

To the New Zealand Commerce Commission,

We, a group of more than 30 New Zealand editors, are writing to say, with respect, you are wrong. We believe that you have misinterpreted the state of New Zealand journalism.

It is unprecedented for a group of editors to write such a letter. It is not unusual for editors to take a stand. We do all the time on behalf of the communities we serve, but rarely, if ever, on our own behalf.

But to have 30 editors sign their name to this letter is a highly unusual show of unanimity and, rather than proving the point a Fairfax Media and NZME merger would result in a lessening of diverse editorial views, it should be seen as a reflection of the deep concern we have that your decision to reject the merger will inevitably spell the end of our ability to maintain quality national and local journalism at scale for New Zealanders.

We decided to write because in its draft decision the commission didn't stick to the economic analysis but strayed into intangibles such as the quality of journalism and unquantified risks to editorial independence, and that is territory where we live and work every day.

We believe you have made fundamental errors in assessing the risk to editorial independence and plurality of voice. A mere change in ownership would not result in us falling prey to political or commercial agendas.

Even if we could accept that there would be a loss of voices through a merger - which we do not - this argument ignores the reality that a great many alternative voices remain giving rise to vigorous plurality, whether through traditional media such as the publicly funded RNZ and TVNZ, commercial media such as Mediaworks, Bauer (which just last week launched a new news service), Associated Press, the Guardian, dozens of independent publications and broadcasters, digital-only international behemoths such as Facebook, Twitter, or niche sites such as New Zealand Doctor, The Spinoff and others. New Zealand, with a population smaller than many international cities, is awash with voices reaching audiences through a variety of platforms and channels.

But of greatest concern to us as editors is the assumption you have made about our professionalism and our capacity to continue to support plurality, quality and accuracy.

Our integrity relies on these. They are the foundations upon which journalism in this country is built.

Every editor in this group is fiercely independent. The same goes for the journalists who work with us.

We have never been swayed by political or commercial influence, and that is not for want of trying by political and commercial forces.

You say that it is important that members of society - government, corporate and private

citizens - are not able to influence one provider without the opportunities for differing views to be expressed. We agree and we, as gatekeepers of many of the most august newsrooms and publications in the country, would never let that happen.

Editorial independence is at the core of what we do and it will never be compromised, merger or not.

By the way, this letter has not been commissioned by, nor approval sought from, the CEOs or shareholders of our businesses. We are speaking as editors whose only concern is the protection of journalism and journalists.

If anything, the mass ownership of a publicly listed company is itself an added protection to journalistic independence. Whose agenda exactly would we fall victim to? There is no ego-driven single owner in sight, threatening the editors with sackings if they don't fall in line. Even if there were, you can be sure the editors and journalists in this country are made of sterner stuff than that.

Ensuring that a diversity of views, perspectives, experiences, and issues are covered is an editor's most fundamental task. It is our privilege and responsibility, not the job of the shareholders.

We also have a code of ethics and are signatories to professional bodies that govern and regulate our behaviour. We take our commitment to the principles of the Press Council, the requirements of the Broadcasting Standards Authority and our journalistic codes of conduct extremely seriously. These codes and regulations protect editorial independence from precisely the erosion that you suggest would be wantonly embraced should there be a changed ownership structure.

In proposing to decline the merger, you assume you are protecting the future of journalism, but have not tackled the very issue that we have sought to solve through the plan - the stability and sustainability of the business that funds the journalism.

It is inevitable that there will be a weakening of the journalism industry in this country as a result. And the only ones to profit from that are those in positions of power that we seek to hold to account.

Things will not stay the same. That is the one certainty.

The view of editors in this country was that despite the reality of job losses in some areas through a merger, it offered the best chance for a more sustainable and strong foundation for supporting local journalism.

This would give time for digital revenues to grow and new business models to emerge. Our journalism is founded on commercial returns. When revenues for newspapers decline, as they are doing, there is nothing to pay for local journalism. Without a merger, we have lost a significant chance to stabilise the financial foundation upon which local and national journalism

in this country is built.

The rosy view that news and newspapers will exist tomorrow because they exist today is misguided.

Without change, the level of change a merger will bring, many jobs will inevitably be lost.

We believe - no, we know - that the rapid dismantling of local newsrooms and journalism at scale in this country is inevitable if this merger does not proceed.

Perhaps, most distressingly, we believed that the merger offered a chance at a New Zealand solution.

For decades, New Zealand newspapers have been owned by Australian and Irish companies and overseas investors. A merged Fairfax-NZME entity would be based in New Zealand, headquartered here with a CEO who had to listen to the voices of New Zealanders.

That is why we found your decision that Facebook and Google are not competitors so galling.

Every day we battle for the attention of New Zealanders against these multinational platforms. Every day we battle for advertising against these behemoths from Menlo Park and Mountain View, California. And we do it by paying for local journalists. And technicians. And salespeople. New Zealand media hire people to inform, educate and delight every day. The overseas giants do not. Yet we have to compete for digital advertising from local ads in Cambridge, Taihape and Balclutha to national advertising by New Zealand-wide companies.

The government shows little inclination to tax these overseas competitors, or to support local journalism. So we held out hope that you would. We encourage you to please revisit your draft decision and take into account the views of those of us working on the frontline.

Signed:

*Miriyana Alexander, editor Weekend Herald, Herald on Sunday*

*Andrew Austin, editor, Hawkes Bay Today*

*Sinead Boucher, group executive editor, Fairfax Media NZ*

*Nicola Coburn, Marlborough regional editor, Fairfax Media NZ*

*Geoff Collett, national lifestyle editor, Fairfax Media NZ*

*Craig Cooper, editor, Northern Advocate*

*Bernadette Courtney, editor-in-chief, Central Region, Fairfax Media NZ*

*Patrick Crewdson, editor, stuff.co.nz, Fairfax Media NZ*

*John Crowley, group editor, Fairfax Media NZ*

*Shayne Currie, managing editor, NZME*

*Mark Dawson, editor, Wanganui Chronicle*

*Stuart Dye, Deputy Editor, Weekend Herald, Herald on Sunday*

*Ryan Evans, Taranaki regional editor, Fairfax Media NZ*

*Laura Franklin, editorial manager, NZME*

*Victoria Guild, Nelson regional editor, Fairfax Media NZ*

*Kamala Hayman, Canterbury Otago deputy editor, Fairfax Media NZ*

*Natasha Holland, Southland regional editor, Fairfax Media NZ*

*Jonathon Howe, Manawatu regional editor, Fairfax Media NZ*

*Joanna Hunkin, head of entertainment, NZME*

*Scott Inglis, editor BOP Times/The Daily Post, Rotorua*

*Murray Kirkness, editor, NZ Herald*

*Amanda Linnell, GM/editor, Viva magazine*

*Jonathan MacKenzie, editor-in-chief, Waikato, Fairfax Media NZ*

*Chris Marriner, head of visuals, NZME*

*Trevor McKewen, head of sport, NZME*

*Jonathan Milne, editor Sunday Star-Times, Fairfax Media NZ*

*Joanna Norris, editor-in-chief, South Island, Fairfax Media NZ*

*Ellen Read, national business editor, Fairfax Media NZ*

*Jeremy Rees, national communities Editor, Fairfax Media NZ*

*Mark Stevens, group digital editor, Fairfax Media NZ*

*Lois Turei, head of production, NZME*

*Tracy Watkins, political editor, Fairfax Media NZ*

*Fred Woodcock, national sports editor, Fairfax Media NZ*