

I am writing to express my objections to the Productivity Commission's draft report, released on April 29 and in particular to the proposal to lift the restrictions on the parallel importation of books.

I have been a published writer for twelve years. Many of my books have sold overseas. My book *Don't Call Me Ishmael* was published by Omnibus Books/Scholastic Australia in 2006. Even though they bought the World Rights my publisher only has the territorial rights to publish in Australia and NZ. I was very fortunate that the book was subsequently sold on to other publishers in the USA and UK. Under the present rules, copies of those overseas editions can't be imported in bulk into Australia for sale, but individuals can still order copies via Amazons etc.

So what would happen in this case if PIRs were removed like the Productivity Commission wants? Well first of all my Australian publishers would now face competition from those imported overseas editions. So what's wrong with that? Isn't competition fair and reasonable? Well I certainly don't think it is in this case.

My Australian publisher is the one that has taken the greatest risk in publishing my book in the first place. They have devoted their time, resources and money to the development and careful editing of the story from the original manuscript to get it to the highest possible publishing standard. Is it fair that overseas companies should be able to just take advantage of all that expertise, expense and effort and then undermine the local publisher's hard-earned profits by having a free hand to sell their overseas version back into Australia?

This situation causes another problem. Since removing PIRs and the importation of foreign editions would erode local sales and profits, it would act as a strong *disincentive* for Australian publishers to pursue and sell overseas rights to Australian books in the first place.

I have been able to move from being a full-time teacher to being a full-time writer, because of income earned through royalties, PLR & ELR and payment for school visits and festivals. A big factor in making that move possible was gaining those royalties from overseas sales in countries such as the USA and UK. I am very grateful to the International Rights Department of Scholastic Australia for their efforts in selling on these rights. But why would they want to continue to do this if it just came back to bite them through a flood of competing imported editions?

In the case of *DCM Ishmael*, the American edition had very big expectations but didn't sell as well as was hoped, so it's very likely without PIRs that copies of that edition would have been *dumped* cheaply on the Australian market to the great detriment of the very popular and successful Australian edition. Of course I should point out that any royalties I receive from the sales of the US edition are significantly less than for sales of the Australian edition.

Another important reason why I wouldn't like to see the UK or USA edition of *DCM Ishmael* sold in bulk here, is that they are not the same as the Australian version. In both the overseas editions, uniquely Australian words and expressions have been removed and replaced, and in the case of the US edition of the story, boys in an *Australian* school, now play a game of *American* Football instead of Rugby Union!

Surely it's important to all Australians that our kids see themselves, their country, culture and language in texts they read? I feel honoured that *DCM Ishmael* is set as a text for middle grade classes in lots of Australian schools. Occasionally I visit a school and I see a student with the US or UK edition which they must have ordered online. I think it's sad that that student will not be reading an Australian story as it was originally intended. If PIRs were removed, it is very conceivable that whole classes or year levels could be doing this.

I totally reject the Productivity Commission's recommendations regarding removing PIRs. I don't think unfairly undermining Australian Publishers' profits will make them more productive. I think what it will do is force some out of business, reducing opportunities for authors and causing widespread job losses in what is at present a very efficient and successful industry. And I also fail to see how reducing the opportunities for authors to get published and for published authors to earn a living (average author income = \$12,900) will make *them* more productive either.

Cheaper books might sound nice, but not if the real price you pay ends up being far too high.

And finally, as for the suggestion in the Report that authors should retain copyright to their work for a measly 15-25 years after its creation (rather than the 70 years after their death which is presently the case), well at this stage I'll give the Productivity Commission the benefit of the doubt and just assume that that's some kind of a very sick joke.