

Dr David Wolfe QC
Chairman
Press Recognition Panel
Mappin House
4 Winsley Street
London W1W 8HF

19 August 2016

Dear Dr Wolfe,

1. I refer to the NMA's previous letters and our submissions concerning IMPRESS's application for recognition.
2. Yesterday IMPRESS published a draft Code for consultation giving until 29 September to respond. A standards Code against which a regulator will regulate its press members and by which editorial conduct will be judged is central to the Royal Charter Scheme of Recognition. The PRP itself has stated that in considering an application for recognition, it must assess the applicant's Code.
3. So it is now clear that IMPRESS intends to adopt its own Code, and not attempt to use the Editors' Code for which it has no responsibility, but that the PRP will not know what is in IMPRESS's Code until some unknown date after 29 September. In our view, the PRP cannot properly give recognition to a body until it knows the content of the Code which that body will administer and adjudicate upon.
4. Alternatively, if the PRP is contemplating in some way treating the draft Code as IMPRESS's Code that would in turn be an improper exercise of its public functions not least because it appears to be just that, a draft, on which the public is to be consulted.
5. We also question when the PRP was made aware of the content of the draft Code and the IMPRESS consultation process and timeline. Unless the PRP had privately been made aware of its contents some time before it was disclosed to the public, it cannot surely have time to assess even the draft on 23 August.

Yours sincerely,



Lynne Anderson
Deputy Chief Executive
News Media Association