

**Attention:**

Productivity Commission  
Parallel Importation of Books

14<sup>th</sup> April 2009

**Response to Productivity Commission Discussion Draft:  
Copyright Restrictions on the Parallel Importation of Books**

I would like to ask the Commission to reconsider the draft recommendation and **retain copyright restrictions on the parallel importation of books** as they currently stand.

The recommendation to provide for lifting of PIRs after twelve months as outlined in the Discussion Draft suggests itself as an attempt at compromise, or at least to appear even-handed, but if it goes ahead as proposed the ramifications have the potential to be disastrous for the book publishing industry in Australia.

While the *Coalition for Cheaper Books* and those that support the call to abolish PIRs are unlikely to be satisfied with waiting, they may well get what they ask for eventually, while publishers, authors, illustrators, and others involved in the making of books in Australia will still find themselves in a financially non-viable position, and as such unable to continue 'as is'.

There are so many issues at stake!

As a starting point, Australian publishers rely on income from best-sellers (which will still be selling after the twelve month cut-off date) to support their less well-known or less well established titles. Removing or reducing this source of income removes or reduces the publishers' ability to take risks on yet to be established authors, thus limiting the number of new or unknown writers /illustrators seeking to enter the industry - limiting the industry and creating a self destructive spiral.

Other people have written far more convincingly than I can on this subject and I urge you to reread some of the earlier submissions such as that made by Sarah Foster of Walker Books.

*Of course* I am concerned (as an emerging author) that my avenues to a future career doing the thing I love to do is about to be severely curtailed (and, as an aside, much as I love to write, I would still like to receive appropriate remuneration if and when my intellectual property goes into publication – unless of course the electricity, phone, internet and grocery providers, etc., are willing to be paid with the same psychic currency?).

And, as much as it has so far prevented me from breaking ground as a career writer, I truly respect that our small market and highly competitive industry means that only the best do get published. We have some of the highest quality books in the world – at the moment. And, yes, I'd like to be a part of that.

More though, as a teacher and a parent, I am concerned that Australian content and voice is about to be submerged under a cacophony of foreign imports. To my mind, as a purchaser of books, my choices will be restricted and I cannot see any evidence that books will be cheaper to compensate for this. Even the Discussion Draft admits that there is a lack of reliable information to support this.

In fact, even if books do hit the shelves at a noticeable reduction in price, I would rather pay a little more for a good book, with Australian voice, grammar, language and spelling - something that

reflects the culture I choose to live in. I am far more likely to choose a book based on interest, need, genre, author, series, how pretty the cover is or compelling the blurb, or media or word-of-mouth recommendation than I am its price.

I admit, I do choose 'foreign' titles, as well, and submit to the differences that this implies, but I *don't want to lose my choice*.

And where will the support materials for teaching increased Australian content come from? Not from OS.

Nor will access to cheaper books (if books are cheaper as a result of lifting PIRs) suddenly improve literacy levels in Australia as some would like us to believe – would that it could. For one, people who do not currently buy books are unlikely to do so just because books become less expensive. In fact, if accessibility were the only or even the main issue, then libraries would be much more heavily utilised. Access to reading material is not the focus in literacy issues and it is simplistic and misleading to make those sorts of connections. There is far more to literacy than that.

Further, if it were likely to help, reducing or even removing GST on books would be a far more effective way of reducing book prices. How committed is the government?

In the meantime, the 'free trade' experience in Canada has led to a diminishing of the industry and a diminishing of the Canadian flavour of books that do continue to be published, and the NZ experience has been similar. Why do we think that it would be different here?

And why – please tell me why – do we feel that it is appropriate to think about removing restrictions, while the far bigger industries in UK and US determinedly maintain theirs?

Not least, I would also be disappointed to see the decimation of an industry, including the loss of Australian jobs and the limitation of existing (let alone new) Australian authors and illustrators to continue (or start) to make an income, in what are already difficult economic times.

The publishing industry in Australia is vulnerable, and it is uniquely Australian. I ask again, please **do not remove or reduce existing copyright restrictions on the parallel importation of books.**

Thank you for the opportunity to comment on the Discussion Draft.

Cate Whittle  
(Catherine M Whittle)