Submission on behalf of The Advertiser Newspaper Group

To Whom it may concern:

I wish to make the following submission in my capacity as Managing Director of The Advertiser Newspaper Group, based in Galway.

This submission is in relation to the predicament facing local print media organisations due to the dramatic decline in revenue as a result of the growth of online platforms, their domination of the advertising spend of businesses, and the effect this is having on the future of businesses such as ours.

Our request is that free newspapers, such as our group, are included in any consideration for assisting local print media, at this difficult time. The free newspaper sector is an important part of the local newspaper market, with free weekly publications published in many counties in Ireland.

I would like to make a few specific points in relation to our three newspapers, The Galway Advertiser, The Mayo Advertiser and The Athlone Advertiser. These papers are distributed weekly, free of charge, throughout their areas of circulation, in two formats: through door-to-door delivery to residences in their areas and through bulk distribution to newsagents and other outlets.

Firstly, we are very much ploughing a lone furrow, as we are not represented by any national organisation. NewsBrands Ireland and Local Ireland are the two bodies who represent national and local print media respectively. It is important that we are not forgotten when the difficulties facing the print media are being considered by the Commission. Indeed, our sole source of income is advertising revenue, whereas the 'paid for' print media have a stream of revenue from sale of newspapers, thus ensuring the recent decline in advertising revenue has had a far more negative impact on us, having decimated our only revenue stream.

It is essential that whatever supports are put in place for local print media also apply to us, as, though our publications are free of charge, our structures are similar to all 'paid for' newspapers. Indeed, the free paper model is one which may prove more sustainable in the future as circulations of local and national newspapers continue to decline. We employ qualified journalists and designers, and other members of staff in a manner similar to all newspaper organisations.

In light of the Covid-19 pandemic, newspapers and broadcast media are listed as essential services due to their role in informing the public and keeping them up to date with developments. In acknowledgement of this, finance has recently been made available for the local radio sector to help mitigate against falling advertising revenue. There has been no such assistance provided to the local print media sector, who are competing with local radio for an ever shrinking advertising spend from businesses.

The Galway Advertiser is by far the highest circulating local newspaper in the country, with a weekly circulation of 50,000 papers. This is a higher circulation figure than many national newspapers. Independent readership surveys conducted as recently as earlier this year show our readership to be considerably higher than any other local newspaper: 74% of adults living in Galway city read The Galway Advertiser every week. I attach below results of a survey carried out by Behaviour & Attitudes into local newspaper consumption in both the Galway and Mayo regions. A similar survey in the Athlone area was showing results along the lines of the Mayo region, but the survey was discontinued early due to the impact of the Covid-19 pandemic.

The Galway Advertiser is also the preferred local media print partner for Galway City Council, and achieved this status after a competitive tendering process. The local authorities, and other public bodies, in our regions are regular advertisers in our publications.

The Galway Advertiser was established over 50 years ago, and today has, along with a print circulation 50,000 papers, 30,000 subscribers to our weekly digital edition and over 112,000 Facebook followers. The printed paper has a pagination size of an average of over 120 pages weekly.

The Mayo Advertiser has a weekly circulation of 21,000 papers, and The Athlone Advertiser has a weekly circulation of 12,000 papers.

All three of our newspapers pride themselves on the independence of our journalism. Indeed, we are among the few remaining independently owned newspaper titles in the country. We play an important part in news dissemination in our region, and in informing public opinion and debate. We reflect the lives of the people in our areas of circulation and are viewed as strong supporters of the arts, lifestyle, culture, sport and music of these areas. We have also been promoters of very strong 'Support Local Business' campaigns in each of our areas. We are media partners to a large number of local charities, and other arts and cultural organisations. We view ourselves very much as a 'public service' media in the promotion of our local areas, and The Galway Advertiser, in particular, has been considered as the 'bible' of Galway life for many decades.

We are determined to continue to provide this public service in the ever changing, and challenging, media landscape we now inhabit. Our editorial independence is very important to us, and small, independent companies such as ourselves must be helped to survive and thrive, if the Government wish to maintain a diverse media landscape.

As a public service content provider, we believe we should be included in any assistance provided to this sector. The provision of assistance to only certain parts of the local or national media, e.g. in the form of a licence fee, only serves to discriminate and make life more difficult for businesses such as ours.

The situation has become critical for small local media companies and though we strive to improve our offering to our customers, the power of the large tech companies and their grasp of advertising budgets is proving to be an insurmountable obstacle. If the Government is serious about combating fake news and ensuring continuing diversity in how news, current affairs and other issues are covered, it is obliged to offer assistance to those of us who are providing that specific service. Otherwise, independent media companies will wither and die. Whatever funding is to be made available to this sector must be spread fairly, and not be used to make a bad situation even worse for those who may be excluded.

The social, political and cultural life of this country, and its specific regions, are under threat from these behemoths who think of themselves as something between a newspaper and a tech company. I appreciate that there is no simple answer to the challenge they present, but the answer must include maintaining an independence and diversity of opinion, and an acknowledgement of the individual nature of the different parts of Ireland, and how local media must continue to reflect these. The growing dominance of the tech giants may look irreversible, but it is not. There are things to do with our culture, history, communities and way of life which are beyond their reach and which can best be truly reflected in a vibrant local media. The Government has an opportunity to help save something unique, but time is running out. Recent developments in both Europe and the US in the antitrust and regulatory area give some hope that the abuses of power of the larger tech companies will be curtailed, but, based on previous experience, this will not happen in time to save much of our

existing local media. If we wait for the conclusion of the European Commission's efforts to exert some control over, particularly, Google and Facebook, then we will be looking back on a lost opportunity. The Irish Government must act speedily and decisively in their effort to assist local media organisations, and not wait for a Europe wide response. Those countries who do not provide this assistance in the near future will soon preside over the demise of their local media industry. And once it is allowed disappear, it will not be returning, and we will all lament its passing. Ireland can take a lead in this area, and set an example for other countries to follow.

Apprenticeship type schemes should be considered for the training of journalism students, particularly in the areas of libel law, ethics, interview techniques and other relevant topics. A more direct subvention could be paid to media organisations to assist with their staffing costs to ensure the continuation of a platform for independent and diverse voices. This could be in the form of a tax rebate, or a direct payment based on turnover, and could be ring fenced for newsroom costs. This training could be subsidised from a dedicated fund. Another option to assist with the income side of the business would be a requirement for Google and Facebook to pay news organisations for their content, as is now proposed in Australia.

It is also vital that the tech companies who now dominate the digital media space are treated the same as traditional publishers under defamation, and other, laws. The levels of cyberbullying, promotion of crime, hosting of criminal and degrading acts and abuse of the vulnerable, to name but a few, are truly shocking. Meaningless fines offer no solution in this area, and real penalties should apply for the myriad of abuses of power, whether of individuals or of corporations. A levelling of the playing pitch is urgently required in this area.

It is important that our concerns are considered when the government is planning on the future of media and how this impacts on news organisations in print and on radio, and that our newspapers are included in any assistance provided to the print media sector.

I would be very happy to participate in any follow up discussions in relating to the matters under consideration by the Commission, or to elaborate further on any of the issues raised above.

Thank you for taking the time to read this submission

Kind regards

Peter Timmins

Managing Director

Advertiser Newspaper Group

Ireland's biggest and most successful free newspaper group

Check out our website and see for yourselves

www.advertiser.ie

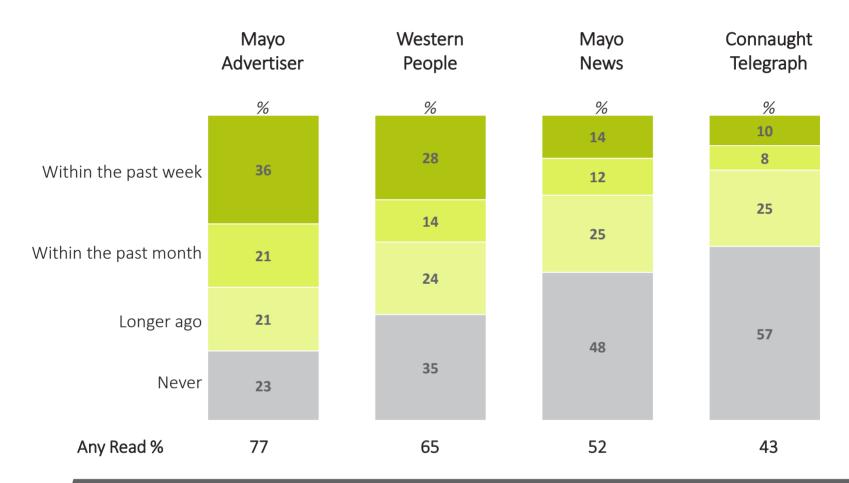
Galway Advertiser - Mayo Advertiser - Athlone Advertiser

Independent Behaviour & Attitudes survey shows the Mayo Advertiser has by far the highest readership of any local newspaper in Mayo.

Local paper readership

Base: All adults aged 18+ - 251





Over a third (36%) of Mayo adults have read the Mayo Advertiser within the past week: higher incidence than that of other papers

In answer to the question for local Mayo newspapers as to the last time you read or looked at a copy of each of them. Behaviour & Attitudes (B&A) carried out this poll in the three weeks ending on September 16th. The poll was conducted at 25 locations throughout county Mayo, where 250 people were sampled. These samples were based on CSO census 2016 figures for gender, age and area. Interviewing was completed face-to-face in voters homes. This was a quota controlled survey, resulting in a representative sample of adults residing in county Mayo.

We wish to thank the people of Mayo for making The Mayo Advertiser the most widely read newspaper in county Mayo. This survey also confirms for the businesses advertising in The Mayo Advertiser that they are reaching the maximum possible audience, and are doing so in the most cost effective manner.

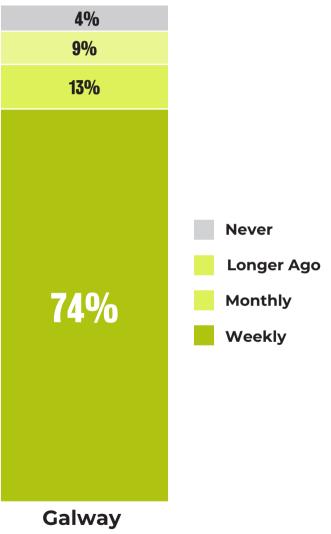


Local paper readership

Base: All adults aged 18+ living in Galway City - 100/59,278







Three quarters of those living in Galway City have read a Galway Advertiser in the past week. The paper's closest competitior (of the three) in this regard is The City Tribune: 14% read in the past week

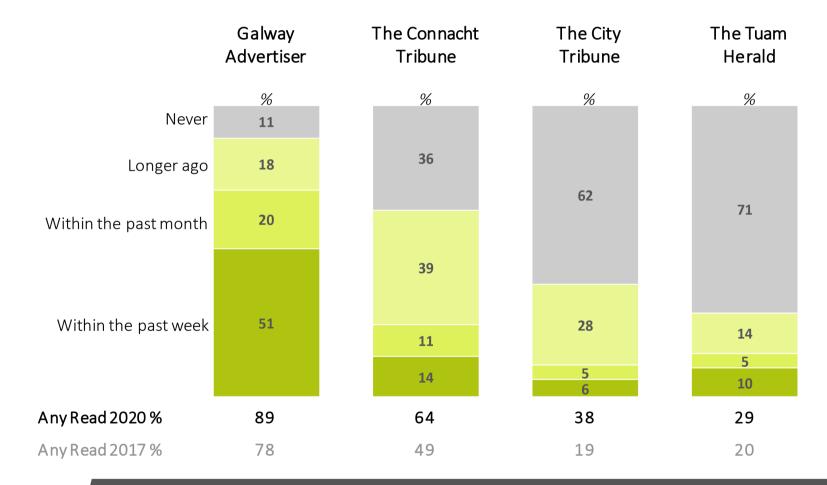




Local paper readership







More than half of Galway dwellers have looked at the Galway Advertiser within the past week. Much higher than the proportion looking at any other paper in the region.