This is a submission in response to your preliminary determination in the NZME/Fairfax application, made public on November 8.

I am Fairfax Media's Group Digital & Visual Editor. I have been a journalist for well over two decades, working for community, regional and metropolitan dailies as well as the Stuff.co.nz news website.

In regard to the Commission's concern around the potential for a 'single editorial voice', not enough attention has been paid to the current approach of the two companies, or the modern media landscape.

Stuff.co.nz, for example, is already host to journalism from RNZ, TVNZ, our audience and external commentators/contributors. We are not the only platform for those voices either - they of course have their own platforms and distribution channels. And these are only domestic players - there are scores of editorial voices internationally that are so easily obtainable by New Zealanders living in a modern and connected world.

Today, audiences no longer consume a single daily main meal of news. They snack repeatedly on stories, video and interactive content throughout the day and night from a myriad news sources.

The Commission's worry, to my mind, also infers that editorial voice is determined at corporate level or is in some way influenced by political or commercial means. This is an insult to the journalists who are fierce in their protection of basic principles of accuracy, fairness and balance; of reporting the news without fear or favour.

And to assume that it is competitive edge which drives their commitment to these principles is equally flawed. Journalists are driven not by a need to beat their counterparts, but to expose truths and feed the insatiable appetite of their audience for news.

If even for a moment we accepted that it was competition which drove a quality of journalism which the commission suggests it at such risk from a merger, why only competition between Fairfax and NZME? I can assure you that the threat of being 'beaten' to a scoop comes from a far greater pool of players than just these two companies.

Lastly, too much attention has been paid to the status quo. Funding the status quo (ie, regional journalism at the current level) is not sustainable. It is no secret, and the application illustrated, that revenue is falling and the potential slice of the advertising pie continues to shrink and be gobbled up by global juggernauts.

As a senior editor operating in the 'status quo', I can assure you it is not some utopian scene where company coffers are spilling open for burgeoning teams of journalists to spend up large in pursuit of stories.

Of course, a merger would also lead to job losses. But I would argue fewer than if a merger was denied.

If Fairfax and NZME were to merge, 'efficiencies' would be identified and actioned. The outcome would be short and sharp. But if the two companies aren't to merge, we will continue as an industry as we have been: Needing to retrench, cutting costs and being unable to properly fund the journalism the Commission quite rightly seeks to protect.

So instead of using this merger application as a chance to give journalism in New Zealand a shot in the arm; a chance at complete remission, your draft decision effectively puts us in palliative care. Or, worse, death by a thousand cuts...