

Parallel Importation of Books  
Productivity Commission  
GPO Box 1428  
Canberra ACT 2601

Dear Commissioners

Reading through your draft report a couple of your conclusions struck me as particularly pertinent.

Firstly, your assertion that abolition of the restrictions would not be prudent (pg 136). In your own words, 'A flourishing Australian books industry has taken three decades to achieve and an industry of sufficient scale could not be recreated overnight.'

And secondly, your admission that there is insufficient data to fully analyse the books market, making gauging the impacts of the PIR's inherently difficult. As you mentioned on pg 22, there needs to be a cautious approach to reform.

With these two points in mind it seems reckless to introduce a time frame change to the PIR's that will result in an almost identical effect on the books industry as abolition of the restrictions would. I urge to you fully investigate the ramifications of removing the PIR's after a period of twelve months. As many submissions have already pointed out, twelve months is an incredibly short time in the book industry, and it is not at all unusual for books to take more than this time frame to reach peak sales.

To my mind, there appears to be only one *possible* benefit resulting in the removal of PIR's, cheaper books *if* the booksellers decide to pass their savings to the public, instead of *looking after their responsibilities to their share-holders*, a well used phrase in the corporate world. In contrast, the risks of removing the PIR's after twelve months are many and far reaching.

In closing, I would like to reiterate your own words, that '*A flourishing Australian books industry has taken three decades to achieve and an industry of sufficient scale could not be recreated overnight.*'

Regards

Trudie Trewin