



L4 Boehringer Ingelheim Building,
2 Osterley Way, Manukau, 2241

10 February 2022

Commerce Commission New Zealand

Te Komihana Tauhokohoko

Dear Registrar, tēnei te mihi ki te tau hou, mālō e lelei

News Publishers' Association's application seeking authorisation for collective bargaining

Please treat this as a submission on behalf of The National Pacific Radio Trust (Pacific Media Network) in response to "News Publishers' Association of New Zealand Incorporated (NPA) seeking authorisation and provisional authorisation on behalf of itself, and its current and future members to collectively negotiate with each of Meta (formerly known as Facebook) and Google about the terms on which their news content appears on each platform".

1. Pacific Media Network is the operating arm of The National Pacific Radio Trust. Our constitutional mandate in accordance with our Deed of Trust stipulates the provision of media and journalism services to the Pacific population of Aotearoa (381,000 people, NZ Census 2018).
2. Pacific Media Network is not an NPA member. We are a member of the Radio Broadcasters Association of New Zealand. This membership stems from our historical business operating model that was originally founded on content distribution solely by radio.
3. Like most other NZ media organisations, our content distribution has undergone significant transformation and now encompasses distribution via multimedia platforms, not merely limited to radio.
4. Our community-centred content-creation operating model is a major factor in PMN's distribution being heavily skewed towards and overly reliant on third-party platforms such those owned by Google and Meta. Pasifika have already passed the cross-over point, and digital media now attracts a bigger daily audience among Pasifika than traditional media (NZ On Air, Where Are the Audiences, 2021).
5. The infusion of third-party platforms into our distribution model combined with a relatively small operating model commensurate with the minority population we serve, places PMN on an "uneven playing field" on a number of fronts. First, we will never have the scale of large NZ media entities. Second, we have an over reliance on Facebook and Google for content distribution.



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6. Pacific Media Network supports the notion of a collective of New Zealand news media being granted the opportunity to bargain with Google and Meta.
7. Our position is that accredited News Zealand news media (irrespective of the membership body they belong to), should be granted the opportunity to participate in the collective bargaining instigated by NPA.

Thank you for considering this submission.

Ngā mihi, mālō 'aupito

Don Mann

Chief Executive Officer