

Response to the

NEWS BARGAINING INCENTIVE Consultation on Revenue Distribution

May 2026

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Scope of submission

We appreciate the opportunity to respond to the proposed News Bargaining Incentive Revenue Distribution—Statutory Payment Scheme (“the NBI scheme”). The aim of our feedback is to respond to the questions posed in the consultation paper released on 29 April 2026, and offer insights based on our research expertise in the Australian news industry and its audiences. This is a joint submission from the News & Media Research Centre, University of Canberra and the News, Technology, and Society Network, RMIT University.

The News and Media Research Centre ([N&MRC](#)) advances public understanding of the changing news media landscape and advocates for a media system that builds trust, inclusivity and diversity, to defend and repair the country’s social fabric.

The News, Technology, and Society Network ([NTS](#)) brings together interdisciplinary researchers and industry professionals focused on the social impacts of news, journalism and emerging technologies to drive positive social change.

In addition to our command of the relevant academic literature and industry research, the authors of this submission have, over the past five years, interviewed hundreds of community members living in regional Australia, and surveyed thousands of Australian news consumers about their media habits, perceptions, and expectations. We have also engaged deeply with industry and government stakeholders through more than a dozen roundtables, workshops, and related events. We bring the breadth and depth of this experience—and the voices of the journalists, editors, and audience members with whom we have engaged—to inform this submission and its recommendations.

We welcome the government’s commitment to develop new policy measures to strengthen the economic viability and diversity of the Australian news media in recognition of the crucial role journalism plays in supporting an informed and socially cohesive community. The proposed News Bargaining Incentive, if executed strategically, offers a new opportunity to level the playing field between global digital platforms and Australian news organisations.

Based on our research and expertise, in this submission we are providing responses to questions Q3, Q5, Q6, Q10, Q11 and Q13.

Throughout the submission we use the term ‘public interest journalism’ to mean news and other information which is produced and disseminated to the public according to high standards of accuracy, ethics, fairness, independence and accountability in line with best-practice journalism.¹

¹ We adopt the Public Interest News Foundations’ definition (see Appendix for details).

Recommendations

1. **Broaden and strengthen the eligibility criteria of the NBI scheme:** Remove the \$150,000 income threshold to include smaller news businesses that produce original Australian public interest journalism, and require higher editorial independence and complaints standards.
2. **Invest directly in workforce sustainability and pipeline development:** Allocate 15% of funds to a national cadetship program (200 traineeships annually), with dedicated quotas for regional and underserved community media.
3. **Adopt a fairer funding allocation model:** Move beyond a purely FTE-based approach by incorporating freelancers, volunteers, and non-traditional newsroom roles, and apply a root-weighted formula to prevent large news businesses dominating funding.
4. **Expand the definition of eligible journalism roles:** Include emerging roles (e.g., data, audience engagement, and multimedia journalism) and recognise hybrid roles common in small organisations.
5. **Establish ongoing evaluation and data collection mechanisms:** Dedicate funding (2%) to longitudinal research tracking workforce, journalism output, and industry trends to inform continuous policy improvement.
6. **Minimise regulatory burden and risk for small publishers:** Calibrate reporting requirements to news business size and exclude low-revenue organisations (<\$250k) from financial penalties to avoid discouraging participation and innovation.
7. **Ensure transparency and accountability in funds use:** Mandate public reporting on how funds support public interest journalism.

Response to questions

Q3: 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?

Response to Q3: Remove the \$150,000 revenue test and adjust the content criterion

The proposed eligibility criteria are not fit-for-purpose in ensuring the NBI scheme supports continued investment in public interest news, diversity of media voices, and quality journalism. The proposed \$150,000 annual revenue threshold for registration under the current News Media and Digital Platforms Mandatory Bargaining Code (the Code) is too high and will stifle diversity, disincentivise news start-ups,² and undermine the sustainability of public interest journalism for local, regional and other under-served communities. Broadening and strengthening the definition of ‘news business’ will ensure emerging and small publishers are included, while eliminating the risk of funds flowing into non-news entities.

According to the Australian Communications and Media Authority (ACMA) *News Media in Australia: 2025 Report*³, there are 2,864 professional news outlets across 9 platforms in Australia. Most brands (70%) belong to one of 106 networks. Under the Code, only 85 news businesses—about three percent—are registered⁴, indicating a significant gap. The ACMA’s report cites the Public Interest Journalism Initiative’s Australian News Sampling Project which shows that 80% of the sampled news content from Australian news providers were stories classified as public interest journalism between 2022-2024⁵.

The proposed \$150,000 threshold will exclude many small news businesses and not-for-profits with significant volunteer workforces (up to 90%) that are delivering public interest and community journalism, especially in regional areas.⁶ Approximately 58% of Community Broadcasting Association of Australia (CBA) members, and 35% of Local & Independent News Association (LINA) members are excluded from eligibility under the Code on this basis. A recent LINA survey revealed that one in five local and hyperlocal news outlets have an annual income

² Community Broadcasting Association of Australia. (2022). Joint submission to the review of the news media and digital platforms bargaining code. <https://treasury.gov.au/sites/default/files/2023-02/c2022-264356-cbaafnma-lina.pdf>

³ ACMA. (2025). *News Media in Australia 2025 Report*. <https://www.acma.gov.au/news-media-australia>

⁴ <https://www.acma.gov.au/register-eligible-news-businesses>

⁵ <https://www.acma.gov.au/news-media-australia>

⁶ We use ‘regional’ as an umbrella term to denote any non-urban area that includes regional, rural, and remote areas.

of less than \$50,000⁷. These organisations provide critical information to their communities and should be included in the NBI scheme.

To resolve these issues, we recommend the NBI scheme eligibility criteria be based on a definition of news business with the following elements:

1. Remove the current income threshold: One of the key elements of the Code registration is the revenue threshold (\$150,000 per annum), which excludes small, niche and hyperlocal news outlets that may otherwise qualify based on content criteria and professional standards requirements.
2. Adjust the content criterion to stress the production of original Australian public interest journalism: Under the existing proposal, eligible news businesses are only required to carry 'core news content', which can include syndicated content and journalism obtained from external parties.
3. Strengthen the eligibility standards to include the need for a transparent formal complaints process: Eligible news businesses must have a robust internal complaints mechanism, and, if a complaint is not resolved satisfactorily by the news business, consumers must be able to send their complaint for review to an external body. Accountability is essential to ensure the quality of public interest journalism is maintained.
4. Strengthen the editorial independence eligibility criteria to require the declaration of funding to news businesses from political parties, significant third parties and associated entities as defined under the Commonwealth Electoral Act 1918: Funding from advocacy or lobby groups and associated individuals not captured under the Electoral Act should also be required to be declared. In addition, ownership or control by—or funding from—public relations-related businesses, government entities, and those with an ongoing commercial interest in the journalism produced by the news business should be declared. In line with existing proposed eligibility criteria, if any of these apply, the business must provide evidence to demonstrate editorial independence from these sources.

Q5: Is FTE journalists a good approximation for investment in news and journalism, and an appropriate basis for determining payments to the sector?

Response to Q5: Relying solely on FTE journalists is likely to reinforce news media market concentration

While FTE journalists is a feasible basis for determining payments to the sector, the proposed model has its limits as a journalism investment tool in that it neglects the increasingly

⁷ <https://lina.org.au/membership/2025-survey/>

precarious nature of the Australian news industry and could further entrench the power of larger players. This would jeopardise the NBI scheme goal of sustaining a diverse news industry. Australia already has one of the most concentrated media markets in the democratic world.⁸ FTE-based distribution of funding is likely to reinforce the status quo, rather than enabling diversity and addressing news deserts through support for small and emerging news businesses catering to under-served communities

The FTE calculation was adopted in Canada by the Canadian Journalism Collective (CJC) to disburse \$100 million in funds annually from Google across more than 400 news organisations. While it was deemed a relatively efficient method, critics argue it favoured large incumbents, leaving some sections of the news market, such as local, under-resourced.⁹

FTE journalist numbers do not necessarily reflect the volume or impact of public interest journalism produced by a news organisation. In 2024 the Media, Entertainment & Arts Alliance (MEAA) reported that more than 30% of its members were freelancers.¹⁰ The Community Broadcasting Association of Australia (CBA) in 2023 found 96% of its workforce was comprised of volunteers.¹¹ *The Conversation* is largely sustained through volunteer academic contributors who produce most of its content which is then syndicated through other news outlets. Freelancers and volunteers therefore play a crucial part in Australia's news ecosystem, but their input would be excluded from a payment system that relies on FTE numbers. Small and volunteer-run outlets are the most in need of support and many of them act to increase the diversity of the sector by serving regional, local, Indigenous, and CALD and other under-served communities. The rise in freelancing also reflects the damage already done to the news industry by digital platforms over the past two decades as FTE workforces have shrunk.¹² From 2006 to 2016, there was a 9% fall in Australians employed in journalism-related occupations, and a fall of 20% from 2014-2018. Among local and regional newspapers, 106 outlets closed between 2008 and 2018.¹³

Precarity of the news media industry is reflected in the Labour Force Survey¹⁴ (see figure 1). The overall workforce is shrinking and the proportion of those holding multiple jobs within the sector is growing, whereas those with single jobs has declined.

⁸ Fulton, J., Park, S., McCallum, K., & McGuinness, K. (2024). 'You can't be what you can't see': A pilot study of reflections on diversity and inclusion in the news media. *Australian Journalism Review*, 46(1), 53-72. https://doi.org/https://doi.org/10.1386/ajr_00148_1

⁹ <https://reutersinstitute.politics.ox.ac.uk/news/how-googles-funding-canadian-news-publishers-split-and-who-benefits-most>

¹⁰ <https://www.infrastructure.gov.au/sites/default/files/documents/nmap-media-entertainment-and-arts-alliance-meaa.pdf>

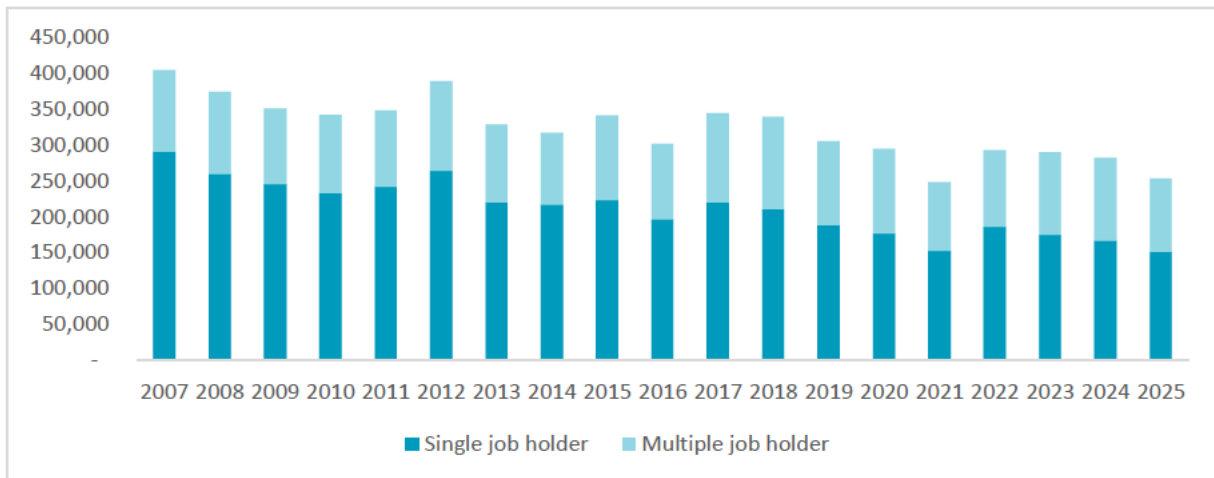
¹¹ https://treasury.gov.au/sites/default/files/2023-03/c2023-379612-community_broadcasting_association_of_australia.pdf

¹² Park, S., Lee, J. Y., & Fisher, C. (2024). Changing journalists' occupations: An analysis of Australian Census 2021. *Australian Journalism Review*, 46(1), 17-31. https://doi.org/https://doi.org/10.1386/ajr_00146_1

¹³ <https://www.accc.gov.au/system/files/Digital%20platforms%20inquiry%20-%20final%20report.pdf>

¹⁴ The Labour Force Survey (LFS), Australia's official monthly measure of employment and unemployment, is conducted through household interviews by phone or face-to-face and includes around 70 survey questions.

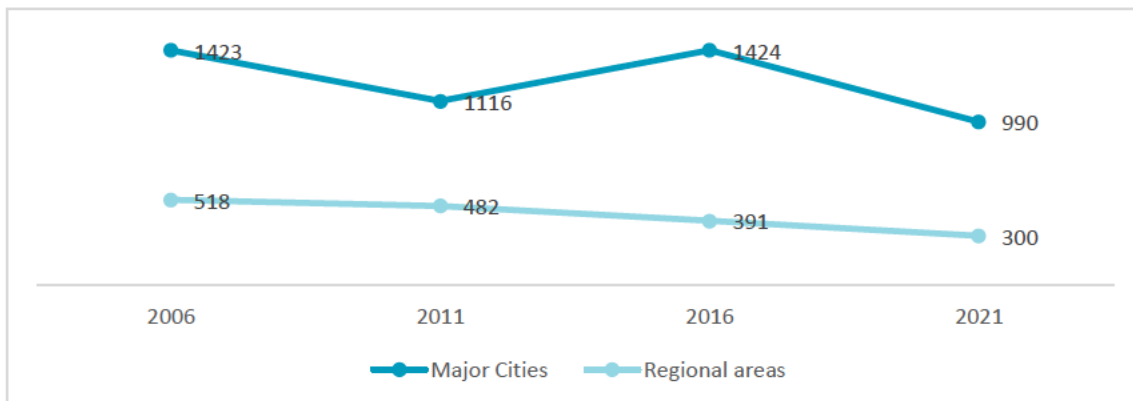
Figure 1: Newspaper, periodical, book, directory publishing and broadcasting industry workforce trend (persons)



Source: TableBuilder - Labour Force Survey <https://www.abs.gov.au/statistics/microdata-tablebuilder/available-microdata-tablebuilder/labour-force-survey>

The number of journalists aged 18 to 24 has steadily decreased, falling by almost one third from 1,425 in 2006 to 990 in 2021. The decline is even steeper in regional areas, falling from 518 in 2006 to just 300 in 2021 (see figure 2).

Figure 2: Number of journalists aged 18-24 in Australia



Source: Tablebuilder - Australian Bureau of Statistics: Counting persons, place of enumeration (2006 – 2021)

For the sustainability and diversity of the industry as a whole, the NBI scheme must include measures to help recover a diminished workforce, particularly in regional Australia. To adjust for this, we propose a broader and more inclusive approach to calculating FTE journalists.

Redefine FTE journalist

The proposed formula to determine FTE journalist numbers in eligible news businesses relies on self-reporting by applicants under the NBI scheme. We recommend the definition of eligible

journalist be expanded to include different types of employment, such as freelancers and volunteers, in the calculation of FTE numbers:

- Full-time, part-time, freelance journalists and editors paid to help produce public interest journalism or fact-check content
- Volunteers who contribute to the production of public interest journalism
- Photojournalists, videographers and graphic designers that produce or contribute to public interest journalism in multimedia form

Content producers, audience engagement and social media content producers, subeditors and podcast creators contributing to the production and distribution of, as well as engagement with, public interest journalism.

Adjust the FTE journalist formula for a fairer distribution of funds

To address the structural problem of the proposed FTE model that disadvantages small organisations and favours larger outlets with diversified revenue streams, the NBI scheme should apply a root weight to the formula—taking the square root of the FTE. Applying root weight would soften the impact of large numbers so they still matter, but don't dominate the formula.

The proposed payment allocation formula does not account for the size of the organisation. A root weight would prevent very large news businesses with multiple revenue streams from taking the bulk of the funds and boost the proportion allocated to small publishers reliant almost entirely on revenue generated by journalism.

For example,

- Organisation A: 100 FTE
- Organisation B: 25 FTE

Without root weight, A gets 4 times more than B. With square root applied, A gets twice as much.

- $\sqrt{100} = 10$
- $\sqrt{25} = 5$

The suggested formula could look like:

$$\text{Payment allocation} = \frac{\sqrt{\text{Eligible FTE journalists per organisation}}}{\sum \sqrt{\text{Total FTE journalists for all eligible organisations}}} \times \text{Incentive revenue}$$

Establish a cadetship fund

News industry sustainability is a key goal of the NBI scheme. To that end, we propose investing in journalism cadetships in areas of need in a similar fashion to the rural pathways and incentives offered for other professions, such as teachers and doctors. This would ensure a sustainable employment pipeline for maintenance of this critical piece of civic infrastructure at a national scale.

We recommend the NBI scheme reserves \$30 million, or 15% annually, of funds under the model to finance 200 additional journalism traineeships across the industry to invest in rebuilding public interest journalism capacity diminished over the past two decades by platform disruptions to the news and information ecosystem.

These positions should be spread across eligible news organisations based on the expanded FTE journalist model outlined above. However, 30% of the trainee positions should be carved out specifically for small news outlets or those catering to under-served communities, including but not limited to hyperlocal, regional, First Nations, youth and CALD.

Each traineeship position would attract \$150,000 per year in funding to cover salary, superannuation, hiring, travel and relocation costs, training, and equipment.

Such a program is not unprecedented. In 2022, the two-year, \$10m Journalist Fund for regional Australia was opened for applications to support co-funded cadetships with packages up to \$150,000 per cadet (up to 70% of the funds), as well as \$2 million for training and upskilling journalists.¹⁵ In 2025 the federal government launched the Journalism Assistance Fund (\$67.6m) to provide grants to eligible Australian-owned news businesses to support the wages of journalists. This funding covers the three years to June 2028, with publishers able to receive up to \$39,000 per eligible FTE journalist.

As deals struck under the News Media Bargaining Code were confidential it is not possible to document the impact of the Code on journalism job numbers, including trainees. However, Google reported funding 60 new journalism traineeships in regional areas over three years after the Code came into effect.¹⁶ There were 46% more journalist jobs ads on SEEK, one of the largest online job markets, during the operation of the Code than before it was introduced.¹⁷ These examples highlight the high level of need and receptivity for funding to support the employment of journalists in Australia.

Q6: Are the identified editorial roles clear and fit-for-purpose? Are there other roles that should be included?

Response to Q6: The current identified editorial roles are clear and fit for purpose but other roles that clearly contribute to public interest journalism should be included

Digital transformation and disruption have expanded the traditional practice of journalism to include roles that would once have been considered 'interlopers' in the profession but are now

¹⁵ Department of Infrastructure, Transport, Regional Development and Communications (2022). *New grant program: Journalist Fund*. Australian Government, Canberra

¹⁶ Standing Committee on Communications and the Arts (2022). *The Future of Regional Newspapers in a Digital World*. Parliament of the Commonwealth of Australia, Canberra

¹⁷ Browne, B. & Grudnoff, M. (2023). *Effect of news media bargaining code on journalism employment*. The Australia Institute, Canberra

fundamental to its production.¹⁸ For example, journalism might now require web analytics, advanced data visualisation, videography, and social media and newsletter content for journalism distribution on multiple platforms. Similarly, journalism roles may not always ‘look’ like a traditional journalism role. The Journalism Research and Education Association¹⁹, for example, has suggested that industry graduates now and in the future will find employment as affiliate content producers, social media content creators, and podcast creators. We recommend that identified editorial roles are ‘future proofed’ to account for these developments.

In small and hyperlocal news organisations, journalists and editors may perform a mix of commercial and editorial functions within a single role. Separating the two under the definition of eligible journalist could unfairly disadvantage smaller operators whose journalism could not exist without each employee fulfilling multiple functions.

Q10: Is the proposed retention obligation an appropriate measure to ensure that funding provided to the sector delivers against a clear and valid public purpose?

Response to Q10: Retention should be just one among multiple measures small news businesses use to indicate delivery against public purpose

A retention obligation should not be the sole measure of ensuring that funding delivers against the NBI scheme’s purpose. Qualitative research conducted with Australian news media executives has shown that smaller news outlets face significant disadvantages in attracting and retaining journalists.²⁰

Local and independent news organisations working within mainstream or metropolitan news markets dominated by large businesses have a competitive disadvantage. They have less opportunity to attract journalism talent through wage, employment, job security, and career development conditions.

This is especially true if they are producing public interest journalism for smaller audiences, such as CALD or niche communities, where slow-growth projection requires a business model based on high-value engagement rather than high-volume audience traffic.²¹ International studies have similarly documented the difficulties regional news organisations face in attracting and retaining graduates based on economic, geographic and professional prestige deficits.²²

¹⁸ Holton, A. E., & Belair-Gagnon, V. (2018). Strangers to the game? Interlopers, intralopers, and shifting news production. *Media and communication*, 6(4), 70-78.

¹⁹ <https://jeraa.org.au/journalism-faqs-why-study-journalism-are-there-jobs-and-more/>

²⁰ Bossio, D., & Barnett, B. (2023). The news media bargaining code: Impacts on Australian journalism one year on. *Policy & Internet*, 15(4), 611-626.

²¹ Čakš, P., Kožuh, I., & Žilič Fišer, S. (2026). Journalistic Roles and Community Expectations: External and Internal Challenges for Local Investigative Journalism. *Journalism Practice*, 20(5), 1502-1520.

²² Olsen, R. K., & Mathisen, B. R. (2023). Deserted local news: Exploring news deserts from a journalistic recruitment perspective. *Media and Communication*, 11(3), 390-400.

We propose that retention be just one measure that a smaller news business can use to indicate delivery against public purpose. Possibilities for additional measures may include increased production of original public interest journalism content, growth in audience engagement, employment of cadets, training opportunities for reporters, and offering internships to journalism students.

Q11: Are there any risks or other issues we should take into consideration with regard to the retention obligation, including time periods and tolerance thresholds?

Response to Q11: The retention obligation risks stifling innovation and diversity

Using the retention obligation as the sole measure of delivery of purpose risks creating a disincentive for news organisations to experiment with growing audience reach or with labour-intensive and higher-risk content production methods to avoid penalty.

Many small news businesses, especially start-ups, may experience rapid growth or contraction, including change in employment practices and staff retention rates, within a reporting period. These changes should not be considered misreporting for the purposes of retention obligations under the NBI scheme, nor trigger pecuniary penalties.

Financial penalties for failing to ‘maintain, at a minimum, the number of eligible FTE journalists that was used to determine the payment’ could disincentivise small, hyperlocal and start-up publishers by exposing them to unacceptable financial and reputational risk. As such, news businesses with a revenue under \$250,000 per annum should be excluded from any pecuniary penalties arising from failing to meet retention obligations.

Q13: Do you have any concerns about the general approach to regular reporting and an event-based notification framework?

Response to Q13: Transparent and robust reporting and evaluation must be embedded in the NBI scheme

Regular reporting is critical to measure the outcomes of funding, but it must be tied to robust research and evaluation. The NBI scheme offers a significant opportunity to implement longitudinal monitoring to track how the industry is performing over time. For transparency—and to ensure the funds are flowing into public interest journalism—data related to the workforce, public interest journalism outputs, and work practices should be made available to the public and cannot be allowed to hide under commercial-in-confidence agreements. Further, guardrails are needed to ensure that eligible expenditure is limited only to those activities that support the creation of original Australian public interest journalism.

One of the key criticisms of the News Media Bargaining Code has been its lack of transparency.²³ The NBI scheme is an opportunity redress this through the collection of key data which would also help the government monitor its performance and inform adjustments over time.

Australia has limited industry-wide data on public interest journalist jobs, outputs and impacts. The ACMA's *News Media in Australia* reports²⁴ have started to capture 6 indicators that are critical to gauge the health of the news ecosystem. However, its Indicator 2 (professional workforce) and Indicator 4 (range and variety of news content) do not have primary data and have been identified as gaps. We suggest that at least 2% of the funds collected under the NBI scheme are set aside to track the following three key indicators:

- Journalistic output
- News production practices
- Workforce statistics.

²³ Fisher, C., McCallum, K. & Park, S. (2021). Is the news media bargaining code fit for purpose? The Conversation. <https://theconversation.com/is-the-news-media-bargaining-code-fit-for-purpose-172224>; Bossio, D., & Barnet, B. (2023). The News Media Bargaining Code: Impacts on Australian journalism one year on. *Policy & Internet*, 15, 611–626. <https://doi.org/10.1002/poi3.361>

²⁴ <https://www.acma.gov.au/news-media-australia>

Appendix: Definitions of public interest journalism

ACMA's definition

News: “Includes any factual reporting by journalists or other information on current events at either a local, regional, national, or international level (see also professional news).”²⁵

Professional news: “News produced by a news outlet that adheres to professional standards, is editorially independent, operates predominantly in Australia and produces publicly available news content.”²⁶

The eligibility of news businesses under the News Media Bargaining Code is based on the concept of *core news*.

Core news: “News content that reports, investigates or explains (1) issues or events that are relevant in engaging Australians in public debate and in informing democratic decision-making issues; or (2) current issues or events of public significance for Australians at a local, regional or national level.”²⁷

Public Interest Journalism Initiative's definition

Public interest journalism is news that informs the community. It is the accurate, reliable journalism that lies at the heart of public discussion, diversity of voice, open justice, accountability and informed decision-making. It is an essential public good, and it is under threat from governments, operating conditions and leaders both here in Australia and around the world.²⁸

Public Interest News Foundation's (PINF) definition

Public Interest News²⁹ is news and other information which is produced and disseminated to the public according to high standards of ethical conduct and best practice in journalism and which provides one or more of the following benefits to the public:

- Informs members of the public about matters of relevance to their role and responsibilities as citizens;
- Enables members of local communities to become aware of and understand matters of common concern to them as members of their community and which

²⁵ <https://www.acma.gov.au/glossary-news-media-australia>

²⁶ <https://www.acma.gov.au/glossary-news-media-australia>

²⁷ https://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;query=Id%3A%22legislation%2Fems%2Fr6652_ems_2fe103c0-0f60-480b-b878-1c8e96cf51d2%22

²⁸ <https://piji.com.au/faq/>

²⁹ <https://www.publicinterestnews.org.uk/about/>

promotes their involvement and cooperation in such matters and community cohesion accordingly;

- Enables members of the public to participate in an informed manner in relevant democratic processes and, as a result, supports the legitimacy of the democratic process as a whole;
- Benefits the public by promoting charitable educational outcomes, such as improving public understanding of health and medical matters or the conservation of the environment; and
- Specifically excludes material which is simply entertaining in nature, politically motivated, biased or inaccurate, or which fails to observe a person's right to privacy.