

APRA/acc

February 2019

Mr. Gavin Jones
Director
Adjudication Branch
ACCC
PO Box 3131
Canberra ACT 2601

By email: adjudication@acc.gov.au ;

Dear Mr. Jones

Re : APRA application for revocation and substitution- A1000433

This submission is made on behalf of the Australian Lottery and Newsagents Association (ALNA), which is a not-for-profit organisation and is the peak industry body that provides advocacy and support services to our members nationally and through our affiliate association members at the Lottery Retailers Association (LRA) in Victoria. ALNA advocates for fairness for our member newsagents and lottery agents on a range of issues, and we are guided by our members as to what issues affect them.

We have not made a submission before in relation to APRA.

Some ALNA members use music in their premises and have some experience with APRA.

Our members use of music is limited and often localized. Our members want to choose small offerings , or even deal with local performers.

The APRA regime, I am told by members, is daunting and confusing.

The Australian Lottery and Newsagents Association asks that the regime be made more user friendly to small businesses, in particular businesses who have limited use of music but still have to comply with the comprehensive APRA regime.

As indicated, we have not made a submission on APRA before but in doing so have been amazed by the existence of a highly developed private and almost secret regulatory regime whose only legal elements are copyright held by individual performers and the ACCC authorisation.

The past newsagency distribution regime was dismantled as being anti-competitive but this regime still exists.

I understand that this submission may be placed on the ACCC Public Register and ALNA appreciates your taking on board our comments and considering these.

Kind regards
Ben

Ben Kearney
Chief Executive Officer
Australian Lottery and Newsagents Association
Suite 1.7 & 1.8, 56 Delhi Road, North Ryde, NSW 2113