

Discussion paper: Business Leadership in Consumer Protection OFT1058

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8th May 2009

Dear Kate,

I have pleasure in sending the response from the Periodical Publishers Association ("PPA") to the OFT discussion paper (OFT1058): **Business leadership in consumer protection - A discussion document on self regulation and industry-led compliance.**

About PPA and its members

PPA is the trade body for the UK Magazine and Business Media industry. Its 250 members operate in print, online, and face to face, producing more than 2,500 titles and their related brands.

The turnover of the UK magazine industry is approximately £6bn¹. The UK magazine industry consists of consumer magazines and business media brands – each of these sub-sectors with more than £2bn² of turnover – and customer publishing, with a turnover of c £900m³. The industry directly employs 114,000 people⁴.

About Self Regulation

PPA members are subject to a number of different self regulatory and co-regulatory regimes. These are variously designed to protect consumers; set standards; and promote compliance with the law. As stated in the Discussion Paper some of the provisions may exceed the requirements of the law.

We understand from the Foreword to the Discussion Paper that this paper is addressing the prospect of introducing further self-regulatory and co-regulatory schemes with possibly widely differing aims and functions as described broadly in Paragraph 2.9 of the Discussion Paper (Model of

¹ PriceWaterhouseCoopers Global Entertainment and Media Outlook: 2008-2012

² PriceWaterhouseCoopers Global Entertainment and Media Outlook: 2008-2012

³ Ibid.

⁴ PPA analysis of the Periodicals and Journals Industry based on Annual Business Inquiry



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Self Regulation components). While the distinction between the types of self regulation is of great importance, the underlying need is to protect the reputation of the whole system of self regulation.

The true measure of success of any type of self regulation is its ability to simply, quickly and cheaply help and protect consumers. This is perfectly illustrated at Paragraph 4.5 of the Discussion Paper.

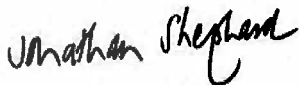
Key to Successful Self-Regulation

PPA supports the views expressed by the Advertising Association in its 12th March 2009 submission to the OFT related to developing use of "established means" (OFT1043con). We attach a copy as Annex 1 to this letter.

We are concerned that existing self regulatory and co-regulatory regimes which have established reputations for assisting and protecting consumers could inadvertently be damaged and devalued by encouragement of expansion of the system of self regulation without ensuring in each case that this is the most appropriate solution and will achieve positive reputational and practical results.

In looking at the specific questions in Paragraph 5.15 of the Discussion Paper PPA does not believe that these can be answered as general statements. PPA does not feel that the current system requires change or additional government support beyond the existing CCAS scheme and use of "established means" in future where co-regulation is required and "established means" will be likely to be effective in enforcing regulation. As always, we are more than willing to engage in formal or informal discussions to improve the end result.

Yours sincerely



Jonathan Shephard
Chief Executive
Periodical Publishers Association



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