

## News Media Assistance Program (News MAP) Submission

Director, News and Journalism Section

Platforms and News Branch – Online Safety, Media and Platforms Division

Department of Infrastructure, Transport, Regional Development, Communications and the Arts

GPO Box 594

Canberra ACT 2601

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Dear Director, News and Journalism Section,

I am writing to you as the Co-Founder of Man of Many (<https://manofmany.com>), in response to the invitation for submissions regarding the News Media Assistance Program (News MAP). We appreciate this government initiative to gather stakeholder feedback to develop a robust and principled policy framework to support public interest journalism and media diversity in Australia. As an integral part of the news media landscape, Man of Many is keen to contribute our perspectives and insights to this vital discourse, particularly in light of the challenges and opportunities presented by the evolving media environment.

## Man of Many Background:

Welcome to Man of Many, Australia's largest men's lifestyle site and Australia's first 100% Carbon-Neutral digital publisher featuring the latest products, culture & style. We're not just the leading voice in Australia's men's lifestyle domain; we're a beacon of empowerment, guiding over 2 million monthly global readers and 750,000 social followers towards positive investments in themselves and their communities. Our commitment to authenticity makes us the trusted voice for Australians, and our recent accolades reflect our impact and influence in the industry.

- 🏆 WINNER – Best Media Platform | B&T Awards, 2023
- 🏆 WINNER – Best Engagement Strategy | Mumbrella Publish Awards, 2023
- 🏆 WINNER – Website of the Year | Mumbrella Publish Awards, 2023
- 🏆 WINNER – Publish Leader of the Year | Mumbrella Publish Awards, 2023

Man of Many has continuously excelled as an independent online authority, delivering the latest news, features, and expert insights on consumer products, technology, fashion, and pop culture. Our dedicated team drives the cultural conversation, offering a premium platform for editorially-driven commerce and news that resonates locally and globally.

Since our inception in 2012, we've maintained our self-funded and independent status, ensuring editorial impartiality and transparency. This commitment fortifies our position as a trusted voice and a tight-knit team that consistently delivers an exceptional experience to our readers and brand partners.

Man of Many is a platform and a trendsetter, shaping the cultural dialogue in the men's lifestyle arena. We've partnered with international brands like Nike, Samsung, Microsoft, IWC, Bose, and Netflix, showcasing our ability to effectively engage a savvy, style-driven audience. Our platform is a proven catalyst for impactful and engaging ad campaigns, offering a brand-safe and award-winning environment.

## **Existing News Media Bargaining Code Framework Background**

Significant disparities have emerged in the year since the implementation of the News Media Bargaining Code, particularly disadvantaging independent publishers like Man of Many (MoM). Large traditional news publishers have gained considerable leverage, primarily through substantial financial agreements with major digital platforms such as Facebook and Google, totalling an estimated \$200 million across approximately 20 deals. This scenario has created an uneven playing field, where smaller publishers are not only excluded from these lucrative deals but also need access to critical information like upcoming algorithm changes, further diminishing their competitive edge.

This imbalance is also evident in the application process for recognition under the Code. While the Australian Communications and Media Authority (ACMA) guidelines are primarily clear, ambiguities remain, especially regarding the definition of "public significance" in news content. This lack of clarity has resulted in Man of Many's unsuccessful application for registration as an eligible news business, a status we are currently reapplying for. The existing definitions in the Code do not fully capture the scope of content that constitutes core news, particularly in the context of digital platforms and modern news dissemination.

Moreover, the Code does not mandate reporting on how the funds from these commercial deals are utilised. There is no requirement to demonstrate how these funds contribute to hiring more journalists, investing in technology, or enhancing the quality and distribution of news content. This lack of transparency and accountability

has led to a situation where significant funding does not necessarily translate into proportional benefits for the industry, such as job creation or innovation in journalism.

This environment has resulted in significant challenges for Man of Many and similar independent publishers. Despite industry recognition and awards, efforts to engage in commercial agreements with major digital platforms have failed. This includes initiatives like the Facebook Australian News Fund, where our substantial investment in the application process yielded little, leading to the underutilisation of resources. As a result, independent publishers face significant disadvantages, including being outspent on talent, marketing, and technology, crucial for competitive digital publishing.

Despite our considerable reach, with over 2 million monthly readers predominantly aged 25-44, and being a registered news business with ACMA, we've faced significant hurdles in engaging meaningfully with digital giants like Google and Facebook. Our experience reflects a broader issue where the value and contributions of independent publishers are often overlooked in negotiations under this Code.

The current framework of the News Media Bargaining Code, designed to foster a balanced media environment, has inadvertently created a power imbalance. Large traditional news publishers have benefited disproportionately, as evidenced by the substantial deals negotiated with digital platforms, totalling around \$200 million. In contrast, smaller publishers like Man of Many find ourselves at a disadvantage despite our industry recognition and substantial audience. We need access to critical information, such as impending algorithm changes, and face challenges securing commercial agreements with these platforms.

The Code's implementation has led to a situation where funding does not equate to tangible benefits like job creation or innovation in journalism. The lack of transparency and accountability in utilising these funds further exacerbates this issue. As a result, the Code inadvertently entrenches the dominance of larger media organisations, counteracting its goals of promoting media diversity and a competitive market.

We respect the objectives of the News Media Bargaining Code but urge reevaluating its impact, particularly on independent publishers. A portion of the funding should be reallocated to support smaller news companies, fostering a more balanced and inclusive media environment. Given ACMA's oversight role, we seek guidance on additional avenues to pursue or measures to ensure compliance with the Code's intent.

In conclusion, we emphasise the need for collaborative efforts to elevate the Australian media industry, ensuring fairness and growth for all involved. We hope our insights contribute to Australia's more equitable and diverse media landscape.

## **News Media Assistance Program (News MAP) Feedback:**

Man of Many asserts the crucial role of independent digital publishers in enriching Australia's media ecosystem. We advocate for an amended framework under the News Media Assistance Program that recognises and supports the unique contributions of independent entities like ours. Our stance is that such publishers diversify the media landscape and drive innovation and community engagement. Therefore, a more inclusive approach in policy-making and funding allocation is vital to nurture and sustain the growth and impact of independent digital media in Australia.

## **Part 1: Framework and Objectives Feedback**

The digital publishing industry, represented by entities including the Digital Publishers Alliance, plays a pivotal role in Australia's media ecosystem. Our collective employment of over 1,500 Australians in full-time or contractual roles is a testament to this. This significant contribution to the economy and the media sector must be recognised and integrated into the policy framework to ensure a holistic approach to media support.

However, the current draft of the Consultation Paper presents several areas of concern:

**Vague Definitions:** The paper's lack of precise definitions for critical terms such as 'public interest journalism' and 'media diversity' poses a risk of ambiguity in setting policy objectives. Clear definitions are essential for effective policy formulation and implementation.

In expanding upon the critique of vague definitions in the consultation paper, it's crucial to underscore the need for precise terminology, particularly for pivotal concepts like 'public interest journalism' and 'media diversity'. With clear definitions, there's a risk of ambiguity that can lead to consistent policy objectives and applications. Defining 'public interest journalism' should encompass a range of journalistic practices, including investigative reporting, community reporting, and analysis that serve the public good. Similarly, 'media diversity' should be clearly articulated to include diversity in ownership, viewpoints, and representation across different demographics. Precise definitions are fundamental for setting measurable, actionable, and fair policy goals, ensuring that the framework effectively addresses the needs of the entire media landscape, including emerging digital platforms.

There can be no argument that digital and other technologies and products have fundamentally changed modern-day life and had resultant impacts on critical matters

such as relationships, mental health, personal safety, predatory behaviour, where people spend and invest, where they go, and how they live; where and how they work. However, much of the discussion around Government Support has tended to prioritise political or narrow 'hard news' public interest journalism as playing a crucial role in democracy and citizenship at the expense of considering the societal contribution of softer forms of journalism. However, the development of consumption cultures in Australia and globally, and the resultant major societal shifts toward individualisation, lifestyle, and values change, have heightened the public significance of lifestyle and technology journalism.

It is clear that the notion of existing conceptualisations of public interest and lifestyle journalism as binaries need to be updated and in accord with their connections and general significance.

News and information on such things as significant product innovations and consumer product releases, arts and community developments and events, and other key lifestyle issues deal with matters that materially impact such things as spending patterns, lifestyle choices, social cohesion, community identity, and community wellbeing (including mental health) and prosperity, and positive economic and social progress and development. They are not just matters of minor interest to Australians. They are matters that impact every aspect of their daily lives and the communities in which they live.

Research and academic studies have also validated the public significance of focused lifestyle news in the context of its impact on consumption patterns and societal changes. See, for example, [4] and [5]. The link between sound lifestyle choices and behaviours and the resulting impacts on society is established and not questioned. And lifestyle choices affect the quality of life, health, and survival at all ages. Too many Australians follow an unhealthy lifestyle. Hence, they encounter relationship breakdowns, mental illness, sickness, disability, and even death. Problems like joint and skeletal problems, cardiovascular diseases, hypertension, overweight, violence and so on can be caused by an unhealthy lifestyle. News content (including the regular Health, Fitness, and scientific research news that Man of Many publishes) that informs better lifestyle choices is consequently of public significance in helping to address these problems and the related social and economic impacts.

As a result, lifestyle issues and trends are not just matters of minor or casual interest to Australians, they are matters that materially impact every aspect of daily lives and hence have significant impacts for Australians and the communities in which people live.

As a clear example, the social impact of technology is becoming more pronounced as people's lives become more digitally connected. New technologies have helped improve the quality of Australian life by giving people improved access to life-changing devices and information while providing the ability to interact and communicate in different ways. The resultant societal benefits become tangible and significant as more people take advantage of such technologies. Technology, consumer products, and

lifestyle news, such as that presented by Man of Many, undoubtedly play a crucial role in assisting people to take advantage of such technologies.

Lifestyle journalism is also of crucial economic consequence for mainstream media outlets as audiences look to the media to provide guidance and advice on how to live their lives. The fact is, the role of traditional institutions has been eroded in society, and it is now the media for which many people look for guidance in their day-to-day lives.

As a result, lifestyle journalism in the media ecology has become of economic and cultural importance. It undoubtedly now plays a crucial role in influencing the formation of individual identities and assisting citizens to live a positive life.

**Traditional Model Bias:** There needs to be more emphasis on conventional news media models. This approach risks overlooking the significant contributions and needs of digital-first platforms like Man of Many, which are at the forefront of media innovation and audience engagement in the digital age.

**Government Intervention:** The extent of government intervention suggested in the paper raises concerns about the potential impact on editorial independence and the risk of political influence in journalism. Safeguards must be established to maintain the integrity of journalistic content.

Man of Many, as an independently owned platform, emphasises the importance of maintaining editorial autonomy to ensure impartiality and transparency. Safeguards are necessary for the policy to protect media entities from political influences, ensuring that diverse voices, like those represented on Man of Many, continue to thrive without external pressures.

**Limited Scope:** The objectives outlined need to sufficiently address the complexities of the evolving media landscape, notably the influence of social media and digital content platforms on news dissemination and consumption. An expanded scope is necessary to encompass the full spectrum of today's media environment.

As for Man of Many, we represent a unique position within this landscape. Our platform reaches a significant demographic and is committed to quality journalism and content diversity, aligning with the policy's objectives. Our innovative adaptation to technological changes positions us as a sustainable model for future journalism. Our platform can contribute significantly to media diversity, representing a new age of digital journalism that should be acknowledged and supported under the new policy framework.

## Part 2: Potential Measures Feedback

Our unique position in the Australian media landscape allows us to offer a distinct perspective. While we appreciate the government's effort to adapt to the changing media environment, we have concerns about the outlined measures in Part 2 of the consultation paper. These include the risk of compromised editorial independence due to direct funding, the potential exclusion of innovative digital platforms like Man of Many through support for traditional business models, complexities and potential biases in tax-based incentives and government advertising, and the challenges in effectively fostering true media diversity.

**Direct Funding Critique:** Direct government funding for media poses a significant risk to perceived editorial independence. When a news outlet receives funding from the government, there's a concern that this could lead to biased reporting or a reluctance to criticise government policies. This is particularly problematic in a democratic society where the media is expected to serve as a watchdog. Additionally, the criteria for funding allocation could be subjective, favouring certain types of media or content over others, leading to a homogenisation of the media landscape rather than promoting true diversity.

**Business Model Support Critique:** Government support for specific business models in media can be problematic as it might not adequately cater to the diverse needs of the media landscape. This approach risks favouring established players over smaller, independent ones, potentially stifling innovation. For instance, emerging digital platforms like Man of Many might need to fit neatly into traditional media business models and, thus, could be inadvertently excluded from such support. Moreover, this kind of support might encourage dependency on government policies, hindering the development of autonomous, resilient business models in the media industry.

**Tax-Based Incentives Critique:** Implementing tax-based incentives for media organisations is complex and could create an uneven playing field. The intricacies of tax laws might favour larger organisations with the resources to navigate these complexities, leaving smaller publishers, like independent digital platforms, at a disadvantage. Additionally, the criteria for such incentives might not align with the evolving nature of digital media, potentially overlooking innovative content delivery methods or new forms of journalism.

**Government Advertising Critique:** Relying on government advertising to support media could lead to allocation biases. Government advertising funds could be disproportionately directed towards media outlets that align more closely with the current government's views or objectives. This approach needs to be more transparent and could lead to media outlets being incentivised to align their content with government priorities to secure advertising revenue, thereby undermining journalistic integrity.

**Media Diversity Fostering Critique:** The challenge with fostering media diversity through government measures lies in the difficulty of defining and quantifying 'diversity'. This could result in support measures that are too broad or too narrow,

failing to address the actual needs of diverse media outlets. For example, niche platforms like Man of Many, which cater to specific interests and demographics, might need to be adequately recognised or supported under generic diversity initiatives. This approach also risks oversimplifying the complexity of media diversity, reducing it to a few measurable parameters that might not capture the true breadth of diverse perspectives and content in the media landscape.

As Man of Many, our unique contribution to the Australian media sector aligns well with the objectives of the News MAP. Our platform:

1. **Highlights Unique Audience Reach:** We cater to a demographic vastly underrepresented in mainstream media, bringing fresh perspectives and diverse content.
2. **Showcases Innovations:** Our adaptation to digital media trends and modern consumption patterns sets us apart, demonstrating our commitment to evolving with the industry.
3. **Focuses on Specialized Content:** We emphasise the importance of niche content, which is crucial for a vibrant and diverse media landscape.
4. **Emphasises Community Engagement:** Our platform actively engages with our community, contributing significantly to public discourse and offering a unique blend of lifestyle content.
5. **Presents Growth and Sustainability Plans:** We have concrete plans for sustainable growth, ensuring our continued contribution to the media landscape.

In conclusion, while we support the intentions behind the News MAP, we urge reconsidering the proposed measures to ensure they genuinely support and nurture the diversity and innovation platforms like Man of Many bring to the Australian media ecosystem.

## Part 3: Establishing the Evidence Base Feedback

We want to provide our perspective and constructive feedback on the 'Establishing the Evidence Base' section of the News Media Assistance Program consultation paper. This section is pivotal as it outlines the approaches to measuring media diversity, maintaining news market data across Australia, and evaluating the effectiveness of support measures. It is essential that these metrics and evaluations accurately reflect the realities of the modern media landscape, which includes digital-first publications like Man of Many.

**Limited Scope of Data Consideration:** The framework primarily focuses on traditional metrics for measuring media diversity, such as audience reach and content variety. This approach may need to fully capture the nuances of digital media, especially



metrics like engagement rates, user interaction, and content-sharing patterns, which are vital for digital platforms.

**Challenges in Evaluating Effectiveness:** The evaluation criteria for the effectiveness of support measures are geared towards short-term impacts, lacking an emphasis on long-term sustainability and innovation in journalism. This could lead to a biased preference for established players over new entrants or innovators in the digital space.

**Potential Bias towards Larger Entities:** The proposed methods for maintaining news market data and evaluating effectiveness might inadvertently favour large, established media organisations. This oversight could marginalise the unique contributions and challenges independent digital publishers such as Man of Many faces.

### **Suggested Improvements:**

#### **1. Inclusion of Digital Metrics:**

The current evaluation criteria for media diversity and effectiveness of journalism support focus predominantly on traditional media metrics. In the digital age, however, platforms like ours leverage various digital channels that need to be sufficiently represented in these metrics. We advocate for the inclusion of digital performance metrics such as:

- **YouTube Engagement:** Metrics such as view counts, likes, shares, and comment activity on our YouTube channel, which is a significant source of engagement and content distribution for us.
- **Newsletter Subscribers:** The number of subscribers to our newsletters reflects a dedicated and engaged audience.
- **First-Party Data Analysis:** Use of first-party data like website analytics, user behaviour, and engagement patterns on our website, providing deeper insights into audience preferences and content impact.
- **Technological Support:** Recognition of the role of advanced technologies in content creation and distribution, including AI-driven content personalisation and analytics tools.

#### **2. Highlighting Niche Market Impact:**

Man of Many significantly impacts niche markets, often underserved by mainstream media. Our content strategy focuses on specific interests like technology, finance, whisky, and lifestyle, catering to a unique audience segment. Our approach demonstrates diversity in content and thought, contributing to a richer media landscape in Australia. We suggest:

- It recognises the importance of niche content creators in contributing to media diversity.
- It provides support measures that acknowledge the unique audience engagement strategies of platforms like ours.

### 3. Case Studies and Success Stories:

To illustrate our impact, we can provide case studies demonstrating our successful audience engagement and innovative content strategies. For example:

- In a recent campaign, we leveraged user feedback to create articles on emerging technology trends, resulting in increased reader engagement and ad revenue.
- Our innovative use of mixed media combines video, articles, and social media to create a comprehensive storytelling experience.

### 4. Focus on Long-term Sustainability:

We emphasise the need for support measures that address current market success and focus on long-term sustainability and adaptability. Man of Many, for instance, has consistently adapted to changing market dynamics and audience preferences, reflecting resilience and a sustainable business model. We suggest:

- It is supporting initiatives that foster innovation and adaptability in media business models.
- It recognises and encourages the role of independent digital media in contributing to a sustainable and diverse media ecosystem.

These suggestions will significantly contribute to a more comprehensive and practical support framework for Australia's public interest journalism and media diversity.

## Conclusion

As Man of Many, we appreciate the opportunity to contribute to the consultation process for the News Media Assistance Program. Our feedback is grounded in our experience as an independent digital publisher and our commitment to enriching Australia's media landscape.

**Existing News Media Bargaining Code Framework:** We have observed a disparity in the benefits derived from the Code, disproportionately favouring larger traditional news publishers. This imbalance has created challenges for independent publishers like us, hindering our ability to engage with major digital platforms and access critical information. We urge you to reevaluate the Code to ensure it supports a more balanced media environment, including independent publishers.

### News Media Assistance Program Feedback:

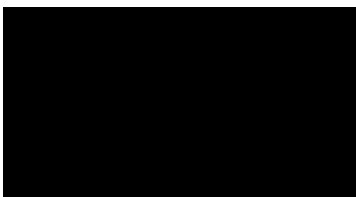
**Framework and Objectives:** We recommend more explicit definitions of 'public interest journalism' and 'media diversity' to eliminate ambiguity. It's crucial to recognise the evolving nature of digital media and the role of platforms like Man of Many in the media ecosystem.

**Potential Measures:** We express concerns about the risks of compromised editorial independence due to direct government funding, the potential bias in tax-based incentives, and the challenges in effectively fostering media diversity. We advocate for measures that recognise and support the unique contributions of digital platforms.

**Establishing the Evidence Base:** The current framework should include digital performance metrics such as YouTube engagement, newsletter subscribers, and first-party data analysis. These metrics are critical for accurately measuring media diversity and evaluating the effectiveness of support measures in the digital age. We emphasise the importance of supporting measures focusing on long-term sustainability and innovation.

In conclusion, Man of Many advocates for a more inclusive and balanced approach to supporting public interest journalism and media diversity under the News MAP. Our suggestions can contribute to a more comprehensive and practical support framework, ensuring Australia's vibrant and diverse media ecosystem.

Kind Regards,



**Scott Purcell**  
Co-founder, Man of Many

