



newsXpress Pty Ltd ABN 99 098 073 833
National Support Centre: 3A Lynch Street Hawthorn VIC 3122
PH: 03 9524 8000 FAX: 03 9524 8099
www.newsXpress.com.au

June 12, 2020

Mr A Mahony
ACCC
GPO Box 3131
Canberra ACT 2601
By email: adjudication@accg.gov.au

Dear Sir

AA1000515 – NLNA - submission

We write on behalf of 225 newsXpress member businesses to register our objection to the authorisation request lodged by the National Lotteries and Newsagents Association Ltd (NLNA). Our objections are as follows:

1. **Not needed.** Newsagents are already well covered through the Australian Lotteries and Newsagents Association (ALNA), which has ACCC authorisation for this representation.

In our experience, we have found ALNA to be accessible, transparent and engaged in representation of newsagents in dealing with Tabcorp – this includes ALNA helping and representing small business retailers beyond its immediate membership base.

2. **NLNA / VANA representation of newsagents.** NLNA has one member, VANA. VANA is a commercial organisation focused on providing commercial products and services to newsagents from which it receives a commission. It has commercial relationships with Amazon, Tyro and Henderson Greetings and others. The commercial focus of VANA and NLNA is evidenced by their recent public advertising for commission only agents offering \$1,000 to \$2,000 a week in commission from sales.
3. **No public benefit.** VANA already has authorisation. NLNA, its only member, is represented through that.
4. **Track record.** The NLNA submission touts VANA's history and track record. While VANA does have a long history, there is little of that represented in the current organisation. In our experience, VANA has no track record of representative

achievement for an on behalf of its members. VANA's track record relates to its commercial businesses, from which it makes a commission.

5. **The authorization submission is a business plan move.** We see the NLNA application for authorisation as designed to provide them with something for their commission only sales people to sell and consider this objective to be the core reason for the application.
6. **Undermining integrity.** Given the core commercial focus of VANA and NLNA, their recent hiring of commission only sales people and their own commercial operations, granting the requested authorisation would undermine the integrity of ACCC authorisation.

Sincerely,

[Redacted Signature]

Mark Fletcher
Managing Director

M [Redacted] E [Redacted]