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To Whom It May Concern,

Thank you for the opportunity to comment on the development of a National Cultural Policy.

The Australian Music Association is the industry body representing wholesalers, importers, manufacturers, retailers, and associated businesses for music products in Australia. Established in 1977, the AMA has a strong history of supporting and advocating for the music products industry and contributing to the development of musical life in Australia. One of our main interests, and the focus of this submission, is growing music making in Australia.

This submission focuses on only a few areas that particularly interest the AMA. There is much to say about the five pillars that this submission is not attempting to cover, on the basis that many others will do so based on their expertise.

The AMA is not financially supported by government funding, typically our members are not either. We are not seeking particular funding initiatives that would flow to our organisation or our members, although certain kinds of government investment in the arts certainly interact with our industry. Funding for schools to properly resource music education programs, and funding for live music venues and productions to improve their infrastructure, are examples of government investment that benefits cultural institutions, participants (in these examples, students, teachers, audiences, musicians), and our members.

#### Summary of proposals

- Provide universal access to music education through systemic improvements to, at least, meet the requirements of the Australian Curriculum: The Arts
- Specifically reference participation in the arts, strategies and institutions that support participation in the arts
- Guarantee radiofrequency spectrum for cultural use, particularly in the 600 MHz band
- Implement a system of Musical Instrument Certificates

Regards,

Alex Masso  
Executive Officer  
Australian Music Association

**1. Are you submitting this submission...**

- on behalf of a not-for-profit arts organisation
- on behalf of an arts peak body

**2. What challenges and opportunities do you see in the pillar or pillars most relevant to you? Feel free to respond to any or all pillars:**

This submission focuses on The Centrality of the Artist and Reaching the Audience. See below.

**3. Please tell us how each of the 5 pillars are important to you and your practice and why. Feel free to respond to any or all that are applicable:**

See below

**4. What other things would you like to see in a National Cultural Policy?**

This submission refers to things that do not fit easily into the five pillars but attempts to place them within these categories. The development of a National Cultural Policy presents an opportunity to develop and commit to policies in areas outside the Arts portfolio and even outside the parameters of the five pillars in the consultation material. All but one of these proposals relates to portfolios outside the Arts. See below.

**5. How would you like us to attribute your words?**

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## Music Education

Pillar:	<b>The Centrality of the Artist</b> (Also: All other pillars)
Portfolio/s:	Education (DESE), Arts
Context:	Goal 3, Creative Australia Policy; Australian Curriculum: The Arts
Proposal:	Provide universal access to music education

Our comments will focus on the provision of music education in Australian schools, which arguably addresses all five pillars. The third (Centrality of the Artist) is the approximate equivalent of Goal 3 from the Creative Australia policy, which referred to arts education.

The aims of the 2013 Creative Australia policy were:

- 1 Every student has the opportunity to receive an arts education.
- 2 Creativity in schools is considered as a vital 21st century skill to drive innovation and productivity.

These are worthy goals that could be retained almost without modification, but Australia needs more and better strategies to achieve these aims.

Quality music education is not universal in Australia. Although progress has been made, including through initiatives (National Music Teacher Mentoring Program) and curriculum (Australian Curriculum: The Arts, NSW Music Syllabus review), we don't really know the extent to which students are receiving an arts education at all, the depth and quality of their arts education experience, the training and preparedness of teachers to deliver the arts curriculum, or the resources available (and required) to deliver the curriculum.

The AMA values music education and music making very highly. There is considerable work to be done and some progress has been made including through the previous Cultural Policy, initiatives since that time (for example, parliamentary inquiry and subsequent Music Education Strategy in South Australia) and more recent efforts. The Creative Australia policy proposed the implementation of the Australian Curriculum: The Arts, and the National Arts and Cultural Accord, as the mechanisms for improving access to arts education.

The notion that jurisdictions ought to work together to advance arts education, as proposed and partly achieved through the previous cultural policy, goes some way to finding a solution. Perhaps rather than becoming uniform, the different education systems and jurisdictions ought to learn from each other. All states having an equal amount of music in Stage 4 could lead to a reduction in NSW; all states having an equal instrumental music system could lead to a reduction in Queensland. The kind of cross-jurisdictional work that has been done on live music policy, through the Live Music Office, is an example of where developments, policies, and legislation in one jurisdiction can inform improvements in another.

The AMA is a member of the *Music Education: Right From The Start* Advisory Group. This initiative, led by Alberts Music, is a major development in the work that needs to be done: the strategic and targeted improvement of systems. For example, the system of Initial Teacher Education is vital to the delivery of the curriculum, and this initiative is commissioning research on that issue. Particular school systems require more attention than others, such as public primary schooling in NSW & Victoria, and this initiative is focusing on those issues.

We refer to and support the *Music Education: Right From The Start* submission which has further detail.

### References:

- Australian Government. *Creative Australia* (2013). <https://www.arts.gov.au/documents/creative-australia-national-cultural-policy>
- Department for Education, South Australia. *Music Education Strategy* (2019). <https://www.education.sa.gov.au/schools-and-educators/strategies-and-initiatives/music-education-strategy-and-innovation-fund/music-education-strategy-and-music-innovation-fund>
- Collins, A., Dwyer, R., Date, A. *Music Education: A Sound Investment* (2020). [https://www.alberts.co/wp-content/uploads/2020/10/Alberts\\_Music-Education-Report\\_A4.pdf](https://www.alberts.co/wp-content/uploads/2020/10/Alberts_Music-Education-Report_A4.pdf)
- Alberts Music. *Music Education: Right From The Start* (2022). <https://www.alberts.co/music-education/>

## Participation

Pillar:	<b>The Centrality of the Artist</b> (Also: A Place for Every Story, First Nations, Reaching the Audience)
Portfolio/s:	Arts, whole of government
Context:	Goal 3, Creative Australia Policy
Proposal:	Specifically reference participation in the arts, strategies and institutions that support participation in the arts

The AMA is focused on participation in music making in the community, in the music industry, and certainly in schools. Playing music brings great joy, creative expression, health benefits, brings people together, and certainly from our point of view music plays an important role in the music industries, including our area of music products.

Australia imported an all time high of \$350 million worth of music products (import value) in 2021 and accounts for 3.2% of global sales, the equal 7<sup>th</sup> largest consumer of music products (although the economy overall is the 13<sup>th</sup> largest). While parts of our industry experienced a decline due to the effects of the pandemic (pro audio / live sound; wind & brass; orchestral strings), demand for musical instruments remained relatively strong. This demonstrates the importance that Australians place on music making, and alludes to the economic benefits of participation in music for industries such as ours.

The AMA coordinates Make Music Day in Australia, part of an international effort to celebrate, promote and encourage music making everywhere. The principles of Make Music Day are that entry should be free (although many performances involve paid musicians), it is held on a particular day (21<sup>st</sup> June, which originated in France in 1972 as *Fete de la Musique*), and that everyone from beginners to professional musicians, children and adults, highly experienced musicians and non-musicians, are encouraged to participate.

We have a best practice model of government involvement in Make Music Day, with the Create NSW partnership developed over several years, and would welcome all and any government departments and agencies becoming involved in this global celebration of music making.

We would support specific reference in the Cultural Policy to participation, music making, particularly in schools but also in the community, in people's homes, at community events, as part of multicultural life in Australia.

## References:

Australian Music Association. *Make Music Day Australia*: <http://www.makemusicaustralia.org.au>

Australian Music Association. *Market Report 2021: Executive Summary (2022)*.  
<https://australianmusic.asn.au/industry-statistics/market-report-2021-executive-summary/>

## Radiofrequency Spectrum

Pillar:	<b>Reaching the Audience</b> (Also: Other pillars)
Portfolio/agency:	Communications (DITRDCA) / Australian Communications & Media Authority
Context:	Draft Five-year spectrum outlook 2022–27 – consultation 12/2022
Proposal:	Guarantee radiofrequency spectrum for cultural use, particularly in the 600 MHz band

The AMA maintains an interest and supports the position of our industry partners, including members and the Australian Commercial & Entertainment Technologies Association (ACETA), in relation to radiofrequency spectrum.

Wireless audio devices are now an integral part of live music and other applications such as conferences, churches, other public events, and so on. UHF (470-698 MHz) is the primary band for wireless microphone operation and there is cause for concern about the future of this band.

The demand for wireless audio devices, and the necessary spectrum to operate them, is *increasing* as the technology improves and productions become more reliant on it. This interacts with the experience of audiences, performers, production crew, festivals, theatre producers, live music venues, and many others.

The development of a Cultural Policy presents an opportunity to commit to certainty in the availability of spectrum for cultural purposes, including broadcasting and Wireless Audio Devices.

### References:

ACETA. *Five Year Spectrum Outlook 2021-26 Submission* (2021). <https://www.aceta.org.au/five-year-spectrum-outlook-2021-2026.html>

ACMA. *Draft Five-year spectrum outlook 2022–27 – consultation* (2022). <https://www.acma.gov.au/consultations/2022-03/draft-five-year-spectrum-outlook-2022-27-consultation-122022>

## Endangered Species & Musical Instruments

Pillar:	<b>The Centrality of the Artist</b>
Portfolio/agency:	Environment (DCCEE) / Wildlife Trade Office
Context:	Samuel Review
Proposal:	Implement a system of Musical Instrument Certificates

International regulations to protect endangered species, particularly but not limited to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), interact with musical instruments, musicians, and our members. In particular, the listing of Dalbergia (Rosewood) several years ago was a major disruption to the industry and the AMA has participated in local and international efforts to work constructively on managing the impact of CITES on the musical instruments industry.

This year the AMA has been involved in consultation on proposals to the 2022 Conference of the Parties, particularly in relation to Paubrasilia echinata (Pernambuco, used in string instrument bows), Dalbergia sissoo (Indian rosewood), and Khaya spp (African mahogany). This submission does not need to address those issues but we acknowledge and welcome the Australian Government's consultation with our industry.

Since particular species have been added to the CITES protection list that are found in musical instruments, and because the movement of existing instruments across borders does not affect future harvesting or sourcing of the protected species, a system of streamlined permits has been developed to facilitate travel with instruments across borders. This is a form of permit specifically designed for musical instruments, to reduce the regulatory burden on both musicians and governments.

As more species become CITES listed, MICs will become increasingly useful.

The EPBC Act does not allow for the implementation of MICs so Australia does not yet have this system. Therefore we support Recommendation 20 of the Samuel Review into the EPBC Act:

*Amend the EPBC Act to ensure wildlife permitting requirements align with Australia's international obligations related to:*

- *species listed under Appendix I and II of the Convention on the Conservation of Migratory Species (Bonn Convention)*
- *import permitting requirements for Appendix II listed species under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)*
- *requirements to ensure the humane transport of live fish and live invertebrates.*

The review found that “Wildlife trade and permitting requirements do not align with Australia's international obligations, are inflexible and unnecessarily burdensome”, and recommended Amendments to Part 13A, Divisions 2 & 5 of the Act, including to “introduce musical instrument passports and accept overseas musical instrument passports for import and export, for improved client experience.”

We have heard from members that the burden of certification sometimes falls on known experts, such as manufacturers, repairers, luthiers and retailers. We would welcome resources outlining what is expected of musicians and assessors, for example to verify pre-CITES status or to ascertain the origin of an instrument with a post-CITES listing species. The AMA will always be a willing partner in this work and happy to consult further on these issues.

### References:

Samuel, Graham. *Independent Review of the EPBC Act, Final Report* (2020). <https://epbcactreview.environment.gov.au/resources/final-report/recommendations>

Various organisations (including Australian Music Association). *Statement on CITES Musical Instrument Certificates* (2019). <https://australianmusic.asn.au/wp-content/uploads/2019/07/CITES-Musical-Instrument-Certificates-ENG.pdf>