
(i)SDL Insight - Digital Lending pathways in Italy, Poland, and Spain. Outcomes and future outlook

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**(i)SDL Insight - Digital Lending pathways in Italy, Poland, and Spain.
Outcomes and future outlook**

Structured Abstract

Purpose

The digital transformation has profoundly changed the way libraries offer access to knowledge; however, they currently lack a legal framework that would enable them to fully exercise their public interest functions in the digital environment.
(independent) Secure Digital Lending (i)SDL has emerged as a promising model, enabling libraries to digitise and lend physical works under secure conditions. This article examines the project “(i)SDL Insight - Digital Lending Pathways in Italy, Poland and Spain” results and outlines the directions for future developments to enable libraries to carry out their institutional mission also in the digital environment.

Design/methodology/approach

The project is based on disseminating a survey in the three participating countries. By investigating the specific barriers encountered in Italy, Poland, and Spain, the project seeks to map the gap between the current legal framework and its practical implementation, aiming to turn theoretical legal flexibility into sustainable library practices.

Findings

The comparative survey of libraries in Italy, Spain, and Poland reveals a shared ambition to implement (independent) Secure Digital Lending (i)SDL services, but also highlights major systemic barriers. Successful (i)SDL adoption requires coordinated national and international efforts, including legal reform, funding, capacity-building, and infrastructure development.

Originality/value

The (i)SDL Insight project set out to map the current landscape of (i)SDL in Italy, Poland, and Spain, analysing the legal, technological, and operational obstacles to its adoption while identifying opportunities for future development.

Keywords

e-lending - Controlled Digital Lending (CDL) - (independent) Secure Digital Lending ((i)SDL) - copyright - barriers- open knowledge

1. The context

The project “(i)SDL Insight – Digital Lending Pathways in Italy, Poland, and Spain”¹ was launched to investigate the systemic barriers libraries face when implementing independent secure digital lending across these three countries.

Through the dissemination of a survey, the project examines the factors and barriers that affect the implementation of (i)SDL, as well as the current state of practice, including digital lending models, types of materials lent, user demand, and future outlook, serving as a starting point for developing strategies to overcome these challenges.

(i)SDL is the e-lending based on paper books digitised and lent by libraries, using technological protection measures to prevent non-legitimate uses (for instance, measures to limit the lending time, to prevent downloading, often called DRM - Digital Rights Management Systems, in general, measures to prevent illegal uses of the e-copy by the end-user).

The project was supported by the Knowledge Rights 21 (KR21) program. KR21 is an European advocacy initiative focused on reforming copyright law and digital practices to ensure open and fair access to knowledge. The project was launched as a multi-year program to tackle a growing crisis: the shift from physical books to digital formats (e-books, digital journals) has left libraries legally and financially vulnerable. While physical libraries have a historical right to buy a book once and lend it out freely, the digital market is governed by restrictive, expensive licensing agreements. Publishers often charge libraries many times the consumer price for an e-book, or restrict access entirely, severely hindering modern education, research, and cultural preservation. This gap became especially critical during the COVID-19 pandemic, when schools, universities, and libraries closed, and the lack of robust digital rights crippled remote learning. To address this, the Arcadia Fund (a charitable foundation that promotes Open Access to knowledge and cultural heritage) provided the financial backing for the project. The initiative is officially managed and led by IFLA (The International Federation of Library Associations and Institutions), in close partnership with other key European networks: LIBER Europe (Association of European Research Libraries) and SPARC Europe (Scholarly Publishing and Academic Resources Coalition). Together, they operate through a network of national and regional coordinators across European countries to campaign for legislative change. The ultimate goal of KR21 is to create a modern, 21st-century information ecology where copyright laws protect public interest, research, and education rather than restricting them. The core objectives are structured around several priority areas, one of each is enabling e-lending, in the form of Independent Secure Digital Lending (i)SDL to allow libraries to digitise their physical, analogue collections and lend out those digital copies on a "one-to-one" basis, ensuring out-of-print or historical books aren't lost to time.

¹ <https://www.knowledgerights21.org/reports/isdl-insight-digital-lending-pathways/>. The (i)SDL Insight project is coordinated by Deborah De Angelis through [DDA Law Firm](#) (Italy), the Italian coordinator of KR21, with the participation of [CLAKP](#) - Copyright Law and Access to Knowledge Policies Group, a multi-stakeholder initiative coordinated by the Institute of Legal Informatics and Judicial Systems ([IGSG](#)) of the National Research Council (CNR) and of the “*Dario Nobile*” Library of the CNR Research Area, the Library and Scientific Documentation Center of the CNR Research Area in Pisa, the [Centrum Cyfrowe](#) (Poland); the [Fesabid](#) (Spain).

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In this context, the recent Action Plan “Let Libraries Be Libraries”², promoted within the KR21 framework, further reinforces the policy dimension of digital lending in Europe. The Action Plan identifies nine strategic measures aimed at safeguarding libraries’ public interest mission in the digital environment. Notably, one of its central points, enshrined in point 6, expressly calls for the implementation of EU jurisprudence on e-Lending into both European and national legislation, through the proposal “*Implement EU Jurisprudence on e-Lending into European and National Law and Create Backstops to Enable Access for Library Users*”. The document specifically advocates the integration of the Judgment of the Court of Justice of the European Union of 10 November 2016 on e-lending by libraries in the EU ³ (CJEU VOB judgment) into the Rental and Lending Directive, including safeguards against contractual override and technological protection measures, while also clarifying libraries’ ability to digitise lawfully acquired physical books and lend them under a one-copy-one-user model.

The CJEU VOB Judgment provides a basis for (i)SDL. The Court ruled⁴ that digital lending can fall under the public lending exception in EU law, provided it follows a "one copy, one user" model, aligning with Directive 2006/115/EC⁵. According to the decision, for e-lending to be lawful, libraries must hold a legitimate digital copy. The Court did not address whether libraries can digitise their books under EU exceptions, though the Advocate General supported this possibility. Nonetheless, a lack of effort to reform national laws to provide clarity on this point, as well as the reluctance of some publishers, has hindered the widespread adoption of e-lending across the EU.

The (i)SDL framework is characterised by the fact that loans must be carried out by clearly defined institutions, such as libraries, that are open to the public and do not derive any direct or indirect economic or commercial advantage from lending activities. Table 1 exemplifies the (i)SDL framework, according to (Gliściński, 2025). (i)SDL is designed to balance the rights of authors and publishers with the fundamental public mission of libraries, ensuring that libraries can continue to play a central role in the dissemination of culture and knowledge, including in the digital environment.

<<INSERT TABLE 1>>

² Safeguard Access, Empower Europe. An Action Plan to Let Libraries be Libraries. Nine actions to ensure Europe's libraries can continue to support research, education, preservation, and cultural participation in the digital age, available on <https://knowledgerights21.org/library-action-plan/>

³ The Judgement C-174/15 (Vereniging Openbare Bibliotheken-VOB case) is available here: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:62015CJ0174>

⁴ The possibility of digitising paper books is based on the interpretation provided by CJEU TU Darmstadt ruling (Technische Universität Darmstadt v Eugen Ulmer KG. Case C117/13).

⁵ Directive 2006/115/EC of the European Parliament and of the Council of 12 December 2006 on rental right and lending right and on certain rights related to copyright in the field of intellectual property, <https://eur-lex.europa.eu/eli/dir/2006/115/oj/eng>

2. Related research and legal context

From the perspectives of libraries, pursuing their mission of “promoting education, research and access to information”, requires them to offer digital lending as a service complementary to the lending of printed books. What remains of the role of libraries in an increasingly automated and digitalised future if they are excluded from e-lending? This service is, after all, the primary way they fulfill their public interest mission of promoting education, research, and access to information.

(independent) Secure Digital Lending (i-SDL), Controlled Digital Lending (CDL) and e-book lending (e-Lending) are distinct modes that libraries may implement in order to offer their patrons a digital lending service, that means, a temporary and controlled (secure) access to a digital book copy.

E-book lending usually refers to the possibility for libraries to acquire a license from a publisher to lend digital books. This latter is still controversial and far from reaching any kind of sustainable equilibrium. In the Giblin and Weatherall case (2022), it was shown that licensing practices contain flaws that indicate key failures in the market, such as, for instance, lack of availability of e-books in publishers catalogs, lack of affordability for libraries, and in general, lack of transparency affecting all players. Such problems have been confirmed by a larger EU study (Barr et al., 2025), highlighting several potential abuses of e-Lending market power, such as: refusals to supply, restrictive licensing conditions/delayed supply, bundling, excessive pricing, avoidance of the spirit of other laws, e.g. the copyright exception for text and data mining, and lack of transparency.

In Europe, only a few countries (such as the United Kingdom, Finland, and Ukraine) have enabled e-Lending based on licensing models. However, this approach undermines the societal role of libraries by limiting their operational capabilities in the digital realm and raises many problems, as demonstrated in the Barr et al. (2025) study. In general, scholars suggest a set of interventions on copyright reforms for e-Lending, such as exceptions for controlled digital lending or legislation targeting licensing practices.

(independent) Secure Digital Lending (i-SDL) and Controlled Digital Lending (CDL) are both practices based on the “digitise-and-lend” paradigm that libraries may put in place to provide their patrons with digitised copies of physical books. Although CDL and (i)SDL look very similar in practice, they have different histories and stand on different legal frameworks.

This divergence is deeply rooted in the differing legal traditions of common law and civil law systems. In the United States and other common law jurisdictions, Controlled Digital Lending (CDL) developed primarily through flexible judicial doctrines, specifically Fair Use and the First Sale Doctrine. This “Open norms” framework allows courts to adapt copyright rules to new technological contexts through case-by-case interpretation.

By contrast, the European approach to (i)SDL is anchored in a harmonised system of exceptions and limitations established by EU copyright directives and subsequently interpreted by European courts. This structural distinction explains the different evolution of the two models: while North American CDL emerged as a practice justified through open-ended doctrines, European (i)SDL has evolved as a rights-based, jurisprudentially grounded

model intrinsically linked to the public mission of libraries and the legal framework of public lending rights. Moreover, the impact of the *Hachette v. Internet Archive* ruling in the US has accelerated the need for a distinct, more robust, statutory-based framework like the European (i)SDL (Rub, 2024).

In the US, CDL has been defined in the *Position Statement on Controlled Digital Lending*⁶ as “enabling a library to circulate a digitised title in place of a physical one in a controlled manner”. Under this approach a library may only loan simultaneously the number of copies that it has legitimately acquired, usually through purchase or donation (Bayley et al., 2018). Copyright issues of CDL within the US and Canada Copyright Act have been considered fair use by scholars (Wu, 2017). However, the case *Hachette Book Group v. Internet Archive*, 20-CV-4160 (JGK) (2023)⁷, considered as one of the most significant lawsuits pertaining to CDL, has overturned such a thesis. Under US copyright law, CDL relies on the First Sale Doctrine⁸, which states that once a library buys a physical book, it has the right to lend it out forever without paying the author or publisher again. Therefore, CDL does not include any mechanism for secondary or ongoing remuneration for authors. Because Controlled Digital Lending (CDL) generates zero ongoing royalties for authors and publishers during digital loans, major US publishers filed suit against the Internet Archive (*Hachette v. Internet Archive*). The US courts ultimately ruled against the Archive, finding that unauthorised digital scanning and lending serves as a commercial substitute for official e-book licenses, effectively leaving the US model of CDL without a stable legal foundation (Liptrap, 2023).

Due to a lack of direct legal clauses specifically addressing CDL within the legal frameworks of the US, Canada and the UK, copyright issues of CDL hamper the growth of CDL by creating a freezing effect, as libraries are under the fear of costly litigations. In general, authors agree that amending copyright laws would be necessary to allow libraries’ digital lending, in order for the sustainable development of CDL to be achieved. According to Wang and Lipinski (2024), who surveyed library organizations in US, Canada and UK, CDL practices have been adopted in individual libraries as well as in consortial library services, for multiple and different services: circulation services, course reserves, document delivery and interlibrary loan. A comprehensive understanding of copyright issues should be tightened to each mode, considering different factors, such as the nature and legal status of library organizations, the nature of CDL service resources, and the usage modes of CDL. Suggestions to amend copyright law in US, Canada and UK include: to explicitly grant libraries the right to make digital copies of published and unpublished copyrighted works for the purpose of supporting their core values, not just purposes like archiving, preservation, security, replacement, management or maintenance; to explicitly allow libraries to provide digital services, including e-reserves, digital document delivery and digital interlibrary loan; to clearly define the scope of a library, including academic library, public library, and library consortia; to include an exception to clarify the types of works eligible for digital lending, including scholarly monographs, learning aids, reference books, older works, and orphan works (Wang and Lipinski, 2024). Rub (Rub, 2024) offers a comprehensive analysis of the digital lending problem from legal, comparative, and economic and social justice perspectives, explaining why it is highly problematic to let libraries be completely subject to the publishers’ powerful

⁶ <https://www.controlleddigitallending.org/position-statement-on-controlled-digital-lending-by-libraries>

⁷ <https://www.courtlistener.com/docket/17211300/hachette-book-group-inc-v-internet-archive/>

⁸ Codified at 17 U.S.C. § 109, the U.S. First Sale Doctrine limits intellectual property rights by exhausting a creator's control over a physical item once it is lawfully sold. Consequently, legal owners are free to resell, lend, or gift their items without seeking the copyright holder's consent.

commercial interests. The study rejects extreme unbalanced approaches and proposes alternative frameworks to balance libraries' role in providing access to knowledge with the publishers' role in supporting the creation of new works. Such frameworks may require federal legislation but also may be implemented by state and local governments, like in the emerging (i)SDL distinct European model.

In Europe, the digital lending of books that have been digitised by libraries has been referred to as (independent) Secure Digital Lending (i-SDL) (Gliściński, 2025). This European digitise-and-lend model is based on the flexibility of European copyright law arising from Article 6 of the Rental and Lending Rights Directive (RLD) and Article 5(2)(c) of the InfoSoc Directive, interpreted in accordance with the fundamental rights of the beneficiaries of these exceptions. The use of the letter "i" is intended to indicate that this type of e-Lending is based on books that are digitised or otherwise created by a library; it is not based on licence agreements related to the use of e-books (Gliściński, 2025). Both CDL and (i)SDL are conceptually based on an important restriction, according to which a library can e-Lend as many electronic versions of books as it has paper copies. In other words, it must use the one copy - one user model.

This aligns with the model that was seen as permissible under the Court of Justice of the European Union's (CJEU) judgement C-174/15, usually referred to as the VOB ruling². According to it, the concept of lending encompasses both the lending of physical copies and digital books; an e-book is equivalent to an analogue book and can, therefore, be lent under the same conditions: no more than one copy per user simultaneously and for a limited time.

The concept can be considered an autonomous concept of EU law developed in the case law of the CJEU. The possibility of digitising paper books is itself based on an analogous interpretation grounded in another CJEU ruling, the so-called TU Darmstadt ruling⁹.

Based on this jurisprudence and on the EU copyright law, carrying out "controlled" digital lending has been considered legal in Spain, where limitations to copyright to support libraries, archives and museums are well implemented in national legislation (Xalabarder, 2023). Further studies, deeply rooted in the Knowledge Rights 21 (KR21) programme, have more clearly assessed the different legal frameworks for CDL and (i)SDL, and eventually (i)SDL has been proposed as the legal framework in Europe through which physical books can be legally digitised by libraries, and the resulting copies can be lent out to patrons in electronic form (Gliściński, 2026).

Like CDL, (i)SDL operates on a 1:1 ratio using secure Digital Rights Management (DRM) to prevent illegal redistribution (for instance, to prevent unauthorized use of the e-copy by the end-user) and protect user privacy (complying with GDPR). However, it is explicitly designed to be Independent, since libraries digitise their collections and use their infrastructure to lend, rather than relying on private, data-tracking commercial platforms and Secure, because it ensures technological protection and, last but not least, unlike its American predecessor (CDL), which offers zero ongoing compensation to creators after the initial book purchase, the European iSDL (Independent Secure Digital Lending) model integrates mandatory author remuneration as a core legal and economic pillar, leveraging Europe's established Public Lending Right (PLR) system and the landmark *VOB v. Stichting Leenrecht* CJEU ruling, which legally equates 1:1 digital lending to traditional physical lending. As a result, every digital loan executed through an independent library infrastructure automatically triggers a statutory micropayment to the author via national collective management organizations. This framework

⁹ <https://infocuria.curia.europa.eu/tabs/document?source=document&docid=157511&doclang=en>

also satisfies Article 18 of the EU CDM Directive, which mandates "appropriate and proportionate" remuneration for creators, while simultaneously shielding public libraries from restrictive, commercial e-book corporate licensing contracts. However, scholars agree that a range of interventions could be carried out in copyright, consumer and contract law in order to clarify the equivalence of Lending and e-Lending, supporting in such a way the goals of libraries in the digital age. Furthermore, the shift from a "purchase-and-own" model to a "license-and-access" model has created a "right to acquire" crisis which needs to be addressed through a mandatory legal framework that prevents publishers from unilaterally refusing to sell digital works to libraries. Unlike physical books, which libraries can buy from any bookstore, digital titles are often withheld from the library market or offered under licenses that expire after a certain number of loans (Frigeri et al., 2024).

This evolving and relatively recent legal landscape, marked by the promise of the (i)SDL model and the judicial milestones of the CJEU, presents a significant opportunity for libraries, yet it remains fraught with uncertainty. While the theoretical framework for "digitise-and-lend" is gaining ground among legal scholars, its practical application is often hindered by a lack of explicit national transposition and a general awareness gap within the library community. Preliminary data from our survey confirm that many institutions operate in a state of 'legal shivering', where the fear of litigation and the complexity of digital rights management outweigh the perceived clarity of current jurisprudence. It is precisely within this tension between emerging legal possibilities and institutional caution that the (i)SDL Insight project finds its rationale. By investigating the specific barriers encountered in Italy, Poland, and Spain, the project seeks to map the gap between the current legal framework and its practical implementation, aiming to turn theoretical legal flexibility into sustainable library practices. The following section outlines the methodology used to capture these dynamics and to identify the strategies necessary to bridge the gap between digital potential and current operational reality.

3. The methodology

The project is based on disseminating a survey in the three participating countries, divided into eight sections: I. Library profile, II. Digital lending, III. Legal barriers, IV. Technological and infrastructure barriers, V. Risk of opposition, VI. Human resources, VII. Financial barriers, VIII. Others. Additionally, some free-text comments were provided in response to several questions.

The Italian partners of the project drafted the survey questions, which were then revised by the foreign partners and KR21.

The questionnaire was administered anonymously, and each country sent the invitation email through its designated channels on February 5, 2025. The questionnaire remained available until March 3, 2025.

In **Italy**, the most authoritative directory of Italian libraries is the Anagrafe delle biblioteche italiane, managed by ICCU (Istituto Centrale per il Catalogo Unico)¹⁰. According to the Anagrafe, as of December 31, 2024, there are 13,639 libraries in Italy. Most libraries are

¹⁰ The Anagrafe of Italian libraries, available at <https://anagrafe.iccu.sbn.it/it/>

described with a high level of detail, but for some, there is only identifying data and addresses. Moreover, some libraries do not update their data; only those libraries that have updated their data from 2020 to the present have been selected (11,710 libraries). Not all of them have the email address. Still, since the essential task of importing the Anagrafe of Italian Libraries into Wikidata was completed in 2024, it has been verified whether Wikidata contains more up-to-date data concerning the dataset, with a particular focus on the email addresses required to retrieve and send the questionnaire.

The final dataset to send the survey consists of 10,739 libraries with unique email addresses. A dedicated mailing list was populated with 10,739 email addresses to enable simultaneous reach of all target libraries and to facilitate easy sending of reminders.

The National Research Council (CNR) account sent the invitation email on February 5, 2025, and the questionnaire remained available until March 3, 2025. Reminders were repeated on February 19 and 25. Reminders were also sent to the special libraries' mailing lists.

In **Spain**, a total of 7,640 email addresses were identified for Spanish libraries of all types, ranging from schools to national, public, and specialised libraries. This initial figure comprehensively covered virtually all Spanish libraries of all kinds.

The survey was distributed through two mass mailings, conducted on February 5, with a reminder sent on the 19th of the same month. The delivery rate for these emails was 85.4%, leaving a final number of approximately 6,500 addresses.

In **Poland**, the questionnaire was addressed to Polish libraries of all kinds, which were reached through professional Polish library associations and the Centrum Cyfrowe's professional network. As the survey was distributed directly by the library associations, the precise size of the population to which the survey was sent is unknown. Centrum Cyfrowe shared the information with a newsletter contact base consisting of 2,283 addresses (resulting in a total of 4,944 emails sent) and disseminated the survey on social media channels, including Facebook (9,800 followers) and LinkedIn (1,500 followers).

In **Italy**, the data collection process generated a total of 440 completed questionnaires (a response rate of approximately 4.10%). In **Spain**, 179 completed responses were received (2.75%), while representatives from 86 libraries completed the survey in Poland. For the Polish sample, calculating a precise response rate remains impossible given that the distribution relied on both organisational mailing lists and social media channels, leaving the total size of the reached population undefined.

Given the relatively low response rates in Italy and Spain, combined with the lack of a defined baseline for the Polish sample, these factors must be explicitly acknowledged as significant limitations of this study. Consequently, the findings presented herein cannot be considered broadly representative, and this scarcity of data inevitably affects the generalisability of the results. Nevertheless, this widespread "data of uncertainty", further evidenced by the high frequency of "Don't know" responses across several sections, constitutes a significant finding in itself. Rather than a mere statistical shortcoming, this scarcity and ambiguity reveal a critical gap in professional awareness and engagement within the library communities of the surveyed countries. This suggests a systemic lack of information and familiarity with the legal and technological frameworks of digital lending, confirming that the very barriers hindering a shift in consolidated paradigms are deeply rooted in a lack of institutional and professional awareness.

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Figure 1 summarises the (i)SDL Insight project workflow and structure, outlining the methodology, research area and expected outcomes.

<<INSERT FIGURE 1>>

4. The results

Regarding the responses to Section I - **Library's Profile**, in Italy and Poland, the majority of those who have actually responded to the questions are library directors and librarians, while in Spain, the majority of respondents are either library technicians or library assistants. The percentages of responses from different types of libraries, following IFLA's typology¹¹, are similar in the three countries, where the majority are public libraries, followed by academic libraries.

In the majority of cases the libraries that respond to the questionnaire have a large¹² physical collection while having a small¹³ digital one.

Finally, in all three countries, the vast majority of respondents (between 70% and 75%) don't have a dedicated team to manage digital services or collections.

Section II explores **how libraries exercise and provide a digital lending service**. The comparative analysis of the questionnaire responses from Italy, Spain, and Poland reveals notable differences in the development and perception of digital lending and (i)SDL services across the three countries.

Spain is the most advanced in the implementation of digital lending, with over 50% of libraries offering some type of this service and a significant portion extending access to their entire collections. In Italy and Poland, only 36% of participating libraries offer e-lending, and the majority do so selectively, limiting digital access to specific resources. See Figure 2.

<<INSERT FIGURE 2>>

Regarding the adoption of (i)SDL: Poland seems to lead (i)SDL service, having 22% of his sample declaring to do it, while both Italy and Spain report minimal implementation. See Figure 3.

<<INSERT FIGURE 3>>

In terms of the types of materials lent under (i)SDL, public domain works dominate in both Italy and Spain, due to the absence of copyright barriers around these, while Poland shows a bigger effort to include out-of-commerce or print-only in-copyright works.

User demand for (i)SDL is generally perceived as low or unclear across the board, with fewer than 10% of libraries in any country reporting high demand. Nevertheless, Spain shows relative optimism, with over 60% of its respondents foreseeing increased demand, while Italy and Poland are more cautious.

¹¹ <https://librarymap.ifla.org/data-glossary/library>
¹² 10.000-50.000 records
¹³ less than 1000 records

Finally, when considering the strategic importance of (i)SDL, libraries in all three countries regard it as important with different nuances: 29% of Polish libraries consider the service essential and 38% of them important; 22% of Spanish libraries consider the service essential and 50% of them important; 12% of Italian libraries consider the service essential and 56% of them important. However, there is a high percentage of Polish libraries (28%) that do not have any opinion, which seems to suggest a lack of information about their own users' needs. See Figure 4.

<<INSERT FIGURE 4>>

Another aspect explored by the questionnaire regards the **legal barriers**. The responses from Italy, Spain, and Poland highlight a significant level of uncertainty regarding the national copyright frameworks in all three countries.

Across all three countries, the perceived or absolute lack of legal clarity constitutes a significant barrier to the adoption and expansion of (i)SDL. Italy appears slightly more advanced in terms of engaging with legal questions and attempting to interpret frameworks; however, overall, the data highlights the urgent need for more precise guidance, training, and possibly legislative reform to foster a coherent and confident approach to digital lending within the European library ecosystem. See Figure 5.

<<INSERT FIGURE 5>>

The analysis of **technological and infrastructural barriers** to (i)SDL implementation across Italy, Spain, and Poland reveals a structural fragility, but with varying degrees of awareness, preparedness, and collaborative potential. See Figure 6 (a,b,c) and Figure 7.

<<INSERT FIGURE 6a>>

<<INSERT FIGURE 6b>>

<<INSERT FIGURE 6c>>

<<INSERT FIGURE 7>>

In Italy, the data shows that major technological obstacles are widely recognised, in terms of lack of digitisation equipment, absence of robust archiving systems, DRM technologies or technical know-how. Notably, the relevant number of "don't know" responses in this section reflects both gaps in technical understanding and the need for more explicit guidance and capacity-building programs. Italy also presents a relatively strong foundation in collaborative infrastructure, with 42.7% of libraries being part of consortia or partnerships that could facilitate resource sharing. These range from regional and municipal networks (such as SBV, SDIAF, and the Bergamo Library Network) to national hubs like SBN and NILDE, as well as thematic collaborations (e.g., Bibliosan). Although not all these systems are explicitly oriented towards (i)SDL, they offer promising starting points, especially where platforms like MLOL are already in place, for experimenting with or scaling up secure digital lending.

In Spain, the perception of technological barriers is similar to that of Poland, reflecting the identification of the major obstacles as those concerning access to all of the digitisation

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equipment, archiving, and DRM systems. Notably, there is also a high percentage that highlights a lack of staff expertise as a critical issue, and a critical lack of knowledge on the issue. Yet Spain reports the greatest integration in collaborative networks, with 59% of libraries belonging to wider systems, potentially placing them in a stronger position to develop shared solutions.

In Poland too, the respondents mark all three technological factors as significant barriers - digitisation equipment, archiving systems, and DRM - with additional concerns about limited staff competencies in the field. The lack of concrete examples or mentions of collaborative infrastructure can be considered another major obstacle to (i)SDL implementation.

While recognising these challenges is an essential first step, the absence of coordinated efforts or networks to mitigate them highlights a critical need for strategic investment, training, and infrastructure development. The responses from the three countries highlight that the successful implementation of (i)SDL will depend not only on clarifying legal frameworks, but also on bridging the persistent technological divide through funding, staff development, and especially the strategic use of library consortia to pool resources, expertise, and infrastructure.

The data on the perceived **risk of opposition** to implementing (i)SDL across libraries in Italy, Spain, and Poland reveals an atmosphere of uncertainty, both within institutions and in their relationship with external stakeholders, particularly publishers. However, Spain seems to be more trusting, having 18% of libraries without any concern of legal actions from publishers, and 11% that even expect strong support from them. This Spanish scenario can be explained by a robust set of exceptions to copyright that support libraries in national legislation, which can be a driver to implement digital lending as a legal activity (Xalabarder, 2023). On the contrary, Italy and Poland are more cautious and reluctant. See Figure 8 and Figure 9.

<<INSERT FIGURE 8>>

<<INSERT FIGURE 9>>

The responses from Italy, Spain, and Poland to the section on **human resources and expertise** for implementing (i)SDL reveal a consistent pattern of significant structural limitations, marked by a lack of legal and technological support, minimal staff training, and a strong perceived need for professional development.

In Italy, the vast majority of respondents explicitly lack legal and technological support. In fact, 83% never have received legal training and 79% a technological one (see Figure 10 and 12). Even where legal offices exist at institutional levels (e.g., universities), their focus is often too general to effectively address copyright issues specific to digital lending and training for library staff is limited. The obstacles behind this lack of preparation include chronic underfunding, staff shortages, reliance on volunteers or unqualified personnel, and institutional indifference toward library development.

In many cases, training depends on individual initiative, with some librarians pursuing education at their own expense or outside working hours. These figures are slightly higher in Spain, where 87% of respondents express the need for legal and technological training (see Figures 11 and 13), reinforcing the idea that while knowledge is currently lacking, awareness of the gap is widespread and strongly felt.

The case of Poland reinforces and amplifies these concerns. Legal and technological infrastructure for (i)SDL is virtually absent: only 31% of libraries have received legal training (see Figure 10), and 21% any form of technological one (see Figure 12). 73% of Polish respondents agree that legal training is necessary (see Figure 11), and 70% request technological instruction (see Figure 13), underscoring that the desire to engage with (i)SDL is present. Around 22% of Polish respondents do not have any opinion about legal and technological training needs, which demonstrate a lack of awareness and support by institutions. What emerges across all three countries is a clear and pressing human resource gap that threatens to impede the broader adoption of secure digital lending. Libraries often lack both the internal expertise and the institutional support necessary to navigate the legal and technical complexities of (i)SDL, and this is compounded by long-standing issues like underfunding, precarious staffing, and a failure to make libraries a policy priority.

<<INSERT FIGURE 10>>

<<INSERT FIGURE 11>>

<<INSERT FIGURE 12>>

<<INSERT FIGURE 13>>

However, the human capacity to implement (i)SDL exists in potential, but activating it requires systematic investment and recognition of libraries as vital institutions in the digital transition. The responses from libraries in Italy, Spain, and Poland to the section on **financial barriers** to implementing (i)SDL reveal a consistent picture of economic and financial barriers that, if unaddressed, risk limiting the potential of (independent) Secure Digital Lending. See Figure 14. However, while financial barriers are real, they should not delay legal reform. In fact, a clear legal authorisation for (i)SDL would give libraries the confidence needed to justify investments and request dedicated funding.

<<INSERT FIGURE 14>>

The final section of the survey, dedicated to **"other" considerations**, offers a nuanced and future-oriented perspective on the broader needs, expectations, and uncertainties surrounding (i)SDL across libraries in Italy, with comparative insight from Spain and Poland.

In Italy, a significant majority (69.3%) of respondents expressed a clear desire for more information and training opportunities on (i)SDL, suggesting strong professional interest but also a gap in accessible resources and knowledge. This finding is echoed in Spain, where 83% report the same need, and in Poland, where, despite limited current understanding, there is evident demand for capacity-building and awareness-raising. See Figure 15.

<<INSERT FIGURE 15>>

Italian respondents were also invited to reflect on what national policymakers should do to support (i)SDL adoption. Their answers emphasise four main areas: training (26.1%), funding (17.4%), legal reform (13%), and technical infrastructure (13%). These priorities confirm that the successful implementation of (i)SDL is perceived as dependent on coordinated policy

action that empowers libraries with skills, resources, and legal clarity, needs that are similarly articulated in Spain and Poland.

Regarding the future relevance of (i)SDL, most Italian respondents (62.2%) believe it will become increasingly important for libraries, citing reasons such as digital transformation, user expectations for remote access, inclusivity, and preservation of collections. This belief is slightly more cautious in Spain, where 48% foresee growing relevance, while in Poland, 53% anticipate an inevitable shift toward digital lending, especially in academic and research contexts. However, across countries, a significant proportion - 34.7% in Italy, 35% in Spain, and 41% in Poland - responded "don't know," revealing persistent uncertainty due to legal ambiguity, variable user needs, and infrastructural disparities. See Figure 16.

<<INSERT FIGURE 16>>

The final question explored the consequences of not implementing (i)SDL, revealing a shared recognition of the risks of inaction. In Italy, the most frequently cited concern (33.3%) was that users who cannot physically visit the library and for whom no commercial e-book version exists are effectively denied access. Other problems included reduced competitiveness (27.5%), decreased user engagement (10.1%), and weakened library-user relationships (6.7%). Comparable concerns were raised in Spain and Poland, where respondents highlighted the risk of losing cultural relevance, becoming non-competitive in the digital ecosystem, and failing to fulfil libraries' public-interest missions. Nevertheless, a minority of respondents across all countries questioned whether (i)SDL is necessary, particularly where digital services are already provided through national platforms or where print media remains central to the community. See Figure 17.

<<INSERT FIGURE 17>>

For further details on the project findings, reference should be made to the reports published at the end of the study (De Angelis, 2025, De Angelis et al., 2025), (Drabczyk and Gliściński, 2025), (FESABID, 2025).

4.1. Limitations

The relatively low response rates in Italy (4,10%), Spain (2,75%) and Poland (where the response rate is not computable) limit the representativeness of the respondent sample, preventing a full generalisability of the study results. However, the scarce rate of responses may also suggest a general lack of interest and eventually confirm the barriers emerged in the study.

A generalised chronic underfunding, staff shortages, reliance on volunteers or unqualified personnel, especially in public libraries, and not last, institutional disinterest are factors that affect the library sector and bring about a diffuse indifference toward change and adoption of new digital services.

The high frequency of 'Don't Know' responses in all countries - relating the present implementation of (i)SDL, the technological and infrastructural barriers and the perceived

future relevance of it - reveals a lack of professional awareness that is a significant finding in itself and may explain the low rate of responses.

The lack of strong affirmative or negative views highlights the need for more precise policy guidance, legal clarification, and enhanced internal communication within library systems, as well as open dialogue with the publishing industry to address concerns and explore cooperative models.

Furthermore, the high number of 'don't know' responses in the survey indicates that libraries need to increase their professional awareness through focused training programmes. With more certainty and knowledge, institutions would be better equipped to plan their budgets and prioritise digital transformation.

5. Conclusions and future works

This article has presented the comprehensive results of the project "(i)SDL Insight - Digital Lending Pathways in Italy, Poland and Spain", an intensive six-month targeted research and advocacy initiative sustained by Knowledge Rights 21. As outlined in the introduction and foundational framework of this study, the project was launched to systematically map the current landscape of (i)SDL to analyse the legal, technological, and operational obstacles to its implementation across three distinct European jurisdictions, and to identify concrete opportunities for future development.

Despite the limitations outlined in section 4.1, the empirical investigation, executed through a methodology based on a survey targeting institutional profiles, digital capacities, and perceived barriers, has exposed a critical structural friction. The shift from an analogue "purchase-and-own" to a digital "license-and-access" model has left libraries legally and financially vulnerable to restrictive, corporate licensing practices. This vulnerability is heavily exacerbated by an industry-wide state of "legal shivering" and a profound professional awareness gap, as evidenced by the high frequency of "Don't Know" responses regarding technical capabilities and legal boundaries across the three investigated countries. A core finding of this study is that (independent) Secure Digital Lending (i)SDL represents a sophisticated, emerging regulatory paradigm within the evolving European copyright ecosystem. It is vital to underscore that (i)SDL is not merely an alternative operational model for electronic circulation, but a structurally distinct framework rooted in continental legal traditions.

Furthermore, as the comparative survey across Italy, Spain, and Poland clearly demonstrates, the transition of (i)SDL from an abstract legal theory into widespread sustainable practice is intrinsically anchored to targeted advocacy and policy-making framework driven by Knowledge Rights 21.

The structural friction points documented in this research, such as Spain leading the transition due to robust local exceptions, Italy navigating transitional capacity through established consortia networks, and Poland lagging behind due to severe infrastructural and conceptual fragmentation, confirm that the legal openings provided by the CJEU are insufficient if left unmapped and unbacked by statutory reform at the national level. The findings highlight that the practical implementation of (i)SDL requires a direct, coordinated policy response that aligns with the strategic measures of the recent KR21 Action Plan, "Let Libraries Be Libraries".

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Specifically, Point 6 of the Action Plan, which explicitly advocates for the formal integration of the VOB jurisprudence into both European and national legislation, alongside strict safeguards against contractual override and technological protection measure (TPM) abuses, serves as the primary catalyst for resolving the human resource and technological gaps identified in this study. While financial barriers are real and pressing across all three surveyed countries, they must not be used as an excuse to delay legislative intervention. On the contrary, clear legal authorisation for (i)SDL is the necessary foundation that libraries require to justify capital investments and secure dedicated public funding. The consequences of policy inaction are severe: without the structural deployment of (i)SDL, libraries risk systemic digital exclusion, decreased user engagement, and a gradual loss of cultural and educational relevance. Crucially, it creates a severe equity crisis, effectively denying access to knowledge for vulnerable populations, such as rural, disabled, or socioeconomically disadvantaged users, who cannot physically visit a library and for whom no commercial e-book alternative exists.

Current limitations of the study, including the high rate of “don’t know” answers, as well as the survey results, provide several ideas for continuing the analysis of the development of (i)SDL in the future.

Firstly, the survey should be repeated over time to involve more libraries from different countries to obtain a more comprehensive European picture, monitor trends, identify changes in adoption, and assess the impact of policy interventions.

In addition, targeted studies on the legal and digital skills of library staff could provide useful information for the design of effective training programs and institutional capacity-building strategies.

Studying how to effectively integrate (i)SDL systems with existing catalogues, archives, and e-books distribution platforms could provide useful information for the creation of shared standards.

Furthermore, working together with publishers and information providers could offer libraries a well established technological platform as a starting point to implement effective (i)SDL, while guaranteeing an “appropriate and proportionate” remuneration for creators, as established by the European Public Lending Right system.

Finally, targeted research on how (i)SDL can promote equity in access to knowledge, particularly for rural, disabled, or socioeconomically disadvantaged users, would support the development of inclusive policies.

In conclusion, realising the full potential of digital lending in the digital age requires a shift away from isolated, institutional effort toward a coordinated, structural framework. By advancing the legislative and advocacy policy objectives championed by Knowledge Rights 21, European policymakers can systematically empower public libraries, ensuring they remain vibrant, independent, and resilient pillars of open culture, education, and democratic access to knowledge in a fully digitalised future.

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ANNEX

Questionnaire on the barriers to the adoption of (independent) Secure Digital Lending- (i)SDL: Legal, technical, and operational challenges.

This questionnaire results from an initiative of [Knowledge Rights 21](#) (KR21) aimed at gathering information from libraries in Italy, Poland, and Spain concerning (independent) **Secure Digital Lending (iSDL) — e-lending based on paper books digitised by libraries where some protection measures are adopted to prevent non-legitimate uses (for instance, measures to limitate the lending time, to prevent downloading, etc. often named DRM Digital Rights Management Systems)**¹⁴. It investigates the legal, technical, and other barriers that influence the potential for further adoption of (i)SDL.

The partners of this research project are:
Italy: [STUDIO LEGALE DDA](#); [CLAKP](#) (Copyright Law and Access to Knowledge Policies Group) dell'IGSG (Istituto di Informatica Giuridica e Sistemi Giudiziari)/CNR (Consiglio Nazionale delle Ricerche)
Poland: [CENTRUM CYFROWE](#)
Spain: [FESABID](#)

The project explores these issues to lay the groundwork for identifying the key challenges and potential benefits behind (i)SDL implementation. The project outcomes could provide a foundation for future strategies to overcome these obstacles and support the mission of libraries in the digital realm.

The questionnaire is divided into eight sections and contains **36 questions**.

Given the topic's relevance, please take about **20 minutes** to respond to the questionnaire we have prepared.

The deadline for completing the questionnaire is **February 26th, 2025**.

We greatly appreciate your participation in this survey, as your responses will directly contribute to shaping the future of (i)SDL in libraries across Europe.

¹⁴ E-lending in the (i)SDL model was developed as part of the report *eBooks and Secure Digital Lending in European Libraries* (scheduled for publication in January/February 2025). In detail, e-lending based on the (i)SDL model is characterised by the following features: 1) Loans are made by strictly defined entities - establishments accessible to the public (e.g., libraries) that derive no direct or indirect economic or commercial advantage from their lending activity (requirement for a special case); 2) Lending covers the lending of a digital copy of a book; 3) Loans are made under the one copy - one user model; 4) Lending is carried out in a mimetic (i.e., allowing patrons to download electronic copies of books) or a quasi-mimetic fashion (i.e., allowing the use of electronic copies of books in streaming); 5) Lending is only for a limited period; 6) After the lending period has expired, the user cannot use the e-book; 7) A digital copy of a book must be obtained from a lawful source, but the library can make an electronic copy of a legally obtained copy of a paper book; e-lending under the (i)SDL model gives rise to the right to remuneration (PLR) in line with the Rental and Lending Directive; 8) there is no transfer of data, including personal data of library patrons, to publishers or other third parties.

I. LIBRARY'S PROFILE

1. For which library are you responding to this questionnaire? (Add the library's name)

2. What is your role in the library?

3. What type of library are you answering for? Following [IFLA's typology](#):

- National
- Academic
- Public
- School
- Other

4. What types of collections does your library primarily hold?

(Select all that apply)

- Serials (e.g., journals, magazines, periodicals)
- Monographs (e.g., books, reports)
- Archival materials (e.g., manuscripts, historical documents)
- Multimedia (e.g., DVDs, audio recordings, images)
- Digital-only resources (e.g., e-books, databases, online journals)
- Public domain or out-of-copyright materials
- Other (please specify)_____

5. What is the size of your library's physical collection?

- Small (less than 1,000 records)
- Medium (1,000–10,000 records)
- Large (10,000–50,000 records)
- Very large (Over 50,000 records)

6. What is the size of your library's digital collection?

- Small (less than 1,000 records)
- Medium (1,000–10,000 records)
- Large (10,000–50,000 records)
- Very large (Over 50,000 records)

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7. Does your library have a dedicated team to manage digital services or collections?

- Yes
- No
- I don't know

II.DIGITAL LENDING

8. Does your library provide an e-lending service?

- Yes
- No
- I don't know

9. If you answer “yes” to the question above, please specify your library's current digital lending model.

- Digital lending provided for specific resources
- Digital lending fully provided
- I don't know

10. Does your library digitise physical works and lend digital copies under (i)SDL?

- Yes
- No
- I don't know

11. If you answer “yes” to the question above, which of the following types of material do you lend under (i)SDL?
(Select all that apply)

- Public domain works
- In-copyright works which are out of commerce
- In-copyright works which are on sale but only in paper format
- In-copyright works which are on sale, also in electronic format
- Other (please specify)_____
- I don't know

12. Is there/would there be a demand for (i)SDL services from your library's users?

- Yes, there is high demand
- Yes, but the demand is moderate
- Very little demand

- No demand
- I don't know

Please specify your answer

13. Do you foresee that this demand, in the coming years, will:

- Increase strongly
- Increase marginally
- Stay stable
- Decline
- I don't know

14. In your opinion, how important is it for your library to offer a (i)SDL service?

- Essential
- Important but not essential
- Not important
- I don't know

Please explain why:

III. LEGAL BARRIERS

15. Does your national copyright law or other legislation authorise (i)SDL, and under what conditions?

16. How clear is your country's national copyright law or other legislation regarding (i)SDL?

- Very clear
- Somewhat clear
- Not clear at all
- I don't know

IV. TECHNOLOGICAL AND INFRASTRUCTURE BARRIERS

17. What technological barriers has your library encountered – or might encounter – in implementing (i)SDL?
(Please rate each barrier on a scale from 0 to 5, where 0=I don't know, 1 = Not a barrier and 5 = Major barrier)

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Barrier	0=I don't know	1 (Not a barrier)	2	3	4	5 (Major barrier)
Lack of adequate digitisation equipment	☐	☐	☐	☐	☐	☐
Lack of an adequate archiving system	☐	☐	☐	☐	☐	☐
Inadequate digital rights management (DRM) system or lack of technical protection measures know-how	☐	☐	☐	☐	☐	☐

If you think there are other technological barriers, please indicate them below:

18. Is your library part of a consortium or collaboration that could share technological resources or infrastructures to enable (i)SDL?

- Yes
- No
- I don't know

If you answered Yes, please specify which consortium or collaboration

V. RISK OF OPPOSITION

19. Do you face resistance from within your institution (e.g., staff or administration) to implementing (i)SDL?

- Yes
- No
- I don't know

If you answered "Yes" to the previous question, please specify

20. In your opinion, are libraries in your country reluctant to implement (i)SDL because of concerns about potential legal actions from publishers or authors?

- Yes
- No
- I don't know
- Other (please specify)_____

21. In your opinion, are libraries in your country reluctant to implement (i)SDL

because of concerns about potential technological barriers?

- Yes
- No
- I don't know
- Other (please specify)_____

22. How would the publishing industry in your country respond to the idea of (i)SDL?

- Strongly supportive
- Neutral
- Opposed
- I don't know

VI. HUMAN RESOURCES

23. Does your library have access to legal expertise to address copyright and (i)SDL-related issues?

- Yes, we have dedicated legal staff or advisor
- No, we lack the necessary legal support
- Other (please specify)_____
- I don't know

24. Has your library staff received training or guidance on (i)SDL's legal aspects?

- Yes, extensive training
- Yes, but limited training
- No training has been provided
- In progress
- I don't know

If you answer "No" or "In progress" to the question above, please explain any challenges related to human resources:

25. Do you think such legal training or guidance is necessary?

- Yes
- No
- I don't know

26. Does your library have access to technological expertise to address (i)SDL-related issues?

- Yes, we have dedicated staff or advisor
- No, we lack the necessary technological support
- Other (please specify)_____

- I don't know

27. Has your library staff received training or guidance on (i)SDL's technological aspects (e.g., digital rights management, archiving systems, etc.)?

- Yes, extensive training
- Yes, but limited training
- No training has been provided
- In progress
- I don't know

If you answer “No” or “In progress” to the question above, please explain any challenges related to human resources:

28. Do you think such technological training or guidance is necessary?

- Yes
- No
- I don't know

VII. FINANCIAL BARRIERS

29. Does your library have adequate financial resources to implement (i)SDL?

- Yes
- No
- I don't know

30. Are digitisation tools and DRM systems affordable for the library?

- Yes
- No
- I don't know

VIII. OTHER

31. Would you or your staff benefit from more information/formative events on (i)SDL?

- Yes
- No
- I don't know

32. In your opinion, what steps should national policymakers take to facilitate (i)SDL adoption in libraries?

33. Do you think (i)SDL will become more relevant for libraries in the future?

- Yes
- No
- I don't know

Please specify why

34. Could the library's (i)SDL system integrate with existing catalogues and platforms?

- Yes
- No
- I don't know

35. Can the library secure users' personal and digital content data by providing (i)SDL?

- Yes
- No
- I don't know

36. What are the negative consequences of not providing (i)SDL?

(Select all that apply)

The library loses its relationship with users

The library cannot allow a user to read a book if he/she cannot go to the library personally and the publisher has not provided an e-book version of the book.

Users are less likely to engage with the library's services

The library may face increased pressure to offer digital access options

The library's services become less competitive than other libraries or digital platforms.

There are none

Other (please specify) _____

I don't know

Explanation of (independent) Secure Digital Lending - (i)SDL
Loans are made by strictly defined entities - establishments which are accessible to the public (e.g. libraries) which derive no direct or indirect economic or commercial advantage from their lending activity (requirement for a special case);
Lending covers the lending of a digital copy of a book;
Loans are made under the one copy-one user model;
Lending is carried out in a mimetic (i.e. allowing patrons to download electronic copies of books) or a quasi-mimetic fashion (i.e. allowing the use of electronic copies of books in streaming);
Lending is only for a limited period;
After the lending period has expired, the user cannot use the e-Book;
A digital copy of a book must be obtained from a lawful source, but the library can make an electronic copy of a legally obtained copy of a paper book;
e-Lending under the (i)SDL model gives rise to the right to remuneration (PLR) in line with the Rental and Lending Directive;
There is no transfer of data, including personal data of library patrons, to publishers or other third parties.

Table 1. The (i)SDL framework, according to (Gliściński, 2025).

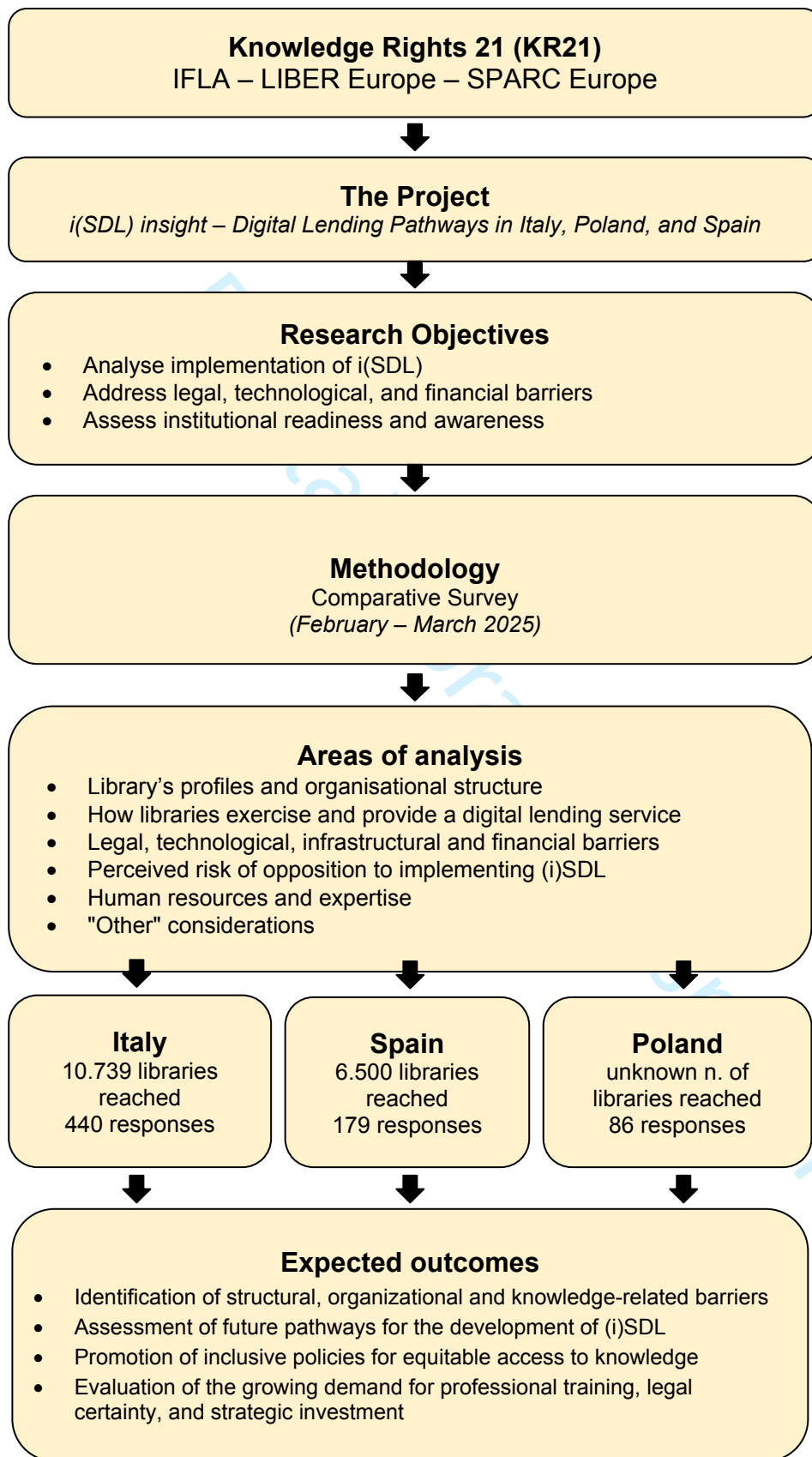


Figure 1. Workflow and structure of the (i)SDL Insight project: overview of the structure, methodology, research areas, and expected outputs

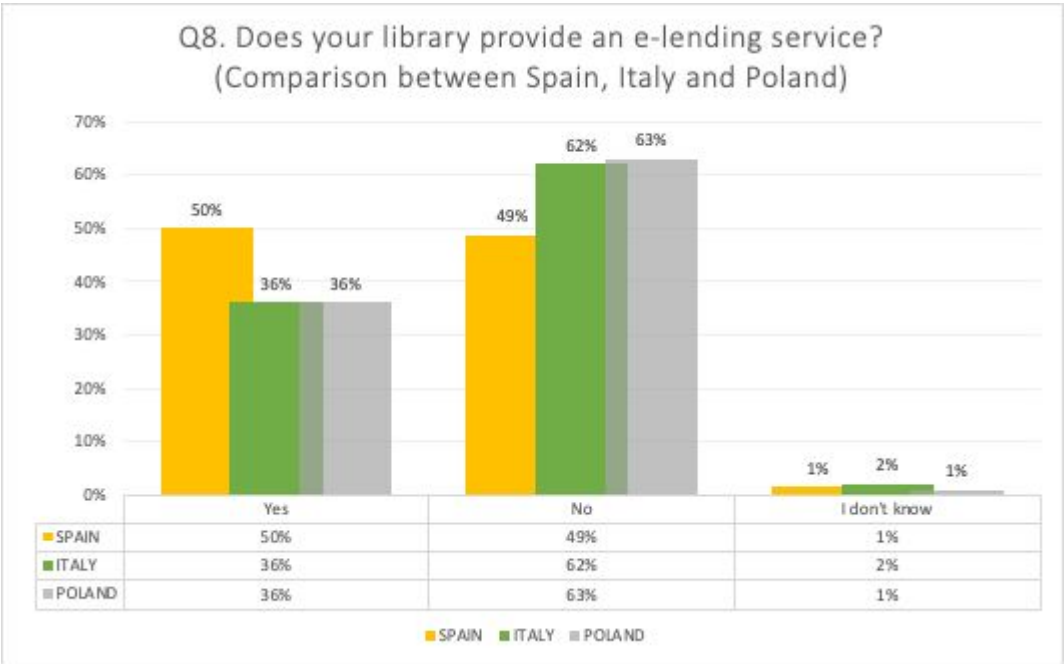


Figure 2. Comparison between Spain, Italy and Poland. Providing e-lending service.

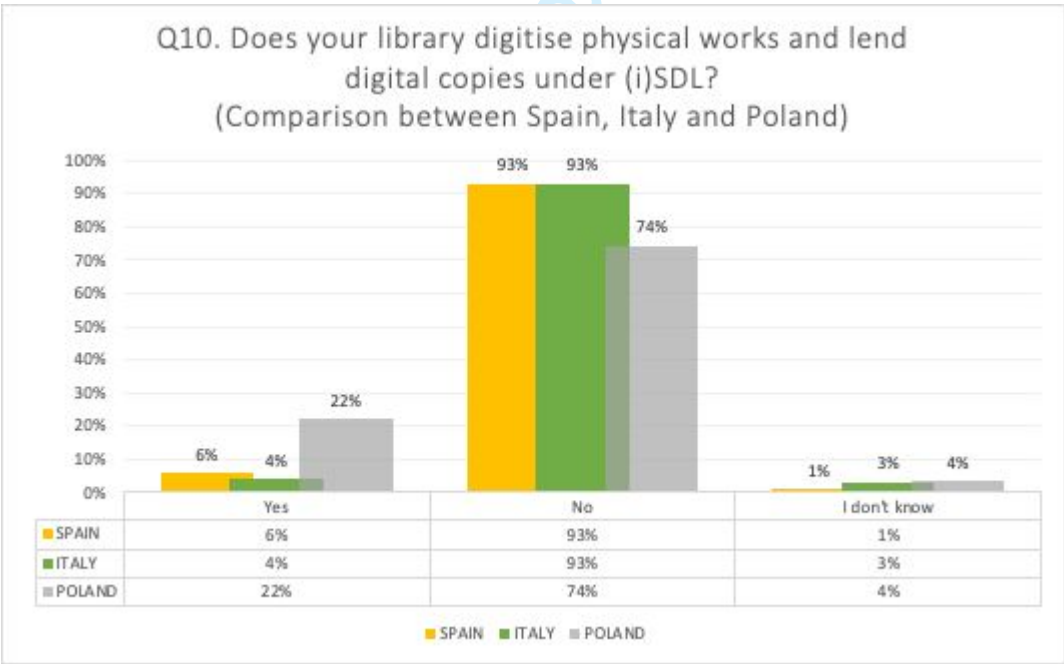


Figure 3. Comparison between Spain, Italy and Poland. Providing (i)SDL service.

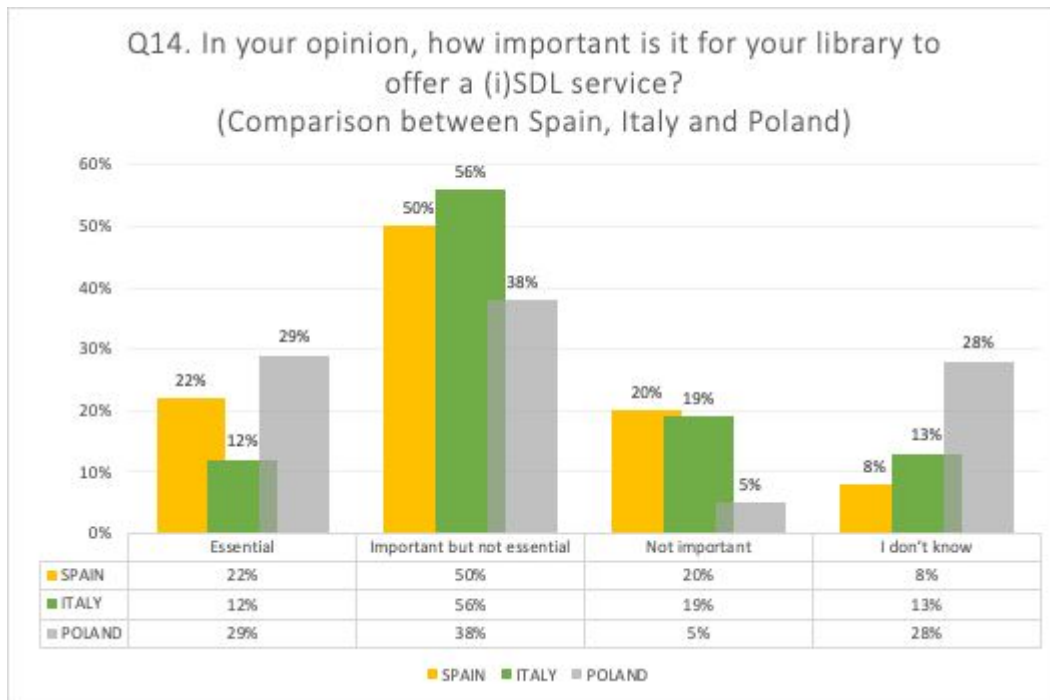


Figure 4. Comparison between Spain, Italy and Poland. How important is to offer a (i)SDL service for the library

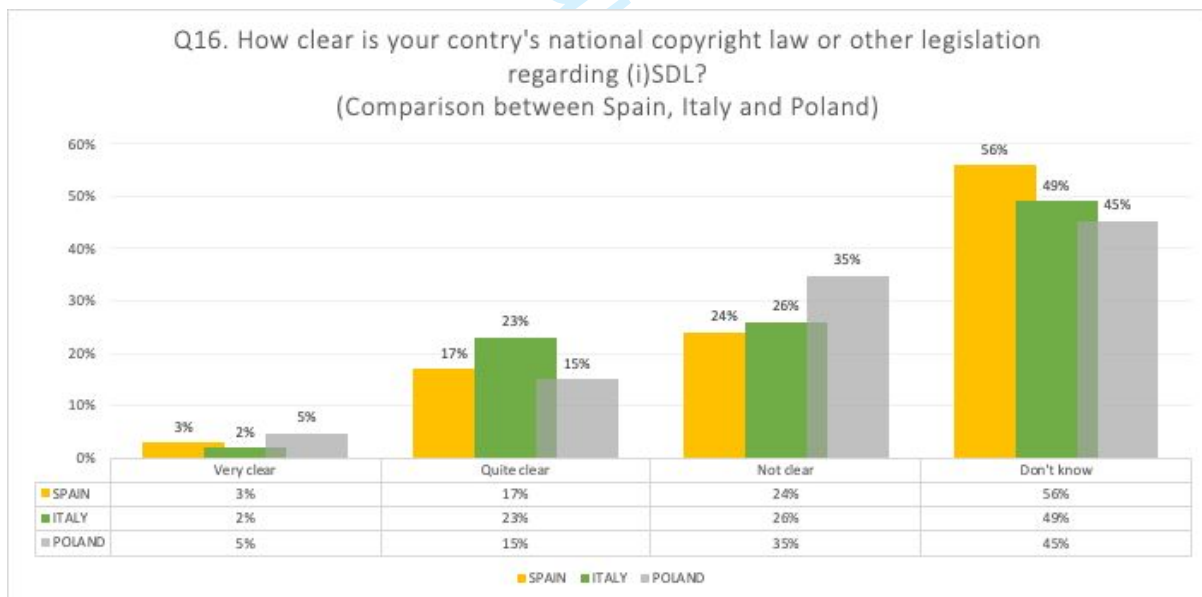


Figure 5. Comparison between Spain, Italy and Poland. Legal barriers.

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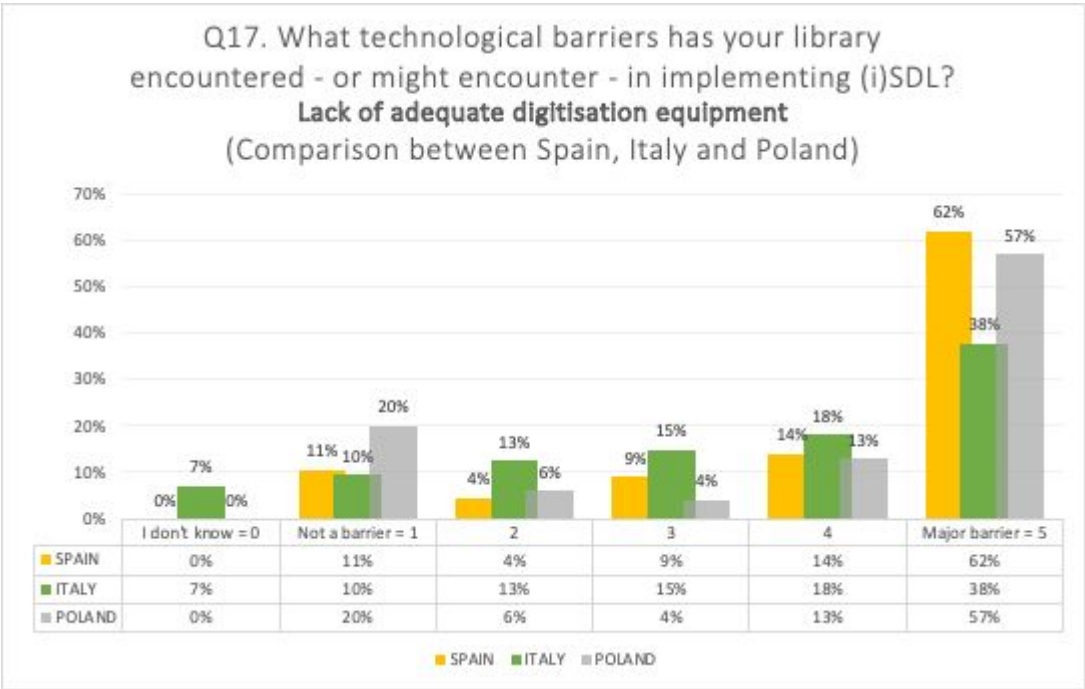


Figure 6a. Comparison between Spain, Italy and Poland. Lack of adequate digitisation equipment.

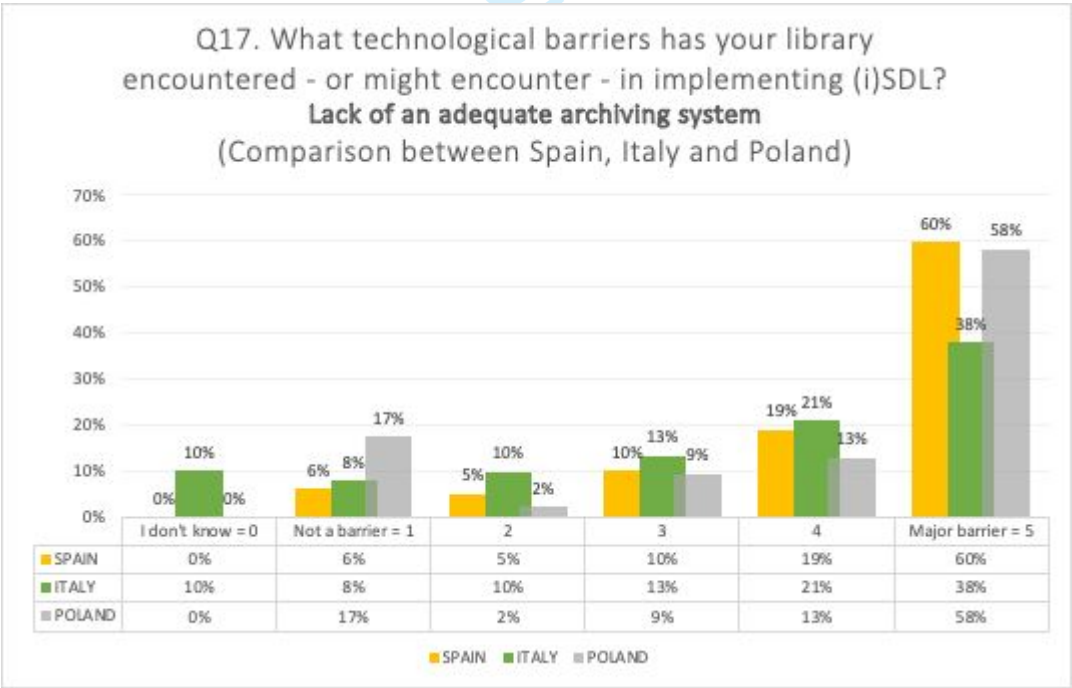


Figure 6b. Comparison between Spain, Italy and Poland. Lack of adequate archiving system.

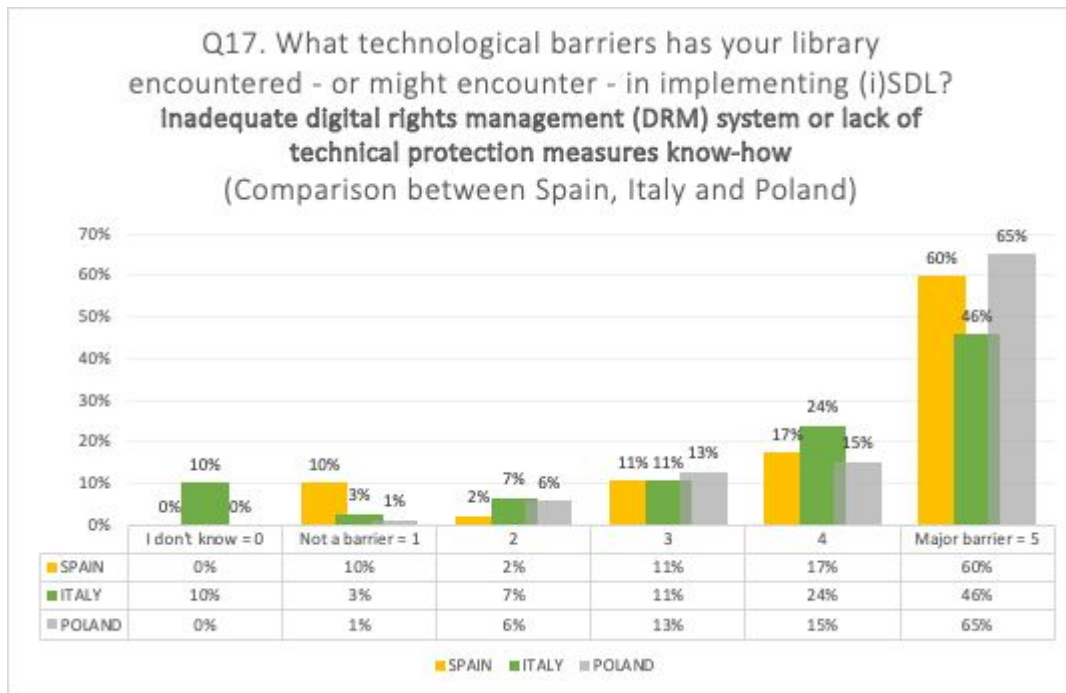


Figure 6c. Comparison between Spain, Italy and Poland. Inadequate digital rights management (DRM) system

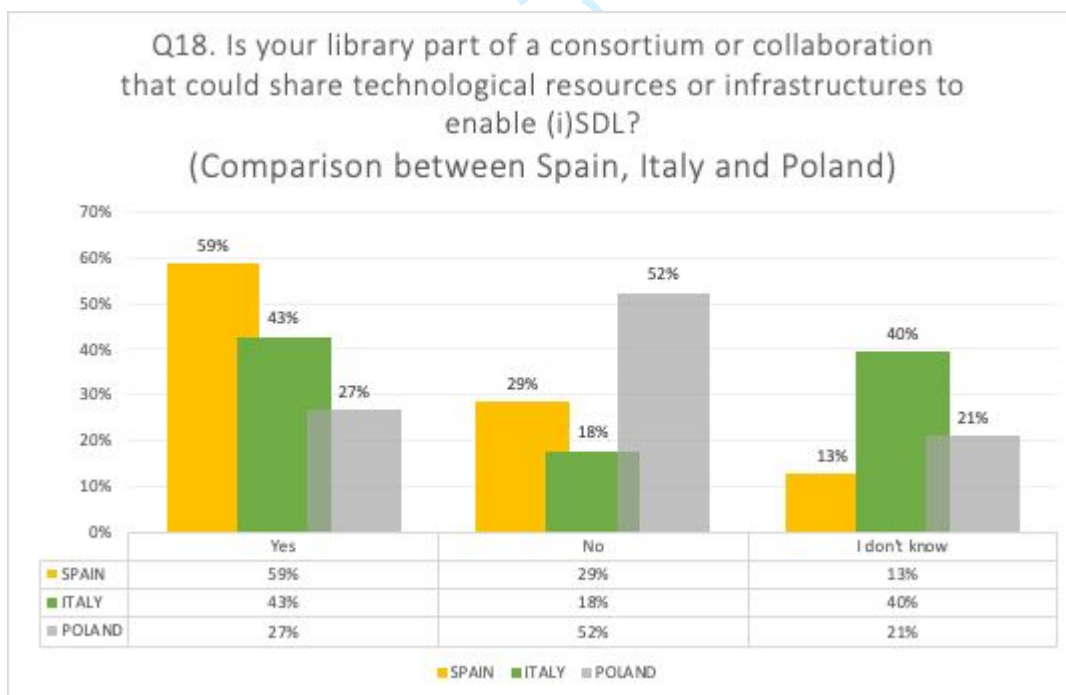


Figure 7. Comparison between Spain, Italy and Poland. Part of a consortium or collaboration.

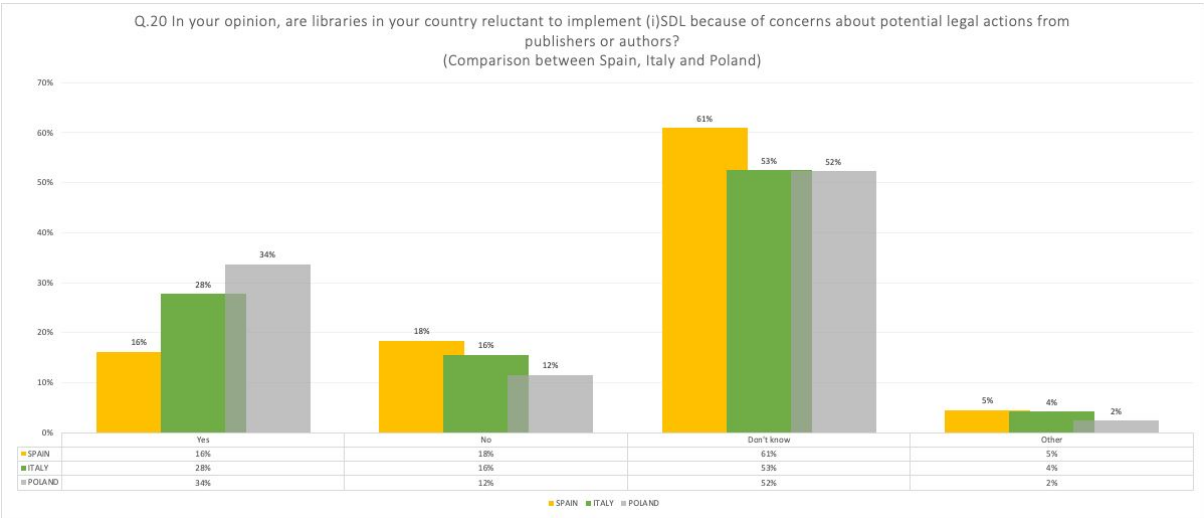


Figure 8. Comparison between Spain, Italy and Poland. Risk of opposition.

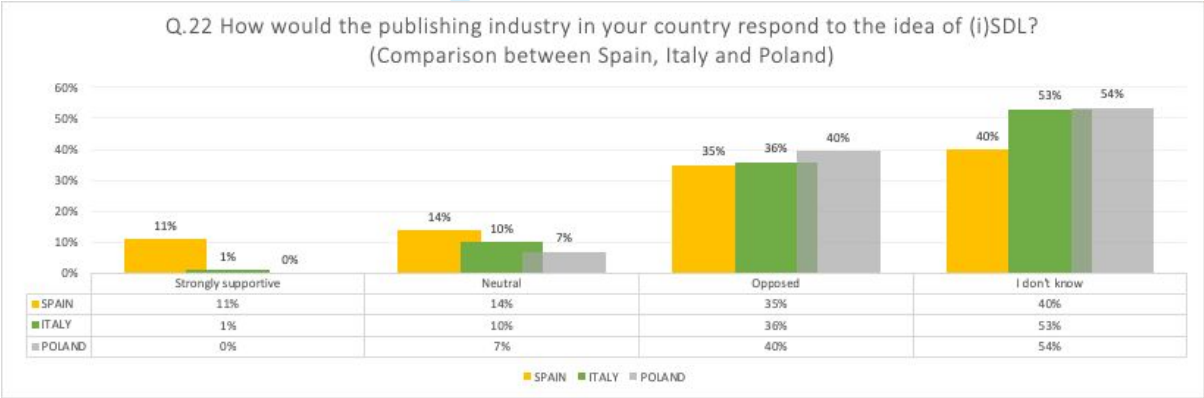


Figure 9. Comparison between Spain, Italy and Poland. Publishing industry response to (i)SDL adoption.

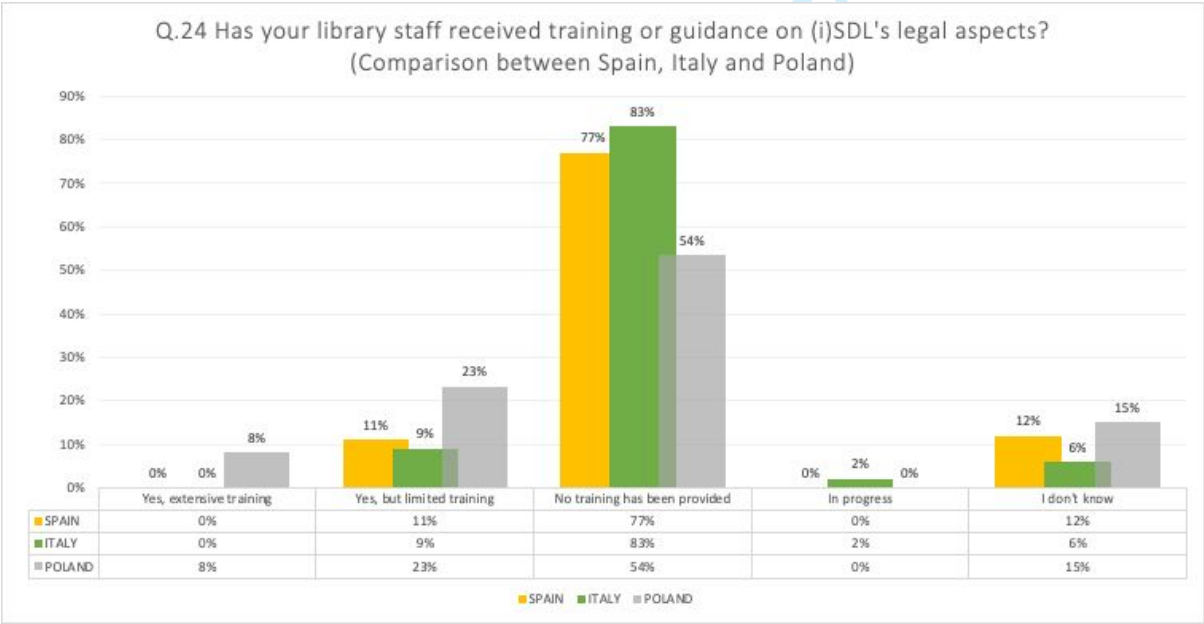


Figure 10. Comparison between Spain, Italy and Poland. Received legal training or guidance.

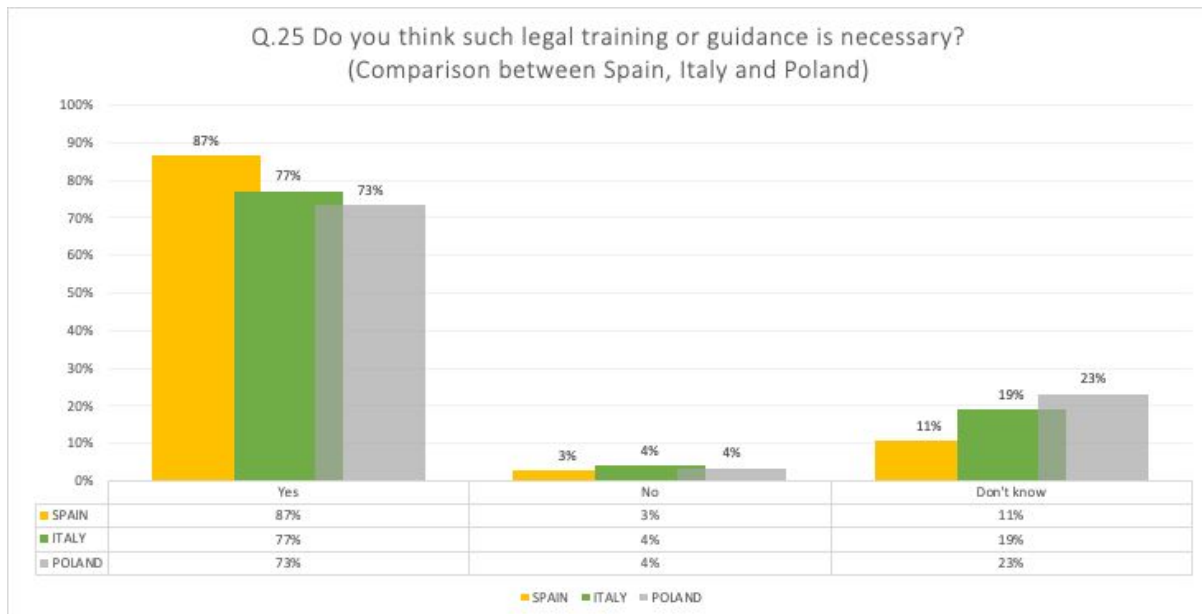


Figure 11. Comparison between Spain, Italy and Poland. Need for legal training or guidance.

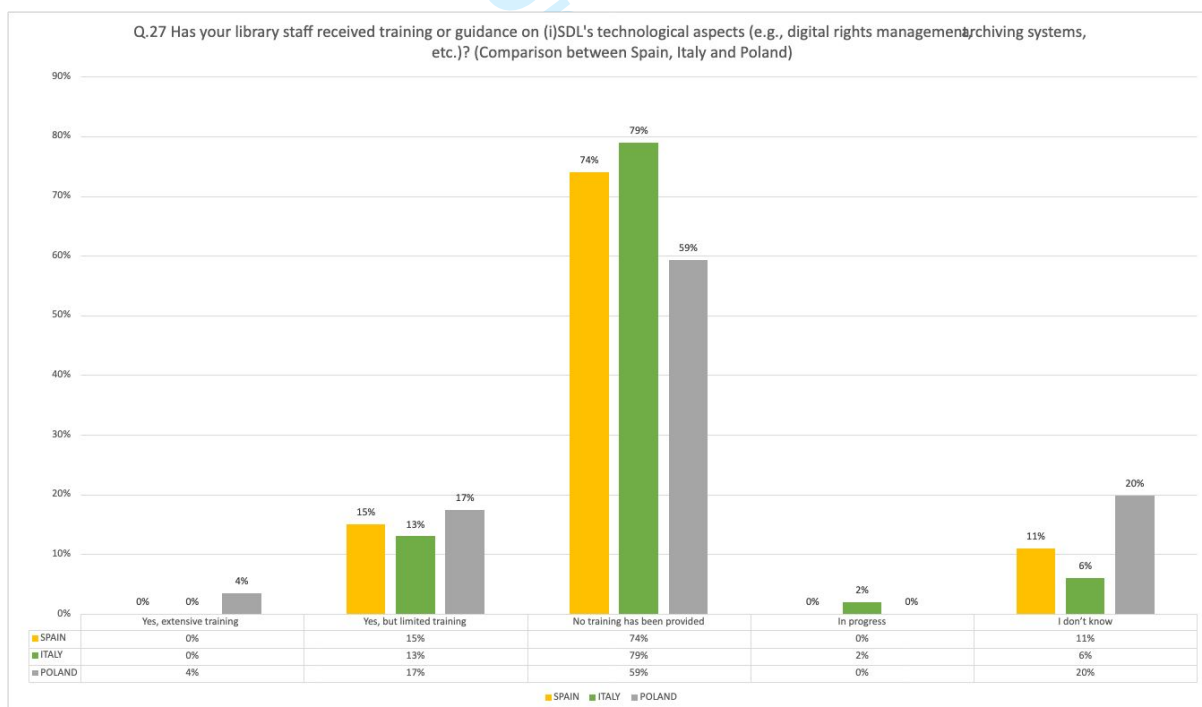


Figure 12. Comparison between Spain, Italy and Poland. Received technological training.

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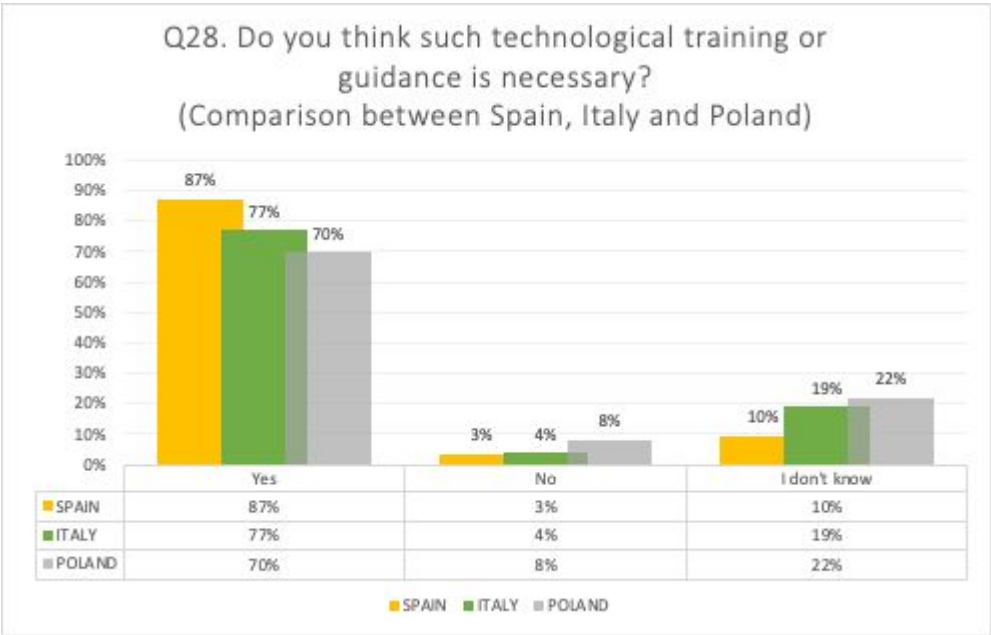


Figure 13. Comparison between Spain, Italy and Poland. Need for technological training.

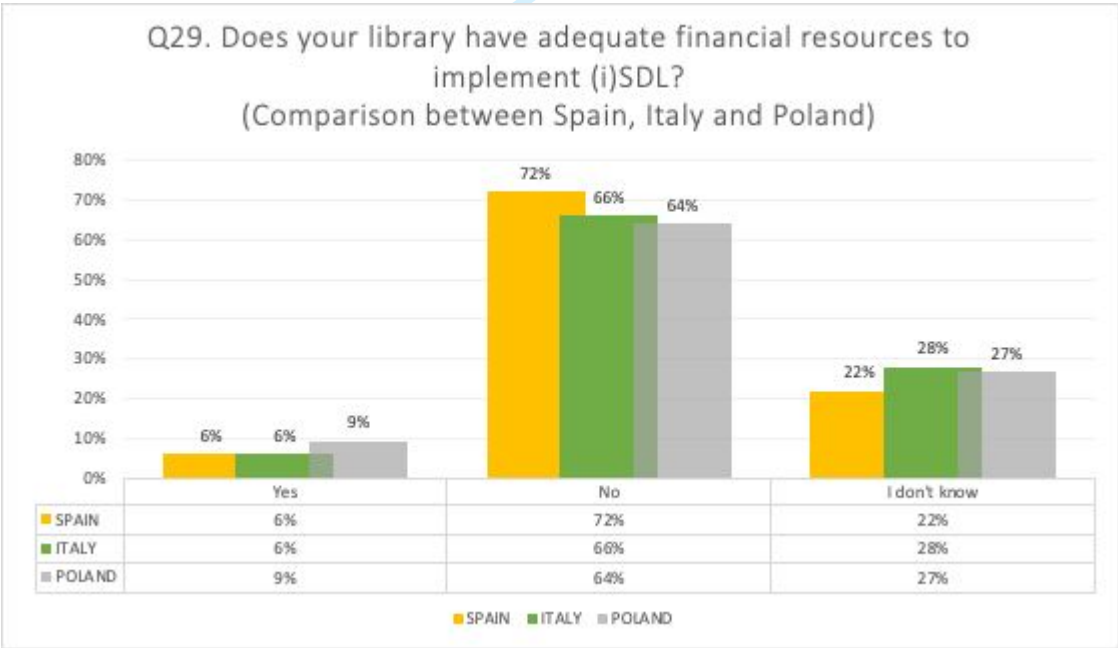


Figure 14. Comparison between Spain, Italy and Poland. Financial barriers.

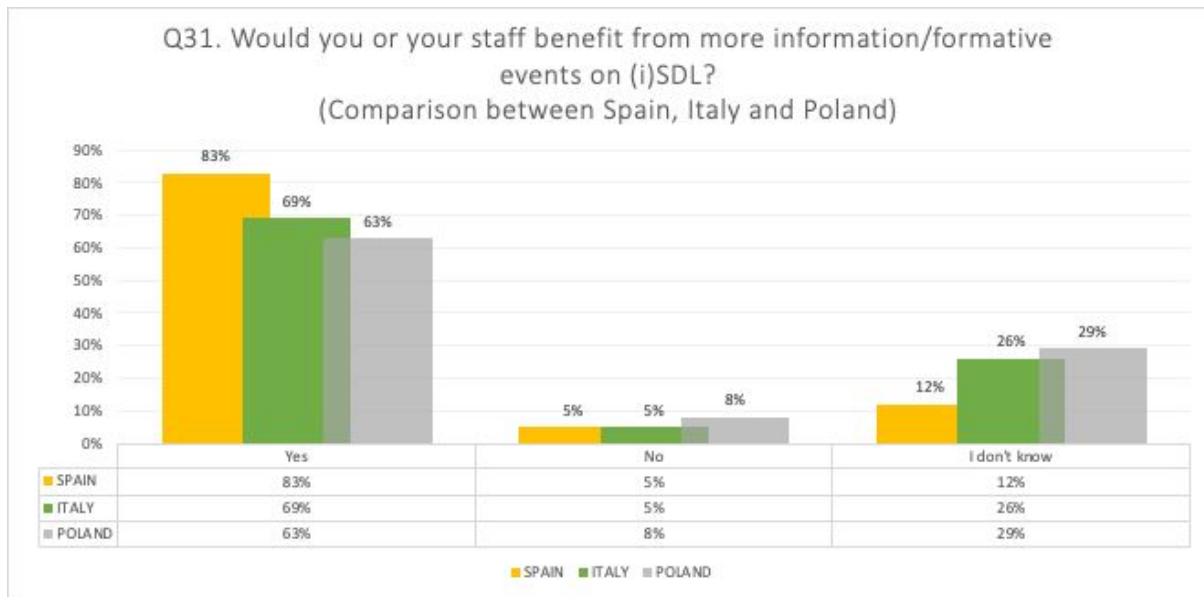


Figure 15. Comparison between Spain, Italy and Poland. Benefit from more information or formative events.

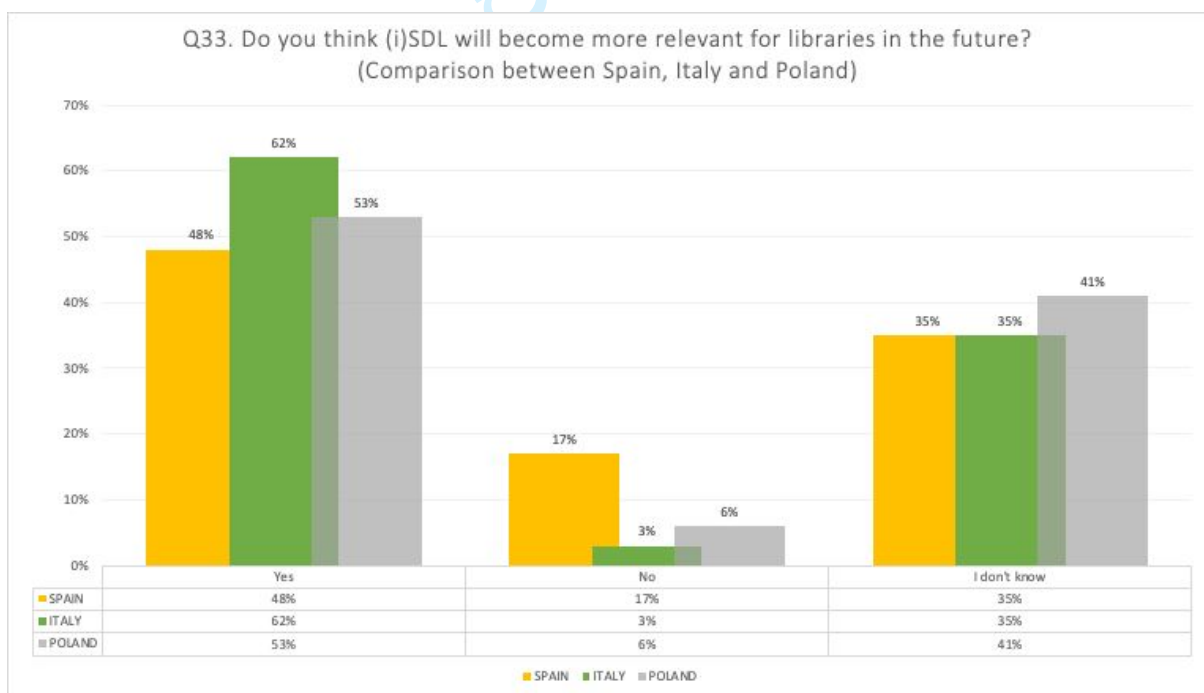


Figure 16. Comparison between Spain, Italy and Poland. Relevance of (i)SDL in the future.

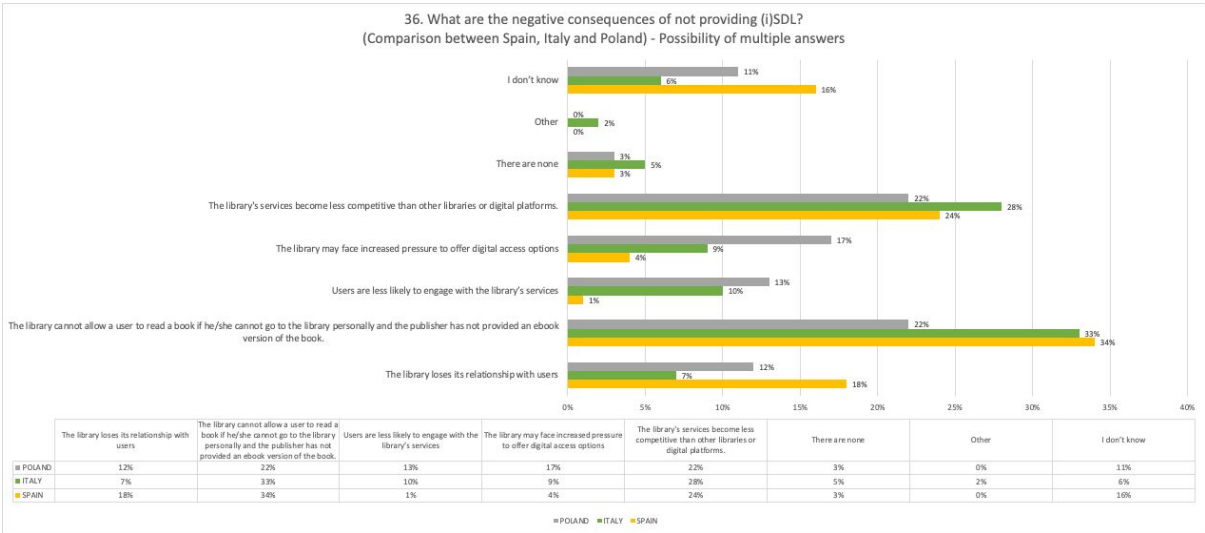


Figure 17. Comparison between Spain, Italy and Poland. Consequences of not implementing (i)SDL.