

8 March 2024

Ms Tess Macrae
Director, Competition Exemptions
ACCC

Dear Ms Macrae

Australasian Performing Right Association Ltd – application for revocation of authorisation AA1000433 and substitution of new authorisation AA1000661 – interested party consultation

Thank you for the opportunity to make a submission on APRA’s application for authorisation from the ACCC.

I am the Managing Director of Mushroom Music, an independent Australian music publisher based in Melbourne. Mushroom Music has been in operation since 1972 helping Australian songwriters to build rewarding, sustainable careers.

As a proudly Australian independent company, Mushroom Music is certainly not the biggest music publisher operating in Australia, in fact our revenues and market share are modest when compared to the major international publishing houses. However, we consider ourselves to be true champions of emerging Australian artists and pride ourselves on nurturing talent. Whether new or established, cult or chart-topping, our Australian songwriters are at the heart of everything we do.

I am also a Non-Executive Director of APRA. I was first elected to the APRA Board in November 2021. Mushroom Music is the smallest independent music publisher currently represented on the APRA Board. While definitely not the sole reason, I do think a factor which would have assisted my election to the APRA Board, was the change in APRA’s voting entitlements in Board elections in 2018. When I look around the APRA Board table I see what I would consider to be a broad representation of the diversity of APRA writer and music publisher members. I do not consider the Board to be dominated by the voices of local representatives of the major international music publishers.

Last year I had the privilege to be the “Board Buddy” to one of the two National Aboriginal & Torres Strait Islander Music Office “NATSIMO” Observers on the APRA Board, Catherine Satour. Catherine brought a quiet but strong voice focussed on equity and change to Board discussions. I think the APRA Board learnt as much from Catherine as she did from us and I remain deeply grateful for the opportunity to develop what I know will be an enduring relationship with Catherine.

My experience as both a Board Director of APRA and as the Managing Director of an APRA Publisher Member has been that APRA takes its obligations under its conditions of authorisation from the ACCC very seriously. In particular I have observed that APRA goes to great lengths to try and explain its (often complex) distribution policies as transparently and simply as possible; it does not try to stand in the way of members seeking to opt out or licence back their works in order to directly license them; and its ADR service, Resolution Pathways, is readily offered up for use in resolving disputes.

In summary, Mushroom Music's experience dealing with APRA between 2020 and 2024 has been positive and we are of the view that APRA's arrangements continue to result in a net public benefit. Accordingly we support APRA's current application for re-authorisation by the ACCC.

Please let me know if Mushroom Music can provide any further assistance with the ACCC's assessment of APRA's application.

Yours sincerely,



Linda Bosidis
Managing Director
Mushroom Music Publishing