Please accept this response to the discussion draft.

The draft document recommends parallel import restrictions for only the first 12 months of a title's life.

I feel this is very damaging to the careers and incomes of Australian authors. It is erroneous to base such policy on the supposition that an Australian title will make the majority of its sales income in the first twelve months after publication. Novels of many genres – but particularly novels created as part of a series and those subsequently adapted to media such as film – gain significant sales income from backlists. The limited protection that the current draft proposes will penalise any authors whose work has longevity or whose reputation builds over time by word-of-mouth. It is also very difficult for many first-time authors to recoup just their publisher's advance in the first 12 months, let alone build additional taxable income.

Australian culture is not a short-term affair, and the careers of Australian authors should not be thought of in short terms, either. Parallel import restrictions should be implemented in perpetuity.

Regards Stephen M Irwin