

Ian Carter, Editorial Director, Iliffe Media—supplementary written evidence (FOJ0104)

Iliffe Media Group is an independently owned publisher with interests in newspapers, websites and radio stations. We publish in Cambridgeshire, East Anglia, Kent, Lincolnshire and Nottinghamshire. We also publish, on a joint venture basis, in the Scottish Highlands and Berkshire.

We welcome the CMA report, which we believe demonstrates a clear understanding of both the challenges faced by publishers and the areas where dominance of the search advertising market and social media display market significantly impact our ability to operate on a level playing field.

Iliffe Media Group has long believed the solution to these challenges is for social and search platforms to be deemed publishers when they incorporate our content within their own digital offerings.

Placing similar regulatory requirements on social platforms as those faced by publishers and broadcasters would incentivise them to approach regulated entities for content which would be syndicated with indemnities.

We note the arguments of the platforms that they do not believe their activities constitute publishing. However, we do not agree and believe a number of their activities definitely do, especially if one considers that at present a contract printer falls under the same publishing regulations as we do.

We also note Google is in the early stages of discussing paying *some* publishers for *some* content.

However, we need to see greater detail of this initiative as our concern is it may be limited in scope and application.

It is our belief that there are clear examples where social and search companies benefit directly from content generated by our editorial teams.

The snippets returned in natural search results often provide enough information for readers that they have no need to click through to our own platforms.

This problem is exacerbated when our content appears in a 'featured snippet', displaying an even greater amount of our journalism.

A featured snippet is designed to display enough information to provide a full answer to a user's search query with no need to visit the publisher's website.

The same applies to Google's Knowledge panels, which scrape our own original content and serve to keep the user within their ecosystem. In those circumstances, we would argue Google is performing the role of a publisher.

The growth of Google's Accelerated Mobile Pages gives us further cause for concern.

AMP pages restrict the advertising we can display alongside our own articles and restrict our ability to negotiate appropriate terms. As with featured snippets and Knowledge panels, AMP pages keep the user away from the publisher's own website. Both search and AMP leave publishers' in an undesirable position.

If we refuse to 'play the game' and make our content search and AMP non-compliant, we lose a significant proportion of our audience as our visibility in search results is severely impacted.

Unlike Google, publishers make an active choice to push content onto the Facebook platform. As with search, we rely on Facebook for a proportion of our digital audience.

However, we believe Facebook's - and its affiliated platforms including Instagram and Whatsapp - dominance of the social market again makes it hard for publishers to compete on a level playing field.

Facebook derives huge benefits from having user-level data on those reading our content on their platform. By the time this data reaches the publisher, it is aggregated and of far less commercial value.

The overall recommendation for a Digital Market Unit (DMU) as described sounds a good idea and the tackling of issues such as embedded default positions as mentioned in paragraph 89 of the summary are positive suggestions.

We believe publishers should have greater say in how platforms use our content and it is our firm belief that treating them as publishers would be a significant move in this direction.

We, therefore, would like to debate and agree on what constitutes "publishing".

The counter argument that the world wide web is an unregulated ecosystem with scale and so impossible to regulate should not apply to when "content" is being expressly presented within social media and search engine curated pages.

It is these curated pages that are now dominating the advertising markets. Companies should not be allowed to plagiarize our content and so attribution should be mandatory and penalties applied to those that persist to steal content. Instead a constructive conversation should be had between content originator and publishing platform.

We also believe there is merit in the suggestion within the CMA report that restrictions should be placed on search engines who seek to make themselves the default provider on handsets and other hardware.

Although Iliffe Media Group is a relatively small publisher compared to Reach, Newsquest and JPI we do, as an independent, have firm views on the regulation of social and search platforms and would wish to remain part of the debate as it develops.

Iliffe have been publishing since 1890 and before that were contract printers. Our current portfolio includes the Stamford Mercury and Kentish Gazette two of the oldest continuously published newspapers. Our latest investments include Mojeek, the UK's largest search engine which does not track its users.

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