

Dear David

Thank you for your email below, inviting me to comment on your current consultation. I have responded to some of your earlier consultations, so you will be aware that I have a previous connection to the IMPRESS Project and am generally supportive of its aims and goals.

Question 1: Has the new system for overseeing press regulation in the UK been a success or failure so far?

Without commencement of section 40 of the Crime & Courts 2013 (or something with equivalent effect), it seems to me that the new system cannot succeed. That piece of legislation was an integral part of the incentive system for encouraging publishers to join a recognised regulator. Unless and until the secretary of state carries out the will of Parliament by bringing that section into force, I fear that the new system for overseeing press regulation will prove toothless.

So far as the work of the PRP is concerned, I find myself unable to express a firm conclusion either way at this point. From what I have observed, the new system has made the Panel capable of overseeing press recognition and I have some confidence that the Panel will do so. But, until the Panel has made at least one decision on an application for recognition (either granting recognition or denying the application), it seems premature to form a view on the Panel's contribution to the system.

I view this from the perspective of someone who thought that (i) Lord Justice Leveson's proposals were, on the whole, highly desirable and (ii) the manner in which they were developed by way of a Royal Charter and the associated legislation similarly desirable. It follows that, for me, success or failure of the PRP's role in the new system depends on seeing that the Panel reaches sound decisions.

Question 2: What factors or issues will affect regulators' and publishers' decisions when they consider these choices?

I don't have any special insights into the thinking of publishers or of regulators on this issue. All I can offer by way of comment is that each publisher and regulator will opt to participate in the approval regime if *either* they have a genuine desire to regulate or to be regulated in a manner which commands public confidence *or* the incentives for publishers to participate are sufficiently effective to overcome any doubts which they may have, leading publishers to wish to join a regulator which has received recognition.

Regards

Simon Carne