

**Submission to the Press Recognition Panel on behalf
of the members of the Scottish Newspaper Society**

June 1, 2016.

In response to the Press Recognition Panel's response paper of April 27, 2016, the Scottish Newspaper Society fully associates itself with the comments made by our colleagues at the News Media Association, who have laid out in great detail why the application from IMPRESS should be rejected.

There would be little purpose in repeating the points so well made by the NMA, but I would briefly like to add some specific observations about IMPRESS's proposed operation in Scotland.

As you will be aware, Press regulation is a devolved matter and is therefore the responsibility of the Scottish Parliament. Therefore, proper Scottish representation and the ability to engage with Scottish politicians (as opposed to being accountable to them) from a position of direct knowledge of Scottish readers, publications and political landscape is in our view essential if a regulator of Scottish publications is to have any credibility.

However, it appears that IMPRESS has no Scottish representation on any of its bodies whatsoever, whereas IPSO, the legitimate regulator to which the vast majority of Scottish titles are signed, has Scottish representation on its boards specifically guaranteed in its articles of association.

Like the NMA, we would also point to the observation by Lord Leveson that to be successful any regulator must command the confidence of the industry, yet IMPRESS has only attracted the membership of one Scottish-based website.

So IMPRESS is a body with no Scottish input and only one very small Scottish customer. If there is a sham regulator in Scotland, it is IMPRESS and it is very difficult to see how it can lay claim to being a regulator for the whole of the UK's publishing industry.



John McLellan,

Director, Scottish Newspaper Society