

# IC57 – PRELIMINARY REPORT

## Executive Summary

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attached to the resolution ordering its publication, available at [www.agcm.it](http://www.agcm.it)*

On 10 September 2024, the Italian Competition and Market Authority (*Autorità Garante della Concorrenza e del Mercato*, AGCM) launched a sector inquiry into the school publishing sector, in light of its significant socio-economic impact and the critical issues perceived in the processes of adoption, production, and distribution of school textbooks.

By resolution dated 29 July 2025, the AGCM ordered the publication of a preliminary report on the sector inquiry, pursuant to point II-5 of the Communication on the implementation of Article 1, paragraph 5, of Decree-Law no. 104 of 10 August 2023, converted with amendments by Law no. 136 of 9 October 2023, adopted on 7 May 2024; those concerned may submit their comments by September 30, 2025.

The preliminary report reflects the outcomes of a broad initial public consultation (with 83 submissions), 19 hearings involving institutional and market stakeholders, requests for information addressed to key market participants, and data analyses conducted using advanced tools. Several stakeholders—including the companies Mondadori, Zanichelli, Sanoma, and the Italian Publishers Association (AIE)—have formally requested to be admitted as parties to the proceedings.

## Key Figures and Market Dynamics

### ***Demand: Student and Teacher Population***

Demand for school textbooks in Italy stems primarily from students enrolled in primary school (*Scuola Primaria*, SP), lower secondary (*Scuola Secondaria di Primo Grado*, SS1), and upper secondary education (*Scuola Secondaria di Secondo*

*Grado*, SS2), through the adoptions approved by teachers' committees. Additional demand arises from teachers, who typically receive free copies for evaluation or classroom use.

In the 2024/25 school year, the student population in Italy is approximately 7.9 million, while the teaching workforce

numbers around 900,000, including over 200,000 special education staff.

Italy has been experiencing a prolonged demographic decline: between 2019 and 2024, student numbers fell by nearly 600,000 (-7%), a trend expected to worsen further, particularly affecting SS1 and SS2 levels. Simultaneously, the number of students with certified disabilities has grown to over 330,000 (+23% compared to 2019/20), increasing the need for special education teachers and—relevant to this investigation—a growing demand for tailored educational materials for students with special needs (*Bisogni Educativi Speciali*, BES).

Textbook adoption, a prerogative of teachers' committees, is concentrated in the so-called "cycle-starting" years (e.g., the first years of SP, SS1, and SS2) and often involves multi-year editions, with incremental adoptions in subsequent years.

### ***Supply: Market Structure and Leading Players***

The market structure varies by education level: in SP, books are fully publicly funded, prices are regulated, and there is no used-book market; in SS1 and SS2, purchases are predominantly private, and the second-hand market is significant.

In 2024, total sector sales approached €800 million, marking a 13% increase compared to 2014. However, growth has been uneven, with post-pandemic

gains in SS2, while SP and SS1 remained stable.

The market is highly concentrated: the top four groups—Mondadori, Zanichelli, Sanoma, and La Scuola—hold nearly 80% of the whole market (SP+SS1+SS2), with the remaining 20% divided among around thirty smaller players, including mid-sized publishing groups like ELI and Giunti-Treccani. Mondadori leads with a 32% share across all levels, followed by Zanichelli (25%), Sanoma (13.5%), and La Scuola (8%).

While some groups operate across all levels (Mondadori, Sanoma, La Scuola), others are more specialized (e.g., Zanichelli is active only in SS1 and SS2). The market remains static, with only one significant new entrant in the past five years (Feltrinelli Scuola), and limited international presence—Sanoma being the sole foreign group active in Italy.

There is widespread anticipation of potentially disruptive impacts from artificial intelligence across development, production, and usage of educational resources, though these outcomes remain uncertain.

The investigation also noted a continuing decline in the so-called "parascholastic" market (dictionaries, summer workbooks, publications for INVALSI test preparation), which appears irreversible due to the increasing availability of free digital alternatives.

### ***The Second-Hand Market***

The economic size of the second-hand market—limited to SS1 and SS2 textbooks—is difficult to measure accurately due to fragmented resale channels and a high percentage of untracked transactions. Nevertheless, it is estimated at approximately €150 million annually.

While relatively stable overall, the second-hand market shows significant variation by level, with a decline in SS1 and growth in SS2. The development of new digital peer-to-peer platforms and rising interest from traditional retailers could further fuel this market.

### ***2012 Reform and Textbook Adoption***

A regulatory process initiated in the early 2000s culminated in Law no. 221/2012 and Ministerial Decree no. 781/2013, which introduced a sweeping reform (Reform) aimed at encouraging the adoption of digital textbooks, with goals (also) of cost savings and improved user efficiency.

The Reform made textbook adoption optional and defined three types of books that could be adopted:

- Type A: print-only editions with additional digital content;
- Type B: combined print and digital editions (e-book) with additional digital content;
- Type C: e-books only with additional digital content.

Nearly fifteen years on, both the use of textbooks and the preference for print editions remain dominant. Type B textbooks (print + e-book) are used in over 95% of classrooms, while Type C (digital-only) adoptions are marginal, albeit showing constant growth.

To be noted, actual digital resource usage is limited: according to a recent AIE survey, only 16% of Type B e-book licenses were activated in 2023/24, with very low average usage (11 accesses per year in SS1 and SS2, and just 4 in SP).

### ***Costs, New Adoptions, and New Editions***

The market exhibits a peculiar structure, akin to prescription pharmaceuticals: the decision-makers (teachers' committees) are not the ones who bear the cost, while those who either use the products (students) or pay (families or public budgets) do not choose them.

A key distinction lies in public support policies: SP textbooks are universally available to users at no cost, while from SS1 onward, costs largely fall on families, with varying degrees of public assistance depending on local authorities.

Despite the declining student population, per-student spending has risen: in 2024/25, the average theoretical spending amounts to €580 for SS1 (typically lasting three years) and €1,250 for SS2 (typically lasting five years), with significant regional variation. According to estimates collected during the investigation, families in the South

and Islands face higher costs than those in the North, where Type C adoptions and textbook lending schemes seem to be more frequent.

New adoptions—textbook changes in cycle-starting classes—are common: over 80% in SP and over 35% in SS1 and SS2, where families bear the cost. This limits reuse and shrinks the second-hand market. New editions and editorial novelties are a major driver of new adoptions: catalog analyses show an annual renewal rate of around 10%, with peaks during curriculum updates.

### ***Distribution Channels***

The investigation confirms that wholesale distribution is handled by proprietary networks owned by publishers and a few specialized operators. Retail distribution sees a stable coexistence of bookstores and stationers, large-scale retail (*Grande Distribuzione Organizzata*, GDO), and online platforms.

Over the past five years, traditional retailers have maintained, and even slightly increased, their market share in the more profitable SS1 and SS2 segments. This shift follows legislative restrictions (Law no. 128/2011, amended by Law no. 15/2020) limiting discounts and vouchers in textbook sales, curbing aggressive pricing by GDO players.

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## **Main Challenges of the School Publishing Sector in Italy**

The AGCM's investigation carried out so far assessed the critical issues affecting the Italian school publishing sector, focusing on textbook adoption dynamics, distribution, costs, and innovation—especially the challenges faced in implementing the Reform. The goal was to evaluate the current mechanisms to offer suggestions to improve the system for the benefit of consumers and the wider community.

While textbook prices have generally tracked inflation, consumer dissatisfaction has grown, due in part to families' diminished purchasing power and the limited availability of free textbook

lending schemes. In fact, unlike in other EU countries, Italian families still bear the bulk of secondary school textbook costs, with highly uneven public subsidies across regions.

### ***An Incomplete Transition***

The Reform aimed to promote digital resources and Open Educational Resources (OER), with the expectation of reducing family expenditures.

However, the transition from printed books to e-books only has not materialized, and the anticipated savings have not been achieved.

As previously noted, teachers overwhelmingly favor Type B books (printed copy + e-book + digital supplements)—the only option in which a paper version remains available. In fact, Type A adoptions (printed copy + digital supplements) have become negligible, likely due to a widespread but incorrect belief that schools can no longer adopt them, compounded by the declining supply of such formats. Meanwhile, Type C (e-book + digital supplements) adoptions and actual digital usage within Type B remain marginal.

The investigation identified several key reasons for this outcome:

- inadequate digital infrastructure for students and schools;
- insufficient digital training for teachers;
- technological constraints imposed by publishers' proprietary platforms.

### ***Technological Constraints and Market Entry Barriers***

The distribution of devices by public institutions remains limited and fragmented. As a consequence, to access digital resources students often use personal smartphones, which face increasing regulatory restrictions in classroom settings.

From the publishers' perspective, digitalization has required significant investment—undermining the Reform's original assumption that digital books would lead to cost savings. This has contributed to a market dominated by a few

large publishers capable of developing complex educational ecosystems based on proprietary platforms and apps. As a result:

- barriers to entry for smaller publishers have increased;
- market concentration threatens editorial diversity ("bibliodiversity").

The dominance of Type B adoptions has hindered the development of alternative models that better align with preferences for printed materials and digital content used as a supplement—not a substitute—for print. This persists despite the growing availability of open digital content and the stated interest—expressed also by publishing representatives during the sector inquiry—in developing print-centric Type A editions.

### ***Proprietary Platforms and Digital Access Limitations***

Leading publishers provide access to digital content exclusively through proprietary platforms and apps. Efforts to encourage interoperability (such as the AIE's "Zaino Digitale" project) have failed, worsening fragmentation. This undermines the usability of digital resources for users, who clearly need to move easily from one resource to another, even when produced by different publishers.

Currently, the main platforms include HUB Scuola (Mondadori), My Place (Sanoma), MyZanichelli (Zanichelli), and DBookEasy (Giunti), with BSmart acting as an independent aggregator for

smaller publishers. These platforms form expansive educational ecosystems, offering not only digital content but also teachers' support services and training linked to adopted materials. Access is granted through individual login credentials and single-user codes provided with each purchase. This involves the collection of personal data and user profiling.

The investigation revealed that the delimitation of usage rights for digital resources does not generally occur through the standard technical tools developed to combat digital piracy (Digital Rights Management, or "DRM", whose controlled use had been duly recommended by the Reform in order to maintain interoperability and usability of resources). Instead, it takes place through the operating methods of the platforms and apps used to read the files. Furthermore, unlike what has been observed for other editorial products, there is no evidence that major publishers have experimented with less invasive control methods—such as so-called "Social DRM"—for school textbooks.

Current platform limitations include:

- download and printing restrictions;
- limited interaction with content (e.g., for annotations or customizations);
- time-limited access (typically 2–3 calendar years).

These restrictions result from the shift from ownership to temporary licensing. Users cannot transfer licenses, and publishers often fail to disclose clear contractual terms or itemized pricing—

particularly for Type B bundles that combine a physical product and a digital license.

Furthermore, contrary to the requirements of Ministerial Decree 781/2013, access to digital content is not guaranteed after graduation, undermining user's right to retain the digital component of the products they have acquired.

### ***Issues with Printed Editions***

Printed textbooks in Italy have distinctive features. Notably, they tend to be far more voluminous than their European counterparts—by some estimates, at least twice as long—reflecting both pedagogical preferences and, potentially, publishers' attempts to foster teachers' commercial loyalty.

This leads to portability issues for students and widespread negative perceptions of product quality. Interestingly, simplified editions designed for students with special needs (BES)—which are shorter and lighter—are often used by a broader audience, highlighting demand for more manageable formats.

Despite ministerial recommendations and the findings of a previous proceeding by the AGCM (I692, dating back to 2008), the market has not adopted the practice of publishing modular editions (e.g., separate components for theory, exercises, updates), which could:

- enhance flexibility of use;
- enable partial updates;
- improve resale value.

Allowing partial printing of digital editions—which is currently prohibited under publishers’ digital licensing policies—would further support usability. Technological developments also allow for improved integration between print and digital. For instance, the use of QR codes in textbooks (which link to supplementary digital content without necessarily requiring login) has seen great success, demonstrating that both teachers and students embrace digital tools when access is simple and immediate.

### ***Rising Prices and Restricted Discounts***

AGCM analysis shows textbook prices have risen between 2019/20 and 2024/25, largely in line with inflation—but more steeply than household purchasing power. This contradicts the cost-saving potential anticipated from digital adoption. Even the so-called publishing bestsellers show a rising trend, in some cases outpacing inflation.

Average per-student spending has increased by nearly 4% (SS1) and over 5% (SS2), with wide regional disparities. Northern regions spend less, possibly due to greater adoption of Type C materials.

Legal limits on textbook discounts—capped at 15%—aim to protect traditional bookstores for their cultural value, but they also constrain competition and directly harm consumers, who are unable to benefit from stronger discounting. To be noted, while discount restrictions exist in other countries, they typically

apply to general-interest books, not textbooks, which families are obligated to purchase after school adoption.

Given the social role of education and the mandatory nature of textbooks once selected by teachers’ committees, it seems inappropriate for the costs of supporting industry operators to be passed on to consumers’ families. Alternative forms of public support for businesses—such as tax credits or direct incentives—already effectively applied in the newspaper publishing sector, could be implemented to support school publishing and traditional distribution.

### ***Ineffective Spending Caps***

The spending caps, established in specific ministerial measures to limit the economic impact of school textbooks, have proven ineffective: teachers’ committees are required to comply with these caps, but there are no adequate control mechanisms—and unlike what is provided for SP textbooks, which are purchased directly by public administrations—there are no price negotiation mechanisms with publishers for the SS1 and SS2 segments.

Therefore, the effectiveness of these caps as price controls is compromised, and they remain only a theoretical parameter, lacking real impact on the commercial supply. In practice, to keep up with increases in cover prices—which cumulatively contribute to exceeding the caps—teachers’ committees find themselves having to circumvent these limits

(e.g., by designating optional books that are actually mandatory, or choosing less expensive type C books despite the actual use of type B).

### ***Frequent Turnover of Adoptions and New Editions***

High turnover rates—over 35% in SS1 and SS2 cycle-starting classes—limit textbook reuse, especially penalizing families with multiple children or students who repeat a year.

New editions support this turnover: publisher catalogs show an average annual renewal rate close to 10%, with higher peaks during curriculum reforms. As a result, over the course of five years, a significant percentage of titles can be replaced, drastically reducing the possibilities for reuse.

Self-regulatory measures by AIE have proven neither clear nor effective. Article 25 of the AIE code, which defines what qualifies as a “new edition,” is vague and hard to verify—particularly since the 20% content change threshold can include subjective or purely graphic updates. Without independent oversight, the system risks opportunistic publisher behavior.

One previously proposed solution is to separate updatable content (such as exercises and supplements) from the core material, enabling the reuse of printed textbooks while updating only the digital components through increasingly accessible tools like QR codes.

It should also be remembered that until 2013 a regulation (Article 5 of Decree-Law no. 137/2008) was in effect that blocked new adoptions for a period of five years. This regulation was later repealed as part of the Reform, based on the assumption that savings from the transition to digital would render such rigid measures unnecessary.

### ***Barriers to the Second-Hand Market, Lending, and Rental***

The second-hand market offers families a potential cost-saving route, but is hindered by the dominance of Type B books and publishers’ restrictive licensing policies. Once the digital code is used, the online component cannot be transferred, reducing resale value and usability.

While national and regional laws allow for textbook lending, such programs remain limited and uneven, usually dependent on local initiatives. Once again, a major obstacle is the existing digital licensing framework: while printed copies are reusable, digital components in Type B and C books cannot be transferred.

A dispute between the Aosta Valley’s regional government and AIE illustrates the issue. The administration sought to offer both print and digital books through lending schemes but was refused flexible licensing by publishers. The regional court rejected the publishers’ appeal, which cited copyright infringement, though the conflict remains unresolved.

Likewise, digital rental—legally allowed and promoted as a potential savings tool—is practically nonexistent. The dominant “one-copy, one-user” license model blocks broader circulation of digital editions, unlike in the general e-book market, where public and school libraries offer wide access. This confirms that current licensing structures are a major barrier to affordable alternatives.

### ***Limited Development of Open Educational Resources and In-House Content***

Open Educational Resources (OER) and school-produced content could offer cost-saving together with pedagogical benefits, but current regulations stifle their development.

Under existing rules, self-produced materials must be completely free, created during school hours, submitted to the Ministry of Education within the school

year, and legally owned by the school—with no financial compensation or other benefits granted to the teachers responsible for their development. This contrasts sharply with the compensation teachers receive when collaborating with commercial publishers for producing textbooks.

The only significant initiative identified by the investigation—“Book In Progress”, developed by a network of schools across the country—is voluntary and isolated in nature, due to the lack of public platforms for the nationwide dissemination of OER.

Without structural incentives, technical support, or compensation, self-produced educational materials are unlikely to emerge as a viable alternative in the Italian school system.

## Table of Contents of the Preliminary Report

<b>I. THE INVESTIGATION PROCESS</b>	<b>1</b>
<b>II. SCHOOL PUBLISHING: INTRODUCTION AND REGULATORY FRAMEWORK</b>	<b>2</b>
II.1 Introduction	2
II.1.1 Development of School Publishing Products and New Technologies	6
II.1.2 Intermediated Demand and Editorial Promotion	9
II.2 Regulatory Framework	11
II.2.1 National Education System and School Organization	11
II.2.2 Provisions on the Characteristics of School Textbooks	14
II.2.3 Provisions on Infrastructure and Technological Equipment	18
II.2.4 Adoption of School Textbooks	19
II.2.5 Support for the Purchase of School Books and Spending Limits	22
II.2.6 Discounts on Book Prices	26
II.2.7 Lending, Rental, and Self-Produced Materials	27
II.3 Previous Interventions by the Authority	29
<b>III. DEMAND AND SUPPLY OF SCHOOL TEXTBOOKS</b>	<b>31</b>
III.1 Demand Analysis	31
III.1.1 Students and Teachers	31
III.1.2 Trends in School Textbook Adoptions	34
III.1.3 Trends in Spending on School Textbook Adoptions	39
III.2 Supply Analysis	45
III.2.1 Components and Economic Dimensions	45
III.2.2 Main Operators	47
III.2.3 Price Dynamics, with a Focus on Bestsellers	51
III.2.4 Catalogue Changes, New Releases, and New Editions	57
III.2.5 Organizational Structures and Working Conditions in School Publishing	65
III.2.6 OER and School Self-Productions	66
III.3 Wholesale Distribution and Retail Sales	67
III.3.1 Definitions of Trade Margins Between Publishers and Retailers	72
III.4 The Secondary Market for Used Books	74
III.5 Supplementary Educational Publishing	77
<b>IV. MAIN CRITICAL ISSUES IDENTIFIED IN THE SECTOR</b>	<b>79</b>
IV.1 Reforms, Impact, and Perceived Spending	79
IV.2 Actual Choices and Preferences in the Adoption and Use of Textbooks	81
IV.3 Limits to the Use of Digital Resources	86
IV.4 Limits to the Use of Paper Resources and Paper-Digital Interactions	95
IV.5 Limits to Discounts, Price Trends, and Inefficiencies of Spending Caps	98
IV.6 Changes in Adoptions and New Editions	100
IV.7 Secondary Markets for School Books	104
IV.8 Lending and Rental	106
IV.9 Limits to the Development of OER and School Self-Productions	110
IV.10 Tensions in the Distribution of School Books	112
IV.11 Administrative Inefficiencies in Managing Primary School Book Expenditures	113