



INDEPENDENT  
MULTICULTURAL  
MEDIA AUSTRALIA

**News Bargaining Incentive — Revenue Distribution Model**

Response to Treasury Consultation Paper

**Submitted May 2026**

## Executive Summary

Independent Multicultural Media Australia (IMMA) is the peak body representing independent multicultural news publishers and producers across Australia. Our members collectively produce 137 titles in print, digital, radio and broadcast formats, in heritage languages and in English, serving communities across generations in every state and territory.

IMMA welcomes the opportunity to respond to Treasury's consultation on the revenue distribution model for the News Bargaining Incentive (NBI). This submission builds on IMMA's December 2025 submission to Treasury's initial consultation on the design of the NBI, in which we set out the structural case for explicit recognition of independent multicultural media within the scheme. It should also be read in conjunction with IMMA's separate submission on the exposure draft of the News Media Bargaining (Administration) Bill 2026 and the News Media Bargaining Charge Bill 2026, which addresses the charging mechanism upstream of the distribution model considered here. The current consultation moves the design conversation into operational detail — how eligible publishers are identified, how their entitlement is calculated, and how the scheme is administered over time. The three submissions should be read together.

We support the policy intent of the scheme: sustaining public interest journalism, protecting diversity of media voices, and ensuring large digital platforms make a meaningful contribution to the Australian news ecosystem. The explicit reference within the scheme to culturally and linguistically diverse media, First Nations media and LGBTQI+ media is overdue and welcome. It must now be reinforced through the operational design of the scheme. Policy recognition without operational design will not deliver outcomes for our sector.

IMMA's submission identifies four design choices that, if unaddressed, will disadvantage independent multicultural publishers and undermine the diversity objectives the scheme is intended to advance.

**First**, the narrow definition of "editorial roles" eligible for FTE counting excludes the production, social media, narration and presentation roles that are integral to small multicultural newsrooms and how they deliver news deep into their communities. In our ecology, the people who research and write also edit, distribute, post to social media, produce video, and present on air. A definition that does not recognise this writes a substantial portion of multicultural news production out of the scheme. We are not major media with hundreds of staff and producers, yet we are vital to ensuring our diverse audiences are engaged and receive public interest journalism.

**Second**, without a meaningful weighting mechanism for small to medium multicultural publishers, an FTE-based formula will entrench the resourcing advantage of large, well-funded organisations and reproduce the same concentration of value that occurred under the original Code.

**Third**, compliance, reporting and retention obligations designed primarily for major national publishers risk imposing disproportionate administrative burden on multicultural newsrooms operating with one to five staff.

**Fourth**, geographic reporting based on local government areas does not reflect the ethnospecific, cultural, linguistic and faith-based audience structures of multicultural media, whose readers are dispersed across the country. Greek-Australian media such as The Greek Herald, Jewish-Australian media such as the Australian Jewish News, and pan-Muslim publications such as El-Wasat do not engage audiences primarily through geography or local government boundaries. They serve ethnospecific, faith-based and language-specific communities that exist across all of Australia's local government areas.

IMMA's key recommendations are:

- Broaden the definition of eligible editorial roles to include production, social media, and on-air narration and presentation, applied through a revenue threshold so the benefit accrues to small publishers without diluting payments to the broader sector.
- Introduce a minimum 200% weighting uplift for publishers eligible through IMMA's representation criteria, recognising the structural resource gap and the public-interest value of multicultural news production.
- Apply proportionate, sector-aware compliance and penalty settings that distinguish material misrepresentation from natural workforce volatility in small newsrooms.
- Replace local government area reporting with audience-based descriptors better suited to ethnocultural, faith and linguistic communities.

## **About IMMA and the Independent Multicultural Media Sector**

IMMA is the national peak body for independent multicultural publishers in Australia. Our members produce print newspapers and magazines, digital news sites, radio programs and video content in dozens of languages — Arabic, Chinese, Greek, Italian, Vietnamese, Filipino, Hindi, Macedonian, Turkish, and many others — as well as English-language publications serving intergenerational, culturally tied and faith-specific audiences such as Indian, Jewish and African communities.

Our sector is structurally distinct from the major national publishers, government-funded broadcasters, and metropolitan and regional commercial media. Independent multicultural publishers are small, multi-disciplinary, deeply embedded in their audience communities, and operate as a labour of commitment rather than scale. Most IMMA members operate with between one and five staff. A small number of larger members employ between fifteen and forty-five people across editorial, production and operations.

Our ecology plays a critical role as a conduit between communities and institutions. We provide essential public interest journalism in language and in English, and we represent issues that mainstream outlets seldom prioritise. As the federal government's *Towards Fairness: A Multicultural*

*Australia for All* observed, IMMA represents independent multicultural media outlets across print, radio, television and digital — small-to-medium private enterprises with diverse levels of digital capacity, including some of the most dynamic digital-only publishers in Australia, all serving the language needs of ethnic communities.

The sector's role is most visible in moments of crisis. During the Covid pandemic, multicultural media became the reference point that reached communities when mainstream media could not — often as our own advertising income was being gutted by lockdowns. The same ecology continues to do the hard work of promoting cohesion across communities through periods of overseas conflict and heightened social tension at home. This is the very definition of media diversity and public-interest journalism, and the NBI must reflect it in the criteria and weightings that determine who receives funding and on what scale.

## **Responses to Consultation Questions**

### **Question 1: Do you have any concerns with the proposed registration and application process?**

IMMA does not object to the broad architecture of the proposed registration and application process. Any scheme distributing public-purpose revenue must rest on a credible eligibility framework, and the ACMA News Media Bargaining Code register is an appropriate vehicle for that purpose.

We do, however, want to be plain about the workload. Members who have completed ACMA registration consistently report it to be an excessively demanding administrative exercise. This is not a reason to dispense with the process, but it is a reason to ensure the application interface, guidance materials and supporting documentation are accessible to small organisations operating without dedicated legal, regulatory or compliance staff.

We recommend that Treasury and ACMA jointly publish plain-English guidance (or provide translation), worked examples covering common multicultural publishing models — digital-only, print-led, and hybrid radio-and-publishing — and a single, well-supported application channel for new entrants. Dedicated assistance for small multicultural and First Nations publishers navigating the process would substantially reduce the access barrier without compromising scheme integrity.

### **Question 2: Would your organisation meet the criteria as set out under the ACMA register?**

IMMA's members vary considerably in size, format and structure. A subset of our members is already registered on the ACMA register and would readily meet the eligibility criteria as drafted. A larger group has not yet registered, partly because of the administrative complexity referenced under Question 1, and partly because there has been limited practical incentive to do so to date. We expect a significant proportion of these members would, on assessment, meet the substantive eligibility tests.

Two aspects of the current eligibility framework warrant attention.

**The \$150,000 revenue test.** Several of our members — particularly emerging and digital-only publishers serving new and emerging multicultural communities — operate below the revenue threshold despite producing genuine core news content for their communities. Eligibility tied to revenue scale rather than editorial output systematically excludes the publishers whose inclusion is most consistent with the scheme’s diversity objectives. We recommend that the revenue test be reconsidered, or that an alternative pathway be available for publishers below the threshold who demonstrably meet the content, professional standards, editorial independence and Australian audience tests.

**Radio-led publishers.** Members whose primary output is community radio with associated news segments may find that only discrete news bulletins — rather than the broader output of the station — can be registered. This understates the news role these organisations play in their language communities, where talkback, current affairs and in-language information programming are the principal vehicle for news delivery to the audience.

The contractor and sole-trader employment structures common across our sector raise separate issues for the FTE-based payment formula rather than for ACMA registration. We address those at Questions 5 and 7.

### **Question 3: Is the proposed eligibility criteria fit-for-purpose in ensuring that the scheme supports continued investment in public interest news; diversity of media voices; and quality journalism?**

The eligibility criteria — revenue, content, professional standards, editorial independence, Australian audiences, and the connection requirement — are sound foundations for ensuring the scheme funds genuine public-interest journalism. IMMA supports each test in principle.

However, the criteria as currently framed do not operationalise the scheme’s stated commitment to diversity of media voices. The consultation paper acknowledges the importance of culturally and linguistically diverse media within the broader objective of a diverse Australian media ecosystem, but in the eligibility design itself this commitment is largely implicit. There is no mechanism that recognises or rewards a publisher’s role in serving an under-represented community, nor any structural safeguard against an outcome in which most distributed revenue flows to a small number of large generalist publishers. Policy recognition without operational design will repeat the pattern of the original Code.

Publishing is the core of independent multicultural media. It is in the publishing format — newspapers, magazines, online news and digital editions — that our sector contributes most distinctively to the Australian information environment. Multicultural publishers reach audiences that other media cannot reach, in languages other media do not serve, and on issues the rest of the sector seldom prioritises. This is the very definition of media diversity, and it must be reflected not only in the framing of the NBI but in the criteria and weightings that determine who receives funding and on what scale. We address this directly under Questions 8 and 9.

#### **Question 4: Do any of the proposed eligibility criteria present significant costs or administrative burden for your organisation?**

The most material burden is ACMA registration itself, as noted above. The professional standards, editorial independence and connection requirement tests each require members to produce — in some cases for the first time — formal policies and documentation that reflect well-established practice but are rarely written down in small newsrooms. For an organisation operating with one to five staff, the time and external advisory cost is non-trivial.

Beyond ACMA registration, the proposed evidentiary requirements for FTE journalism (addressed at Question 7) will impose an ongoing reporting burden that must be carefully calibrated to the scale of small multicultural publishers. The compliance overhead should not grow to the point where it consumes a meaningful share of the funding it is designed to allocate.

We recommend that Treasury and ACMA consider standardised, lightweight templates for eligibility documentation suitable for small publishers; phased onboarding support for first-time registrants, including direct assistance for small multicultural and First Nations publishers; and a single, integrated reporting interface to avoid duplication between agencies.

#### **Question 5: Is FTE journalists a good approximation for investment in news and journalism, and an appropriate basis for determining payments to the sector?**

IMMA supports the use of FTE journalists as the primary basis for determining payments. It is a reasonable approximation of investment in news production and is materially less burdensome — for applicants and administrators — than line-item cost-based approaches. The recent experience of the Journalism Assistance Fund demonstrates that FTE-based allocations are workable for the sector.

The FTE measure does, however, carry an embedded bias the scheme must address. Large, well-resourced organisations have the structural capacity to maintain dedicated journalists alongside discrete production, social media, video and audience teams that amplify journalism. Small multicultural publishers do not enjoy that division of labour. The same handful of people who research and write also edit, distribute, post to social media, produce video, and engage with the community. If FTE is restricted to a narrowly defined “journalist” role, the formula will systematically understate the editorial workforce of small multicultural publishers and over-reward large publishers whose journalism investment, relative to their overall newsroom, is proportionally smaller.

Our recommendation, set out in detail at Question 6, is that the editorial-role definition should be broadened for publishers below a revenue threshold, so the integrated production roles that are integral to small multicultural newsrooms are properly counted.

#### **Question 6: Are the identified editorial roles clear and fit-for-purpose? Are there other roles that should be included?**

The identified editorial roles are clear, but they are not fit-for-purpose for our sector as currently drafted. The explicit exclusion of narrators, anchors and presenters is particularly problematic, as is the absence of recognised social media and production roles.

In multicultural radio, the on-air presenter is frequently the principal vehicle through which news reaches the audience. A morning-show host on a small multicultural radio station will routinely write the news, deliver it on air, and contextualise it for an audience for whom that program is often the only accessible source of news in their language. The personality of the presenter is inseparable from the news function. Excluding presenters and narrators effectively writes a substantial portion of multicultural news production out of the scheme.

In digital publishing, the modern “journalist” role is multi-skilled by necessity. Audience reach today depends on social media amplification, short-form video and platform-native formats such as TikTok and Instagram Reels. A small multicultural publisher typically needs at least one full-time production and social media role to translate journalism into audience engagement. Without those roles, the journalism does not reach the public — defeating the public-interest purpose of the scheme.

IMMA therefore recommends the editorial-role definition include the following, with eligibility for the broader definition applied to publishers below a revenue threshold (we suggest annual revenue under AUD 10 million as a working figure to be tested in consultation):

- Production and post-production staff materially engaged in producing news content.
- Social media and digital audience producers responsible for the amplification of editorial output.
- On-air narrators, anchors and presenters who deliver or contextualise news content as part of their substantive role.
- Video journalists, editors and short-form content producers attached to news output.

This threshold approach achieves two objectives. It recognises the operational reality that small multicultural newsrooms cannot afford the labour-division of major publishers, and it preserves a narrower FTE definition for large organisations whose journalism workforce is already substantial in its own right.

**Question 7: Do the proposed evidentiary requirements present any specific difficulties, or a sizeable burden, for your business? Are there any risks arising from these evidentiary requirements?**

The evidentiary requirements as currently described — that FTE journalists are primarily producing core news content — are workable for traditional employment-based publishers. Payroll records, role descriptions and bylines provide a reasonable evidentiary basis.

Three issues require further consideration.

**Broadened role definitions require commensurate evidence frameworks.** If, as IMMA recommends, eligible editorial roles are broadened to include production, social media, narration and presentation, the evidentiary framework will need to support those roles in a proportionate way. We suggest a combination of role descriptions, time-allocation statements signed by the responsible

editor, and sample output (social media posts, on-air segments, video produced) as sufficient evidence for small publishers.

**Contractor and sole-trader arrangements require flexibility.** A growing number of independent multicultural publishers operate using contractor or sole-trader structures, particularly emerging digital publishers and one-person operations. These structures are legitimate and reflect the realities of starting and sustaining a small publication. The evidentiary framework must accommodate them — counting contracted editorial labour at appropriate FTE-equivalent fractions where the contractor is substantively engaged in producing core news content. IMMA also accepts that the scheme can legitimately encourage members to formalise their business structures over time, and we will work with our membership on capacity building in this area.

**Evidence cost must be proportionate to funding at stake.** For a small publisher whose entitlement may amount to a modest sum in the scheme's first years, the cost of accountant-prepared, legally reviewed evidentiary documentation could erode much of the benefit. ACMA should publish standard templates that smaller publishers can use without external professional advice.

### **Question 8: Are the proposed weighting categories an appropriate and effective means of accounting for the economies of scale and resourcing differences across the sector; and meeting the objectives of the Statutory Payment Scheme?**

Yes. IMMA strongly supports the inclusion of weighting categories within the payment formula, and considers them essential to the scheme achieving its stated objectives. Without weightings, an FTE-based distribution will materially favour the largest publishers — who already enjoy advertising scale, audience scale, government support in the case of ABC and SBS, and existing platform deals — and will deliver only marginal benefit to the small multicultural publishers whose sustainability is most fragile and whose contribution to media diversity is most distinctive.

The scheme's design contemplates weightings for rural and regional publishers and references support for under-represented communities. IMMA welcomes this and considers it well-aligned with the diversity objectives in the Bargaining Code. We strongly support the inclusion of an explicit weighting category for publishers serving culturally and linguistically diverse audiences, applied through criteria such as IMMA membership and registration, language of publication, and demonstrated service to a specific cultural, linguistic or faith-based community.

Weighting is not a subsidy or a concession. It is the only effective mechanism within an FTE-based formula to correct for the structural resource gap between small multicultural publishers and the major national news organisations, and to ensure the scheme actually delivers on its diversity objective rather than treating diversity as a rhetorical adjunct.

### **Question 9: What weighting values would best achieve these aims?**

IMMA proposes a minimum weighting uplift of 200% for FTE roles within publishers eligible as independent multicultural publishers, assessed through criteria including IMMA membership

eligibility, language of publication, demonstrated community connection, and small-to-medium business size.

The 200% figure reflects the structural reality of small multicultural newsrooms. A typical IMMA member reports between three and five FTE editorial roles. At a 200% weighting, a publisher reporting three FTEs would be treated as having six in the payment formula. In absolute terms, that remains a modest share of the overall pool when compared to major national publishers reporting many tens or hundreds of FTEs. The weighting is large in percentage terms because it must operate against a small base if it is to produce a meaningful absolute outcome for the publishers the scheme is designed to support.

A lower weighting figure — for example, 20% — would have minimal practical effect at the scale at which our members operate. A three-FTE publisher treated as having 3.6 FTEs in the payment formula receives an essentially nominal uplift, which is not commensurate with the structural resource gap or the public-interest value of multicultural news production.

Weightings should be transparent, periodically reviewable, and capped in a way that prevents gaming through artificial restructuring of corporate or workforce arrangements.

**Question 10: Is the proposed retention obligation an appropriate measure to ensure that funding provided to the sector delivers against a clear and valid public purpose?**

The principle of a retention obligation is appropriate and IMMA supports it. Public-purpose funding should result in actual, sustained investment in journalism — not be diverted to other ends, and not be received by organisations that immediately reduce the editorial workforce the funding was calculated against.

We have a number of practical observations about how the retention obligation should be designed, set out at Question 11.

**Question 11: Are there any risks or other issues we should take into consideration with regard to the retention obligation, including time periods and tolerance thresholds?**

Three risks require careful design attention.

**Workforce volatility is endemic to small multicultural publishing.** IMMA member publishers routinely train and develop bilingual and multicultural journalists — often the first published platform for emerging journalists from those communities — only to see them recruited into mainstream media, government communications and corporate roles where remuneration and resourcing far exceed what a small publisher can offer. This is a structural feature of our sector. A small publisher with ten reported FTEs at the point of application may, through no fault of its own, find itself with seven or eight a year later because mainstream organisations have hired its best staff.

**Replacement timelines are longer for our sector.** Finding bilingual editorial staff with the requisite cultural and linguistic competence is materially harder than recruiting in mainstream media. Replacing a departed staff member can take months. A retention obligation that does not accommodate this lag will penalise publishers for circumstances entirely outside their control.

**Administration risks disproportionate impact on small publishers.** The consultation paper notes that the scheme will be supported by information-gathering and investigatory powers, with penalties for non-compliance. We urge that these powers be exercised with clear sector awareness. The last thing the scheme needs is for the bureaucratic apparatus designed to keep major platforms and major publishers honest to be turned, in practice, on a small multicultural publisher who has lost a journalist they cannot quickly replace.

Recommended design responses:

- A tolerance threshold of at least 20% variation in reported FTEs before any compliance action is triggered, recognising natural workforce fluctuation in small newsrooms.
- A reasonable grace period — we suggest at least six months — to replace departed staff before a retention shortfall is considered material.
- An explicit sector-aware administration policy that distinguishes small-publisher workforce volatility from material non-compliance.
- A safe-harbour provision where the publisher can demonstrate good-faith effort to recruit replacement staff.

### **Question 12: What penalties should apply for organisations that are later found to have mis-reported their eligibility or employment practices?**

The penalty framework should be clearly proportionate and should distinguish three categories of conduct.

**Minor variation from reported figures** (for example, a publisher with 21 FTEs at application reporting 20 the following year) should not attract any penalty. This is normal workforce movement and should be absorbed within the tolerance threshold recommended at Question 11.

**Material under-delivery against the reported figures, in the absence of misrepresentation**, should be addressed through adjustment of future entitlements — reducing subsequent payments to bring the cumulative position back into balance — rather than through recovery of monies already disbursed. Recovery of already-spent funding is impractical for small publishers, would in many cases cause the publisher to fail, and would defeat the scheme's sustainability objective.

**Material misrepresentation** — for example, a publisher reporting 156 FTEs while only employing three — should attract a meaningful penalty, including reduction or revocation of future entitlements and, in serious cases, repayment obligations. The threshold for this tier of penalty should be set such that genuine errors and good-faith reporting differences are clearly out of scope.

IMMA is not in a position to recommend specific monetary penalty quanta and considers that to be properly a matter for Treasury and ACMA. We would, however, urge that any monetary penalty be proportionate to the publisher's revenue and the materiality of the misreporting, rather than fixed quanta that would have disproportionate impact on small publishers.

**Question 13: Do you have any concerns about the general approach to regular reporting and an event-based notification framework?**

IMMA supports the general approach to regular reporting and event-based notifications.

Transparency about how scheme funds are received and used is essential to public confidence and to the legitimacy of the policy.

We have one specific concern. The consultation paper indicates that regular reports would cover the number of persons employed as eligible FTE journalists and the local government areas covered by the news media business. Local government area reporting is not a meaningful descriptor for the independent multicultural media sector.

The audiences of independent multicultural publishers are ethnocentric, faith-based and linguistic — they are not, in any practical sense, geographically bounded by local government areas. A Chinese-language publication based in Sydney will have readership in Melbourne, Brisbane, Perth, regional centres and rural communities. A Greek-language newspaper based in Melbourne will be read by Greek Australians wherever they live, across Australia, and we have evidence to substantiate this in terms of content and audience engagement.

Imposing local government area reporting on this sector would either produce data that is misleading or meaningless, or force publishers to nominate the entire continent as their coverage area, which is technically accurate for online publishers but uninformative.

We recommend that, for publishers eligible as independent multicultural publishers, the geographic reporting requirement be replaced with — or supplemented by — audience-based descriptors: the cultural, linguistic and faith-based community served, the language(s) of publication, and the location of the publisher's editorial and operational base. This would produce more accurate, more useful, and less burdensome reporting than a forced fit into a geographic schema designed for traditional metropolitan and regional press.

**Question 14: What lead-in time would you require for information required under regular reporting and event-based notices? Do you have any concerns about the feasibility of collecting this information, the timing or sequencing of obligations, or disclosure of commercially sensitive information?**

IMMA's recommendation is that initial reporting obligations carry a minimum lead-in time of six months from the date the eligible publisher first receives funding under the scheme, with subsequent regular reports scheduled annually and aligned to the publisher's financial reporting cycle wherever practicable.

We have three areas of concern.

**Feasibility of data collection for small publishers.** Many of our members do not currently maintain the precise time-allocation and role-classification records the scheme will require. Implementing those systems takes time and, in some cases, modest investment in payroll or HR software. A six-month lead-in is the minimum required for small publishers to put adequate systems in place; a twelve-month lead-in for the first reporting cycle would be preferable.

**Sequencing of obligations.** The scheme should avoid imposing reporting deadlines that fall in the same quarter as ACMA registration renewal, BAS lodgement, or other recurring compliance events that consume small publishers' limited administrative capacity. We recommend that Treasury consult with peak bodies including IMMA on the calendar of obligations before they are fixed.

**Commercial sensitivity.** Information about advertiser relationships, individual platform deals, and detailed financial data is commercially sensitive and, in small markets serving specific communities, can be competitively damaging if disclosed. We strongly support the principle of transparency about scheme operation, but the level of detail in publicly available reporting must be calibrated to avoid material commercial harm. Aggregated, anonymised reporting is appropriate; line-item disclosure of individual deals, particularly for small publishers, is not.

### **Question 15: Do you have any concerns or views about penalties under the scheme, including the thresholds and penalties for serious non-compliance?**

Our principal concern about penalties — set out in detail at Question 12 — is proportionality. Penalty thresholds and quanta should be designed with sector diversity in mind, so that the framework that disciplines major platforms and major publishers does not, in practice, fall heaviest on the small publishers least able to bear it.

We recommend the following principles for the penalty framework:

- Penalties should scale with publisher revenue, so the same percentage of non-compliance attracts a proportionate response across publishers of vastly different size.
- Material misrepresentation should be sharply distinguished from administrative error, with clear definitions and worked examples published in advance.
- Serious non-compliance penalties should be reserved for deliberate, sustained, or large-scale misrepresentation.
- First-instance administrative errors by small publishers should be addressed through corrective action and educative engagement before financial penalties apply.
- A clear right of review and appeal should apply to any compliance determination, with an accessible process suitable for small organisations.

Above all, the penalty framework should be embedded within a broader administrative culture that recognises the public-interest purpose of the scheme and supports compliance rather than treating it as an enforcement exercise.

## **Conclusion**

IMMA welcomes the Government's commitment to the News Bargaining Incentive and the explicit recognition within the scheme of culturally and linguistically diverse media. The scheme has the potential to be a genuine inflection point for the sustainability of independent multicultural news in Australia, and through that, for the diversity of the Australian information environment.

Realising that potential depends on a number of operational design choices being made carefully. A broadened editorial-role definition for small publishers, a meaningful weighting for independent multicultural media, sector-aware compliance and retention settings, and audience-appropriate reporting requirements together represent the difference between a scheme that delivers on its diversity objective and one that, despite good intentions, allows the existing structural advantages of major publishers to dominate the outcome.

IMMA welcomes the opportunity to engage further with Treasury and ACMA on these design questions and is happy to participate in any subsequent workshops, technical sessions or sector-specific consultations that would assist the implementation of the scheme.

### **Submitted by:**

Independent Multicultural Media Australia (IMMA)

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