



European Commission
Directorate-General for Competition
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STATE AID — LUXEMBOURG, State aid SA.38944 (2014/C) (2014/NN), Alleged aid to Amazon
Invitation to submit comments pursuant to Article 108(2) of the Treaty on the Functioning of the
European Union

Contribution of the European & International Booksellers Federation

The European and International Booksellers Federation (EIBF) welcomes the investigation by the Commission concerning Amazon's fiscal practices and seizes the opportunity offered by the Commission to send its comments on behalf of its Members.

EIBF is the voice of Booksellers in Europe and beyond. Members of EIBF are National Booksellers Federations which in turn have in membership booksellers of all kinds: independent, cultural chains, specialized, online, and brick and mortar bookshops.

EIBF and its Members have always advocated for a level playing field for all book retailers. Booksellers in membership with EIBF pay their taxes and contribute to their local economies by creating jobs within their community.

Amazon's fiscal practices have long been questioned by the bookselling community. The EIBF stands for a free and open market space with fair competition securing a variety of booksellers to offer a broad range of titles – both online and offline. Indeed, consumers suffer when single companies monopolise the market whether in the USA or in Europe. And consumers are the ultimate beneficiaries of a level playing field governing commercial conditions and favouring healthy competition between retailers.

EIBF takes the opportunity of this letter to re-iterate its full support for its German Members regarding the decision by the German Publishers and Booksellers Association (Börsenverein des Deutschen Buchhandels) to file an official complaint against Amazon with the German Federal Antitrust Authority. Amazon's business practices have an effect not only on those publishers



involved in the German market; they can also pose a threat to all e-book sellers and distributors in various countries.

While acknowledging the existence of different laws regarding competition in the Member States of the European Union and internationally, the European and International Booksellers Federation has always strongly supported the position that consumers must have wide access to a rich and varied network of retailers.

For further information, please contact EIBF Director Fran Dubruille on +32 475 40 32 34 or fran@europeanbooksellers.eu.

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