

Junkee Media welcomes the opportunity to comment on the *Treasury Laws Amendment (News Media and Digital Platforms Mandatory Bargaining Code) Bill 2020* (the *News Media Bargaining Code*). We are keen to ensure that the voices of smaller publishers such as ourselves are heard in this important debate.

About Junkee Media

Junkee Media is one of Australia's largest and fastest growing youth publishers, reaching millions of young Australians each month through our consumer-facing websites, Junkee, Punkee and AWOL, as well as our network of Digital Out of Home (DOOH) screens via our parent company, oOh!media, and social platforms such as Facebook, Instagram, Twitter and TikTok.

Junkee Media's mission is to inform and entertain in equal parts. We aim to put information and events in context so that young Australians can understand the world around them; we aim to enrich young Australian's lives by giving them the know-how they need to grow and develop as people; and we seek to entertain and provide some respite for our readers when they just need somewhere to escape.

Junkee Media employs 51 people across its operations, including around 15 full-time editorial staff, and dozens of freelance writers. Junkee Media provides a crucial voice for young Australians in an increasingly concentrated Australian media environment. We are extremely proud of the role we've played for the past decade, giving a generation of a diverse young writers a platform to enter Australia's social debate, and a leg-up into Australia's competitive journalism and writing industries.

You can read Junkee Media's Editorial Code [here](#).

About oOh!media

oOh!media is a leading Out of Home media company that is enhancing public spaces through the creation of engaging environments that help advertisers, landlords, leaseholders, community organisations, and local, state and federal governments reach large and diverse public audiences.

The company's extensive network of more than 37,000 digital and static asset locations includes roadsides, retail centres, airports, train stations, bus stops, office towers, cafes, bars and universities.

Listed on the ASX, oOh! employs around 800 people across Australia and New Zealand and had revenues of \$649 million in 2019. It also owns digital publisher Junkee Media, printing business Cactus, and experiential provider oOh! Experiential.

oOh!media invests heavily in technology, and is pioneering the use of sophisticated data techniques that enable clients to maximise their media spend through unrivalled and accurate audience targeting.

Junkee Media's Response to the proposed *News Media Bargaining Code*

Junkee supports the principles of the *News Media Bargaining Code* as a way to correct the power imbalance that currently exists between the large tech platforms and digital publishers, especially smaller publishers such as ourselves.

Across our history, we have prided ourselves on our ability to innovate and find new ways to reach audiences through online forums, direct traffic to our websites, or – increasingly – away from our owned platforms and directly on the platforms owned by large tech companies.

The dominance of the large tech companies, particularly Google and Facebook, has had an enormous impact on the way digital publishers operate. Online publishers are increasingly fighting over a smaller slice of a pie that is rapidly being eaten up by the large tech companies. The flow of advertising dollars to big tech has put enormous pressure on smaller publishers to grow rapidly, consolidate, or perish. This has had a significant impact on media diversity and quality in Australia.

As the large tech companies grow, so too does our reliance on them. This is a double-edged sword: in recent years, Junkee Media has been able to reach record audiences through our relationship with Facebook and Google, but we have also become increasingly reliant on them for our survival – approximately 75% of Junkee Media's traffic is driven through search and social, and almost all of that traffic comes from either Facebook or Google. A small tweak to Facebook or Google's algorithm can have an outsized effect on our ability to drive traffic, and therefore revenue. We have had to remain constantly vigilant to changes in the online environment, lest we be left behind.

The over-reliance on algorithms for traffic also has an effect on the quality of content that digital publishers are able to create. Digital publishers are now subject to algorithms that appear to reward the loudest voice in the room, which has given rise to clickbait and sensationalism at the expense of quality journalism. This reliance on the algorithm means investments in longer-form, in-depth journalism that we've created in the past make less sense due to the type of content that is rewarded with views.

The proposal to divert a small percentage of the large tech companies' revenue to publishers is a welcome change to the Australian media landscape, providing a level of certainty that would allow us to invest directly back into the creation of full-time jobs and quality content. As a small digital publisher, we would welcome the opportunity to invest any revenue received through the *News Media Bargaining Code* directly into the production of quality public interest journalism.

Similarly, we welcome the *News Media Bargaining Code's* proposed algorithm notification provisions, which would provide a level of certainty as we attempt to peer over the horizon to implement long-term strategies and make decisions about how we can best invest our revenue into the creation of quality, original content, and the creation of full-time jobs.

Junkee Media's Relationship with Facebook and Google

Junkee Media acknowledges that we have a long-standing, mutually beneficial relationship with both Google and Facebook that reaches beyond the day-to-day of publishing our content on their platforms.

In 2019, Google awarded Junkee Media a grant through its Google News Initiative. This money allowed us to invest in a comprehensive video publishing strategy, allowing us to create quality, original content that speaks directly to our audience.

Similarly, in 2019, Facebook funded video content on Junkee through the Facebook Journalism Program. This money was invested directly into the creation of quality original journalism. Through this investment, we were able to hire multiple journalists to produce The Junkee Takeaway, a daily video news show published directly onto Facebook Watch, and later onto our own platforms and YouTube. The Junkee Takeaway has been an enormous success, driving tens of millions of views across hundreds of episodes, allowing us to inform our audience on the important issues of the day in an innovative environment that directly reaches our audience. Anecdotally, the feedback from our audience to this product has been extremely positive, and we view The Junkee Takeaway as a key plank in our editorial strategy into the future. It is highly unlikely that we would have been able to take the risk to create these products without the direct support of Facebook and Google.

We have an excellent working relationship with both Facebook and Google, and we would like that relationship to continue into the future. However, the ongoing debate as it relates to the *News Media Bargaining Code* has created an uncertain environment for both companies. The uncertainty has affected our ability to create long-term strategy as it relates to our investments in original journalism, and Facebook and Google's investments in us.

Facebook and Google's future in Australia

Junkee Media takes seriously Facebook and Google's public threats to abandon the Australian marketplace or to severely restrict their presence in Australia if the *News Media Bargaining Code* is implemented. As noted above, we are heavily reliant on Facebook and Google to drive traffic and revenue. If either of these companies were to follow through on their threats, it would have a significant negative impact on our business and on media diversity more generally.

Crucially, any moves by the two companies to abandon the Australian marketplace would have an outsized impact on smaller digital publishers, who for years have been encouraged to invest more in these platforms. In one of the most highly concentrated media markets in the world, this would have significant negative consequences for the diversity of voices available to Australian audiences. The impact of this decision would stretch beyond the creation of news content and would have enormous impact across lifestyle, hospitality and more niche publishers, who play a vital role in serving audiences who are seeking news, information, opinion and utility content that isn't currently offered by larger, more traditional publishers. It would also impact the many industries that these publications serve, and the thousands of Australians who are employed in those industries.

Additionally, any move by Facebook or Google to abandon the Australian marketplace would have a negative impact on the news literacy of young Australians. Junkee Media is one of the few youth publishers dedicated to creating original journalism that attempts to educate and inform young Australians. As noted throughout this submission, a significant majority of our readers find us through

the large tech companies. It is highly unlikely that a significant proportion of these young readers would migrate to directly accessing Junkee or other publishers if their current methods of accessing information were closed off. They would not find news elsewhere; they would simply stop reading news. This would have a potentially devastating impact on young Australian's understanding of the world around them in a period where access to accurate and reliable information is more important than ever.

Junkee Media strongly encourages the relevant stakeholders to find reasonable solutions that are acceptable to everyone and that won't leave smaller publishers out in the cold.