

Broadsheet Media

**Submission to the Department of Infrastructure, Transport,
Regional Development, Communications and the Arts**

News Bargaining Incentive Revenue Distribution Framework

May 2026

1. Introduction

Broadsheet welcomes the opportunity to comment on the proposed statutory payment framework and revenue distribution model for the News Bargaining Incentive (NBI).

Broadsheet supports the Government's objective of supporting the sustainability and diversity of Australian journalism and recognises the importance of ensuring that large digital platforms contribute to the Australian news ecosystem.

The statutory payment framework is to become a critically important component of the NBI if liable platforms elect to pay the charge rather than enter into commercial agreements with publishers. In that scenario, the practical operation of the NBI — and its impact on competition, plurality and sustainability across the Australian media sector — will be shaped substantially by the design of the distribution framework and the publishers recognised as eligible participants within it.

The framework should therefore support broad participation across the contemporary Australian media ecosystem, avoid reinforcing concentration among incumbent publishers and reflect the realities of how journalism is produced and distributed in the modern digital environment.

2. About Broadsheet

Broadsheet is an independent Australian media business founded in 2009. Broadsheet publishes professionally produced journalism focused on culture, cities and community life across Australia, with editions in Melbourne, Sydney, Brisbane, Adelaide and Perth.

Broadsheet reaches a substantial Australian audience and employs a large team of journalists, editors and producers, alongside a broad network of freelance contributors. Our journalism is original, fact-checked, professionally edited and produced in accordance with recognised journalistic standards. We compete directly with the culture and lifestyle verticals of major Australian media organisations for audience attention, advertising revenue and editorial talent.

Despite previously being registered by ACMA under the News Media Bargaining Code framework, Broadsheet was unsuccessful in negotiating commercial agreements with Google or Meta. This placed Broadsheet at a material competitive disadvantage relative to publishers that did secure agreements, including through increased difficulty competing for editorial staff and freelance talent and reduced capacity to invest in technology, audience growth and product development.

In January 2026, Broadsheet was removed from the ACMA register alongside other reputable independent publishers including Man of Many and Urban List.

3. The statutory payment framework should support plurality and competition

Independent publishers compete directly with major publishers within the same commercial media markets. Businesses such as Broadsheet compete every day with major publishers for audiences, advertising revenue, commercial partnerships, editorial talent and investment capital.

If the practical effect of the statutory payment framework is that distributions flow predominantly to already dominant incumbent publishers while independent competitors are excluded or disadvantaged, the framework risks a substantial unintended consequence by creating, and further embedding, structural distortions within the Australian media landscape.

The distribution framework is therefore not merely an administrative mechanism. It will play a significant role in determining whether the NBI strengthens or distorts competition across the Australian media sector.

Independent publishers contribute materially to media diversity, innovation, audience development and the sustainability of contemporary digital journalism. The framework should therefore be designed in a way that supports plurality and broad participation across the Australian media ecosystem rather than reinforcing concentration among a small number of already dominant organisations.

4. Eligibility should reflect contemporary public-interest journalism and modern publishing realities

Broadsheet is concerned that narrow interpretations of eligibility criteria risk excluding substantial forms of contemporary Australian journalism.

Currently, eligibility under the proposed framework is tied to ACMA registration, a process that has proven narrow and uncertain in practice, with only a relatively small number of publishers qualifying. The framework's continued reliance on the concept of "core news content", which is effectively restricted to 'hard news'; risks repeating one of the key shortcomings of the original News Media Bargaining Code by disproportionately favouring traditional general-news mastheads while excluding many contemporary, specialist and digital-native publishers producing journalism of substantial public value.

In doing so, the framework may materially weaken the NBI's ability to achieve its stated objective of supporting diversity across the Australian news media sector.

Broadsheet supports replacing "core news content" with the broader concept of "covered news content" as proposed by the Digital Publishers Alliance.

Public-interest journalism increasingly operates through specialist, vertical and digital-native publishing models rather than traditional general-news formats alone. Journalism concerning cities and communities, housing and cost of living, health and wellbeing, consumer and financial issues, culture and civic life, local economies and social participation can all constitute journalism of substantial public significance.

Importantly, Australian media regulation already supports a broad interpretation of matters of public significance. The Broadcasting Services (Regional Commercial Radio — Material of Local Significance) Licence Condition 2014 expressly recognises social issues, health issues, events, persons or organisations and their views, and cultural interests as matters of public significance.

This demonstrates that Australian media regulation already contemplates a broad conception of journalism serving the public interest.

The framework should therefore ensure that specialist, community, local and digital-native publishers are not excluded merely because they publish through contemporary formats or cover areas outside narrow traditional hard-news categories.

Broadsheet supports replacing “core news content” with “covered news content” within the eligibility framework and supports broader substantive eligibility pathways that better reflect the realities of the contemporary Australian media landscape.

5. Distribution formulas should reflect modern journalism capability

Modern journalism operations depend on a broad range of professional capabilities beyond traditional editorial roles alone.

In contemporary digital publishing environments, audience development, product capability, engineering, analytics, SEO and distribution functions are increasingly essential to the production, sustainability and reach of journalism. A narrow journalist-only FTE definition risks disadvantaging digital-native publishers whose operations are deeply integrated across editorial, product and audience development functions.

Broadsheet therefore supports broadening the relevant FTE definition to include wider “news staff” involved in the production, support and distribution of journalism.

6. Strong plurality safeguards are necessary to prevent concentration

Pure scale-based allocation models inherently favour large incumbent publishers due to their substantially larger staffing bases and organisational scale.

Without sufficient structural safeguards, the statutory payment framework risks concentrating distributions among a small number of already dominant media organisations, undermining the Government’s stated objective of supporting diversity across the Australian media sector.

Broadsheet supports stronger mechanisms that ensure meaningful participation by small and independent publishers within the framework, including reserving at least 25% of distributable funds for small and medium publishers.

Broadsheet also supports stronger weighting and diversification mechanisms within the allocation framework to ensure the benefits of the NBI are distributed more broadly across the Australian media ecosystem.

These settings are important not only for fairness across the industry, but for ensuring that the framework supports competition, plurality and sustainability rather than reinforcing concentration.

7. Administrative clarity and certainty are important

Independent publishers have experienced substantial uncertainty under the existing framework regarding eligibility interpretation and registration outcomes.

The statutory payment framework should provide clearer eligibility guidance, transparent decision-making processes and proportionate administrative requirements. The objective should be to create a framework that is contemporary, predictable and accessible for independent publishers producing journalism of public value.

8. Recommendations

Broadsheet recommends that the statutory payment framework:

1. Replace “core news content” with the broader concept of “covered news content” to ensure specialist, community, local and digital-native publishers are not excluded through narrow interpretations of public-interest journalism.
2. Broaden the relevant FTE definition to include wider “news staff” involved in the production, support and distribution of journalism.
3. Reserve at least 25% of distributable funds for small and medium publishers.

9. Conclusion

Broadsheet supports the Government’s objective of strengthening the sustainability and diversity of the Australian media ecosystem through the NBI.

If liable platforms elect to pay the charge rather than enter into agreements with publishers, the statutory payment framework will become one of the primary mechanisms shaping the future structure of Australian media and journalism.

The design of the framework therefore has direct implications for competition, plurality and sustainability across the sector.

A framework that disproportionately advantages incumbent publishers or applies overly narrow interpretations of journalism risks embedding concentration and reducing the ability of independent publishers to compete and operate sustainably.

For many independent publishers, these issues are not theoretical. The commercial impact of exclusion from meaningful participation in the framework can materially affect the ability of independent media businesses to compete, invest, retain talent and continue operating sustainably within an increasingly concentrated market.

The statutory payment framework should support the full range of contemporary publishers producing journalism of public value for Australian audiences.