

As Director of IP, one of Australia's leading independent publishers, I am deeply worried by the proposed changes to copyright and importation regulations. The tone of the draft document is worrying, suggesting that the Commission is determined to impose these changes, regardless of submissions citing clear evidence that these changes would be harmful to our local publishing industry.

The Commission seems to feel that perceived short-term benefits to consumers outweigh the long-term risk to the vitality of our publishing industry, which is already feeling the strain of the economic crisis. The 12-month limitation will discourage publishers from developing on-going relations with their authors. Endangering Australian publishers' revenue from their backlist will seriously undermine their financial viability. Further, Australian publishers will have insufficient time to exploit the rights provisions of their contracts. Indeed overseas publishers may choose to defer rights agreements until such time as they could produce editions that could immediately compete with locally produced editions.

In the current economic climate, we need to avoid actions that would undermine the viability of our local industry. This is not the same as arguing for protectionist measures. Maintaining the status quo makes sound economic as well as cultural sense.

Sincerely

Dr David Reiter  
Director, IP