



Dr. Eoin O'Neill,
Chairman,
The Copyright Review Committee,
Room 517,
Department of Jobs, Enterprise and innovation,
23 Kildare Street,
Dublin 2.

13th July 2011

Re: Consultation on the Review of the Copyright and Related Rights Act 2000

Dear Dr. O'Neill,

The Licensed Vintners Association (LVA) is the representative body for the publicans of Dublin.

Our members are liable for IMRO charges relating to the use of background and featured music. We note the legal rights enshrined in the legislation and do not dispute the principles. Our issue centres around the system and fees involved in collecting such royalties in Ireland.

IMRO are essentially a monopoly with regard to the setting of costs for the use of copyright music. Their current fee structure for the Dublin licensed trade involves a formula of increasing their fees by a minimum of CPI plus 3% per annum for background music and CPI plus 14% per annum for featured music. It takes no account of the serious declines in turnover and footfall since the onset of this deep recession in 2008.

We believe the EU market for copyright collection needs to be liberalised as a matter of urgency. In practice, this would facilitate the free movement of such services across borders. The laws of economics would be thus brought to bear on the provision of copyright collection services and would result in greater efficiencies, lower costs and greater innovation in the provision of these services.

Music rights in Ireland now cost substantially more than in the UK. This is a significant barrier to competitiveness and innovation in the Irish hospitality sector.

We urge you to recommend the various necessary legislative changes to facilitate copyright collection agencies from outside Ireland being able to compete in this market, thereby facilitating great competition and innovation

Yours sincerely

Donall O'Keeffe
Chief Executive