

Supplementary Submission to the Review of the News Media and Digital Platforms Mandatory Bargaining Code

Submission to The Treasury

7 October 2022

[Public
Interest
Journalism
Initiative]

The Public Interest Journalism Initiative (PIJI) welcomes the opportunity to make a second submission to Treasury regarding the News Media and Digital Platforms Mandatory Bargaining Code Review.

This submission provides new data on news outlets covered by deals, following the recent addition of television and radio news production data to PIJI's [Australian Newsroom Mapping Project](#) (ANMP).

PIJI's ANMP produces core data for policy makers, industry and the community including baselines of local news production, tracking changes in news production and availability and a register of new production in all media formats - the [Australian News Index](#) (ANI). This project continues to be delivered in progressive stages¹ and has multiple components and diagnostic tools.

PIJI is platform-neutral and size-neutral with respect to news media production. Our interest lies in the health – and long term sustainability – of public interest journalism and its role as a public good for the Australian community.

1 PIJI Australian Newsroom Mapping Data

The following data should be read with the following comments in mind:

- Data covers active news outlets as at 31 August 2022, and therefore includes changes since the May 2022 data presented in PIJI's previous submission to this review.
 - Preliminary September 2022 data² indicates a possible reduction in number of active news outlets covered by commercial deals with one or more digital platforms. However, the lack of transparency makes it difficult to assess the relative value of the number of news outlets compared to other factors (eg. content output; throughput to search and social; editorial expenditure) to deal terms.
- This data includes radio and television news outlets as distinct from PIJI's previous submission to the NMBC Review, which was print and digital news only.
- The data presented below does not simultaneously analyse data by media format and news scale.
- The absence of any broadcast news content monitoring means deal coverage data for broadcast media should be read as an approximation only.
- Issues persist around the data and the lack of deal transparency, such as:
 - news business that have individual deals but are also members of collective bargaining units have been excluded from the collective bargaining count.
 - a lack of clarity on deal coverage specific to television news content.
- The data includes the relevant news outlets covered by the collective agreements that both Country Press Australia (CPA) and the Public Interest Publishing Alliance (PIPA) have with one or more digital platforms. However, 17 of PIPA members fall outside PIJI's news mapping. PIJI applies different assessment standards for inclusion in our data, compared to the ACMA's eligibility for registration as a news media business. For a more detailed explanation of PIJI's criteria, please see *Section 2.1 Eligibility for the Australian Newsroom Mapping Project* and Section 4: PIPA member list.
- Similarly, the ACMA's NMBC register now records 32 news businesses, signifying five new additions since PIJI's previous submission, four of which are captured in PIJI's data. For more detail, again

¹ A comprehensive baseline of radio and television news producers by local government area is currently in development.

² To be released mid October 2022.

please see 2.1 Eligibility for the Australian Newsroom Mapping Project and Section 3: ACMA NMBC Register additions.

1.1 Aggregate data

According to ACCC estimates and subsequent reporting, 35 commercial deals have been struck over the past 18 months³. Google has struck 21 deals and Meta 14. There are 12 common deal entities where Country Press Australia's collective bargaining arrangement is counted as a single entity.

Based on [PIJI's Australian News Index](#) (ANI), there are 1,199 news outlets - print, digital, radio and television- in Australia operated by 537 news businesses as at 31 August 2022. The Index estimates that of these, up to 152 news businesses – representing 580 news outlets – are covered by deals with one or more digital platforms (*Table 1*). As many as 577 news outlets have a deal with Google (excluding an additional 17 media outlets not mapped by PIJI), while Meta has made deals covering up to 540 outlets.

SUMMARY: NMBC COMMERCIAL DEALS 31 August 2022					
DEAL STATUS	BUSINESS ENTITY		NEWS OUTLET		NOTES
	#		#	%	
Google & Meta	119		534	45%	Includes adjustment for Times News Group 7 titles both in CPA collective and having individual deal.
Google only	14		23	2%	Includes adjustment for Out Publications (1 title) both in CPA group and individual deal.
Meta only	2		6	1%	
Outside PIJI data, Google only	17		17		
SUBTOTAL Deals	152		580	47%	
SUBTOTAL Without deals	385		619	52%	
TOTAL	537		1199	1	

Table 1: Summary of news media businesses and outlets with reported commercial deals (Data: ANI, August 2022)

Unsurprisingly, print and digital account for the majority of primary formats covered by deals (*Table 2*).

Given the absence of any broadcast news content monitoring, deal coverage data for broadcast media should be read as an approximation only. It should also be noted that the radio data overwhelmingly represents ABC news production as PIJI records the ABC as primarily a radio news producer (of 56 outlets recorded, 52 are the ABC).

SUMMARY: NMBC COMMERCIAL DEALS 31 August 2022									
DEAL STATUS	PRIMARY FORMAT								
	RADIO		TV #		PRINT		DIGITAL		UNKNOWN
	#	%	#	%	#	%	#	%	#
Google & Meta	56	16%	17	32%	325	57%	136	63%	
Google only	1	0%	2	4%	12	2%	8	4%	
Meta only	0	0%	5	9%	0	0%	1	0%	
Outside PIJI data, Google only									17
SUBTOTAL Deals	57	16%	24	45%	337	60%	145	67%	17
SUBTOTAL Without deals	291	84%	29	55%	229	40%	70	33%	
TOTAL	348	1	53	1	566	1	215	1	17

Table 2: Summary deal status by primary format (Data: ANI, August 2022)

³ The Treasury 2022. Review of the News Media and Digital Platform Mandatory Bargaining Code: Consultation paper. April 2022. <https://treasury.gov.au/sites/default/files/2022-04/c2022-264356_0.pdf> p. 10 plus the [reported PIPA collective bargaining](#) led by the Minderoo Foundation.

In terms of news scale, deals collectively cover more than 50% of national, state, metropolitan and local news outlets. Community outlets remain the outlier with three of 174 covered by deals.

SUMMARY: NMBC COMMERCIAL DEALS | 31 August 2022

DEAL STATUS	NEWS SCALE											
	NATIONAL		STATE		METRO		LOCAL		COMMUNITY		UNKNOWN	
	#	%	#	%	#	%	#	%	#	%	#	
Google & Meta	18	35%	4	50%	10	71%	500	53%	2	1%	17	
Google only	10	20%	0	0%	0	0%	12	1%	1	1%		
Meta only	1	2%	0	0%	0	0%	5	1%	0	0%		
Outside PIJI data, Google only											17	
SUBTOTAL Deals	29	57%	4	50%	10	71%	517	55%	3	2%	17	
SUBTOTAL Without deals	22	43%	4	50%	4	29%	418	45%	171	98%		
TOTAL	51	1	8	1	14	1	935	1	174	1	17	

Table 3: Summary deal status by news scale (Data: ANI, August 2022)

1.2 Commercial deals excluding collective bargaining

The number of business entities has increased with the entry of Network Ten’s deal with Meta under new PIJI’s broadcast data (Table 4) while the number of news outlets has increased with the addition of 57 radio and 24 television news outlets (Table 5).

While print and digital remain the dominant formats, deal coverage at national and local news scales has increased with the addition of broadcast data.

COMMERCIAL DEALS (excluding CPA and PIPA collective bargaining)

DEAL STATUS	BUSINESS ENTITY	NEWS OUTLET
Google & Meta	11	346
Google only	8	15
Meta only	2	6
TOTAL	21	367

Table 4: Summary of reported commercial deals excluding collective bargaining outcomes (Data: ANI, August 2022)

COMMERCIAL DEALS (excluding CPA and PIPA collective bargaining)

DEAL STATUS	PRIMARY FORMAT					Unknown
	Radio	Television	Print	Digital		
Google & Meta	56	17	141	132		
Google only	1	2	8	4		
Meta only	0	5	0	1		
TOTAL	57	24	149	137	0	

Table 5: Reported commercial deals by primary format, excluding collective bargaining outcomes (Data: ANI, August 2022)

COMMERCIAL DEALS: exc CPA, PIPA

DEAL STATUS	NEWS SCALE					
	National	State	Metro	Local	Community	Unknown
Google & Meta	18	4	10	314	0	
Google only	8	0	0	7	0	
Meta only	1	0	0	5	0	
TOTAL	27	4	10	326	0	0

Table 6: Reported commercial deals by news scale, excluding collective bargaining outcomes (Data: ANI, August 2022)

2 About the Australian Newsroom Mapping Project

The Australian Newsroom Mapping Project is an ongoing effort to collect data about the Australian news media landscape. Data is actively maintained and reported on a monthly basis.

2.1 Eligibility for the Australian Newsroom Mapping Project

For inclusion in this project, a news outlet should primarily and regularly produce:

(a) original core news content for (b) a local metropolitan, state or national (c) public audience and (d) adhere to identifiable professional and ethical standards.

Each of these expectations are discussed below.

a. Core news

The definition of core news which we have adopted for this project is:

original content that records, reports or investigates issues of public significance for Australians; issues relevant to engaging Australians in public debate and in informing democratic decision making, or content which relates to community and local events.

These criteria align closely to earlier definitions of public interest journalism, such as that developed by the Australian Competition and Consumer Commission in the [Digital Platforms Inquiry](#).

b. Local, metropolitan, state or national

News outlets provide coverage for geographic areas of different sizes. Every news outlet is in this project assigned one of the below 'primary coverage scales':

- Local: primarily cover a small geographic area, from a single town or local government area up to a sub-state region.
- Metropolitan: have a coverage area which includes an entire capital city. News outlets in this category tend to cover news over a large geographic area and provide irregular attention to any single place, unlike local news outlets. Some companies have outlets in both this category and related outlets at the local scale, reflecting both the city-wide and dedicated local coverage produced by the relationship of these outlets to each other.
- State/territory: primarily cover news from across an entire state or territory. Any local news tends to be reactive or illustrative of a larger issue facing the state or territory.
- National: tend to focus on news which affects the entire country, such as federal politics or the economy.

Some outlets are recorded as having a community primary coverage scale. See below for more detail on the eligibility criteria of community news.

c. A public audience

To be eligible, news content should be published to a public audience, meaning that it is readily available to any person who wishes to access it. This does not preclude a company from charging a fee for access to the content, but it should not otherwise be limited through, for example, requiring a person to be a member of an association or industry.

d. Professional and ethical standards

Journalism is a process of finding out information, verifying it and applying editorial judgment. It is characterised by professional values including independence and fairness. News outlets must adhere to identifiable professional and ethical standards.

An outlet will satisfy this test if it is subject to the rules of the is subject to the rules of one of:

- The [Australian Press Council](#) or the [Independent Media Council](#)
- The [Commercial Television Industry Code of Practice](#)
- The [Commercial Radio Code of Practice](#)
- The [Subscription Broadcast Television Codes of Practice](#) or,
- Is publicly committed to substantially equivalent editorial standards relating to the provision of quality journalism.

An important ethical standard is that news outlets have editorial independence from the subjects of their news coverage. This means that they are not owned or controlled by a political advocacy organisation (such as a political party, lobby group or a union); and not owned or controlled by a party that has a commercial interest in the coverage being produced (for example, a publication that covers a sport that is owned or controlled by the sport's governing body).

This does not include to the inherent commercial interests a news company may have in the production of content. It describes where such coverage may give rise to a conflict of interest which disadvantages or misleads the public audience.

Community news organisations

Some outlets are tagged as community scale news producers, rather than local. These outlets have different characteristics to other news producers, but nevertheless can fill an important role in a local news ecosystem.

These outlets tend to be non-commercial and produced by volunteers, sometimes without journalistic training, and covering hyperlocal issues such as social events, profiles of individuals in town, and local history. They are often produced by a local institution such as community centre or civic organisation.

The community scale option is intended to reflect these outlets, which do not provide the depth, consistency or professionalism of local news outlets, but which are important parts of community news provision. We do not apply the requirement to adhere to professional and ethical standards to these outlets, though we do require that they be independent of local government or other interests like chambers of commerce or tourism boards.

Local coverage geographies

News outlet geographies are determined differently depending on the type of outlet.

Print and digital outlets are represented according to the local government areas that they report on. Upon adding each outlet, PIJI undertakes a basic assessment of the content output in order to determine this.

Radio and television outlets are represented according to the local government areas where they are licensed to broadcast. ACMA publishes a public registry of callsigns, their operators, and the broadcast license areas in which they transmit, including maps of these areas. Using this information, PIJI has added each radio and television station to those local government areas that overlap with their broadcast license areas.

Each approach has its strengths and weaknesses.

For publishers, assessing content output is a resource-intensive process, as is maintaining this data. Errors in coverage geographies may be introduced where the initial assessment is not representative of longer-term production, or where changes occur in the output over time.

A strength of the approach to mapping broadcasters is that the geographies are likely to remain comparatively stable. On the other hand, broadcast license areas and local government areas rarely align, leading to situations where an LGA may have two or more overlapping broadcast areas within it. This would cause that LGA to be misrepresented as having a very high news density. This approach also creates a false equivalency between a news station being licensed to broadcast in an area, and actually transmitting in that area. Transmitting in a place also does not inherently suggest that local news is produced about that place.

The research reason for this distinction in how we map publishers and broadcasters is that we are not able to independently verify news production for the latter group. While we can remotely audit print and digital news content relatively easily, it is much more difficult for us to reliably access radio or television news programming from outside of their broadcast areas. In almost all cases that we have found, there are no public digital archives of news

content available, meaning that assessments must also be done on live streams. This is a significant barrier to independent scrutiny.

Determining local geographies by the content produced by an outlet is a strongly preferred approach, despite the challenges. The founding purpose of PIJI is to support public interest journalism in part by identifying where there may be undersupply. Content assessments are stronger evidence of this than availability.

Data collection and maintenance

News outlet and business data is assembled by the Public Interest Journalism Initiative from public sources. Analysis of news outlets for compliance with eligibility standards for inclusion in the project is undertaken independently and relies on public access to relevant policies and content.

Data for the Australian Newsroom Mapping Project is actively maintained. It is updated monthly with new assessments and to reflect incoming information about changes to news outlets and their operations. However, due to the volume and complexity of the data being maintained, it is not possible to reverify every record every month. Therefore, there may be inconsistencies and errors in the data, particularly where things change over time.

3 ACMA NMBC Register additions

New additions to ACMA NMBC Register:

Valetta Media (in PIJI data as Somerset Media)*
MyCity Media*
Post Newspapers*
Man of Many
ACE Radio Broadcasters*

* News outlets mapped in PIJI's Australian Newsroom Mapping Project.

4 PIPA member list

Australian Chinese Daily
Acquis Data
Australian Jewish News*
Australian Property Journal
Australian Rural and Regional News
Arts Hub
City Hub*
Cosmos Magazine
Indian Link
Il Globo
Hills to Hawkesbury Community News*

Greek Herald

Naracoorte Community News*

Neos Kosmos

Out in Perth

Perth is OK

Primer Magazine

Probono Australia*

QNews

Renew Economy

* News outlets mapped in PIJI's Australian Newsroom Mapping Project.

5 About the Public Interest Journalism Initiative

The [Public Interest Journalism Initiative](#) (PIJI) is a specialist think tank advancing a sustainable future for public interest journalism in Australia.

Through our original research and advocacy work, we seek to stimulate public discussion and establish optimal market pre-conditions in investment and regulation that will sustain media diversity and plurality in the long term.

PIJI is a [registered charity](#) with tax concession charity (TCC) status. It is a philanthropically funded, non-profit company limited by guarantee (ABN 69 630 740 153) governed by a Board of independent directors, advised by an Expert Research Panel and Policy Working Group and regulated by the ACNC, ATO and ASIC. PIJI is a limited shelf-life initiative, due to cease operation in 2023 in line with achieving its intended impact.

Our evidence-based approach focuses on three key research themes into public interest journalism: assessment of diversity, community value and support, and investment and financial sustainability.

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[Public Interest Journalism Initiative]

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