

Sydney Ice Hockey League  
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31 August 2009

Dear Sir or Madam:

**Re: Australian Ice Hockey Federation Incorporated - Notification - N94049**

Thank you for your time in considering the following submission in relation to the above exclusive dealing notification by Ice Hockey Australia.

The proposal by the Australian Ice Hockey Federation to sanction participants in “non-sanctioned” leagues will have a significant adverse impact on both the Sydney Ice Hockey League and Australian Ice hockey in general.

Sydney Ice Hockey is a not-for-profit organisation that is committed to the promotion of the sport through the delivery of a safe, well organised and value for money Ice Hockey league. The league is open to all Ice Hockey players regardless of age and gender, and currently has around 100 members.

The main areas of argument against the Australian Ice Hockey Federation proposal fall into three categories:

**1) Reduced Competition**

The Sydney Ice Hockey League is run by volunteers, with all excess funds returned to the league to reduce the cost-per-player. In what has traditionally been an expensive sport in Australia, Sydney Ice Hockey delivers players unbeatable value-for-money, opening up the sport to those who could otherwise not afford it.

The average cost-per-player to participate in the “sanctioned” Ice Hockey NSW senior B League is currently around \$830 per season. By contrast, the average cost-per-player to compete in the Sydney Ice Hockey League is currently \$420 per season. Our non-sanctioned league offers the same amount of game-time per-player for approximately half the cost.

**2) Safety and standards**

The Sydney Ice Hockey League is operated to the same, if not higher standards than “sanctioned” leagues. The league is operated under a well documented set of rules whilst games are officiated by experienced referees who are paid above market rates for their time, ensuring the highest possible standards of game control. The league is run at Sydney Ice Arena managed rinks at both Sydney and Erina in NSW. These rinks have in place the same insurances as those

advertised by Ice Hockey Australia. In addition, a number of players in the league are former coaches at both club and State level and provide mentoring to those who are less experienced.

### **3) Impact on the sport**

The Sydney Ice Hockey League offers Ice Hockey all year round as opposed to “sanctioned leagues, which restrict regular competition to the southern winter, and in doing so provide a disincentive for players of overseas origin who have a strong preference for participating in ice hockey during the northern winter.

There are a great many players who play in “sanctioned” leagues who would like to play more than the one game a week they offer, however they risk lengthy bans if they choose to do so. In addition, a number of players who enjoy playing alongside their adolescent children have in the past been advised by Ice Hockey NSW that their children’s state and national level representative careers are under threat as a result.

It can be concluded from the above that if the ACCC should grant Ice Hockey Australia’s request, there will be a reduction in the exposure of the sport within Australia, no improvement in overall safety or organisation, and most significantly, a reduction in competition, which will invariably lead to increased player participation costs.

Please do not hesitate to contact me if I can be of any further assistance.

All the very best

Michael Costin

Sydney Ice Hockey