INTERGRAF

International confederation for printing and allied industries a.i.s.b.l.

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(1) Adequate description of main indicators for competitiveness across different publishing segments

The document describes very relevant publishing issues at the light of current developments in business models and technological developments. As Intergraf, we would like to make the following comments :

- The Commission working paper's section dealing with statistics reflects adequately available data, bearing in mind however that figures currently available are based on the traditional statistical template, and few data are available for the new economy.

- The work of modernizing the statistical classification framework will result in moving publishing away from the manufacturing sector into a new section on "Communication" activities. While this shift will reflect changes in technology and consequently in business issues for the publishing sector, such as content acquisition, transformation and distribution across various media, we feel that a suitable bridge needs to be ensured between the new and traditional media distribution of publishing products, bearing in mind that a considerable proportion of the population wants the continuation of the distribution of publishing products as printed products, which satisfy their reading habits and have proven their user friendliness and suitability for specific conditions for readers, eg reading while sitting in public transport. The printing industry pleads therefore for a comprehensive approach to ensuring the competitiveness of the communication and publishing sectors, particularly in a situation of official split as a result of the official classification of industrial activities, ie the NACE.

- Chapter 3.3 of the document entitled "Trade openness", in our view, does not reflect recent market trends in relation with globalisation of the market for printed communication. It is a correct assumption to state that the EU publishing sector is strongly export oriented reflecting a strong foreign demand. The new element is a growing trend of delocalization of printing work for some publishing products, ie books, towards low-cost countries, and particularly China.

(2) Other issues, notably in connection with i2010

i2010 concentrate on electronic media and have valuable objectives, not incompatible with the coexistence of various media channels.

(3) Industry structure across all segments to survive the transition to electronic value chains

The printing industry feels confident that the industry structure of the information sector across all segments will survive since the various media are complementary to each other, answering various requirements of reader's habits.

In addition there is a strong concentration move in the communication sector which results in large holding; the concentration move brings often under the same umbrella publishing and printing businesses, enabling in-house printing.

(4) business model in Digital Rights Management

Finding adequate business models in Digital Rights Management is essential since it should ensure that digital distribution of information is placed on equal footing with the traditional printed version of the information. Totally free access to information would give wrong signals to consumers if they did not perceive the value of the content of the information.

(5) Tension on ways to satisfy the need for profitability at time of technological change and to maintain cultural and democratic diversity

Contributing to the maintenance of cultural and democratic diversity among the population world-wide is a major challenge for the publishing sector, which can best be achieved via promoting reading.

A European policy should therefore encourage publishers to promote the reading of printed products, since reading still is the basis of education, and an adequate tool to fight against the growing a-literacy among the population.

(6) Diversity of content and ownership sustaining in electronic markets with direct participation of citizens (blogs)

(7) Regulated , licensed media vs unlicenced press

(8) Advertising regulation instruments

Advertising regulation instruments should be limited to regulation aiming at ensuring ethic and deontological requirements

(9) Main issues to integrated media policy

An integrated media policy should ensure an adequate competitiveness framework for the various distribution media. Electronic media seem now to have more growth opportunities than the traditional printed media. Ensuring the profitability of the latter requires reducing distribution costs. This can be achieved in a system of efficient and harmonized postal services, as suggested by the document.