

To whom it may concern,

It has come to my attention that you are currently assessing the benefits of the Football Queensland (FQ) Marketing program. Policy no. N93401

I wish to offer my support for this program. These are my own personal views formulated over the last 11 years.

For the past eleven years I have been a member of EXCLUDED FROM PUBLIC REGISTER which is member organisation of the Football Brisbane (FB) region which is intern, governed by FQ. In that 11 years I have performed most club roles including 2 years as a committee member culminating in my election as Seniors Vice President which I unfortunately had to resign from after only 2 months due to a family member death in our family based business.

I am currently a licensed Senior Football and Goal Keeper coach. This is the highest community coaching licence available in Australia under the FFA. I have never been employed by either FB or FQ. I have however been offered a role as a development coach for Brisbane based juniors which I turned down due to club commitments. My full time job is working in our family wholesale electronics import business, which involves sourcing product, importing and then distribution throughout Australia. I believe my football and importing experience make me uniquely qualified to comment on this program.

I note in the right honourable Mr Arch Bevis's submission a number of items that need clarification.

I first bring your attention to the similarities between the FQ program and your currently approved Queensland Rugby League (QRL) program. N95172.

From my perusal of documents on your site, both are their sports state peak body, both have similar aims and objectives and both have similar membership numbers. Both also have similar contracts and terms and conditions based around their respective Q logos. For both these sports, the licensing of these logos and the brand recognition involved is important in attracting sponsors, growing their respective sports and also aiding in the protection of their members.

In Mr Bevis's submission to the ACCC.

1. He thought the \$20,000 for FQ suppliers was too expensive and anti competitive. And put unfair costs on clubs. The current cost for the QRL is \$25,000. These costs ensure companies who are financially sound and have a solid understanding of their market and costs involved are more likely to commit. These figures are therefore protective of member clubs, also allowing greater control by FQ in the event of disputes between clubs and suppliers. In the unfortunate event that a supplier is unable to fore fill their obligation then FQ will have funds to aid affected clubs.

2. He thought that having only 13 suppliers was not enough to give sufficient range of product and price comparison. The QRL policy only has 6. Each of the FQ suppliers is an importer. Each has exactly the same ability and access to the same or similar manufacturing factories around the world. If you ask them, they will source it and then give you the choice of multiple variations based on price and quality all under their own brand name. Adding extra suppliers will have no effect on range, price or quality as they are supplying only what the clubs order.
3. His main point was a safety issue in that none of the 13 suppliers provided sufficient goal keeper clothing with enough padding to protect keepers as they were at risk of potential injury from collision. Nowhere in the FIFA regulations is there a minimum or maximum padding requirement. Rugby league is a collision sport. As is rugby union and AFL. Mr Bevis has not asked to have any padding built into their jerseys. Football (soccer) which is a semi contact sport pad keepers jerseys as a duty of care to keepers. Further to this, club strips are not an off the shelf item. The clubs decide design, color, and for keepers, padding, all to suit their budget. The suppliers supply what the customer wants as long as it meets FQ criteria. Any of the 13 can and do make keeper jerseys to suit the specifications of the club. You do not need a specialist supplier just for a keeper. Mr Bevis's argument should be directed to FIFA not the suppliers.

To back up his arguments he used posts from the TRSC forum. He describes this forum as representative of the wider football community sentiment with contributors being either family of, or, players, coaches and officials. This site, the TRSC Forum is hardly representative of the general Queensland football community as it is a Brisbane based forum. Since its inception a number of years ago it has had some 3171 people join many under multiple user names. Recently it asked all current members to signify if they were still active. One of the last posts noted that only 7 % responded. Hardly representative of the 66,000 FQ members or 24,000 FB members.

I note that FQ states that money earned is for development of football in this state. In my association with my club I can attest to seeing numerous free grass roots coaching courses, grants assistance facilities, yearly junior development clinics and a complete clubs supply to suit 700 members of Red Rooster bags, balls, bibs and cones to help facilitate training at my club. Every club has been offered and access to the same. FQ has also developed the QSL state men's and youth league and RSJPL for junior development. Both being state wide competitions for the benefit of the whole performance football community. Most complaints in regards to FQ spending are in my opinion from People who believe the Brisbane based competition is the largest and the best and therefore should have the most spent on it. I would contest that due to its size and strength it does not require the same levels of financial assistance that regional centres do. Whilst I agree the FB competition is one of the strongest, it comprises only 36% of FQ state membership. The FQ charter is specific in that it must provide support to every part of the state. Unfortunately with the vast distances between clubs our states size makes this a very expensive exercise. Therefore areas that are possibly more self sufficient ie Brisbane tend to perceive they get less.

It is my belief that a small number of clubs believe that there are significant savings to be made if they are allowed to order direct from overseas themselves. I can assure you my experience as an importer says otherwise.

1. Their one of order will not receive the same price as a major supplier. Large suppliers have the ability to negotiate a complete strip of jersey, shorts and socks for a similar price that a club may possibly only get a jersey. My club orders the set, sells the socks and shorts to the players, which item covers the cost of the jersey that the club retains. Any short fall is picked up with jersey sponsorship. Thus making purchasing thru these suppliers cost neutral or even profitable.
2. Sometimes up to 5 or 6 samples will exchange hands before color, design, quality and price are agreed. All these will be at club cost as a one of order. FQ suppliers include this in their price and have many different samples on hand.
3. Payment terms will be 30% up front with balance before despatch from overseas. Orders from FQ suppliers are 10% on order. Balance on receipt.
4. Suppliers generally have freight expeditors at the factory to check that quantities and quality is to agreed standards before despatch. This will not happen for clubs.
5. Freight spot rate costs for a one of import is significantly higher than the cost for regular account customers.
6. Warranty on one off orders is based on return of goods to manufacturer overseas at your cost. Warranty issues against marketing suppliers are handed to FQ who enforce compliance from supplier.
7. FQ Suppliers are fully aware of manufacture and marketing requirements and if wrong it is at their cost. This will be at clubs cost if not correct.

I believe that if the marketing program is removed there will be a significant loss of sponsorship by the approved marketing companies to clubs. Due to the nature and their understanding of the club football market they are willing to pass on their savings as sponsorship to multiple clubs as reward or to buy their loyalty thus rewarding the whole of Queensland not just the main centres. With the opening of the market, smaller operators without the capacity for volume discounts will target one off larger clubs. These operators generally work from home to minimize overheads. FQ will have no control over these individuals thus forcing costs onto the club if they are not compliant as opposed to the supplier. These small operators have no loyalty to the sport or the clubs and are not interested in growing the sport, thus they do not allow for nor can they afford the sponsorships that are the lifeblood of many clubs. The downward force on the market of competing against these suppliers will force FQ suppliers to lose their marketing budgets to be competitive.

In the event the marketing program is removed, FQ will be forced to increase their fees.

The cost of our sport is a major issue towards growth at this point. Unlike QRL clubs most FQ clubs do not have pokies and their primary income source is revenue thru player registrations and sponsorship. Therefore the marketing program keeps registration down, encourages supplier sponsorship and creates brand recognition that encourages other outside business sponsorship.

I encourage the ACCC to look at this as a complete package as each component is intrinsically linked and should not be taken on individual merits.

Yours faithfully,



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