

Joint Committee on Enterprise, Trade and Employment
Leinster House
Dublin 2
D02 XR20

E-mail: jcete@oireachtas.ie

23 November 2020

STRICTLY CONFIDENTIAL

Ref: ETE-i-021

Dear Mr. Sheridan

I refer to your letter dated 12 November 2020.

Aiken Promotions welcome the introduction of legislation which protects the consumer from over charging on the original sale price of tickets for events.

We have considered the draft Scheme of Sale of Tickets (Cultural, Entertainment, Recreational and Sporting Events) Bill 2020 and have provided our comments below.

1. Head 2 Interpretation

- (a) The definition of “venue operator” does not address green field venues. Green field venues are locations which consist of an expanse of open space and allow for the creation and holding of an event such as a festival and which revert to open green field or empty space after a once off event. The event organiser of the event or festival typically builds all the infrastructure for these green field events. It is unclear from the current definition of “venue operator” whether the owner of the land or the event organiser is responsible for making the application for designation of the green field venue.
- (b) The meaning of the definition of “original sale price” subsection (b) is unclear to us. Is this subsection intended to address complimentary/zero value tickets only?

2. Head 7 Designation of Venue

In this section we have the following questions:

- (a) does the designation of a venue need to be regularly renewed? Certain events are booked many months in advance and artists have preferences regarding venues. It is necessary for an event organiser to have certainty regarding a designated venue at the time of booking an artist. A recurring requirement to apply for designation would undermine that certainty.

AIKENPROMOTIONS

24 Holles Street, Dublin 2 • (T) +353.1.7755800 • (F) +353.1.7755888 • (E) office@aikenpromotions.com • (W) www.aikenpromotions.com

(b) how much is the fee per application; and
(c) time limits need to be specified for obtaining approval of applications. Event organisers may have to plan for such applications.

3. Head 10 Information required when secondary ticket seller advertises for sale ticket or ticket package on secondary ticket marketplace

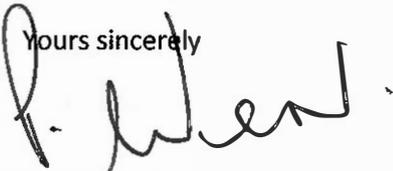
Aiken Promotions recommends more specific information is required under Section 10 3 (b). This information should be (a) seat number; (b) row number; (c) block area; and (d) ticket number for standing only tickets. The provision of this information would address speculative purchasing of tickets by secondary ticket sellers.

4. Head 12 Contract terms excluding or limiting sale of tickets

Aiken Promotions are unclear on intent of Section 12 subsection 1. It states that a term in a contract which states the onward sale of a ticket (including tickets to designated venues) is limited to the original sale price is void. This seems to be at odds with the legislation.

We appreciate the opportunity to comment on this Bill.

Yours sincerely



Peter Aiken

AIKENPROMOTIONS

24 Holles Street, Dublin 2 • (T) +353.1.7755800 • (F) +353.1.7755888 • (E) office@aikenpromotions.com • (W) www.aikenpromotions.com