

## **To whom it may concern**

The EEPG, European Educational Publishers Group, is a non-profit association that has been serving its members for more than 20 years as an advisor on educational publishing. We carefully monitor the situation in our member countries, Europe and indeed the world.

We are therefore deeply concerned about the Serbian textbook law that has been prepared for public hearing.

It is our opinion that the law will not improve the situation on the textbook market in Serbia or have a positive effect on the performance of Serbian students. On the contrary, we are convinced that it will both harm the educational publishing industry in Serbia and have a negative effect on the quality of Serbian education – as similar measures had in other countries.

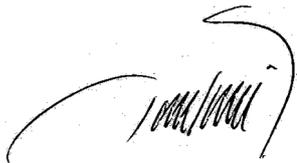
Some of the measures envisaged by the law are particularly problematic:

- The elimination of textbooks that have less than 15% of the market will actually suppress healthy competition among publishers since small publishers will be pushed out of the market. The market will be left only to the big players, who can then set the benchmarks as they wish. This also hinders diversity – one of the key factors of modern educational principles.
- State intervention in the policy of retail prices is in contradiction with the freedom of entrepreneurship.
- The fact that textbooks can be approved only every four years, as well as the complex and not transparent approval process, will discourage authors and publishers to improve their textbooks year by year.
- The fact that teachers cannot choose the textbooks which they prefer but have to accept the choice made by the school bodies, is in contradiction to modern educational principles. In particular, it discriminates against students who have special needs or individual learning styles.

As an association of European educational publishers we can only warn against introducing this law. Not only will it have severe negative effects on the quality of Serbian education but it will also dramatically worsen the position of Serbian educational publishers. It will result in the closure of many small publishing houses and redundancies for highly skilled and knowledgeable educational experts. There will be a loss of know-how which will have dramatic effects on the educational system of Serbia for years to come.

In our experience it is much better to try and find some good solutions through a dialogue with the publishers. Only in this way it can be ensured that an environment is created in which the quality of textbooks for all students can be furthered.

We would be happy to supply you with more information from our member states, present best practice examples from other European countries and would welcome an open discussion.



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