

The proposed model currently distributes funding mainly based on the number of employed journalists (FTE). While we support journalist FTE being part of the formula, we believe the current approach disproportionately favours large metro publishers and undervalues regional publishers operating across large geographic areas with lean staffing structures.

Regional publishers face significantly different operating conditions, including:

- covering larger geographic areas and multiple communities
- higher transport and distribution costs
- smaller advertising markets
- greater difficulty attracting and retaining qualified journalists
- maintaining multiple mastheads and local community identities
- reliance on freelancers and contractors to produce core news content

A regional journalist often covers a much broader range of public interest reporting than a metro journalist working within a larger newsroom structure.

We strongly recommend the final model include:

- regional weighting of +25% for inner regional, +50% for outer regional, and +75–100% for remote/very remote publishers
- small publisher weighting of +50% for publishers under \$10m revenue and +75% for publishers under \$3m revenue
- recognition of mastheads and communities served not just total payroll size
- recognition of transport and distribution burden for regional print publishers
- freelancers and contractors counting proportionally as FTE where they regularly produce core news content and can be evidenced through invoices, contracts, and published content

We also recommend the payment formula be adjusted to better reflect the actual objectives of the scheme:

- 50% journalist/editorial FTE
- 20% regional and remote weighting
- 15% small publisher weighting
- 10% masthead/community footprint
- 5% publication frequency/original local output

The consultation paper itself identifies regional journalism, small publishers, diversity of media voices, and sustainability of public interest journalism as core objectives of the scheme. We believe the final formula should directly reflect those objectives rather than relying predominantly on payroll size alone.

A pure FTE model measures staffing levels, not public value or community service. Without stronger regional and small publisher recognition, the scheme risks directing a disproportionate amount of funding toward already dominant metropolitan publishers rather than supporting long-term sustainability of regional journalism.

Kind Regards,

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