

15 February 2019

PUBLICATIONS

- WANGARATTA CHRONICLE
- NORTH EAST MOTOR GUIDE
- NORTH EAST PROPERTY GUIDE
- NORTH EAST TOURIST NEWS
- NORTH EAST LIVING MAGAZINE
- OVENS & MURRAY ADVERTISER (BEECHWORTH)
- MYRTLEFORD TIMES
- ALPINE OBSERVER (Bright)
- MT HOTHAM-FALLS CREEK NEWS
- MANSFIELD COURIER
- MT BULLER NEWS
- EUROA GAZETTE
- NORTH EAST & GOULBURN MURRAY FARMER
- SOUTHERN FARMER
- AUSTRALIAN ALPINE NEWS
- SNOWY MOUNTAINS MAGAZINE
- MOUNTAIN VIEWS MAIL
- UPPER YARRA MAIL
- RANGES TRADER MAIL
- FERNTREEGULLY-BELGRAVE MAIL
- MOUNT EVELYN MAIL
- YARRA VALLEY & DANDENONG RANGES TOURIST NEWS
- AUSTRALIAN & NEW ZEALAND WINE INDUSTRY DIRECTORY
- AUSTRALIAN & NEW ZEALAND GRAPEGROWER & WINEMAKER
- WINE AND VITICULTURE JOURNAL
- DAILY WINE NEWS.COM.AU
- AUSTRALIAN FORESTS & TIMBER NEWS
- AUSTRALASIAN TIMBERMAN MAGAZINE
- DAILY TIMBER NEWS.COM.AU

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Dear Sir/Madam

RE: ACCC Digital Platforms Inquiry (Preliminary Report)

We write to express our concern at the negative impact Google and Facebook have had on Australian legacy media, particularly regional newspapers. Our fourth generation publishing Group has in recent years been heavily impacted on revenue, profitability, and use of our content and the company's ability to provide public interest journalism to the local communities we serve.

We are unique in producing reliable content for our local communities which is also used by competing radio and TV broadcasters who in many cases have withdrawn local news services. Our content is also trusted, written by professional journalists (who we continue to recruit locally) with balance, and offering our communities a platform for debate and as a voice through accessibility.

Traditional revenue sources which sustain our business have been and continue to be reduced significantly due largely to revenues being taken by Google and Facebook.

These two platforms have secretive algorithms which limit traffic to our platforms, whilst at the same time using our content without agreement or payment. They claim not to be publishers and operate on more advantageous legal terms. They are not subject to the same copyright or defamation legislation governing regional newspapers and magazines.

Small publishing companies such as ours cannot compete and this has resulted in numerous closures and mergers of mastheads depriving communities of grass roots local news and views.

The initial recommendations put forward by the ACCC include tax incentives, which assume profitability. Specific funding of journalists, guaranteed Government spend to communicate and inform the community and extending the current Innovation Fund beyond three years, would be more practical and useful for publishers to ensure

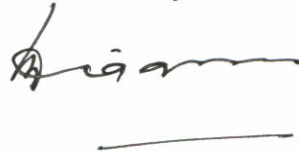
longevity and continue their ability to serve their local communities with quality journalism that serves the public interest.

Making the scope of the Innovation Fund more specific to current operations for publishers would also be more sensible and practical to achieve the immediate outcomes required.

As a news media, Government legislative support is needed to introduce licencing/copyright fees on Google and Facebook for regional publications content, to balance the duopoly and regulated in terms that make the playing field more equal. If not, public interest journalism will be devastated and a significant pillar of democracy will no longer be capable of playing its role of holding Government business and powerful interests to account.

We also seek increased and guaranteed Government messaging plus providing financial incentives to publishers.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Hartley Higgins', with a horizontal line underneath it.

Hartley Higgins
Managing Director