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**Re: Copyright Restrictions on the Parallel Importation of Books Study**

I would like to oppose the changes to importation rules currently under consideration. My company, IP, is a leading independent publisher here, releasing 25 titles per year across our four imprints.

Both as an author and a publisher, I can see absolutely no benefit to content creators or to independent publishers in this country — and many potential dangers inherent in this initiative. While independent publishers here already meet resistance in distributing our titles abroad, this would only get worse if cheaper editions are produced in those territories. Further, multi-national publishers have the clout to “dump” excess stock in territories such as ours, with a direct impact on local publishers’ and authors’ income.

We have a vibrant local independent publishing industry, but the margins by which many publishers operate are slim. Changing the rules is unlikely to improve those margins, forcing those publishers to be more conservative about taking on new authors or risking innovation to keep at the forefront of industry best practice.

Independent publishers are more likely to retain titles on their backlist where those titles continue to sell. Changing the rules will shorten the selling life of titles as they come into competition with dumped foreign editions. This of course will have a direct negative impact on author’s royalties, and, in the current economic downturn, could make some publishers unviable.

Rather than making changes that will threaten the livelihood of the local publishing industry and our content creators, the Government needs to do more to ensure that our local industry is supported and promoted in this country as well as abroad.

Best regards,

Dr David Reiter  
Director