



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

18<sup>th</sup> August 2016

**PPA**  
2nd Floor  
35-38 New Bridge Street  
London  
EC4V 6BW

**Telephone**  
020 7404 4166  
**Fax**  
020 7404 4167

[www.ppa.co.uk](http://www.ppa.co.uk)

Dear Dr Wolfe,

We write concerning the upcoming decision on the recognition of IMPRESS by the PRP and the recent publication of guidance for applicants seeking recognition.

News Media Association have shared a confidential copy of their letter to you, dated 15 August, concerning the same matter and we fully support their analysis and concern regarding the situation.

Throughout the process, following the application by IMPRESS to the PRP for recognition, the PRP has kept industry informed of developments while excising extreme lenience towards IMPRESS by repeatedly extending deadlines for them to respond to the PRP. At the same time, in the case of the guidance on interpretation of terms and elements of the Royal Charter, and the notification of the date of the PRP determination meeting, both were provided at short notice to industry, without the equivalent lenience.

We repeat our concern that IMPRESS falls short on the measures required by Royal Charter, notably failing to represent relevant publishers as we have highlighted in our responses to the PRP's calls for information on IMPRESS's application. Equally, we remain concerned that the PRP will be dependent on funding from IMPRESS to continue its work after its third anniversary, and therefore has an interest in granting recognition. IMPRESS does not have the funding from industry required to conduct its operations and has not engaged with or agreed funding with industry as required under Schedule 3 Article 6 of the Royal Charter.

The PRP should not approach its public functions as a box ticking exercise as has been set out in the guidance to applicants. In any event, it is clear that IMPRESS's application falls short of what is required to meet the recognition criteria and as such we respectfully request the PRP reject recognition of IMPRESS.

Owen Meredith  
Head of Public Affairs

Professional Publishers Association  
Ltd (PPA), a company registered  
in England

**Registered office**  
2nd Floor  
35-38 New Bridge Street  
London  
EC4V 6BW

**Company number**  
00132310