

SUBMISSIONS

Introduction:

- 1.1 Football Queensland Limited acknowledges the ACCC issued a draft notice proposing to revoke the third line forcing notification (N93402) lodged by Football Queensland Limited in 2008.
- 1.2 Football Queensland Limited opposes the draft notice and specially the ACCC assessment under that notice.
- 1.3 Football Queensland Limited repudates the ACCC contention that the public benefit resulting from the notified conduct is outweighed by the public detriment resulting from the said conduct.
- 1.4 It is Football Queensland Limited's view that the ACCC in reaching the conclusion above has failed to properly consider the evidence available and has acted on the basis of inaccurate information.
- 1.5 It is also the view of Football Queensland Limited that the ACCC in preparing its assessment has applied inappropriate weight to the views expressed by a small number of complainants. Some of whom have disclosed a personal self interest in a decision by the ACCC to revoke third line forcing notification (N93402) lodged by Football Queensland Limited.
- 1.6 Football Queensland Limited is also seriously concerned that the independent function of the ACCC in this matter has been potentially compromised by the intervention of current members of the Federal Parliament, apparently seeking to influence the ACCC in its determination of the Statutory test in this matter. This has occurred through the production of direct submissions to the ACCC and the matter being the subject of a motion before the Federal Parliament.
- 1.7 Although it is open to interested parties to make submissions in the matter, the comments made in Federal Parliament under privilege go beyond fair comment and impair the character of the Football Queensland Limited's administrators.

2 Football Queensland Limited

2.1. Football Queensland Limited is a non-profit entity with the following as its company objectives:

- to be the member of FFA in respect of the State and to comply with the constitution and by-laws of FFA;
- to control Football (Soccer) throughout the State, prevent infringement of the constitution and by-laws of FFA and protect Football (Soccer) from abuse;
- to foster friendly relations among the officials and players of Football (soccer) by encouraging football games in the State;
- to prevent racial, religious, gender or political discrimination or distinction among Football players in the State;
- to promote, provide for, regulate and manage football tournaments and games in the State;
- to promote, provide for, regulate and manage football players representing the State;
- to cooperate with FFA, other members of FFA and other bodies in the promotion and development of, or otherwise in relation to, football, the Statutes and Regulations and the Laws of the Game;
- to facilitate the provision and maintenance of grounds, playing fields, materials, equipment and other facilities for football in the State; and
- any other object which, in the opinion of the directors, is in the best interests of Football.

2.2. As can be seen from the above stated objectives Football Queensland Limited exists fundamentally for the benefit of its members and for the promotion and development of the Code of Football in the State of Queensland.

2.3. In short all of Football Queensland Limited's income is applied in support of the above objectives and for public benefit.

- 2.4. It is noted at 2.12 of the draft notice that the ACCC acknowledges that all of the company's profits (if any), other income and property "however derived" must be applied to promote its objectives.
- 2.5. This opportunity is taken to point out the error contained at paragraph 2.13 of the Draft Notice. Football Queensland Limited is stated as divided into nine regional areas. This statement is incorrect. The membership of Football Queensland Limited is made up of ten zones. The North West Zone (Mt Isa) is missing from the list provided at 2.13.

3 ACCC Review of Notification N93402

- 3.1 Football Queensland Limited lodged a notification to the ACCC on 28 April 2011 with a detailed Form G outline in support of the notification.
- 3.2 The ACCC wrote on 6 June 2011 to interested parties inviting them to make a written submission on the likely public benefit and detriment associated with Football Queensland Limited's Team Wear Program. It is noted that the ACCC only received one submission and that was in support of the Notification.
- 3.3 Contained in the abovementioned correspondence is a reference to a comparison to similar conduct in Victoria. In October 2007, the ACCC released its assessment of a similar licensing program operated by the Football Federation of Victoria ("VVF").
- 3.4 In that case the ACCC had proposed to revoke FFV's notification, due to concerns apparently raised with the ACCC that the program forced Clubs to acquire products from a limited range of suppliers. In that case the limited number of suppliers was alleged to restrict choice in terms of price, quality and service. Following the issuing of a Draft Notice proposing to revoke FFV's notification, FFV amended its licensing program, increasing the number of suppliers to eight.

Also, the ACCC expressed a concern that Clubs were required to replace uniforms purchased from a licensed supplier if that supplier did not have its license renewed the ACCC suggest this could lead to significant wastage of apparel and add costs to Clubs.

Again, FFV acted to remove the requirement that clothing purchased from a previously licensed supplier was required to be replaced if a license was not renewed.

- 3.5 The ACCC acknowledge in a positive context in that correspondence that the Football Queensland Limited licensing program had 13 licensed suppliers and it allowed clubs and players to continue to use apparel indefinitely after a licensee ceases to be licensed.

It was clear from communication between Football Queensland Limited and the ACCC at the time, that the ACCC saw the differences between the Football Queensland Limited scheme and the FFV scheme as allaying the ACCC concerns regarding the Notification.

4 Submissions

- 4.1 In March 2010 the ACCC received a complaint from the then The Honourable Arch. Bevis MP, Federal Member for Queensland complaining about immunity.

- 4.2 Mr Bevis indicated at paragraph 4 of his correspondence the following:

“It should make clear that as a parent of a player adversely affected by this requirement I have a personal interest in it.”

“However, since it first came to my attention, I have become aware of more widespread objections to this policy from players, parents, some club officials and both retail and trade businesses that stock football clothing.”

- 4.3 It would seem not unfair to conclude that Mr Bevis’ initial complaint is focused through his personal interest in the availability of goal keepers clothing.

- 4.4 To summarise Mr Bevis’ complaint concerning goal keeper’s clothing, it seems he is of the view that none of the licensed suppliers produce clothing satisfactory for the special needs of goalkeepers.

- 4.5 It is also clear that Mr Bevis has a preferred supplier or suppliers who are not licensed to sell their product. Without entering the debate as to the best apparel manufacturers, if Mr Bevis’ argument is that good quality product is not available from licensed suppliers then Football Queensland Limited would

dispute this claim. International companies such as Nike and Adidas are licensed under the program.

- 4.6 Adidas was operated under an agency agreement with LWR Sports International until that company ceased operation. Adidas now operates the license in its own right and is showing great interest at further development of its product in Queensland. The Queensland State League Champions, Sunshine Coast FC utilised Adidas apparel in 2011. Adidas produces a specialist range of goalkeeper apparel which is worn by players playing at the highest level of football worldwide.
- 4.7 Uhlsport is also a very well known international brand that produces specialist goalkeeper clothing.
- 4.8 To attempt to argue as Mr Bevis has done on several occasions that sufficient choice of produce at the highest quality is not available from licensees under the program is simply not correct.
- 4.9 Personal choice is a long way from implying that players are put at risk by the immunity. Again, this is simply not correct.
- 4.10 Football Queensland Limited would also dispute that goalkeepers have a double financial "penalty" in being required to pay a "double financial penalty". He goes on to state they pay club fees as field players and then typically pay to buy their on playing clothes.
- 4.11 Contrary to Mr Bevis' allegation, it is nearly universally the case that goalkeeper jerseys are supplied by Clubs as are field players' jerseys. All players are usually required to purchase club shorts and socks.
- 4.12 There is no double financial "penalty" for goalkeepers if they chose to wear supplier clothing. Regardless of the claims made by Mr Bevis the reality for a Club seeking to provide clothing to its players is that it must find the money somewhere, this is either through the fees that are charged, generous sponsorships of jerseys or fund raising activities.
- 4.13 Mr Bevis has also made several errors in his initial correspondence, some of which he has begrudgingly acknowledged in later correspondence. The most significant of those errors are as follows:

4.13.1 Paragraph 2. In 2010, that requirement applies to all players and covers shirts, shorts, socks, team tracksuits, training shirts and footballs. See the definition of team wear. Training clothing is not covered if it is not team wear. Club polo-shirts are not covered if not team wear.

4.13.2 Clothing may continue to be used after the license has expired contrary to Mr Bevis' statement.

Mr Bevis seems to rely heavily on one anonymous online football forum renowned for its lack of any serious credibility. The site suffers from manipulation and regular defamatory posts.

4.13.3 In paragraph 9 Mr Bevis states:

"I am unaware if any submissions were received on this application before determination was made. Nor am I aware if the ACCC initiated any investigations with those affected by the application such as players, retail outlets and trade suppliers or made enquiries of the practice followed in other States by their football authorities".

Mr Bevis may have carried out a simple review of the ACCC public register and established that one submission was made in response to the ACCC notice to interested parties. He would also be aware from the Register that the ACCC did call for submissions and randomly sought interest from clubs.

He would also have discovered the ACCC Football Federation of Victoria notification.

Although there are other inaccuracies in Football Queensland Limited's view; in Mr Bevis' submission Football Queensland Limited believes these have been adequately addressed elsewhere in these submissions.

4.14 Mr Bevis' submissions, 15 April 2010, 21 May 2010, 19 May 2011 and 22 August 2011.

4.15 Although Mr Bevis has chosen to raise various matters critical of Football Queensland Limited from its constitutional structure, which is similar to the Football Federation of Australia structure, to the competence of the operation of

the functions of the organisation, it seems one may narrow down his relevant comments to a criticism of the notification lodged by Football Queensland Limited because Football Queensland Limited has not satisfied the public interest test set down by Statute. Clearly, that was not a view shared by the ACCC when it chose not to object to the Notification in 2008.

One would then seek to ask what has changed to give rise to a change in attitude by the ACCC apart from the complaint of Mr Bevis.

Apart from bald assertions made within his various submissions, Mr Bevis who criticises Football Queensland Limited for a lack of evidence in its Notification produces no evidence of research other than personal anti-doctorial evidence disproving the information provided by Football Queensland Limited in its Notification.

Mr Bevis' submission displays a fundamental misunderstanding of the objectives of the Scheme beyond the allegation the Scheme generates income.

4.16 Submission of Mr Bernie Ripoll MD

4.17 Mr Ripoll's submission outlines what he considers anti-competitive behaviour. In response to the items (a) to (e) outlined by Mr Ripoll Football Queensland Limited would comment as follows:

- (a) the Licence Agreement generally is with suppliers. None are manufacturers. If a manufacturer was asked to gain a license, they may seek one. It is a usual business expectation that larger manufacturers can guarantee good quality product, timely supply, quality services and financial security.
- (b) Football Queensland Limited disputes this statement. Football Queensland Limited is only aware of one supplier who is charging an extra cost as a result of the purchase of the Logo. This supplier is currently in dispute with Football Queensland Limited concerning the Marketing Scheme and is opposed to the operation of the Scheme. No evidence is produced by Mr Ripoll to support this claim.

- (c) Football Queensland Limited does not agree with this assertion. Evidence is that the Scheme actually delivers better pricing for Clubs and produces recourse for clubs if an inferior product is supplied.
- (d) Football Queensland Limited does not accept this claim at all. Pricing remains the same whether regional or urban.
- (e) Football Queensland Limited does not accept this claim as the Scheme has 10 suppliers currently active in the Scheme. Some of the licensees are amongst the largest sports apparel suppliers in the world. There is no evidence of price fixing or manipulation in Mr Ripoll's correspondence. With respect, Mr Ripoll has produced no evidence or argument that would support his assertions.

Mr Ripoll has sought to put a motion in Federal Parliament in essence condemning the Football Queensland Limited Marketing Program. Under privilege comments have been made by participants in that debate which in Football Queensland Limited's view would be defamatory if said outside of Parliament.

5 Licensees

- 5.1 Submissions have been made by current licensees in support of the Scheme including licensees not selling large volumes into the Queensland market.
- 5.2 Supporting submissions have been made by Football Queensland Member Zones and Clubs. These submissions provide evidence of public benefit (member benefit) outweighing any perceived detriment.

6 Confidential submissions

- 6.1 Clearly several confidential submissions have been made to the ACCC. It is impossible for Football Queensland Limited to respond to these submissions as it has not been given the opportunity to view them. The parties involved could or could not be acting in self interest. Football Queensland Limited is unable to determine whether this is the case, as they are restricted.

6.2 The restricting of the identity and contents of the submissions puts Football Queensland Limited at a distinct disadvantage in responding to same.

7 **Response to ACCC Assessment – Area of Competition**

7.1 Football Queensland Limited remains of the view that the relevant markets are wholesale and retail markets for sporting apparel. Football Queensland Limited's view is that football apparel is part of a broader sporting apparel.

7.2 Football Queensland Limited supports its view when one looks at the range of sports that many of licensees supply to, for example:

7.2.1 Adidas supply clothing for football, rugby, tennis, golf, cycling, hockey, etc;

7.2.2 Nike also supplies to a whole range of sports;

7.2.3 Several of the smaller licensees supply to several sports.

7.3 The ACCC noted at paragraph 5.7 of the Notice several points in relation to the demand for Team wear products. At paragraph 5.3 the statement is made that

“Individual players do not usually purchase directly from Team wear suppliers. Generally Football clubs / teams purchase Team wear direct from suppliers and then sell this apparel to players (sic). However, ownership of football playing shirts is usually retained by the Clubs, so they can be used again in the following season:

Football Queensland Limited would agree with the majority of this statement except the suggestion that players purchase playing shirts (strips). Playing shirts are usually purchased by Clubs and retained by Clubs.

8 **The Counterfactual**

8.1 It is noted the ACCC has received previously no submissions concerning the counterfactual.

8.2 In consideration of the likely counterfactual the ACCC states what the relevant counterfactual would be, (ie. Football Queensland Limited would

remove the requirement for football clubs to purchase Team wear from licensed suppliers), (ie. The Team wear program). Clubs would then be free to purchaser sporting apparel from other potential suppliers in addition to existing suppliers, based on a range of considerations including price, quality and service.

- 8.3 It is implicit in the statement that the Team wear program somehow restricts Clubs from applying the considerations of price, quality and service under the current arrangements.
- 8.4 Football Queensland Limited disputes this is in fact the case all of the above factors currently operate in the market.
- 8.5 The ACCC goes on at 5.14 to suggest that Football Queensland Limited could still set minimum quality standards for football apparel equipment. The ACCC makes this statement with no indication of what mechanism that Football Queensland Limited could put in place to deal with suppliers that failed to meet the standards set.
- 8.6 As the transactions would be carried out between the Clubs and the suppliers it is difficult to see how Football Queensland Limited could enforce such standards without the authority provided under the Licence Agreement.
- 8.7 It is suggested that Football Queensland Limited should fine / punish its Club members for purchasing inferior product? Such action would of course be condemned as punishing the victim.
- 8.8 Further the ACCC suggest that Football Queensland Limited would also require the use of its Queensland Logo and charge for the use of the intellectual property. Again, this suggestion lacks creditability when one looks at the practical application of the proposal.
 - 8.8.1 How would Football Queensland Limited be able to establish what sales of clothing are being made by an unlimited range of potential suppliers?
 - 8.8.2 Who is to be responsible for the application of the Queensland logo to the apparel?

- 8.8.3 Is the ACCC suggesting this is a function to be performed by Club volunteers?
- 8.8.4 How is the royalty payment to be collected?
- 8.8.5 Is it to be a Club volunteer's responsibility?
- 8.9 The ACCC also fails to appreciate that the Queensland logo serves an important function in accounting for the volume of apparel sold by the different suppliers.
- 8.10 Also, if the ACCC suggestion was adopted, the Clubs could in fact be worse off than under the current system. Apart from the actions of one current supplier (who is in dispute with Football Queensland Limited), no other current supplier adds the cost of the Queensland logo to the purchase price of apparel sold.
- 8.11 Bringing in a system where the Logo is an additional cost to the logo could add significant cost to a Club's clothing costs.
- 8.12 Further, as to the ACCC's last line at 5.14 that Football Queensland Limited may seek methods of raising revenue in the absence of the Team wear program, it is difficult to see what options Football Queensland Limited has to raise revenue except to raise player levies.

9

Public Benefit

- 9.1 Football Queensland Limited is firmly of the view that the Team wear program delivers public benefits:
- Ensuring a good standard of product relevant to price paid;
 - Timely and reliable supply of Team wear apparel and equipment;
 - Promotion of the Code;
 - Promotion of the Football Queensland Limited brand; and
 - Generation of income for Football Queensland Limited to reinvest in the Code.

Clothing Standards

- 10.1 It is Football Queensland Limited's view that the Team wear program has been very successful in ensuring a good standard of clothing apparel being supplied to affiliate members.
- 10.2 The ACCC poses at paragraph 5.22 the question as to whether these standards would be maintained absent the arrangements.
- 10.3 In answer to the ACCC question Football Queensland Limited would ask the ACCC who would maintain the standards, is the suggestion this is another obligation the ACCC would wish to pass to voluntary club officials. Are Club officials left to argue the case with suppliers of inferior quality product.
- 10.4 The ACCC then goes on to pose the next question which asks whether standards are actually necessary to meet the objectives of the Sporting Association. It seems simply amazing such a question would be posed.
- 10.4.1 Is it the suggestion of the ACCC that the promotion of the Code of Football is not relevant to the standard of appearance of its players?
- 10.4.2 Is it appropriate for poorly designed and manufactured clothing to be supplied to Clubs? Clearly, adding cost to the operations of a Club in the early replacement of clothing and even inappropriate materials creating health issues for players.
- 10.5 Also the comment at the end of paragraph 5.22 suggests imposing the ultimate responsibility for setting and enforcing quality standards at Club level. It seems again that the ACCC is adding a further responsibility to the volunteer clubs official. No account seems to be taken of the respective bargaining / negotiating positions of a Club and a supplier.
- 10.6 The ACCC seems to have confused the benefit of the Team Wear Programs ability to require supplier's adherence to a good quality of new clothing apparel and the enforcement of dress standards at Club level. The comment in the last sentence of paragraph 5.22 well illustrates this confusion.

- 10.7 The comments made at 5.23 of the Draft Notice have been responded to earlier in this submission. It is noted the ACCC provides no suggestion as to how it would be possible for Football Queensland Limited to set minimum standards in the case where the Team wear program does not exist.
- 10.8 It is noted at paragraph 5.29 that the ACCC seeks to rely upon confidential submissions which the full content of same is not disclosed.
- 10.9 Football Queensland Limited does not consider its role to seek to set the price of apparel in the market place; to seek to do so may well contravene legislation banning such behaviour.
- 10.10 It is equally nonsense to suggest Football Queensland Limited must call for a whole range of sample products prior to issuing a tender. Football Queensland is very familiar with the football clothing product available in the market place. The company is in fact a large purchaser of such product for our teams.
- 10.11 Football Queensland Limited has been able to maintain quality to a higher standard than if the program did not exist by dealing directly with licensees on behalf of members if a quality failure does occur. For example, only in recent times Football Queensland Limited acted to have the recall of a large volume of footballs found to be defective. The supplier responded to Football Queensland Limited's request and replaced hundreds of defective balls with a higher quality ball at no cost.
- 10.12 Football Queensland Limited has acted on a number of occasions to ensure standards were met by suppliers.
- 10.13 Football Queensland Limited has sought to explain to the ACCC that through the selection of suppliers with a proven track record in the supply of football apparel and the close monitoring of consumer complaints, Football Queensland Limited is able to deliver to its members through the Team wear program a good general quality of clothing with low levels of dissatisfaction.
- 10.14 The ACCC's conclusion that Clubs can perform the functions based on their own quality assessment leaves Clubs open to be prayed upon by unscrupulous suppliers who may provide a reasonable quality sample but

not deliver on quality when the volume is delivered. The ACCC also exposes Clubs to the actions of some suppliers tying Clubs into multi-year “sponsorship contracts” that requires the purchase of a minimum amount of product over a number of years without any guarantee as to quality.

11 **Tender Process**

11.1 The ACCC makes an assumption at paragraph 5.33 that the Team wear program is unlikely to result in levels of better service / quality through the exercise of Football Queensland Limited bargaining power.

11.2 This comment displays a lack of understanding as to the impact of the program. Suppliers within the program compete actively to secure a place within the football apparel market. Some Clubs have reported to Football Queensland Limited significant price savings particularly on product supplied by well known international brands.

11.3 It is with interest that Football Queensland Limited notes the ACCC comments at paragraph 5.36. In previous dealings with the ACCC correspondence has been forwarded to Football Queensland Limited by the ACCC supporting the high number of suppliers under the Team wear program. This was also the position taken by the ACCC in the FFV notification.

11.4 It is interesting to note that the ACCC appeared to have changed their view as to the merit of an increased number of suppliers. None of the criticisms of having a large number of licenses outlined in this paragraph have ever been put previously to Football Queensland Limited by the ACCC.

11.5 Football Queensland Limited refutes the conclusion of the ACCC in paragraph 5.37 as Football Queensland Limited has provided sufficient information to the ACCC to display the efficiency and effectiveness of its tender process.

12 **Generation of Revenue for Football Queensland Limited**

12.1 Football Queensland Limited is of the view that the ACCC is in fundamental error when it requires Football Queensland Limited to provide information

that explicitly demonstrates expenditure of revenues earned from the Team wear program being returned to the sport.

12.2 Football Queensland Limited as requested provided detailed financial information as to its expenditure. It is simply a nonsense to suggest Football Queensland Limited has to prove the income earned from the Team wear program was returned to the sport.

12.3 If one takes a look at the objects of the company one can see the organisation exists in essence for the promotion of the sport. As Football Queensland Limited is a not for profit organisation all of its income is “returned to the sport”.

12.4 It should also be noted in the current FFV notification the ACCC acknowledged the above position as sufficient for establishing public benefit.

13 **ACCC conclusion on Public Benefit – Response**

13.1 Contrary to the allegation contained in paragraph 5.46 Football Queensland Limited disputes it has not provided sufficient financial information as to how it returns revenues to the sport.

13.2 Football Queensland Limited has provided detailed financial reports as to its expenditure. It has also provided examples of expenditure. There is no other requirement necessary to meet the statutory test.

14 **Public Detriment – ACCC assessment – Football Queensland Limited Response**

14.1 Football Queensland Limited remains of the view that there is no significant anticompetitive detriment associated with the notified document conduct.

15 **Reduced competition**

15.1 Football Queensland Limited notes that the ACCC raises concerns that the scheme prevents the possibility of obtaining apparel from non-licensed suppliers.

15.2 Football Queensland Limited does not consider the criticism valid as the number of licenses and the range of product available does not act to reduce competition or the range of product available.

15.3 Contrary to the assumption made by the ACCC suggesting that the impact more in regional areas in reducing suppliers this is not in fact the case.

15.4 Football Queensland Limited's experience has been that the Team wear program has acted to ensure that the pricing available to large urban areas has also been available to regional areas. The level of service has been very good and the quality of product supplied has also been very good.

15.5 Contrary to the assertion made by the ACCC in paragraph 5.59 the price of Team wear in Football Queensland Limited's experience has decreased over the last three years amongst its licensees.

15.6 Football Queensland Limited has received advice from several of the licenses under the program that they charge no more for licensed than non-licensed product. Several licensees have advised that they have forwarded confirmation of the above to the ACCC.

15.7 Football Queensland Limited cannot comment on confidential interested parties' submissions as they cannot view their submissions.

15.8 The ACCC should be able to easily confirm that no impost is made by the licensed suppliers by simply viewing the price catalogue of the licensed supplier.

16 **This simple step would confirm Football Queensland Limited view**

16.1 Football Queensland Limited is of the view that the ACCC has no evidence to substantiate its conclusion at paragraph 5.68. In fact, the evidence supplied by Football Queensland Limited and submitters would indicate the contrary.

17 **Administration and compliance costs**

17.1 The sum of \$74,277 quoted is inclusive of the purchase cost of Queensland logos. Actual administration is in the order of \$24,000 over the period.

17.2 It is noted Football Queensland Limited through the operation of the Scheme Football Queensland Limited is reducing the administration time required by volunteer club members.

17.3 The ACCC appears also not to have taken account of the time saved by Clubs in dealing with potential supplier distribution.

17.4 Football Queensland Limited is of the view that ACCC has no evidence to support its conclusion at paragraph 5.71

18 **Fundraising**

18.1 Football Queensland Limited is of the view that the Team wear scheme provides excellent funding to Football Queensland Limited to allow it to support its activities.

18.2 It also provides Clubs with guarantees of the supply of quality clothing at excellent pricing.

18.3 The ACCC solution to the lost funding from the discontinuance of the Scheme is to raise player levies. The ACCC has failed to take into consideration the impact in levies would have on families seeking to fund one or more children in the sport.

18.4 The registration fees quoted by the ACCC are usually found at the older age groups.

18.5 Many Clubs charge much lower fees for registration at lower ages to try and assist families having their children participate in the sport. To suggest that a levy be imposed across all members is simplistic and takes no account of the real impact of any increase, particularly at this time, on families.

18.6 The percentage increase if a levy was to be imposed across all age groups would be significant in the younger age groups. Such a measure would act to discourage families from placing their children in the sport.

18.7 Football Queensland Limited is of the view the cessation of the Team wear program will bring significant detriment to its members.

18.8 It is of the view that:

- Clothing prices will increase;
- Service will decrease;
- Clubs will be exposed to unreputable suppliers;
- Football Queensland Limited levies will have to rise as a result of the discontinuance of the scheme.