63 and 63A. Section 63 addresses knowing infringement or abetment; s. 63A concerns enhanced punishment following a subsequent conviction, subject to its statutory wording and proviso.
[558]Copyright Act, 1957, ss. 63, 63A and 65A. The existence of criminal provisions does not eliminate the need to determine first whether the challenged act falls within an applicable statutory exception, including s. 52(1)(zb).
[559]Copyright Act, 1957, s. 31B; Copyright Rules, 2013, rr. 17–22. For accessible-format exceptions and organisational safeguards, see also Copyright Act, s. 52(1)(zb), and Copyright Rules, rr. 76–78.
[560]Rights of Persons with Disabilities Act, 2016, ss. 16–17, 40, 42 and 44. These provisions support institutional accessibility measures, inclusive education and access to information and communication technology.

Fifth, India should strengthen coordination among authorised entities and international partners under the Marrakesh Treaty. Shared catalogues, standardised metadata, training and multilingual cooperation can reduce duplicated conversion work and make cross-border exchange more useful. Finally, further empirical research is needed to assess how often sections 52(1)(zb) and 31B are used, what delays applicants experience, which languages and formats remain underserved, and how persons with disabilities themselves evaluate the accessibility of educational and cultural materials.[561]

10. Conclusion

India's 2012 copyright reform and its ratification of the Marrakesh Treaty represent important steps towards reconciling copyright protection with the right of persons with disabilities to access published works. Section 52(1)(zb) provides a domestic exception for qualifying accessible-format activities, while section 31B offers a compulsory-licensing route where the exception does not apply. The Marrakesh Treaty adds an international framework for the exchange of accessible-format copies for persons with print disabilities. These measures demonstrate that copyright law can accommodate accessibility without abandoning the legitimate interests of authors and other right holders.[562]

Nevertheless, statutory recognition is only one part of the solution. Digital restrictions, limited born-accessible publishing, language and technology gaps, institutional uncertainty and uneven international cooperation continue to affect meaningful access. Judicial decisions on education and disability rights reinforce the broader legal commitment to inclusion, but they should not be overstated as direct interpretations of the accessible-format copyright provisions. The central challenge is therefore implementation: ensuring that persons with disabilities can obtain materials in appropriate formats, in a timely manner and on an equal basis with others. A rights-based copyright framework must be measured not only by the exceptions it contains, but by whether those exceptions translate into real opportunities to read, learn and participate.[563]

[561]Marrakesh Treaty, arts. 5, 9 and 10; World Intellectual Property Organization, Accessible Books Consortium, Global Book Service (official programme information).
[562]Copyright Act, 1957, ss. 31B and 52(1)(zb); Marrakesh Treaty, arts. 4–6. These provisions form complementary domestic and international mechanisms, but their respective eligibility conditions and scope should not be conflated.
[563]Disabled Rights Group v. Union of India, 2017 INSC 1244; Rajive Raturi v. Union of India, 2017 INSC 1243. These decisions provide broader disability-rights and accessibility context; neither is a direct interpretation of s. 52(1)(zb) of the Copyright Act.