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Forging a friction

The development of e-lending models and policy across Scandinavian public libraries

Abstract

The article explores the development of e-lending models for digital books (e-books and digital audiobooks) in public libraries from a comparative perspective, analysing cases in Denmark, Norway and Sweden. Special attention is placed on the actors involved in developing e-lending models and the variations across Scandinavia. First, the legal prerequisites of digital books, licensing culture and policy context are linked. Next, the phenomenon of e-lending and e-lending models are introduced and discussed as a form of artificial friction. Then, based on a review of international and Scandinavian grey literature, the paper provides three chronological overviews of e-lending model development, seen as an interplay between publishers and public libraries. The comparison highlights the similarities between the three countries but also differences in preference for a particular e-lending model in involvement of policy actors, and in pace and character of the analysed processes. Differences are primarily attributed to variances in established collaboration practices between the identified actors of cultural policy, to already existing regulatory frameworks, and to the maturity of the digital book market.

Keywords: e-lending, public library, publisher, digital book, cultural policy, friction

Introduction

Digital books¹ have altered the economic and power relations in the publishing industry in recent years. Technological advancements such as the ubiquity of smartphones and broadband Internet, together with the emergence of new distribution channels, such as Amazon and streaming platforms, have changed the way books are produced, distributed and consumed (Colbjørnsen, 2015; Have &

¹ In the following discussion e-books and digital audiobooks, though quite different in their technological features, origins and user affordances, are understood as variants of an umbrella concept of “digital books”. The specific conditions of e-book versus digital audiobook distribution in public libraries are beyond the scope of this study.

Pedersen, 2020; Thompson, 2021). Nevertheless, a crucial actor in this changing book landscape is the public library, which also distributes e-books and e-audiobooks employing e-lending. This phenomenon, which is also well-established in academic libraries, has over recent years been an object of discussion, analysis and research, especially in the English-speaking world (Ashcroft, 2011; Graham, 2014; Sisto, 2022).

In Scandinavian countries, public libraries enjoy a strong societal position as institutions underpinning democracy, contributing to the dissemination of information and knowledge and providing free and equal access to collections of books regardless of format. As stipulated by national library legislations, this collection should be relevant, up-to-date and of high quality (Audunson et al., 2019; Rydbeck & Johnston, 2020). Public libraries in Denmark, Norway and Sweden have been following the changes in media consumption and developments in the book industry over the last decades and consequently introduced lending solutions to make digital books available for their patrons.

However, public libraries need to face not only a fundamental shift in the medium format but an even more significant change in the legal status of the books. Printed books are owned by libraries, which implies that they have the ultimate power to lend them out and dispose of them according to their policies and practices. Digital books on the other hand are licensed to the libraries, which means that the rightsholders, that is the publishers, maintain the power to dictate the terms of use and control pricing and availability (Sang, 2017). E-lending, and consequently e-lending models, may therefore be treated as artificial friction (Perzanowski & Schultz, 2016). The artificiality of it depends on the fact that these distribution limitations are not embedded in the technology itself but are the result of the rightsholders' concerns.

This legal alteration may furthermore be seen as a threat to the libraries' autonomy and traditional core mission, which is building up and storing a book collection (Söderholm & Nolin, 2015). Despite the positive affordances of digital books, which require no storage space and are accessible remotely, this alteration puts libraries in a precarious situation as they find themselves under pressure from many sides. The libraries' legal framework, in the form of library acts and national library strategies, but also the patrons are expecting digital books to be part of the collections. Even if libraries succeed in establishing e-lending mechanisms, they do not always live up to their own and patrons' expectations since the libraries cannot offer stable and attractive catalogues of in-demand titles especially audiobooks. This problem has been pointed out in recent years in the Swedish and Norwegian media (Espevik, 2021a, 2021b; Rottböll et al., 2021).

The importance of legal and policy context in digital book distribution via public libraries has already been pinpointed by librarians and library researchers. The European Bureau of Library, Information and Documentation Associations (EBLIDA), in its report from 2022, employs the terms *library legislation and public policy*. When it comes to the dynamics behind e-lending in particular countries, the term *public powers* is used as well (Eblida 2022). The previous research on e-lending in Scandinavian public libraries places this issue explicitly in the context of cultural policy (*kulturpolitik/kulturpolitikk*). Bergström et al. (2017) shed light on how the Swedish parliament and government considered e-books in libraries and how they see e-lending in the context of copyright, public lending right and EU regulations. In Denmark, a *cultural policy frame* is raised in the analysis of the media debate around the emergence of the platform e-Reolen, conducted by Grøn and Balling (2016); the frame in this context concerns the mission of public libraries which is to make books in all formats available for the public. Such a link is also made by Danish scholar Worsøe-Schmidt (2019). Similarly, the digitalisation of the Norwegian library sector is affected to a high degree by the cultural policy and structures of the library sector, according to Colbjørnsen (2017).

Cultural policy is defined as governmental strategies and activities that promote “the production, dissemination, marketing, and consumption of the arts” (Mulcahy, 2006; Rentschler, 2002). As pointed out by Hylland (2020), in the research literature, the definition of cultural policy usually includes components like 1) a government or public entity that in some way 2) supports and/ or regulates 3) the production and/or distribution of culture (Bell & Oakley, 2015; Mangset & Hylland, 2017; Mulcahy, 2006). Consequently, the cultural policy framework in case of e-lending regards the question of support and regulation of distribution of books in digital formats via libraries.

The objective of this paper is to compare the policy processes behind the development of e-lending models in Danish, Norwegian and Swedish public libraries, in particular the evolution of their e-lending models over the last two decades. The aim is to identify what kind of e-lending models were developed, what the character of these processes was, and what kind of policy actors were involved in these processes. Comparison of these developments has the ambition to elucidate the interplay between library and publishing sectors in respective Scandinavian book spheres and consequently, shed light on the particularities of national cultural policy frameworks when it comes to e-lending in public libraries.

The article has a national and regional focus and consequently the supranational dimension, as the question of legislation and copyright regulations within the European Union, is set aside. However, a comparative analysis of e-lending in Denmark, Norway and Sweden, which are relatively small countries but with lively book markets and strong public library sectors, may bring new perspectives to the understanding of e-lending, which is undoubtedly a question of concern in many other countries around the world (Giblin et al., 2019; Giblin & Weatherall, 2015; Weber et al., 2021).

As mentioned, the major focus of this study is on the actors in Scandinavian book systems that have been involved in the emergence and management of the e-lending models. Other questions, such as the technical infrastructure, Digital Right Management, and issues of piracy are not going to be raised in this study. Despite the involvement of both libraries and commercial or non-commercial actors, the global book digitalisation projects, for instance Project Gutenberg, Google Books, or the Scandinavian ones such as Project Runeberg, Litteraturbanken or Bokhylla.no, are also outside the scope of this study since they mainly concern older literature.

The article begins with an introductory section where the connection between issues of ownership and e-lending is made. Next, the methodological framework of the study is presented. Finally, the main part consists of a historical overview of e-lending models’ development in Denmark, Norway and Sweden, which are then compared and discussed.

E-lending models and ownership

The materiality of a printed book imposes limitations on its distribution: it is pricey to reproduce, it deteriorates over time, and it may even be destroyed after a certain number of loans. In contrast, a digital book has a technical affordance of infinite replicability, which implies that it can be reproduced countless times with no additional cost. This feature may have hypothetically allowed for unlimited digital book distribution in both commercial channels and libraries (Widdersheim, 2015), naturally under the premise that the reading device or technology is not hampering it.

However, the fear of uncontrolled book distribution in the digital context and as a consequence possible erosion or cannibalisation of sales, made the book industry search for new innovative ways of distribution (Chen & King, 2017; Perzanowski & Schultz, 2016). First, digital books are licensed to readers who gain access but do not own them, which is guaranteed by both licensing terms and through Digital Right Management. In many countries and in many commercial channels, the digital

books are no longer downloadable files but are distributed via subscription-based streaming platforms, for instance, Storytel or Bookbeat in Scandinavia. Their growing significance in many book markets may therefore be seen as a successful step made by the book industry to protect their interests, and another sign of expanding licensing culture (Perzanowski & Schultz, 2016; Sang, 2017).

A shift from ownership to licensing of books is of tremendous significance for libraries because of the legal dimension. As paper books are purchased, owned and stored by the libraries, they fall under the conditions of exhaustion doctrine (in the US context known as the “first sale” doctrine), which is one of the principles of copyright law. It stipulates that the rightsholder must accept that after receiving proper remuneration for the initial distribution, the copies or originals of copyrighted works are afterwards distributed by the owner of those copies (Mezei, 2022). In other words, the right to control the copy (selling, loaning, gifting) is transferred from the rightsholder to another actor, who does not need to ask the rightsholder for permission for subsequent use. The exhaustion doctrine is one of the cornerstones of printed book collections and libraries as institutions, but it is not employed in the case of digital books. As mentioned before, publishers of digital books do not sell books and e-audiobooks to the libraries but license them. Consequently, they maintain power over the lending terms and pricing (Giblin & Weatherall, 2015; Perzanowski & Schultz, 2016).

Nevertheless, to make this digital collection available, a public library can make use of e-lending (or digital lending). The International Federation of Library Associations and Institutions (IFLA) defines e-lending as

the temporary provision of an eBook by a library to a registered user for use away from the library premises and in the library should the user wish.

The definition further states that

1. the terms under which the eBook is lent may be dictated by the purchase agreement, license or by the library itself, including the number of simultaneous users, length of loan etc.
 2. the eBook may be supplied to the reader’s device from a vendor, publisher or library server.
- (IFLA, 2014; Whitney & de Castell, 2017)

As made clear in the definition, e-lending extends the traditional understanding of library lending, which could not occur without a visit to a physical building. It also highlights that the lending conditions may be shaped by both the library and external actors and stakeholders, e.g. vendors and publishers. Furthermore, it pinpoints that the book may be delivered to the reader’s device, which becomes an implicitly indispensable part of the lending infrastructure. At a more practical level, e-lending for public library patrons’ is displayed in the form of software on digital devices, which enables access to a catalogue of e-books and e-audiobooks.

The e-lending has been an object of study for many researchers over recent years. Alipour-Hafezi and Khedmatgozar (2016) have identified that scholars predominantly focused on the topic of e-book specification, creation and software, as well as the perspectives of librarians and users. Another vital area of investigation is e-lending in the context of interlibrary loans and copyright issues in general. The pricing models or business models were found to be the least researched and were analysed using quantitative approaches.

In this paper and in the context of public libraries, the abovementioned pricing and business models refer to an e-lending model, which is understood as a mechanism that a library employs to acquire and make digital books available for patrons. There have been several typologies of e-lending models

in the international reports and overview literature. Table 1 presents the generic types of these models used internationally and in Scandinavian public libraries. This typology is based on analysis and summary of existing sources (Mount, 2014, 2016; Waller, 2015; Whitney & de Castell, 2017) and aims to provide the necessary vocabulary² and understanding of the particularities of the e-lending models whose development will be presented afterwards.

Type of model	Rationale	Affordances	Possible drawbacks
<p>One Copy/One User model</p> <p>In Scandinavian languages may also be known as “eksemplarmodell” or “stycklicens”.</p>	<p>Libraries buy a license and lends a digital book to one patron at a time. Meanwhile the other users cannot access the book until the lending period expires. Consequently, waiting lists occur. The licenses tend to be long-lasting (e.g. one year or five years) and may even be perpetual.</p>	<p>This model resembles the lending of a printed book. It may also be more suitable to manage for the library as it brings about predictability and stability of lending. It is argued that this model is favoured by the publishers, who preserve the key feature of analogue lending and can limit the scale of e-lending in favour of their sales.</p>	<p>For libraries, it may be difficult to build up a broad and varied catalogue of books since this model tends to be used for frontlist titles, and the licences may be expensive. Moreover, libraries may spend the funding on licences that patrons will not use. For the patrons, it may seem incomprehensible if one needs to stand on a waiting list for a digital book.</p>
<p>Metered Access model</p>	<p>A variant of the One Copy/One User model, as libraries buy a license in advance, but it is not perpetual, and it expires after either a certain number of checkouts or after a specific time. The patrons may lend the title concurrently or by One User logic. If the library wants to offer this title again,</p>	<p>As in the One Copy/One User model, the publishers preserve the key feature of analogue lending and can limit the scale of e-lending in favour of their sales. For the libraries, this model implies more flexibility in creating the range of available titles.</p>	<p>For libraries, the use of this model may generate substantial costs, as it is usually popular frontlist titles that are distributed via this model. It also leads to unpredictability for both the libraries and the patrons because the title disappears from the catalogue when the license expires.</p>

² It needs to be noted that the names of the models in the table are mostly adapted from the terminology used by the American commercial distributor Overdrive and therefore they sometimes differ from the names used in the previous international grey/research literature, like publications by IFLA. Nevertheless, to my knowledge and understanding of the e-lending phenomenon, the Overdrive terminology nowadays is frequently used by most of library professionals and experts, so I decided to adapt it in this overview. Source: <https://resources.overdrive.com/understanding-lending-models/>

	the license must be repurchased.		
Cost per Circulation model In Scandinavian language also known as “klikmodell” or “accessmodell”.	Libraries pay retroactively a fixed fee for every loan of a digital book, but it can also impose regulations concerning the number of simultaneous users at one time, or price caps to control the lending costs.	For the patrons, this model implies that more titles are available, and one book can be lent simultaneously by many users. At the same time, libraries can offer a collection of books for a broader audience.	For libraries, paying retroactively for loans may cause budgetary problems and unpredictability. For publishers, an easily accessible digital book may be a threat to their sales, especially when it comes to frontlist titles.
Flat Rate model	Libraries pay for access to a catalogue of digital book titles, which the patrons can lend without restrictions over a defined period (for example, one year).	Easy access to a broad catalogue of titles and more predictability for libraries and patrons.	This model tends to be used for backlist titles, which may not be in demand and attractive for the patrons.

Table 1, Types of e-lending models based on existing grey and research literature

Regardless of the choice of a particular type of e-lending model, the public library needs to face not only a different architecture of ownership of its digital collection but, as pinpointed by Perzanowski and Schultz (2016), also different power relations, which has relevance for the policy context. American scholars perceive e-lending models as a form of artificial friction³, which encompasses such actions taken by the publishers as imposing distribution delays, waiting periods, geographical restrictions and, of course, charging the libraries for loans of the digital books; all these actions intend to discourage the patrons from free of charge library loans. The artificiality of this friction depends on the fact that such limitations are not embedded in the technology itself but are the result of the rightsholders’ concerns.

Ultimately, the bone of contention is the fact that both libraries and publishers see the same object (digital books) from two different perspectives: as a *public good* or a *private good* respectively (Colbjørnsen, 2017). These groups of actors are led by different values and interests and need to establish their new positions in a digital environment. The so-called “end of ownership” (Perzanowski & Schultz, 2016) and the rise of licensing culture imply a need for setting down new rules and frameworks in the book spheres.

Material and method

To complement the existing research contributions from Scandinavian researchers (Bergström et al., 2017; Colbjørnsen, 2017; Grøn & Balling, 2016; Wallin, 2019; Worsøe-Schmidt, 2018, 2019), a

³ The term friction is understood as restriction or restraint. It is also used in the case of printed books, for example by American library professionals David R. Hansen and Kyle K. Courtney. They talk about a transactional friction, signifying the time and effort necessary in transporting the printed copies, putting them on the library shelves or delays caused by the library patrons. Source: David R. Hansen, & Kyle K. Courtney. (2018). *A White Paper on Controlled Digital Lending of Library Books*.

significant part of the data gathered for the following historical accounts comes from grey literature, which is defined as literature produced at all levels of government, academics, business and industry, in both print and electronic formats, but which is not controlled by commercial publishers and the publishing is not the primary activity of the producing body (Farace & Schöpfel, 2010). In the following historical summaries, the grey literature consists of international overviews of e-lending developments (Eblida, 2022; Mount, 2014, 2016; Whitney & de Castell, 2017). They are completed by reports, white papers, inquiries and evaluation documents written by experts from Denmark (Kulturstyrelsen, 2012), Norway (Colbjørnsen, 2014; Nasjonalbiblioteket, 2012; Norsk kulturråd, 2009; Rambøll, 2015, 2022), and Sweden (Kungliga Biblioteket, 2011, 2012; Svedjedal, 2012; Waller, 2015, 2022).

The sources were gathered by snowballing, and their scope is meant to provide a sort of triangulation, meaning confronting the information from several sources on the same subject to secure the most comprehensive account for these developments. It has to be noted that the analysed grey literature sources have not been peer-reviewed, and because of the different nature of the ordering bodies (the European Parliament, Danish Ministry of Culture, national libraries in Sweden and Norway, advocacy organisations EBLIDA and IFLA, Publishers', Librarians' and Booksellers' Association in Sweden or even a commercial Swedish distributor Elib/Axiell Media) and different roles of their authors, the question of conflicts of interests and objectivity should be raised here. It should not be overlooked that the authors of these sources sometimes represent one part involved in developing the e-lending models. Nevertheless, their opinions and all form of subjective perspectives are set aside to extract the accounts for policy dynamics and to identify the involved actors.

The comparative approach is employed to highlight the particularities of the dynamics in the three analysed countries. The comparative design of the study derives from the interpretative tradition case-oriented strategy (Ragin, 1987), where the main objective is to examine historical origins and outcomes of the phenomena, to identify invariant relationships, pinpoint patterns of causal complexity and, as a result, explain the variation. The cases are treated as wholes, meaning that the analysis concerns the co-occurrence of conditions across them. Because the three countries share many common features in terms of book and library sectors, the analysed developments can also be seen as a "most similar systems design" (Przeworski & Teune, 1970), where the number of compared features is minimised. More practically, the comparative analysis is made in the form of mirroring these cases with each other in order to identify the differences.

The e-lending models from a historical perspective

Denmark

The first local library in Denmark launched an e-lending model in 2001, and for many years there were two existing platforms, ebogsbibliotek.dk and ebib.dk, both of which applied the Cost per Circulation model. However, the first full-scale national platform offering e-books for Danish public libraries eReolen ("e-bookcase") was not launched until almost a decade later, in November 2011. This was a fellow trial project funded by the governmental Danish Agency for Culture and Media (now The Agency for Culture and Palaces) together with a consortium of county libraries, and big city public libraries in Aarhus, Copenhagen and Frederiksberg. The project also had commercial participants, the big publishers (Gyldendal and Lindhardt & Ringhof) and their in-house backend platform Publizon. Initially 53 Danish publishers with almost 2 000 titles participated in the eReolen project.

From the beginning, the platform applied a Cost per Circulation model, with an embedded mechanism of the falling price of a loan, as a title gets older, and the number of its loans increases. The range of

e-books was therefore generous, since the participating publishers made their complete list of books available, with a restriction for the first six months, when they could withhold some titles or limit the number of loans. The friction mechanism could also be controlled by libraries: if the cost of lending surpassed their budget, they could limit a maximum number of loans by a single patron.

The launching of eReolen affected the commercial part of the Danish book sector. Thanks to its wide range of titles and availability, the platform is considered a catalyst for the growing popularity of e-books in Denmark in general. However, the unexpected popularity of eReolen created tensions between the involved actors, which were afterwards referred to as “the e-book war” (Worsøe-Schmidt, 2019) or “fight over eReolen” (Grøn & Balling, 2016). The dissatisfaction with the Cost per Circulation model applied by eReolen led to the retreat of seven main publishing houses from the platform in late 2012 after they saw a drop in sales figures and feared cannibalisation of e-book sales. Consequently, eReolen lost a significant part of its digital titles, in particular bestsellers. The publishers advocated implementing a One Copy/One User model, but the library consortium was not interested in testing novel solutions. Afterwards, the big publishers Lindhart & Ringhof and Gyldendal created their competitive parallel e-book platform, eBiB, but it was boycotted by the big Danish libraries.

Dissatisfaction with two parallel systems and the search for a solution resulted in creating the Danish Digital Library (DDL) in 2014, an association set up by the Ministry of Culture and the Danish municipalities. DDL was a national collaboration with the responsibility of negotiating with the publishers. In January 2015, after reaching a new agreement between the parties, the big publishers returned to eReolen, which from that point was applying a sort of hybrid model, giving the publishers more control over the titles. During the first six months after release, the new titles were to be lent by the libraries through a One Copy/One User model, and afterwards, they changed into a Cost per Circulation model. The publishers shut down their rival platform eBiB as well.

The new hybrid e-lending model seemed to satisfy both the book sector and the libraries, and the number of patrons and digital loans increased significantly. Nevertheless, in August 2015 eReolen experienced a “writers’ boycott” when four bestselling Danish authors withdrew from the platform because the implemented revenue model did not meet their expectations. The protest was supported by their publishers, whereas the libraries responded with criticism of unrealistic expectations from the commercial side of the book sphere. As a result, several publishers, among them the biggest Danish publisher, Gyldendal, again withdrew from eReolen. However, the second biggest Danish publisher Lindhardt & Ringhof, remained on the platform, with a new agreement giving publishers and writers the right to decide how titles are to be offered for lending on eReolen.

In 2018, the publisher Gyldendal, together with other Danish publishers, came back to eReolen, after signing a new agreement, clearly indicating that the backlist titles would be made available via the Cost per Circulation model. In contrast, the most commercially attractive titles would be under the One Copy/One User model. In addition, a part of the backlist titles was also made available via the Flat Rate model. The publishers’ return led to a significant rise in eReolen’s lending rates.

Currently, the e-lending service eReolen is administrated and run by the national association of the Digital Public Library (the former Danish Digital Library), funded by all 98 Danish municipalities and dependant territories, and representing public libraries in negotiating prices and terms and conditions with the publishers. The platform gathers content from the majority of Danish publishers, offering titles to all public libraries. Despite its turbulent history, eReolen seems to be a stable solution now and is considered a successful e-lending platform from an international perspective. The lending of digital books via eReolen makes up 28% of the digital trade market in Denmark. An additional service

called eReolen Global, which is a result of eReolen's cooperation with the global aggregator Overdrive, offers titles in English and other languages. A parallel platform eReolen Go is dedicated to children and teenagers.

Norway

The first attempt to introduce e-lending solutions in Norwegian libraries dates back to 2009. That year, the Norwegian Arts Council sent an inquiry to four publishers aiming to buy licenses for a selection of e-books. The intention was to assess the possible incorporation of these e-books into the Norwegian purchasing scheme for literature (*innkjøpsordningen*). It is a mechanism established in 1965 and governed by the Arts Council that was created to secure literary production written in Norwegian. Through eight purchasing schemes (e.g. fiction, non-fiction, children's literature), the Norwegian state purchases a certain amount of newly published literature and distributes it to the public and school libraries across Norway.

Simultaneously, in 2009-2011 different pilot projects were launched in libraries in Norwegian regions (Drammen in Buskerud, Ryfylke in Rogaland, and Oslo) with financial support from the Norwegian Archive, Library and Museum Authority, the Norwegian Arts Council and the National Library of Norway. At the same time, different actors developed their visions of what the possible national strategy for future e-lending models might look like. In 2010, a white paper was published by the Norwegian publisher (Gyldendal) and representatives of the library sector, where the authors postulated free-of-charge access to a broad catalogue of relevant e-book titles, providing that a stable and predictable economy and joint administration were guaranteed. A working group from the Norwegian Library Association also put forward their principles, pointing out, among others, that there should be no retention period for frontlist titles and that the libraries should have the freedom to decide which e-books would be included in their collection.

Another pilot e-book project was initiated by the Arts Council in 2011, which reached an agreement with the Norwegian Publishers' Association, the Norwegian Authors' Union and the Norwegian Publishers' Union, with the participation of the National Library and Norwegian Library Association to test the possibility of including e-books in the already established purchasing scheme for Norwegian literature. The preliminary e-lending solution, with the One Copy/One User model, functioned well in many local libraries in Norway and thus became permanent for all Norwegian libraries in 2015. Since then, public libraries can also purchase e-books directly from publishers, outside the Arts Council purchasing scheme, but using their budgets. In other words, the e-books in Norwegian libraries may be acquired in two ways: the first is a purchase directly by the state, and the second relies on every library's policy and budget possibilities.

The national framework for the latter acquisition channel was put forward in 2016 by the National Library of Norway, which developed a recommended scheme for e-book purchasing and lending after negotiations with the Norwegian Publishers' Association and other interested organisations. It may be characterised as a hybrid model since the e-book is supposed to be loaned for the first two years in the form of a Metered Access model, with a license including ten checkouts and the price equivalent to that of a printed book. Afterwards, the e-book goes over to distribution via the Cost per Circulation model with concurrent lending possible and the price for each loan that should correspond to the current market price of the e-book. Within this proposed framework, public libraries have the right to decide which e-books are made available for their patrons.

Three years later, in 2019, the National Library put forward a parallel recommended scheme for digital audiobooks, developed after talks with the Norwegian Publishers Association. This format is not

included in the Arts Council scheme for literature, and for that reason, the public libraries can decide if they want to offer audiobooks for their patrons, as they are solely responsible for the cost of purchasing digital audiobooks. The recommended scheme stipulates that the library lends out a digital audiobook employing a Metered Access model, with a license including six checkouts and the cost of this license corresponding to the price of a digital audiobook available via booksellers.

Regarding library versus distributor relations, the Norwegian public libraries either purchase titles directly from the distributors (libraries in Oslo and Bergen) or are organised in regional consortia, grouping public libraries from one county. The content suppliers are aggregators Biblioteksentralen, owned by municipalities, and Bokbasen, owned by the largest Norwegian publishers. In addition, some libraries also offer books via the American aggregator Overdrive, mainly for literature in languages other than Norwegian.

The recommended e-lending schemes for both e-books and digital audiobooks were evaluated in a report published at the beginning of 2022, ordered by the National Library of Norway and conducted among the public libraries in municipalities, the regional libraries and the content providers (aggregators). The main findings point out that all types of respondents are somewhat dissatisfied with the current schemes, observing that their management is too complicated, that they lead to unpredictability, that the demand is greater than the supply, and that digital books are too heavy a burden for the libraries' budgets. Most regional libraries and almost half of the public libraries also expressed a wish to have negotiations at a national level for the acquisition of digital books.

Sweden

Sweden introduced the first e-lending solution for e-books in 2002 when the aggregator Elib was launched by the publishing industry representatives: four major Swedish publishers Bonnier, Norstedts, Piratförlaget, Natur & Kultur. This aggregator rapidly gained a dominant position in the Swedish market, delivering e-books to both public libraries and booksellers. The original e-lending model applied by Elib was proposed by the libraries themselves, with a Cost per Circulation model and a fixed price of 20 SEK (2€) for a single loan, and the possibility of lending each title without significant limitations. Soon almost all Swedish municipalities joined this cooperation.

Such a generous model was working well when the Swedish e-book market still was immature. However, the situation changed when the readers turned to the libraries in search of bestsellers. The emblematic case was the e-book biography of football player Zlatan Ibrahimović, written by David Lagercrantz and published in November 2011. Within the first month, the book was downloaded 13 000 times from the libraries but sold approximately 5 000 copies in bookstores; moreover, the overall cost for e-book lending in November 2011 alone was around 1 million Swedish crowns (100 000 euros). The same year, the National Library of Sweden and the Swedish Library Association conducted an inquiry and published a report that mapped out the challenges and pinpointed possible solutions, for example, a coordinating role of the National Library.

The previously stable model became unsustainable for both libraries and publishers as e-book readership grew in popularity. Some Swedish publishers were reluctant to share their titles with Elib, preferring a direct sale to the readers, whereas the libraries expressed concerns because of the increasing lending costs. Consequently, both parties introduced their friction mechanism to the Elib model: the publishers imposed a monthly waiting period for the most popular e-books, and the public libraries put lending limitations on library users. At the same time, in 2013, both Stockholm and Malmö public libraries attempted to launch their e-lending models, which were more adapted to their needs and developed them in cooperation with commercial actors other than Elib.

The breaking point was in 2014, when Elib launched a new e-lending model for Swedish public libraries through negotiations with the Swedish Association of Local Authorities and Regions (SALAR), which is an organisation representing the interests of municipalities that oversee the public libraries. In this agreement, the Cost per Circulation model was still in use, but with more control from both publishers' side, who could set higher prices on popular titles and the libraries' side, who could also decide which titles they want to include in their catalogues and set a price cap on loans, leading to better budget control. The updated model also relied on the premise that the publishers priced the front titles higher while the book price fell as the title got older. Practically, the new titles were under embargo since the libraries could not afford to offer them because of budgetary restraints. The libraries could also employ a One Copy/One User model and combine it with the Cost per Circulation model, but this mechanism did not break through because of its costs.

In 2014-2015, one more e-lending model was developed by six minor publishers and SALAR. This model had a price laddering related to the age of a particular title. However, this model did not gain popularity, because the big publishers considered the highest title price as too low. In 2015, the platform Elib changed ownership, as it was bought by Axiell Media Group, a media company that acquired 70% of its shares. Since then, Axiell Media has been the dominant aggregator in the Swedish library market.

In 2018, the public libraries, who had before been negotiating directly with the aggregator, now represented by SALAR, participated in a national procurement deal for digital book provision to all public libraries in Sweden. The winning actor was the global aggregator Overdrive. Their model was only based on the Cost per Circulation model, as before 2014, but with slightly lower prices per checkout. It did not satisfy the publishers who, in the beginning, did not join this aggregator nor the libraries, who were not satisfied with the range of titles. As of today (2022), most Swedish public libraries still use the established in 2014 model and Axiell Media as a distributor. Nevertheless, some libraries (mainly in the Gothenburg area) changed to Overdrive as a distributor and apply their more varied models, both One Copy/One User, Metered Access and Cost per Circulation.

The Swedish library sector has expressed a wish that the question of e-lending should be coordinated and managed by the National Library of Sweden (Wallin, 2019). The same idea about national coordination was also noted in the governmental inquiry on the Restart for Arts and Culture after the pandemic (2021). However, the Swedish National Library Strategy (2022) indicates that the National Library will keep a low profile in that matter.

Comparative analysis

The analysis of the development of e-lending models, with data gathered from both previous research studies and grey literature, gives a comprehensive overview of these processes over the last two decades until 2022. The previous research publications have undoubtedly brought about an understanding of these dynamics, but none of them was focused on the detailed characteristics of e-lending models and their impact on the libraries to such an extent as many of the grey literature sources (Eblida, 2022; Rambøll, 2015, 2022; Waller, 2022).

As mentioned in the introduction, the comparative analysis aims to identify what kind of e-lending models were developed, what the character of these processes was, what kind of policy actors were involved in these processes.

The first observation that may be drawn from the comparison is that in all three countries the e-lending models, in general, are functioning according to similar logic, that is, the restrictive models (One Copy/One User model or Metered Access) are used to lend the frontlist titles and the Cost per Circulation model for mainly backlist titles. The development in Denmark and Sweden in the initial years of e-lending in public libraries until approximately 2011-2014 could be called times of “frictionless” lending, where a generous Cost per Circulation model was applied to all e-book titles. However, the growing popularity of digital books in commercial channels in the middle of the 2010s has led to reactions from the publishers’ side that advocated more flexibility and, therefore more restrictive models, such as One Copy/One User or Metered Access models (in Denmark and later on in Norway) or price laddering for Cost per Circulation model (in Sweden).

Another observation is that the Swedish and Danish developments were ahead of the Norwegian. Development in these two first countries could be characterised as testing different e-lending models by trial and error, even though it also resulted in tensions and conflicts between the publishers and libraries since the solutions were not sustainable for one or both parties. On the contrary, the Norwegian development was slower and more carefully thought out, as noted in the grey literature (Rambøll, 2015). The reason may be that the commercial e-book market in Denmark and Sweden started to expand after e-lending was established in the public libraries, while in Norway these two markets grew simultaneously. Furthermore, the carefulness and subsequently, the retardation in Norway may be explained by the cultural policy ambition to include digital formats in already existing instruments, such as the Norwegian purchase scheme for literature. Another explanation may be the wish to secure the interest of main involved parties: the libraries, the publishers, the distributors and the authors. A visible preference for the One Copy/One User model in the Norwegian purchase scheme for literature (where the state stands for digital books acquisition) and the Metered Access model in recommended schemes respectively (where the particular libraries stand for the acquisition) may also be seen as a consequence of these precautionary policy processes.

The actors that first initiated e-lending in public libraries varied across Scandinavia. In Denmark, it was the governmental Danish Agency for Culture that, together with major public libraries and publishers, funded and launched the eReolen platform in 2011. More recently, the association of the Danish Digital Library (now the Digital Public Library) oversaw eReolen management and has represented the local libraries in negotiations with the publishers. It may be seen as confirmation that Danish e-lending is firmly grounded in the public library sector, which undoubtedly has the most interest and expertise in e-lending management. The cooperation between publishers and major libraries also characterised the early phase of e-book development in Sweden. Afterwards, the Swedish Association of Local Authorities and Regions took responsibility for representing the public libraries in the national procurement for digital book provision. On the contrary, in Norway, it was initially the Arts Council and the National Library that coordinated and initiated the pilot projects and then took the task of forging the e-lending terms with interest organisations, such as publishers’ or authors’ associations. It was also the National Library of Norway that worked on the recommended scheme for lending models and then evaluated them. Given this, in the Danish and Norwegian processes, the initiating and coordinating actors have more robust anchoring in the library spheres. In Sweden, on the other hand, e-lending on a national level was assigned to SALAR, an organisation working on behalf of the municipalities, not the libraries themselves.

A similar aspect of both Swedish and Norwegian development is the role of their respective national libraries which either took an active role (Norway) or a more advisory role (Sweden) in the processes. In contrast, in Denmark the corresponding actor is entirely invisible. Nevertheless, a national platform created in Denmark encompasses all public libraries in the country, whereas in Norway and Sweden,

the responsibility for management of the e-lending models is decentralised since it relies either on the particular public libraries themselves or on regional consortia, alternatively cooperations.

The interplay between the public and commercial actors (public libraries vs publishers) cannot be characterised as unequivocally amicable or hostile in any of the three analysed countries. In the initial years of e-lending models' development, the big publishing houses participated in pilot e-lending projects and/or stayed behind the aggregating platforms. When the existing frictionless models (as in Denmark and Sweden) were no longer sustainable, the relations became tenser and demanded redefining the lending conditions and involvement of new actors, such as a joint association representing the public libraries in Denmark or SALAR in Sweden. In contrast, the state actors have been involved in Norwegian development from the beginning, providing a stable development, but it has not prevented tensions and dissatisfaction with the e-lending solutions after that.

Discussion

As argued by Grøn and Balling (2016), the development of eReolen in Denmark altered the already established *modus vivendi* between the library sector and the book market. As such, one could say that e-lending and its models have renewed the antagonism between sales and lending. One of the key reasons for the conflict is the question of the availability of newly published titles, because they are crucial for publishers who want to maximise their sales, as noted by Giblin and Weatherall (2022). The analysis of Scandinavian developments confirms that observation, since imposing the restrictive e-lending models on the highly in-demand titles (as digital audiobooks in Norway) has been one of the most significant sticking points in discussions between the public and commercial spheres, which the Danish development illustrates perfectly. The frontlist titles are nevertheless also essential for public libraries, who, by offering them want to fulfil their mission stipulated by library laws. The libraries aim to remain responsive to the needs of the communities and confirm the ambition to give free-of-charge access to relevant and up-to-date collections, regardless of the format. At the same time, the artificial friction imposed by publishers aims to hamper easy accessibility of digital books in public libraries.

The different types of e-lending models analysed above are, on the micro level, mechanisms based on various business and pricing agreements. At the same time, on a macro level, they can affect the sustainability of the book spheres, where both the publishers and libraries have coexisted for many decades and need to coexist in the future. The cross-national analysis illustrates that the cultural policy framework comprises actors of different origins (public organs, authorities, associations, trade and interest organisations) and with different mandates and interests. The differences in pace and character of forging friction processes should be attributed to variances in established collaboration practices between the actors and already existing regulatory frameworks, as well as the maturity of the digital book market.

The development of e-lending models in Denmark, Norway and Sweden also must be seen in the light of the presence or absence of internal regulations on national book markets. The Danish book market is among the most liberal in Europe, as there are hardly any restrictions on book distribution, and the fixed book price was abolished in 2011 (Hjarvard & Helles, 2015). A similar feature characterises the Swedish book market, which is highly deregulated, with book prices being freely set since 1970. In contrast, the Norwegian book market is regulated by collective agreements between sectors, mainly interest and organisations representing, and the fixed book price agreement has been in use since 1962 (Rønning & Slaatta, 2012).

This study should be seen as an attempt to shed light on the policy processes behind e-lending in public libraries. However, analysing the policy processes mainly based on grey literature imposes

certain limitations and overlooks many other aspects. For example, in-depth interviews or analysing media debates could provide a deeper understanding of the motivations behind the actions of the identified actors. Neither has the supranational dimension (European Union in this case) been taken into account, nor have the interests of the writers, whose participation in the mechanism of Public Lending Rights is an essential tool of cultural policy. Nevertheless, the tentative conclusions open further research questions. One could ask, for instance, how sustainable and durable e-lending solutions can be created and maintained and furthermore how the introduction, development and maintenance of e-lending models affect the public library's role and mandate in different countries.

Acknowledgement

I want to thank Dr Terje Colbjørnsen for valuable comments on an earlier version of the manuscript and Dr Nanna Kann-Rasmussen for a discussion on its later version. I would also like to thank the two anonymous reviewers for their comments that significantly improved this paper. This research was supported by the Norges Forskningsråd (The Research Council of Norway) through the research project Political Dynamics of the Cultural Sector (POLYCUL), project number 302199.

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