

Thursday, 16 April 2009

Re: Restrictions on the Parallel Importation of Books discussion draft

My name is Sandy Fussell and I am a newly published Australian children's author, a parent and an avid reader/consumer of books. I have a tertiary background in research and statistics.

I welcome and appreciate the opportunity to comment on the Productivity Commission's draft report. I am extremely concerned at the detrimental effects these recommendations will have on the Australian publishing and printing industry, Australian authors and illustrators and Australian readers.

It is difficult to feel any confidence in the basis for the recommendations when the report itself begins with the statement '*The Commission has found that there are insufficient data to fully describe and analyse the books market*' (pXVI).

Similarly, while the report contends that '*Australia's PIRs put upward pressure on prices*' it qualifies its assessment of pricing impacts by saying it '*has had to draw mainly on qualitative evidence together with theory.*'

If by removing parallel import restrictions (PIR) some books will be available cheaper, which books will these be? Certainly not comparative titles. Submissions from a wide range of local publishers show by example that if I want to purchase a specific title, it will not be cheaper. Some educational texts perhaps but other issues are involved there. More likely bestsellers, 'cheaper quality' imported books and dumped remainders from overseas.

As a consumer this has very little appeal, even for an avid book purchaser on a tight budget, like me. I would not trade the current range of books available for a few dollars saved. What price do we put on our own publishing industry – the jobs it provides, the fostering of emerging local authors and the promotion of local culture and literature?

Below is my personal perspective as an author, reader and parent.

My concerns as an author

I am an emerging children's author. My first three books were published in 2008. Two of these books have/will be published overseas in the US and UK. The third has been short listed for a 2009 Children's Book Council Book of the Year award. Despite my early success, would I and other new authors like me, have had the opportunity to be published under the environment the draft recommendations will create? Highly unlikely.

The Australian publishing industry needs a strong local list and the sales from solid sellers published locally to take a risk on new Australian authors. Many Australian authors who are now international best sellers and/or major award winners - such as Matthew Reilly, Peter Carey, Tim Winton, Graeme Base and Di Morrissey – have repeated this viewpoint in their individual submissions.

It has been argued talented authors would still find first publication overseas, although it would be more difficult. Historically, very few children's authors originate overseas. For the publishing houses of the US and the UK it is much easier to promote a new domestic market author – easier to develop a working relationship and easier to market them to establish a readership base when they are in the country to tour. PIR allows the local publishers to invest in Australian authors and their future successes which in turn benefit the local publishing and printing industry. Authors such as NY Times bestseller John Flanagan and Sonia Hartnett, winner of the second richest literary prize in the world.

For authors published internationally, the removal of PIR protection after 12 months means overseas suppliers can dump remaindered copies in the Australian market. Authors generally receive no payment on remainders. Why should our work have no value simply because of where it is sourced from? Why should the Australian publishing industry bear the cost of overseas supply mismanagement?

The royalties on overseas editions are lower so the removal of PIR further erodes an author's income which the report itself has described as difficult to assess but '*on average it appears to be quite small*' (2.10). This seems in contradiction with the key point that PIR places upward pressure on book prices and '*most of the benefits of these higher prices accrue to publishers and authors*' (XIV)

The Australian publishing industry is currently dynamic and growing. Sales of foreign rights and book exports generate significant revenue. Investment in local authors is reaping returns. This is an industry which employs a wide range of people and a significant number of books published in Australia are printed here, generating even more jobs. Do we want to see our publishers reduced solely to a distribution role?

If PIR are lifted after 12 months, an Australian publisher only has a year to recoup the cost of publishing a new book. A company publishing the same book in the US can sell their edition into Australia after a year, increasing the risk involved in the initial Australian investment. Ironically, the Australian publisher can't do the same thing in reverse as in the US (and UK) territorial rights are protected for 70 years!

My concerns as an avid reader and purchaser of books

Publishers are forecasting a reduced range of books under the draft recommendations. Having access to a range of books is far more important to me than saving a few dollars on some titles.

There will be a reduction or loss of books from literary and independent publishers. These publishers have an internationally substantiated reputation for supporting new literary talent. Text Publishing has fostered many Australian authors who have continued on to major critical acclaim, such as Tim Winton, Helen Garner and Kate Grenville.

The report states '*relaxing PIRS would likely put downward pressure on book prices in Australia*'. Downward pressure does not directly translate to cheaper books for the consumer. I see no guarantee that any savings realised would necessarily be passed on to the purchaser.

My concerns as a parent

I read to my youngest child every night and purchase many children's books. I am a regular library user and active in the school community. As a parent consumer, I want my children to read books that entertain, encourage and challenge them. Books that keep them reading. Cheap imports will not have that effect.

I dread the loss of Australian content only found in Australian books. Imagine if there was no Jackie French's *Diary of a Wombat* or Tim Winton's *Lockie Leonard*? It's a cultural issue. If I could steal a sentiment or two from the submissions of my colleagues - I want to see more echidnas than hedgehogs on the library shelves and I want my kids to be able to read about Christmas in summer at the beach.

Overseas editions of Australian books are often edited to remove Australian language and idioms. This cultural loss would result in school and community libraries filled with Americanised versions of Australian works. The report states that '*the cultural externalities associated with Australian publishing*' have been '*assessed as policy relevant but unlikely to be large*.' As an author and a reading parent, I disagree.

I believe access to a growing contingent of Australian authors is a key to developing literacy and this is borne out my own experience as a parent and an author visiting schools.

There are inherent dangers in our children learning history and culture from overseas textbooks. I am unconvinced that the existence of a title which can be imported more cheaply from Asia equates to the necessary curriculum support and availability of ancillary teaching resources.

In conclusion

I take a look around me and the view is not encouraging. Singapore, Hong Kong and Europe have open markets and books are not cheaper there. The New Zealand publishing industry removed restrictions 10 years ago and their industry is suffering (Colmar Brunton Survey of Book Publishing in NZ 2008). The professional organisations of publishers, booksellers and authors all actively oppose the removal of PIR.

The largest publishing nations of the United Kingdom and United States have not lifted parallel importation restrictions. Why would we afford our publishers, printers and authors any less protection?

Thank you for considering my submission.

Yours sincerely
Sandy Fussell