



The General Manager
Adjudication Branch
Australian Competition and Consumer Commission
GPO Box 3131
Canberra ACT 2601

To Whom It May Concern:

Re: Ice Hockey Australia – Exclusive Dealing Notification N94049

Thank you for the opportunity to provide a submission regarding the exclusive dealing notification lodged by Ice Hockey Australia (IHA).

Sport and Recreation Services ACT (SRS) has provided financial support to the ACT Ice Hockey Association (ACTIHA) in the form of annual funding since 1997 to assist with operational expenses.

SRS also provides funding through its National League Team Funding Program (NLTFP) to the Canberra Knights, a club participating in the Australian Ice Hockey League (AIHL).

SRS has discussed this notification with both the ACTIHA and the management of the Canberra Knights. Based on the comments of these stakeholders, together with the information contained within the notification submission, SRS is supportive of the request based on the following reasons:

1. The IHA is recognised by the International Ice Hockey Federation (IIHF), International Olympic Committee (IOC), Australian Olympic Committee (AOC) and the Australian Sports Commission (ASC) as the governing body for Ice Hockey in Australia.
2. The ASC will only recognise one national governing body. The ASC provides funding to the IHA to develop the sport of Ice Hockey at grassroots level and to establish pathways to senior and elite competition. The AIHL is considered the elite Ice Hockey competition in Australia and provides a pathway for players from junior to senior participation under the umbrella of the AHL.
3. The ACTIHA's membership of the IHA and subsequent recognition as the peak body for Ice Hockey in the ACT allows it access to funding through the Sport and Recreation Grants Program managed by SRS.
4. ACTIHA is a member of the IHA, allowing members/participants access to comprehensive insurance in the opportunity to participate in events fully sanctioned both nationally and internationally by the IHA and IIHF. Participants in Ice Hockey events not sanctioned by the IHA are not covered by this insurance even if registered with IHA.
5. The IHA has an extensive risk management plan which provides a safe environment for participants.

It is important that sport in Australia be governed in an efficient manner. Whilst not advocating a 'one size fits all' system, a non-sanctioned National Ice Hockey League could not rely on the support provided by the IHA including an internationally approved risk

management model, comprehensive insurance and well-established pathways for participants. Additionally, it would be expected that such a league would most likely be unsuitable for government funding, this support being important for many sporting organisations.

Kind regards,

A handwritten signature in black ink, appearing to read 'Sue Marriage', written in a cursive style.

Sue Marriage
Director
Sport and Recreation Services
18 August 2009