Our submission to the Productivity Commission on the issue of the "Parallel Importation of Books" relates to the clouded future of the "30 day rule" and the "7/90 rule" and, of course, maintenance of Copyright benefits for the Copyright holder.

Any removal or even a relaxation of these rules will cause substantial damage to locally produced book volumes leading to a severe loss of jobs in the book printing industry.

Moreover any erosion of print volumes in book printing in Australia will also have a negative impact on the print market as a whole.

The printing industry is a major employer in Australia and requires the ongoing support of the Government authorities in maintaining not only job levels but also the expertise and skills required in a specialised industry.

Our company, Allkotes Pty Limited, services the Australian print and publishing industries with a variety of embellishment techniques including laminating, coating, spot coating, foil stamping, embossing and other highly specialised techniques to embellish and beautify print, in this case, book covers, both paperback and loose leaf jackets.

Allkotes has six (6) plants up and down the eastern seaboard in NSW, VIC, QLD and the ACT. It employs 80 people, providing a highly specialised service with an enviable reputation in the world for innovation, efficiency and service to the book and printing industries.

We believe the 30 day rule and the policy in general, is fair and extremely effective in promoting efficiencies and local jobs in an important industry.

We also believe there is absolutely no reason to put Australia on a different footing to the United States and the United Kingdom where the book volumes are much higher. With this in mind, one can assume that any changes in the current policy will see an importation of books from these higher volume markets where the overflow of these long runs find their way into Australia at prices that will decimate Australian book printers and publishers. In other words a form of "dumping".

While Australian book printers and print finishers are already under intense import competition from China and Asia, we are providing a valuable contribution and quality product to the Australian publishers with high efficiencies and the subsequent ability to supply in quick time.

Our ability to maintain this high level of service will be severely eroded by any change in this policy due to a potential reduction in print volumes.

Any weakening of the status quo with a change in this policy will have severe impact on the book printing industry with a resultant high cost in job losses with a flow on effect of putting the industry in general under severe pressure to maintain commercial viability.

It is important in these troubled times to look after all Australians not just the ones at the end of the line but the ones that also contribute to the production of what is a world class product.

Prepared and submitted by Alan Goulburn Managing Director Allkotes Pty Limited

www.allkotes.com.au