



Australian Community Futures Planning

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5 February 2021

Senator Slade Brockman
Chair, Senate Economics Legislation Committee
cc. Senator Alex Gallacher
 Senator Andrew Bragg
 Senator Jenny McAllister
 Senator Susan McDonald
 Senator Rex Patrick
 Senator Sarah Hanson-Young
By email:
economics.sen@aph.gov.au

**Senate Economics Legislation Committee
Treasury Laws Amendment (News Media and Digital Platforms
Mandatory Bargaining Code) Bill 2020**

Supplementary Submission for Tabling

In this submission:

- 1. Response by Dr Bronwyn Kelly, Founder Australian Community Futures Planning to Treasury's tabled opening statement to the Senate Economics Legislation Committee, 1 February 2021**
- 2. Answer to Question by Senator Patrick regarding the proportion of digital advertising revenue captured by Google and Facebook**

Dear Senators,

Thank you for accepting my witness statements at the Senate Economics Committee this week on the News Media and Digital Platforms Mandatory Bargaining Code Bill 2020. I have been advised that Treasury has tabled an opening statement for its appearance at the Committee on 1 February 2021. I request that the Committee consider this response to Treasury's remarks from Australian Community Futures Planning. I trust that this response will provide some insight into useful amendments to the legislation that will help shield the Commonwealth from significant legal risk arising from the Bill as currently structured.

I have also offered a response to Senator Patrick's question to me in the Committee hearing:

Senator PATRICK: The evidence the committee received—just talking about advertising—is that Google and Facebook basically have 81 per cent of the market and 19 per cent goes to everyone else. Do you accept that as a fact?

1. Response to Treasury's opening statement - Potential exposure for the Commonwealth to legal challenge arising from the Bill

Treasury's opening statement tabled on 1 February 2021 raises concerns that the legislation as drafted contains some critical weaknesses – enough to expose the Commonwealth to significant risk of litigation and failure in what may turn out to be very expensive and protracted legal proceedings. The government itself has also already acknowledged that the risk of court proceedings following the introduction of the legislation is palpable. See paragraph 2.10 of the Treasurer's explanatory notes to the revised bill:

Risk – Court proceedings following introduction of legislation

2.10 The Code has been constructed to minimise the potential for successful legal challenge under the Australian law. Nevertheless, it is possible that, for example, decisions by the Treasurer to designate digital platforms could be subject to legal challenge.

ACFP would assert that the legislation exposes the Commonwealth to legal challenge and is unsafe, particularly because it is built on a single and demonstrably unreliable foundation. A decision has been made to base the entire legislation on an assertion that there is a “significant bargaining power imbalance” between Google and Facebook on one hand and Australian news businesses on the other. No other basis for the legislation has been put forward in the relevant section governing the critical decision which triggers the mandatory Code – namely, Section 52E, under which the Minister may make a determination to designate a digital platform service and corporation as being subject to the Code:

52E Minister may make designation determination

(3) In making the determination, the Minister must consider whether there is a significant bargaining power imbalance between Australian news businesses and the group comprised of the corporation and all of its related bodies corporate.

(4) In making the determination, the Minister may consider any reports or advice of the Commission.

The ACCC has asserted that the Digital Platforms Inquiry Final Report “provides strong grounds for the Treasurer to designate these services [Google and Facebook]”. But there is significant doubt about the grounds on which the ACCC has asserted that Google and Facebook in this instance may be legitimately designated.

ACFP has asserted that in the case of Google and Facebook, no bargaining power imbalance over Australian news businesses has been proven to exist and that, if anything, the data relied on by the ACCC to provide comfort to the Treasurer that Google and Facebook may be legitimately designated is more likely to confirm that Google and Facebook do **not** hold a bargaining power imbalance over the news businesses, let alone a “significant” bargaining power imbalance. And they do not hold an imbalance by virtue of acting as a gatekeeper or unavoidable trading partner syphoning advertising revenues from news businesses by “using” their news content. On the contrary, the value exchange flows the other way – Google and Facebook are directing potential advertising and subscription revenues to the news businesses. This would imply that implementation of the Act is not practicable without exposure of the Commonwealth to risk of litigation – and litigation that it is by no means sure of defending, **because the ACCC's own data may be easily used against the Commonwealth.**

Those drafting the legislation have attempted to ward off this acknowledged legal risk by imposing no constraints or limitations on the Treasurer's power to make designations and no measures of accountability for his decision. The Treasurer “must **consider** whether there is a significant bargaining power imbalance” but is not required to prove it or even provide supporting evidence

according to a specified standard. Nor is the Treasurer strictly obligated to consider reports or advice of the ACCC. In short, the bill grants the Treasurer power to determine the imbalance and the designation by mere fiat. Given this unusual acquisition of power by a single Minister without accountability of any kind, senators may at least wish to seek formal advice on the exposure for the Commonwealth if a power is exercised unreasonably over commercial corporations and/or is exercised in a manner that is at odds with the objectives of Australian Competition Policy and Principles.

Invalidity of the ACCC's conclusions supporting the existence of a bargaining power imbalance

The ACCC has effectively stated that the Digital Platforms Inquiry Final Report itself constitutes prima facie evidence of the validity of a designation under the Act. As to whether the Digital Platforms Inquiry Final Report "provides strong grounds for the Treasurer to designate" Google and Facebook, ACFP would suggest that senators consider the following information.

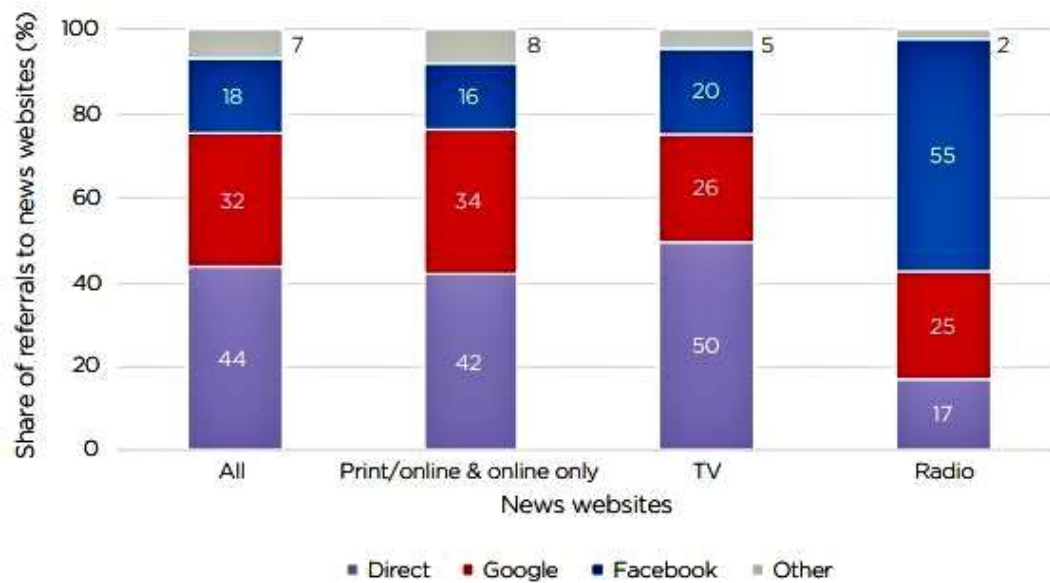
The ACCC has certainly attempted to assert that there is an imbalance and that it is significant, but the claim is untenable based on the evidence supplied by the ACCC itself. For instance, as stated in the ACCC's recent submission to the Senate Inquiry into Media Diversity in Australia:

The DPI Final Report found that Google and Facebook have each become unavoidable trading partners for Australian news media businesses due to the fact that these platforms act as 'gateways to the internet' for many Australian news consumers. For example in 2017-2018, 50 per cent of referrals to news websites came from Google or Facebook, with only 44 per cent of online news audiences accessing news content directly through the webpage of the news provider [page 296 of the DPI Final Report]. This has resulted in a significant bargaining power imbalance between Australian news media businesses and *each* of Facebook and Google [my emphasis].

This is an attempt to imply that news businesses can now no longer get by without Google and Facebook and have no alternative. But the claim is untenable because:

1. The news businesses themselves have been asserting that they, as businesses (and the rest of Australia for that matter) could survive quite nicely without Google and Facebook. They have claimed that if Google and Facebook depart Australia then readers will simply track to the news websites by all the other channels currently open to them. This does not support a contention that Google and Facebook are unavoidable trading partners and that without them news businesses will die. It contradicts the ACCC's contention.
2. Clearly, the news businesses do have alternatives and are using those alternatives, as shown by the ACCC's own data which they summarise in the following chart from their Digital Platforms Inquiry Final Report:

Figure 6.4 Means of accessing news media websites in Australia in 2017-18



Source: ACCC analysis based on data provided to the Inquiry.

In this chart it is clear that:

- the ACCC is invalidly attempting to aggregate the influence of Google and Facebook (adding together their several contributions of referrals so that they equal 50%) to imply that:
 - they act as one and dominate the market by that means (when in fact they are competing with each other); and that
 - they have dominance in the market severally (which when it comes to delivering news referrals they clearly do not); and that
 - they operate together collusively as a quasi-monopoly abusing gatekeeper power (when in fact they compete with each other); and finally that
 - the referrals being provided by Google and Facebook do not track in the news businesses' favour, when in fact they track entirely in the news businesses' favour and are provided at no cost to the news businesses.

In short, the ACCC is representing the referrals that Google and Facebook provide to the news businesses as a theft from them rather than the outright gain that they are to the news businesses¹. If there is a bargaining power imbalance, it is not working to the disadvantage of the news businesses. The current market structure of the net as an open platform effectively prevents any such disadvantage and protects access on reasonable terms for anyone wishing to enter the market.

The presence of Google and to a lesser extent Facebook has also been instrumental in assisting news businesses to transition to new business models for delivery of advertising. This transition has been quite successful, to the point where, contrary to popular misinformation, Google and Facebook do not dominate the available advertising revenues in Australia. As at 2018, the ACCC's data show that

¹ It should be noted that the referrals provided by Google and Facebook would largely be one-offs of new customers that the news businesses can then retain to revisit them direct in future (via apps or subscriptions) without the need to seek the same referral again from Google or Facebook. Taking this into account, the news businesses' dependency on referrals from Google and Facebook is actually much smaller than is implied by the ACCC.

Google and Facebook when taken together have an approximate 32% share of the total available advertising revenues in Australia (22% for Google and 10% for Facebook, according to the ACCC). The other 68% is still received by:

- non-digital media (print, TV, radio and outdoor/cinema) = 47%; and
- digital news media businesses and classifieds = 21%.

For more detail see section 2 of this submission below.

There is no evidence here that Google and Facebook exert gatekeeper pressures over the news businesses and no evidence has been provided by the ACCC that Google and Facebook have colluded or acted as a cartel to exert dominance over other players in the market. If the ACCC has to add the **referrals** of Google and Facebook together (so that they equal 50%) to support an argument that they have more market power than the news businesses (who generate 44% of referrals to themselves), then the ACCC is clutching at straws, especially when all the benefit of the referrals is free to be captured in full by the news businesses (if only they don't put up paywalls and refuse the benefit of the referrals offered to them by Google and Facebook for zero cost).

If evidence of collusive behaviour by Google and Facebook exists, there are already laws to prohibit that. New legislation is not needed and the News Media Bargaining Code is not an instrument capable of preventing such collusion. It is much more akin to an instrument capable of decreasing competition by punitively burdening two players with massive costs that their competitors do not have to absorb.

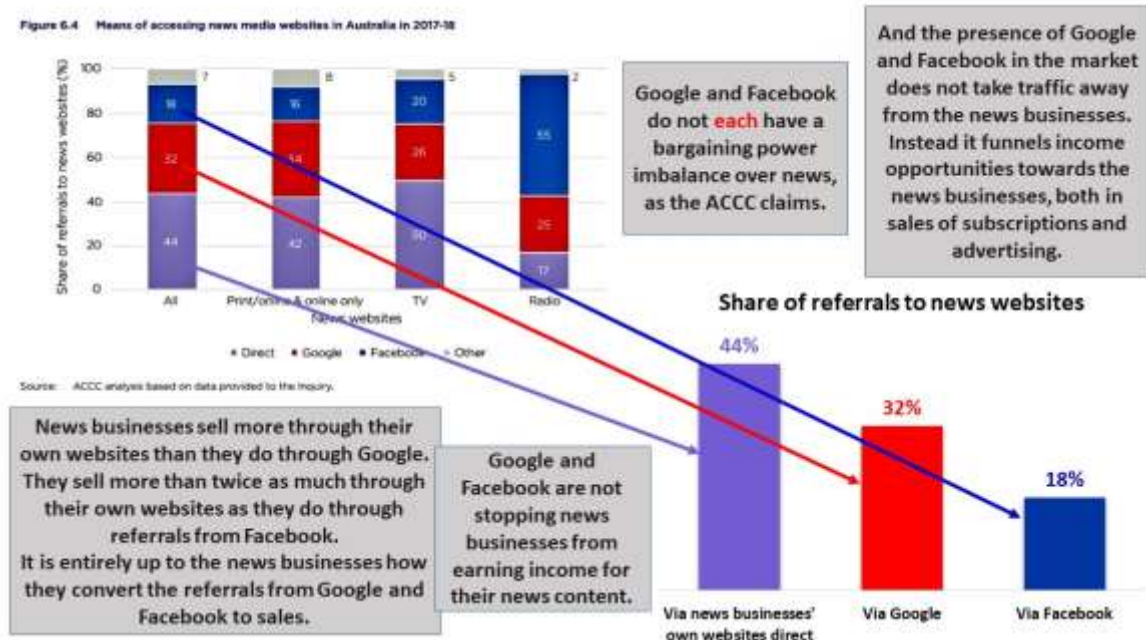
The facts about the bargaining power balance are:

- According to the ACCC, "44 per cent of online news audiences access news content directly through the webpage of the news provider." This exceeds the referrals delivered by either Google or Facebook, although the ACCC has taken pains to make it look as if too many referrals are funnelled through Google and Facebook by adding their referrals together. All this proves is that Google and Facebook give the news businesses a lot of referrals free of charge, over and above what the news businesses can garner for themselves through their own websites. It augments the income of the news businesses; it does not deplete it or syphon off what they would otherwise be able to obtain if Google and Facebook (or another search engine for that matter) did not exist. Google and Facebook do not stand in the way of news businesses for fair recompense for their journalism and shares of the advertising market revenues.
- The ACCC claims in the above chart that 34% of audiences use Google to access news content in print/online and online only news publications. But what they have not mentioned to the Senate Committee is that in the fine print of their 600+ page Digital Platforms Inquiry Final Report they later correct that figure of 34% and say that when usage of publishers' own apps is excluded, only 26% use Google to access news in print/online and online only news publications. Google asserts that this figure is only 21%. Either way, this does not demonstrate that Google acts as a significant barrier or unavoidable gateway to the internet for news and it is unprofessional of the ACCC to divert attention from those features of its data which do not support its conclusion.
- Nor does Facebook, by the ACCC's data, constitute an unavoidable gateway inasmuch as, according to the ACCC, only 16% of audiences use Facebook to access news content in print/online and online only news publications.

None of the percent data quoted about Google's share and supposed gatekeeper power (figures variable from 21% to 34%) add up to more than what the news businesses are garnering from visits made direct to their websites (44%) and from visits made direct to print newspapers and broadcast (55%).

And likewise, none of the percent data quoted about Facebook's share and supposed gatekeeper power across all platforms (18%) adds up to more than what the news businesses are garnering from visits made direct to their websites (44%) and from visits made direct to print newspapers and broadcast (55%). Even if it did, it shouldn't be a problem because more referrals only mean more money for the news businesses.

As such, the ACCC's data on which it has relied does not support its claim of a market power imbalance as the following chart prepared by ACFP explains and as such there are no demonstrably strong grounds on which the Treasurer could legitimately or fairly designate Google and Facebook:



Indeed, designation of Google and Facebook as unavoidable trading partners and pursuit of them with a Code so biased in favour of one side is anti-competitive, inasmuch as it can only result in fewer players in the market - which obviously lessens competition. This is inconsistent with Australia's competition principles.

Additionally, the alacrity with which the government appears to have welcomed the potential departure of Google and/or Facebook from the Australian market would suggest a thoughtlessness about the impact on so many Australians who wish to be able to use Google and Facebook. There is no reason to deny Australians access to the fullest range of willing suppliers of search and share services when in fact such a denial lessens competition in the market and negatively impacts trading and education opportunities for Australians. It is presumptuous in the extreme to deny Australians the choice to use these services by aggressively making them bear costs which their competitors need not.

Recommended amendments to mitigate risk arising from the Bill

When the anti-competitive features of the Code are taken into account, along with the risk of exposure to litigation from designation of Google and Facebook without demonstration of a significant bargaining power imbalance, there are substantial concerns that the News Media Bargaining Code will not achieve the objectives of healthy journalism capable of supporting a strong democracy. Accordingly, ACFP would respectfully submit that the Senate Committee may recommend amendments which establish:

- an obligation on the Minister to transparently demonstrate proof of a significant bargaining power imbalance whenever he or she is considering a designation; and
- a right of appeal by any corporation that is designated.

Recommended amendments to achieve a bargaining power balance, not a reversal of an imbalance

Also the Senate Committee may recommend an amendment replacing the mandatory “final offer” arbitration formula that must be used by the arbitrator with simple standard arbitration. Such an amendment would protect all parties fairly and thereby maximise the potential for a genuine level playing field for competition. Final offer arbitration maximises the potential for favouritism to one side.

Recommended amendments to protect democracy from growth in sub-standard journalism

Finally, ACFP would submit that algorithm notification periods be deleted entirely from the bill as the notification period also gives an advantage to those who receive the notifications over those who do not and it encourages this lucky few not only to game the system but to design the content of news and make editorial decisions based on knowledge of where the click bait will be in 14 days’ time. This will narrow diversity of journalistic content and reduce the quantity of public interest journalism. ACFP would suggest the algorithm notification be replaced with notification of changes in policy overarching the use and modification of algorithms. The intention would be to set standards similar to the standards journalists set for themselves when they adopt a code of conduct or practice and to enable independent audit of compliance with those standards.

2. Answer to Question by Senator Patrick regarding the proportion of digital advertising revenue captured by Google and Facebook

During the hearing on 1 February, Senator Patrick asked me this question:

Senator PATRICK: The evidence the committee received—just talking about advertising—is that Google and Facebook basically have 81 per cent of the market and 19 per cent goes to everyone else. Do you accept that as a fact?

I replied:

Dr Kelly: I don't think the ACCC's report says that.

To which Senator Patrick added:

Senator PATRICK: In the evidence provided to committee, Mr Sims—and I will just quote from the transcript—said: Google and Facebook have about 81 per cent of the digital advertising market, and everybody else has the remaining 19. That's what he told this committee last week.

I have reviewed the ACCC's Digital Platforms Inquiry Final Report and can confirm that my answer was correct: The ACCC's Final Report does not say that "Google and Facebook have about 81 per cent of the digital advertising market, and everybody else has the remaining 19." Mr Sims would seem to be at odds with his own Report here. The Final Report shows instead that Australian digital advertising market revenues are estimated by the ACCC to be shared approximately in the proportions shown in the following table:

Estimate of share of digital advertising revenue Australia - 2018	
Google	42%
Facebook	19%
Other – news media and classifieds	39%

So Google and Facebook do not have 81% of the digital market, they have 61% according to the ACCC. And "everybody else" has 39%, not 19%.

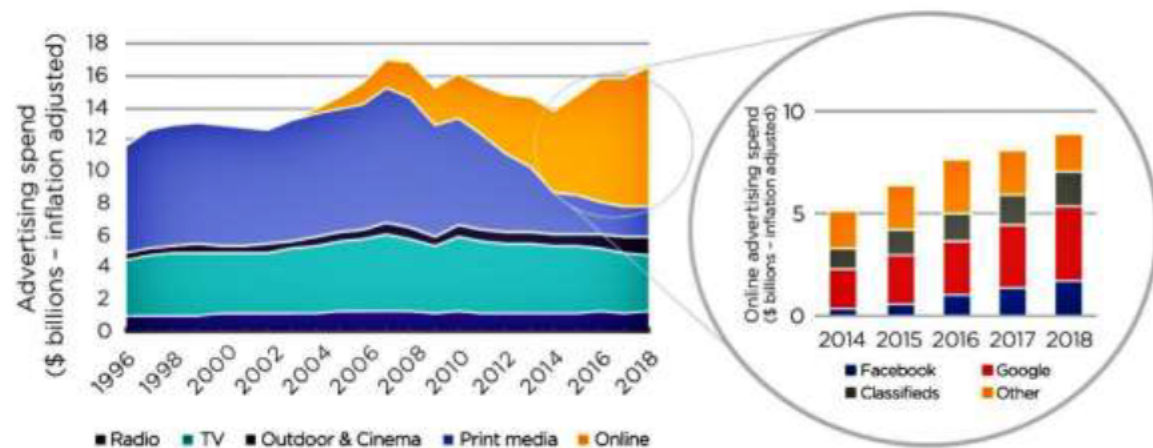
The above estimated data are derived from the ACCC's graph on page 18 of their Digital Platforms Inquiry Final Report, reproduced below. Please note these estimates have been extrapolated by me via this ACCC graph. It has not been possible for me to access the ACCC's exact data on this due to the fact that the ACCC didn't provide it, although they do provide data for Google's share of available digital advertising revenues in 2018 (\$3.7 billion) and Facebook's (\$1.7 billion). My estimations are extrapolations based on those two published figures and the ACCC's graph. They are very close to the ACCC's probable numbers.

Clearly, the ACCC's estimate of Google and Facebook's share of Australian digital advertising revenues would appear be significantly lower than stated by Mr Sims. It would seem to be more like 61%, not 81%. And the share of Australian digital advertising revenues flowing to other players in the market – which would be predominantly online news businesses as classifieds – is more like 39% than 19%. We are looking at a 60/40 split here, not an 80/20 split and this is only in *half* of the available advertising market revenues. Google and Facebook have no share of the other half (because it is non-digital). See below.

How do I draw the conclusion that Mr Sims has not reflected the full picture of advertising market shares (either in the digital sphere or the non-digital sphere)? Here is the ACCC's graph showing change in advertising market shares since the introduction of digital advertising²:

² ACCC, Digital Platforms Inquiry Final Report, page 18.

Figure 3 Australian advertising expenditure by media format and digital platform



Source: ACCC estimates of spend relating to Australian customers based on CEASA data and information provided by market participants. Amounts are shown in 2018 Australian dollars⁷

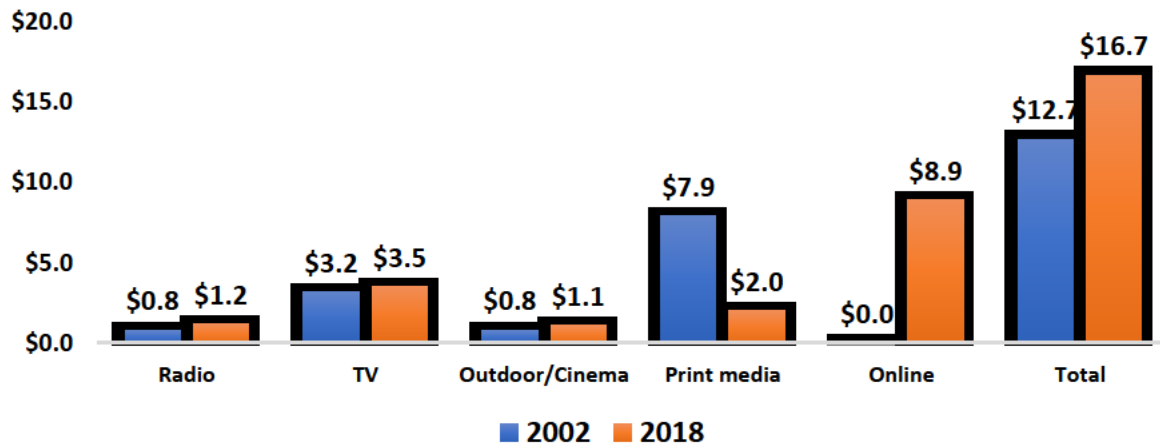
This is the graph I spoke of in my appearance before the Committee. Clearly, it does not show that Google and Facebook have 81% of the digital market. Their share is more like 61%. And to put the picture more fully, as it should have been by Mr Sims (but wasn't), the graphs below, which are prepared by ACFP, based on the ACCC's graph and figures, show that of the total non-digital and digital available advertising revenues, Google and Facebook have nowhere near a majority of the total advertising market:

Estimate of share of non-digital and digital advertising revenue in Australia Available through and to media platforms of Print, TV, Radio, Outdoor/Cinema and online – 2018 – based on ACCC's data.	
Google	22%
Facebook	10%
Advertising income for other players – digital (incl. online news media and classifieds)	21%
Advertising income for other players – non-digital (Print, TV, Radio, Outdoor/Cinema)	47%

Mr Sims has excluded much of the advertising revenue shares still being commanded by non-digital platforms and by online news media businesses by suggesting that the digital market is the only thing we should look at to determine whether market disruption has led to full advertising market failure. In being selective about which data and which part of the whole available market he wishes to foreground, Mr Sims has created an impression that the rise of digital platforms (of which online news media itself is one) has disrupted news businesses' advertising income much more than it actually has.

Certainly annual print advertising income has dropped from around \$7.9 billion in 2002 to about \$2 billion in 2018. But no other non-digital platform (TV, Radio or Outdoor/Cinema) would appear to have suffered a loss of advertising revenue, at least according to the ACCC, as can be seen in the following graph by ACFP (based on the ACCC's graph).

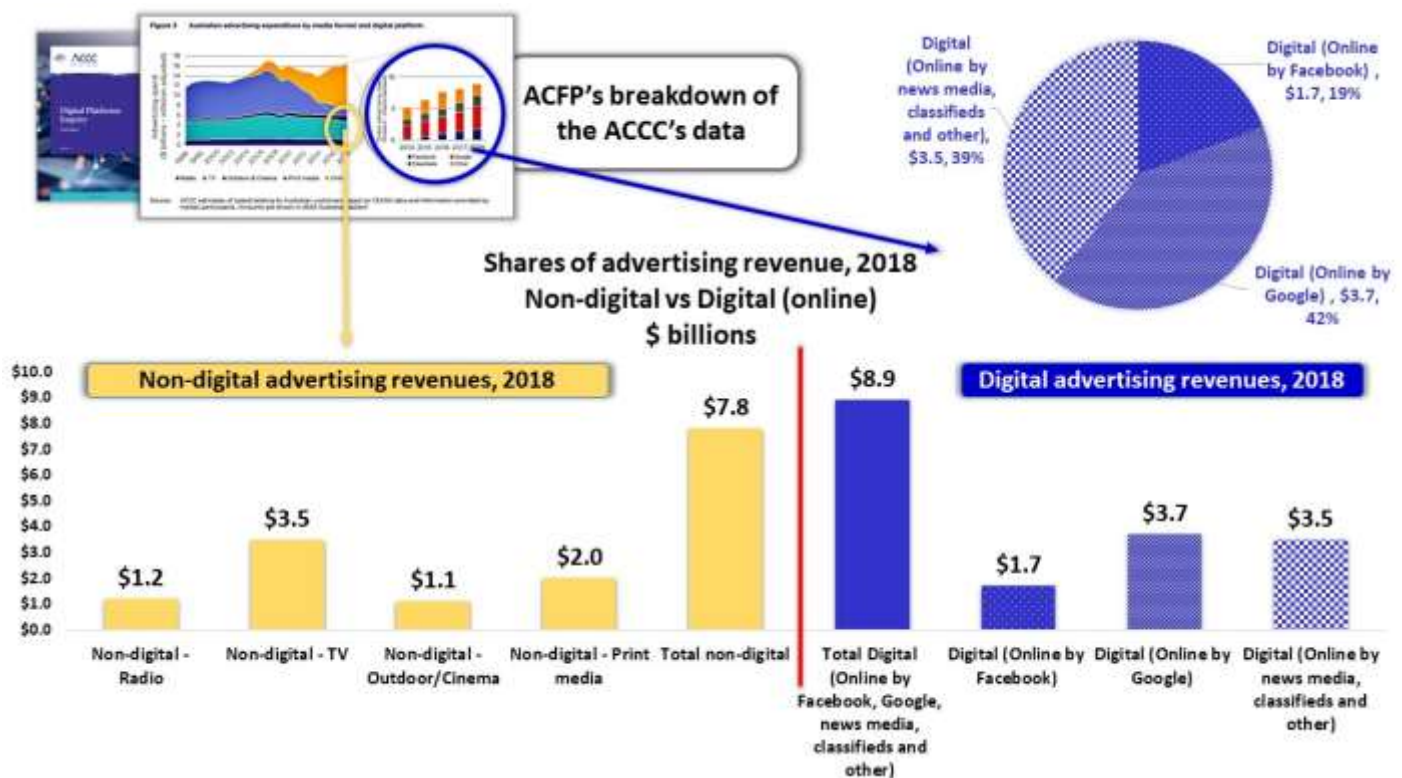
Change in advertising revenues for Australian advertisers 2002 to 2018 \$ billions (approx.)



This shows that the print media businesses have been hit hard (losing almost \$6 billion a year compared to what they could command before the digital period) but it is also apparent from the following graph that with the rise on online advertising opportunities available to news businesses, they have probably clawed back at least half of the advertising revenues they enjoyed in 2002 and can now access even more in subscriptions:

- Print advertisers have lost about \$6 billion since 2002 but have gained back approximately \$3.5 billion by shifting into online advertising and their margins on this new product would be much larger than their margins for sales of print advertising. So the net position of news businesses would probably be similar to what it was in 2002. Anyone listening to Mr Sims would think news media advertising businesses make no money at all in the digital realm, when in fact they command almost 40% of Australian digital advertising revenues.

The following graph has been prepared by ACFP on the basis of the ACCC's chart and their available figures to show the reality of shares of advertising revenue held by news media businesses, versus Google, Facebook and other advertisers. The ACCC's charts cannot be interpreted to accord with Mr Sims' version of digital advertising market shares presented to the committee on 22 January 2021.



It should be noted that from a total income perspective, the news media businesses should be even better off in a digital age because the digital platforms have not only been feeding them online advertising revenues (so that they now command almost 40% – not 19% as Mr Sims has stated), they have also fed them increased reader subscriptions (assuming the news businesses do not turn down these subscriber opportunities by putting up a paywall – as Murdoch does). As such, Google and Facebook have made it possible for news businesses to thrive in the digital age, feeding them excellent opportunities for advertising income and subscriptions – without charge.

Despite all the complaint by news businesses that they are being put out of business by Google and Facebook, the ACCC's graph shows that advertising income is still available in billions of dollars to the news media businesses of Australia. In fact, **of the total advertising revenue of approximately \$16.7 billion that appears to be available to advertising companies** (including news businesses several of which are really just advertising companies):

- **only \$5.4 billion has been cornered by Google and Facebook,**
- **\$10.2 billion is cornered by news businesses including Print, TV, Radio and their online news, and**
- **\$1.1 billion is cornered by Outdoor/Cinema.**

This is clear in the above graph and the graph on the following page prepared by ACCP based on the ACCC's graph above. Google and Facebook have little more than 60% of about *half* of the total market of available advertising revenues (or approximately 32% of the total advertising revenues available in Australia). If news businesses can't produce some decent journalism with \$10.2 billion a year (on top of their rising digital subscription revenues), then they are simply not committed to democracy.

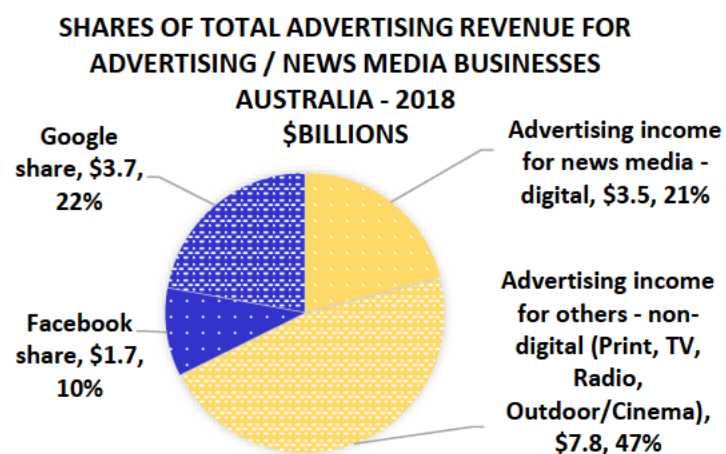
This is doubly true insofar as the available advertising revenue itself in Australia has not dropped since the rise of the internet – it has risen by 34%. And it now costs news businesses far less to pump

out more content and far less to distribute it (if they switch to digital delivery of news). The financial future of news has not been jeopardised by the digital platforms or even by the internet. If news businesses are genuinely committed to democracy, they can utilise the rivers of gold they still command to improve public interest journalism standards instead of media moguls' bank balances.



In summary, which businesses make the most money out of advertising in Australia?

According to the ACCC's data, it is not Google and Facebook, it is still print, TV, radio, online news media businesses, and outdoor/cinema advertisers, as this chart shows:



Based on ACFP's dissections of the ACCC's graphs and other figures they have supplied in their Digital Platforms Inquiry Final Report, it would appear that Mr Sims has not supplied the Senate Committee with the same picture provided in his Final Report. He has proffered part of the picture – the part which foregrounds data for part of the total market of advertising revenues available in Australia, and he has not reflected those particular data accurately. Unless he has access to more up-to-date data, then ACFP would submit that it is not reasonable to conclude from the data in the Digital Platforms Inquiry Final Report that a market failure has occurred or that there is a bargaining power imbalance that requires correction. There is certainly no justification of a 180° reversal of an imbalance.

If the ACCC is correct that news businesses are *forced* to deal with Google and Facebook (this is not correct but let us assume it might be), there is still no evidence that this is working against them. There is no evidence that the net position of the news businesses has become untenable in the digital age. The *composition* of their income has been affected but in the main that is for the better. Less reliance on advertising is a good thing for news businesses. I would request that the Senate Committee not take us back to the bad old days of advertising dependency for the survival of journalism. We will just end up with a flood of rotten journalism.

If it were true that news businesses are in trouble and true that this was being caused by anti-competitive behaviour by Google and/or Facebook, then there might be some justification for a market intervention to re-balance bargaining or market shares. But neither of these things are true,

or at least they have not been proven by the ACCC. Google and Facebook are by no means unavoidable trading partners and to the extent that the news businesses do trade with them it is entirely to the advantage of the news businesses. Google and Facebook have not stolen their content and then made money from it. On the contrary, they have helped them sell content that would not otherwise have been sold and earn advertising and subscription income that would not have come their way in the digital disruption without the help of Google and Facebook.

It is a wholly excessive step to impose a Code on two players that forces them to bear the costs of their competitors among the news media advertisers and bear those costs when their other competitors (eg., Bing) do not. It is wholly excessive to drive two of the most efficient service providers out of the market so that Australians will have less choice about search and share services than they do now. That is completely anti-competitive and that the government should be so cavalier about chasing out a service such as Google – a service that is vital to education for younger generations and vital to billions of transactions in Australia's international and domestic trade – should be beneath any government that cares about Australia's future.

I have noted Mr Sims' comments in his appearance before the Senate Committee on 22 January that brinksmanship has a role to play in commercial negotiations between big hitters like Murdoch, Nine, Google and Facebook. If the Code has been drafted as an overreach tactic (and it certainly is overreach) in a brinksmanship play to get a better deal for news businesses, then the government should be careful not to overplay its hand lest the news businesses find themselves with no-one on the other side of the bargaining table. If the central objective is to save democracy, the Senate has so many other options which do not disadvantage Australian businesses and citizens as much as this one. Brinksmanship is essentially bullying. I, as one Australian, would be prouder of a government that didn't stoop to it and worked instead to ensure all participants in the information market – the most lucrative market of all time – exercise a more genuine corporate responsibility in the national interest while they continue to squabble over the rivers of gold.

In line with my statements to the Senate Committee on 1 February 2021, I would point out that there are three parties in this stoush – the news businesses, the big digital platforms, and democracy. By siding exclusively in brinksmanship with one party – the news businesses – the government and the ACCC have forsaken democracy. Democracy is not served by letting fewer players dominate an information market and flood it with poor quality journalism funded by the interests of advertisers. Democracy needs more independent journalism. It won't get it with the News Media Bargaining Code. But we can shore democracy up by other means. I refer the Committee once again to the 12 steps I suggested in my tabled submission. I wish you well in your task.

Yours sincerely

[Redacted Signature]

Dr Bronwyn Kelly
Founder, Australian Community Futures Planning
www.austcfp.com.au