

**Nickelson, Emma-Jayne - RPC**

---

**From:** Jim Raeburn [info@scotns.org.uk]  
**Sent:** Tuesday 13 September 2011 17:38  
**To:** Lewis, Jaron - RPC; 'Guy Black'  
**Subject:** FW: Northern & Shell plc - PressBoF/PCC

---

**From:** Linda Spowart [mailto:info@pressbof.org.uk]  
**Sent:** 20 December 2010 10:23  
**To:** Martin Ellice  
**Subject:** Northern & Shell plc - PressBoF/PCC

Dear Mr Ellice

Thank you for your letter of 15<sup>th</sup> December addressed to Lord Black of Brentwood, the contents of which we have noted.

I fear you have fundamentally misunderstood the workings of the self-regulatory system. The Code of Practice is drawn up by the Editors' Code Committee, which is a Sub Committee of the Press Standards Board of Finance. PressBoF then promulgates the Code and asks the PCC independently to enforce it.

The application of the Code (as indeed the jurisdiction of the PCC) is therefore inextricably tied to the payment of PressBoF subscriptions. This system is not an *a la carte* menu from which publishers can pick and choose.

Without payment of registration fees from 1<sup>st</sup> January, Northern and Shell titles will be excluded from the system in its entirety. This will not just mean, as Lord Black's earlier letter indicated, that Northern and Shell readers will have no recognised, independent means of their complaints being dealt with (of which there were over 700 in 2009) but also that the Code of Practice, and the ethical standards contained in it, will cease to apply to you.

It is a matter of deep regret that Northern and Shell should be the only major national, regional or magazine publisher in the UK not to subscribe to the industry's successful system of self regulation, and I would again strongly urge you to reconsider your decision before your current subscription expires on 31<sup>st</sup> December this year. If you do not, then the industry will automatically take the action outlined in Lord Black's letter.

I look forward to hearing from you.

Kind regards,

Yours sincerely,

**Jim Raeburn**  
**Secretary & Treasurer**

PressBoF  
21 Lansdowne Crescent  
Edinburgh  
EH12 5EH

Tel: 0131 535 1064  
Fax: 0131 535 1063

14/09/2011

MOD100051615