ALIRE - Association des librairies informatisées utilisatrices des réseaux électroniques

EUDR – Impact on bookshops, data and IT systems across Europe

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Paper is a highly processed raw material subject to a long supply chain, from wood to paper manufacturers who purchase pulp on global markets. To create a Due Diligence Statement (DDS) for a specific book ISBN, the Traces portal requires – for each paper, card or board type used in the production of the book – a list of the forest plots that were harvested to provide the raw timber and paper pulp. It is key to note that, paper is a byproduct and when manufacturing a book:

- there may be up to six different types of paper, card and board used: a simple hardcover book may use one paper type for the main book block, a different type for endpapers, board for the cover, paper for covering the boards, jacket paper and a high-quality coated paper type for inserted cover.
- each paper type may consist of a mix of pulp made from a mix of several different trees
- the trees may have been harvested from several different forest locations, and potentially at different times
- given the long and intricate book value chain, this data needs to be sourced from the paper mill and forestry company, and the printer needs to pass them on them through the publisher to the bookseller

According to French paper manufacturers (COPACEL), up to 200 different plots of land are needed to produce a single sheet of paper, and around 16,000 plots (and thus the same number of geolocation points) are required for one tonne. Ultimately, under the EUDR, each bookseller will have to collect all the geolocation coordinates of the plots of land corresponding to the wood used in the books they offer for sale. 2 million books are available in France and COPACEL has estimated that each book can be linked to 300,000 different plots.

Furthermore, it is common for different print runs of the same book (i.e. same ISBN, different production batch) to use different reels of paper, or even entirely different types, grades and brands of paper. And each batch of a specific type, grade and brand may be made from pulp from different sources.

In an ideal world, the source geolocation points for each print run of a book could be listed separately, per printed lot, and only the details for the latest or ‘current’ lot would need to be included in the metadata tied to the ISBN. However, that is not the reality of the book supply chain. Put simply, all print runs of the same title carry the same ISBN and most book distributors and wholesalers do not operate with a strict lot control system where copies from different print runs are kept separate and fulfilled to retailers in a strict first in, first out manner. The various lots are often mixed and older, returned copies are used to fulfil new orders. There is no machine-readable identification for print runs in use, so a retailer cannot order a copy from a specific lot. Thus, all copies with the same ISBN are essentially interchangeable in the IT system, even if they are made from different paper, card or board.

Therefore, the EUDR provenances should in principle include sources for all timber used for all the types, grades and brands of paper, card and board used across all print runs of the same title. This ‘cumulative’ approach means that upon printing the third edition, the provenances of the papers used in that third print run should be added to the ones already listed from the first and second print run, thus generating massive amounts of data (300,000 geolocations per print run) in the process.

These new constraints require the deployment of significant human and financial resources throughout the production chain, involving a disproportionate administrative and financial burden : if we extrapolate French data, we have an estimate of more than 800 million books being bought by bookstores every year for France only, with an average of 150 000 books per year per bookstore, leading to never-ending updates and such a strain on IT infrastructures requiring changing all data-sending procedures in order to protect vital information (such as prices and commercial information) to comply with EUDR.

Finally, we should also take in consideration Print-on-Demand (POD) products, as their DDS cannot be created in the same way (i.e., for an entire print run and well in advance of delivery of copies to a retailer). A DDS for POD copies can only be created with knowledge of the paper used to create those particular copies, at the time of the customer order and physical manufacturing. This is why the paper could in principle be different for each copy, which means that every time a POD printer buys a new reel of paper, they need to update all the books they might supply with a news DDS, leading to an estimated 600 000 updates a month for the French market (POD and traditional printing mixed).