

**Productivity Commission** 

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Cambridge University Press, Australia and New Zealand (Cambridge) strives to serve the Australian Education market by publishing Primary, Secondary and Tertiary materials specifically designed to fit local curricula, local courses and meet local teacher and student needs. Cambridge University Press is a department of the University of Cambridge whose mission is to advance learning knowledge and research worldwide.

With respect, Cambridge wishes to express opposition to the draft recommendations of the Productivity Commission. It is important, we believe that a distinction is made between trade publishing, which the Discussion Draft released in March by the Productivity Commission appears to focus on, and Education publishing.

For the trade market, a book will tend to sell in high volume when it is front list, in the first 12 months of its life. In the Education market this is almost never the case. Books written specifically for local curricula tend to last for the lifetime of those curricula, often selling for 4 years or more with the majority of sales not occurring during the first year when the book is front list according to the Commission's interpretation. In this market competition is intense and acts as a brake on prices while at the same time increasing publishers' investment in quality and support materials for books for courses.

It is our belief that the Productivity Commission's current draft recommendations would increase the risks publishers have to take and thus cause a decrease in investment in locally developed product, which would have an impact on local publishing, printing and bookselling industries and the people they employ as well as on local authors.

We are therefore opposed to any form of removal or erosion of the current territorial copyright regime.

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