

Consultation  
Commission Staff Working Paper  
Strengthening the Competitiveness of the EU Publishing Sector  
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Brussels, 15 November 2005

Dear Sir,

The European Booksellers Federation represents the National Booksellers Associations from the 25 Member States of the European Union, as well as national Booksellers Associations from other European countries applying to join, and Associate countries. Through its Members, who in turn represent most bookshops in Europe, EBF represents more than 30.000 separate businesses.

EBF welcomes the invitation made by the European Commission to stakeholders in the book trade to provide comments to its paper "Strengthening the Competitiveness of the EU Publishing Sector".

EBF has read with pleasure that the "questions are also intended to probe the link between two different aspects of media policy – competitiveness – and protection of general interests." (p.30).

Although EBF is happy to follow the recommendation of the Commission to provide concise answers, it appears that they do not fit into the questionnaire proposed and this is why the approach followed is to draw the attention of the Commission to the main concerns of booksellers.

1. Statistics: The European Booksellers Federation is very happy to read that the Commission and Eurostat in particular have been studying the NACE classification. EBF has been aware that a revision of the Eurostat classifications is being undertaken for implementation in 2007, and in a letter sent to Mr. Niels Langkjaer in November 2002, it drew the attention of Eurostat that the revision might be a good opportunity to provide books with a more appropriate classification than the one currently in existence. At present, books are classified as follows in Eurostat retail statistics: "Cpa 952471 Retail trade services of books, newspapers and stationery".

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The European Booksellers Federation would like to ask Eurostat formally that books be classified separately under “Retail trade services of books”.

EBF has also mentioned the ISBN-numbering system that is used worldwide to identify books is undergoing a revision. The code will be changed to 13 numbers, which will make it possible to add the numbers 978 (meaning book). This is done so that the EAN code also can identify the product as a book. Furthermore it will double the available ISBN numbers for books. The new ISBN code will be used worldwide starting from 1<sup>st</sup> January 2007.

EBF approves of any revision of statistics on books which would provide stakeholders with reliable, verified data at the level of production and insists to include proper statistics not only on book production but also on book sales, for the benefit of all in the book trade.

## 2. Standards

The ISBN-standard has been of great importance for the book trade to keep track on millions of book titles. Another important standard is the EDI-standard that makes it easy to transfer orders, invoices etc. from one data system to another. Much work remains to be done so that all EU countries could develop good databases for books, and the work of organizations like Editeur on standards e.g. ONIX for books ([www.editeur.org](http://www.editeur.org)) or the DOI standard is of primary importance for keeping track on digital rights. It is also very important that the standards used by the publishing sector should be international. The European Union has recently gone through a major enlargement, and many of the new EU-countries lack valid book databases as well as good distributors, which greatly affect the effectiveness of the book trade.

## 3. Publishing and bookselling issues

EBF would like to remind that publishing is part of the supply book chain, which ranges from authors to readers and that booksellers are an essential element in the chain: it should not be forgotten that booksellers are in touch with the final user - the reader. The bookselling industry, like other stakeholders in the book industry, is also undergoing major changes and has to thrive to stay competitive, due to the changes in distribution patterns, to competition between terrestrial and Internet booksellers, competition from other sales channels and also from other media which benefit from more support and are of easier access.

Alternative delivery channels, like mobile communication and print on demand also affect bookselling, as well as new consumer patterns.

EBF would like to express its support for the specific indicators for book publishing listed on the last page of the document (page 37). Nevertheless, EBF strongly believes that the industry as a whole would gain from including the total sales of books at end-consumer prices (net sales including VAT).

As our purpose was to be concise, this is only a very brief summary of the main reasons why EBF suggests that any valid study on the future of publishing should gain from including the supply chain as a whole, and take on board the bookselling industry.

EBF is at disposal of the European Commission for further information on the issue and would very much like to be informed of the follow-up given to its comments.

Yours sincerely,

Françoise Dubruille  
Director