

Community Broadcasting Association of Australia

Community Broadcasting Sustainability Review

Submission regarding the sustainability of the community broadcasting sector, including funding, administration and regulation for the Community Broadcasting Program and Indigenous Broadcasting and Media Program



1. Submission to the Community Broadcasting Sustainability Review

1.1 Acknowledgement of Country

The Community Broadcasting Association of Australia (the CBAA) acknowledges the Traditional Custodians of Country throughout Australia. We acknowledge First Nations' sovereignty and recognise the continuing connection to lands, waters and communities by Traditional owners of Country throughout Australia.

We pay our respects to Aboriginal and Torres Strait Islander cultures and to Elders past and present. We support and contribute to the process of reconciliation.

We acknowledge Aboriginal and Torres Strait Islander people have been telling stories for millennia and we continue this rich tradition of sharing, protecting and enhancing culture. We honour the dedication and expertise of First Nations broadcasters and their work to strengthen and connect communities.

The CBAA is based on the lands of the Gadigal People of the Eora Nation.



Image Credit: 'Will Tower' a painting by Koori Artist and 2022 Archibald Winner Blak Douglas

1.2 About the CBAA

Founded in 1974 and celebrating our 50th anniversary this year, the CBAA is the national peak body for community broadcasting licensees. As a cultural organisation established for the promotion of community broadcasting, including both radio and television, we are proud to have over 90 per cent of all community radio and television licensees, including those with a First Nations, faith, disability, LGBTIQ+ and multicultural community interest, as members.

1.3 About community broadcasters

Community broadcasters are licensed radio and television broadcasters under the *Broadcasting Services Act (1992)*. The Act outlines the legal framework for community broadcasting and defines the role the sector plays in delivering diverse media services that reflect a sense of Australian identity, character and cultural diversity.

Community broadcasters play an important role in providing a voice for communities not adequately served by other broadcasting sectors, including:

- First Nations communities
- Culturally and linguistically diverse communities
- Educational services
- Regional and remote communities
- Faith-based communities
- People with a print disability
- Music, arts and cultural communities
- Youth and seniors' communities
- LGBTQIA+ communities

The broadcasting regulator, the Australian Communications and Media Authority (the ACMA), monitors community broadcasting stations' compliance with their licence conditions under the Act, ensures that the Community Radio Broadcasting Codes of Practice and the Community Television Broadcasting Codes of Practice meet community standards through a process of registration, and deals with escalated complaints under those Codes.

Community radio and television stations provide broadcasting services for the benefit of the community. They are operated as independent, not-for-profit organisations which actively encourage access and participation by members of their communities in all aspects of broadcast operations. Over 50% of community radio and television licensees are registered charities.

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1.5 Executive Summary

1.5.1 The CBAA's role in sector sustainability

The CBAA plays a crucial role as an intermediary organisation in the community broadcasting sector. It is a focal point for facilitating work to strengthen and develop a supportive ecosystem for stations by co-ordinating efforts across multiple organisations, fostering collaboration, and driving systemic change.

The CBAA's activities extend beyond direct service provision to sector-wide initiatives that build capacity, share knowledge and advocate for policy changes, including;

- the Community Radio Network and Australian Music Radio Airplay Project which facilitate nation-wide content sharing;
- DAB+ digital radio, which supports sector and station infrastructure, free-to-air broadcast delivery of primary services, and technological advancement;
- multiplatform distribution, to complement broadcast service delivery;
- best-practice learning, resources, and cross-industry networking opportunities; and
- leading market data collection and building an evidence base for policy and leading sector strategy.

Through these and other initiatives, the CBAA enhances the capabilities of individual broadcasters while simultaneously working to improve the overall ecosystem in which they operate.

The CBAA has the influence, skills, capability and partners to address challenges and capitalise on opportunities that no single broadcaster could tackle alone. This dual focus on individual organisation support and broader systemic change enables the CBAA to create a more resilient, innovative, and impactful community broadcasting sector.

1.5.2 Community broadcasting Impact

Community broadcasters deliver over 500 AM/FM/DAB+ services and two dedicated television services that reach over 5.19 million people across Australia each week – almost one quarter (24%) of Australians.¹

The sector's social and economic impact is driven by:

- 18,100 volunteers²
- 941 employees
- generating \$1/4 billion in value

Community broadcasting is playing an increasingly important role in connecting Australian communities that are underserved by media. Community broadcasters enrich and strengthen the social and cultural fabric of Australian society and amplify the voices of diverse Australian communities.

Regional and remote Australia:

- 74% of licensees are based in regional and remote areas.³
- 62% of regional listeners say their main reason to tune in is for local information and news.⁴

First Nations Australians:

- 51 organisations provide 158 services, the great majority in regional and remote areas.
- Australians from Aboriginal and Torres Strait Islander background are 44% more likely than the general population to listen to community radio.⁵

Multicultural Australia:

- 1.5 million Culturally and Linguistically Diverse (CALD) people listen to community radio (29% of total audience) for an average of 16.9 hours per week.⁶
- Community radio broadcasts over 110 different languages.

People with disability:

- The Radio Reading Network provides 19 AM/FM and DAB+ digital radio services nationally with 668,000 listeners each month.⁷
- The sector is working to diversify services to increase representation of disability in media, improve how disability is portrayed and improve community attitudes towards people with disability in line with Australia's Disability Strategy.

Faith-based communities:

- Includes 32 Christian radio stations and 1 Muslim station.
- 95% of Christian community radio listeners say their station has a positive impact in their lives and helps them grow spiritually (88%) and relationally (74%)⁸

¹ Community Radio Listener Survey – July 2024

² Station Financial Data FY2022-23, CBAA

³ Community Radio Listener Survey – July 2024

⁴ Community Radio Listener Survey – July 2024

⁵ Community Radio Listener Survey – July 2024

⁶ *ibid*

⁷ Community Radio Listener Survey – July 2024. Total listening for Net RPH and Net Vision Australia

⁸ The Social Impact of Christian Radio in Australia survey, McCrindle, 2021

1.5.3 Introduction

The CBAA welcomes the opportunity to contribute our response to the Discussion Paper released as part of an industry consultation for the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA) Community Broadcasting Sector Sustainability Review.

We thank the Minister for Communications, the Hon Michelle Rowland MP for her policy commitment to conduct this review to identify a sustainable funding base for community radio. Our sincere thanks also extend to the officers of the DITRDCA, the ACMA and the National Indigenous Australians Agency (NIAA) for their in-depth engagement and consultation with the CBAA, community broadcasters and sector organisations throughout the Review process.

The CBAA's submission seeks to address all Australian Government policy impacting the sustainability of all community broadcasters and the sector as a whole. This includes the design and funding of Government support programs for all community broadcasting organisations as well as legislation, regulation and the activity of the regulator.

As a priority, the CBAA is seeking an immediate and substantially increased funding allocation for community broadcasters to deliver *Roadmap 2033: Community Broadcasting's plan for greater impact in every Australian Community (Roadmap 2033)*.

The CBAA is also advocating for Ministerial leadership to deliver a suite of legislative and regulatory reforms which will create a clear and consistent framework for broadcasters to reduce administration, increase business certainty, enable operational efficiencies, expand services and increase opportunities for alternative sources of income.

With a sustainable funding base and a supportive legislative and regulatory framework, the community broadcasting sector can deliver its vision for the future and realise its potential to contribute more substantially and meaningfully to address challenges facing our communities across Australia.

1.5.4 Roadmap 2033: Community Broadcasting's plan for greater impact in every Australian community

Roadmap 2033 is our sector's proactive contribution to achieving a sustainable future for community broadcasting. It strengthens our sector's focus on enhancing community impact through increased collaboration, innovation, and community engagement. The CBAA is calling for Government support to achieve our vision.

Roadmap 2033 supports the Government's 2022 election promise to ensure community broadcasting sustainability. It establishes a policy framework for our sector to collaborate with the Government on key reforms outlined in the Community Broadcasting Sustainability Review.

Roadmap 2033 was developed through extensive consultation with government, stations, staff, volunteers and industry experts as well as research, data analysis and surveys.

It sets strategic priorities that encourage, challenge, and guide community broadcasters. Its implementation will strengthen our capabilities, expand our audience reach, and deliver high-quality content across new and existing platforms to all communities.

Roadmap 2033 articulates a 10-year vision for community broadcasting to be at the heart of every community. Our sector is united behind this plan to achieve even more positive outcomes for our communities.

1.5.5 Addressing government policy priorities

Community broadcasting plays a vital role in addressing many policy challenges identified by Government. The sector is a unique Australian cultural asset with substantial potential to further contribute meaningfully to social challenges facing our communities.

Our plan will harness the power of community broadcasters, staff and volunteers to:

- give more Australians access to trusted, independent, diverse, local news and information;
- play a unique, hyperlocal role communicating emergency information and provide more support to build community resilience in times of disaster;
- support self-determination of Aboriginal and Torres Strait Islander communities and close the gap in social and economic outcomes;
- elevate Australian music, arts and cultural industries;
- strengthen social and economic inclusion and cohesion, support settlement of new migrant groups and strengthen multiculturalism; and
- provide more skilled career pathways into the media and communications industry for all communities.

1.5.6 Government support for community broadcasting

The Australian Government has long been an important partner in supporting the community broadcasting sector through two vital grant programs:

1. *Community Broadcasting Program (CBP)*, managed by DITRDCA and administered independently through the Community Broadcasting Foundation (CBF); and
2. *Indigenous Broadcasting and Media Program (IBMP)*, managed and administered by the NIAA.

These current Government programs are underfunded.

Increased, long-term and secure funding from the Australian Government, delivered simultaneously across both programs, is critical to support the sustainability of community broadcasting.

Funding for these programs has been in real decline over the recent decade and not kept pace with rising costs. They are heavily oversubscribed and have failed to address increasing need from stations and their communities. Due to greater competition for grant funding, an increasing number of stations are at financial risk. Delivery of increased funding is now urgent.

A substantially increased investment is required to make the community broadcasting sector sustainable and strengthen its foundation. The [CBAA Pre-Budget Submission](#) sets out the sector's proposal to inform government funding priorities. If delivered, the Government's support for community broadcasting will transform into an outcome-led investment, critical social infrastructure, delivering more community impact and a better return for taxpayers.

For more information, see: [Roadmap 2033: Community Broadcasting's Plan for Greater Impact in Every Australian Community](#)

1.5.7 Our response to the Discussion Paper

In this submission, we address:

1. CBP Funding Structure and Outcomes;
2. First Nations Funding and Licencing; and
3. Legislative and Regulatory Issues.

Below is a summary of the CBAA's responses to questions in Discussion Paper and other matters relevant to the sector's sustainability.

Table 1: Summary of the CBAA's response to Discussion Paper questions

Discussion Paper questions	CBAA response	Rationale and information
PRIORITY AREA 1: CBP FUNDING, STRUCTURE AND OUTCOMES		
What are the advantages and/or disadvantages of: <ul style="list-style-type: none"> • the 3 grants streams under the CBP? • single-organisation and single year grants versus multi-organisation and multi-year grants? • the consortium model, co-location, sharing infrastructure and network content? • sector-coordinated initiatives to assist with governance, strategic and business planning? 	The CBAA supports the continuation of the three grant streams as they accurately reflect key areas of the sector's funding demand and are, importantly, familiar to stakeholders.	Section 1.6.5 See also Roadmap 2033
	The CBAA calls for greater flexibility around grant delivery structures, including supporting multi-year and untied grant-making to build operational sustainability.	Section 1.6.8 Section 1.6.8.1.4 CBP Evaluation Recommendation 10 See also Roadmap 2033
	Where appropriate, the CBAA supports more collaborative grants and opportunities for shared infrastructure, content and other initiatives that strengthen operations, enable stations to be sustainable and leverage economies of scale to stretch program funds further.	Section 1.6.8 Section 1.6.8.1.4
	The CBAA calls for better funding for intermediary organisations like the CBAA which currently leads sector-wide initiatives that support these types of activities. Further activities are outlined in Roadmap 2033.	Section 1.6.9.1.1 Roadmap 2033
Which quantitative or qualitative outcomes should the framework consider?	The CBAA seeks the outcomes identified in Roadmap 2033. CBAA is developing an associated sector-wide Evaluation Framework in consultation with the CBF, stations, sector organisations and Government. Reporting against Government policy objectives should take a whole-of-Government approach.	Section 1.6.9.1.3 See Roadmap 2033
How can services be supported to collect and report on data?	The CBAA's Data Insights Initiative is creating an evidence base for policy informing sector strategy. This initiative should be funded further. We are also working with the ACMA and other industry organisations to support improved data sharing as an evidence base.	CBOnline P.16
PRIORITY AREA 2: LEGISLATIVE AND REGULATORY ISSUES		
What are the impacts of current licensing conditions on your organisation's sustainability?	The CBAA is aware of regulatory barriers to: <ul style="list-style-type: none"> o Temporary Community Broadcasting Licences (TCBLs) becoming permanent. o CTV Channel 44 transitioning from a narrowcasting to broadcasting licence. o Additional impacts outlined in Section 3. 	CTV – Section 1.8.10 TCBLs – Section 1.8.5 Section 1.8 – 3. Legislative and regulatory issues
What are the advantages and/or disadvantages of: <ul style="list-style-type: none"> o introducing community participation tiers for remote, rural, regional and metropolitan services? 	The CBAA is not aware of benefits from introducing tiers but supports a review of the ACMA's Community Participation Guidelines to ensure they are flexible and serve the diversity of community broadcasters.	Section 1.8
	Social media reach/listener data is one of many possible indicators of community participation.	P.37

<ul style="list-style-type: none"> o including social media reach and listener data as part of community participation? o the current sponsorship limit and/or process? 	<p>An overall review of the ACMA's Community Participation Guidelines is needed.</p> <p>The market has transformed since the 1992 BSA. Stations need greater flexibility. The CBAA supports changes to sponsorship limits and processes. The ACMA Community Broadcasting Sponsorship Guidelines also need review</p>	<p>Section 1.8.1</p>
PRIORITY AREA 3 FIRST NATIONS FUNDING AND LICENCING		
<p>What are the main funding, licensing and revenue challenges; and how might they be addressed?</p>	<p>Challenges and solutions identified by the sector in consultation with Government are detailed in Roadmap 2033, FNMA's Calls to Action and CBAA's Pre-Budget Submission.</p>	<p>Section 1.7 - 3. First Nations Funding and Licencing</p> <p>See Roadmap 2033 See FNMA 10 Calls to Action See CBAA and FNMA submissions to the Indigenous Digital Inclusion Roadmap Consultation.</p>
<p>What should the funding priorities be for the IBMP from 2025 onwards?</p>	<p>Priorities and rationale are outlined in FNMA's 10 Calls to Action and captured in Roadmap 2033 and the CBAA's 2024-25 Pre-budget submission.</p>	<p>Section 1.7.2 See CBAA and FNMA budget submissions</p>
<p>Which funding model and/or grants structure would best support the First Nations sector?</p> <ul style="list-style-type: none"> o which Australian Government department could administer the IBMP? o which organisation could distribute/make decisions on First Nations funding? 	<p>The CBAA believes the Government should commit to the First Nations sector's long-standing Calls to Action. Their implementation should involve co-design to ensure self-determination and community control of program resources. In line with existing budget requests, there needs to be increased support for First Nations community broadcasters to address their unique needs and challenges.</p>	<p>Section 1.7.3</p>
<p>What are the advantages and/or disadvantages of introducing a licence type for First Nations broadcasters over the current licensing model? How would this licence differ from existing licence types?</p>	<p>Successive reviews since 2001 have recommended this change. Government should agree in-principle and consult further with First Nations broadcasters, as above.</p>	<p>Section 1.7.3</p>

1.6 1.CBP funding, structure and outcomes

1.6.1 A sustainable funding base

Increased, long-term and secure funding from the Australian Government is critical to support the Community Broadcasting Program (CBP) to deliver positive impact for our communities.

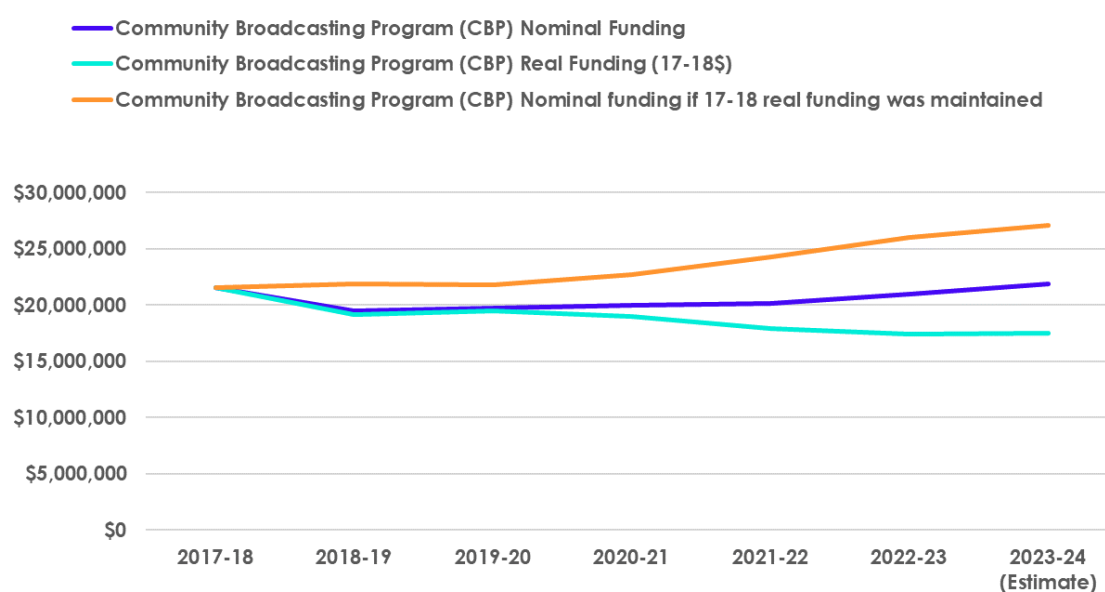
In the October 2022 Federal Budget, stable funding for the CBP was secured, avoiding a decline in funding uncommitted over the forward estimates. This funding was committed over multiple years and indexed to keep up with rising costs commencing from the 2023/24 year.

However, over the previous seven years, funding for the CBP has decreased in real terms. The table below shows the nominal and real value of CBP program funding from 2017/18 through to 2023/24. 2023/24 program funding was \$5.2 million less than it would have been had real funding been maintained over the period.

Table 2: CBP Nominal vs Real Funding 2017/18-2023/24

Community Broadcasting Program (CBP)				
Year	CPI	Nominal Funding	Real Funding (17-18\$)	Nominal funding if 17-18 real funding was maintained
2017-18	2.0	\$21,590,000	\$21,590,000	\$21,590,000
2018-19	1.5	\$19,492,000	\$19,199,620	\$21,918,782
2019-20	-0.4	\$19,733,000	\$19,515,937	\$21,830,131
2020-21	3.9	\$19,984,000	\$18,984,800	\$22,726,316
2021-22	6	\$20,149,000	\$17,932,610	\$24,258,427
2022-23	5.9	\$20,975,000	\$17,430,225	\$25,980,746
2023-24	3.3	\$21,893,000	\$17,470,614	\$27,055,138

Figure 1: CBP Nominal vs Real Funding 2017/18-2023/24



Source: CBF Grant Data

1.6.2 Program oversubscribed

As recognised in the Discussion Paper, and the Government's 2023 Program Evaluation, the CBP is a historically oversubscribed program. The funding shortfall in 2024/25 is at least equal to \$11 million.

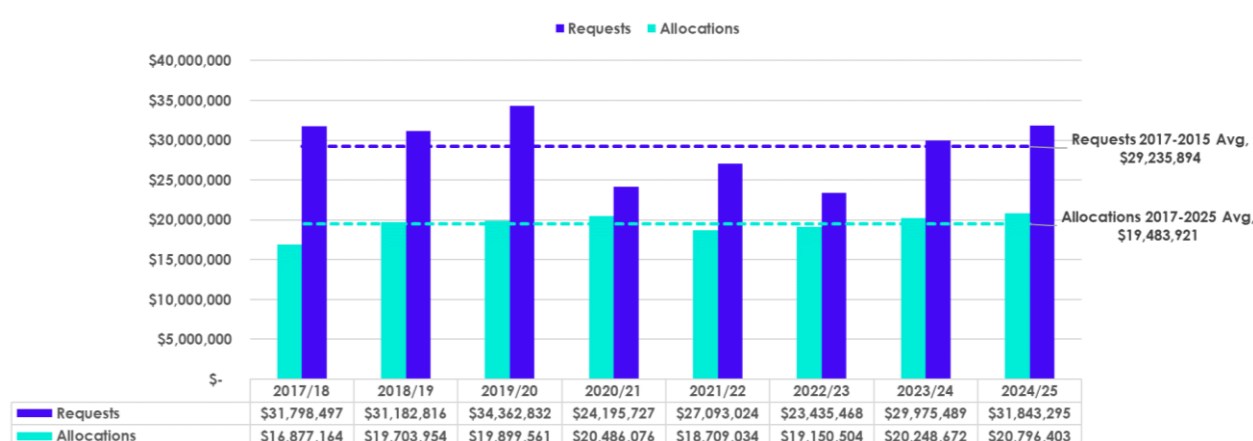
The program oversubscription has been consistent. The average funding shortfall is over \$9.7 million over the last 8 years but demand is likely much higher. There is evidence from the evaluation that many stations do not consider the exercise of applying for grants to be worthwhile, due to resources required to apply, and the low chances of success in receiving adequate support.

Table 3: CBP Grant Funding Shortfall

Year	Requests	Allocations	Shortfall
2024/25	\$31,843,295	\$20,796,403	\$11,046,892
2023/24	\$29,975,489	\$20,248,672	\$9,726,817
2022/23	\$23,435,468	\$19,150,504	\$4,284,964
2021/22	\$27,093,024	\$18,709,034	\$8,383,990
2020/21	\$24,195,727	\$20,486,076	\$3,709,651
2019/20	\$34,362,832	\$19,899,561	\$14,463,271
2018/19	\$31,182,816	\$19,703,954	\$11,478,862
2017/18	\$31,798,497	\$16,877,164	\$14,921,333
8-year average	\$29,235,894	\$19,483,921	\$9,751,973

Source: CBF Grant Data

Figure 2: CBP Grant Funding Shortfall



Source: CBF grant data

Underinvestment has negatively impacted program effectiveness as scarce resources provide the CBF with limited opportunity to allocate grants that make a long-term investment in station sustainability. The amount of funding available is the single most important and transformational measure that Government can make to support sector and station sustainability.

1.6.3 Stations at risk

Community broadcasting stations are facing a growing financial crisis due to decreasing real funding. This has resulted in high operating costs relative to income, leaving stations with razor-thin operating margins.

These financial constraints severely limit stations' ability to invest in medium and long-term business activities. More alarmingly, it threatens to reduce vital services to many of Australia's disadvantaged communities. In the worst cases, some stations may simply fail to sustain their operations.

The need for additional operational funding has become urgent. The CBAA's financial monitoring indicates a troubling trend: 59 community broadcasting organisations, representing 18% of the sector, are now at risk of becoming financially unviable. This marks a significant 40% increase in "High Risk" stations based on our 2022-23 financial data.

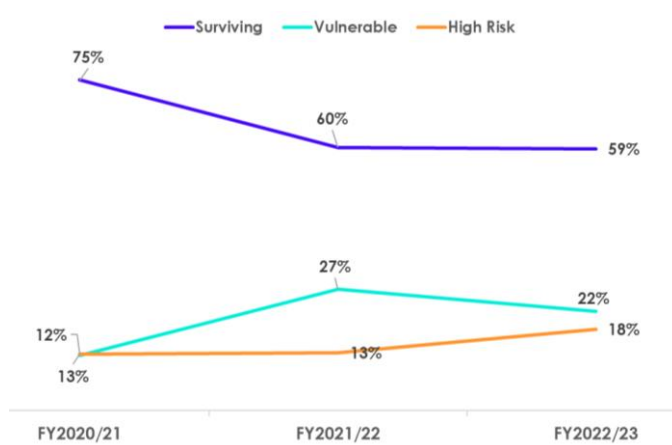
Table 4: Community Broadcasting Operating Costs as a percentage of Income, 2019/20-2022/23 ⁹

Community Broadcasting Licensees		
Year	Nominal Operating Costs	Nominal Operating Costs as % of Income
2019-20	\$217,915	84%
2020-21	\$320,409	87%
2021-22	\$321,183	75%
2022-23	\$335,358	91%

We define a station as "High Risk" when it has an operating deficit and insufficient net current assets to cover this deficit for six months. Of particular concern is that 29 organizations have fallen into this High Risk category for the first time in just the last three years. The situation is even more dire in regional areas, where we've seen a staggering 59% growth in High Risk stations¹⁰.

These statistics paint a clear picture of a sector under increasing financial strain. Without immediate action to boost operational funding, we risk losing a significant portion of our community broadcasting network, particularly in regional areas where these stations often serve as vital community hubs and information sources.

Figure 3. Station Financial Sustainability



Definitions

Surviving - Operating on a surplus.

Vulnerable - Organisations can cover their reported deficit for at least six months.

High Risk - The organisation has an operating deficit, based on their income and expenses. They do not have enough net current assets to cover their reported deficit for six months.

Source: Station Financial Data 2024, CBAA

The CBAA's budget submission proposes a 3-fold increase in funds available through the CBP for station development and operations (\$14.3m pa allocation to General and Transmission funding line).

⁹ Using individual station financial data, operating costs (expenses) and income levels have been compared from FY20 to FY22 as an average across the two categories of funding, CBAA

¹⁰ Station Financial Data FY2022-23, CBAA

1.6.4 Funding request (CBP)

The CBP is under extreme pressure. Trends are driving increasing demands for grants - increasing services, increasing costs, declines in volunteerism, a challenging sponsorship and advertising market, growing needs and expectations from communities and greater complexity of modern and multiplatform media operations.

Funding levels should increase to enable the CBP to:

- meet station demand for grants;
- meet growing community need for services;
- support efficient, multi-year grant-making;
- respond to technological, social, environmental and economic trends;
- support investment to build station resilience;
- support collaborative grant applications at scale; and
- foster innovation.

Funding for the community broadcasting program should be increased to \$40 million annually with indexation applied over the forward estimates. This proposal would result in \$18.1 million of new funding including \$10 million in increased program funding across existing CBP budget lines and \$8.1 million of new initiatives targeted at priority outcomes.

Table 5: The CBAA budget proposed for CBP total funding

	2023/24	2024/25	2025/26	2026/27
Total	\$21,893,000	\$40,000,000	\$41,025,641	\$42,077,581

1.6.5 Priorities for the Community Broadcasting Program (CBP)

The Social Research Centre evaluation of the CBP demonstrated that the program had broad and positive impacts maintaining the viability and operations of community broadcasting organisations.

The CBP should continue to prioritise the key 3 grant streams that reflect accurately the key areas of funding needs for the sector:

1. Station Development and Operations
2. Content
3. Sector Investment

More funding is needed across all three streams.

Existing grant funding lines should be maintained including earmarked funding for Ethnic, First Nations, Radio Reading and General and Transmission. Long-term funding to critical sector investment projects should be maintained, including funding for:

- Australian Music Radio Airplay Project (AMRAP)
- Community Broadcasting Online
- National Training
- Digital Radio Project (DRP)
- Multiplatform Distribution Project
- National Training – Industry capacity & skills development
- Enhanced National Radio News Programming fund

Funding delivered through all existing grant lines should be increased proportionally (See CBAA Pre-Budget Submission). Stations, broadcasters and Sector Organisations have a high level of awareness of the funding lines dedicated to their services and many have developed a familiarity with processes, and a reliance on these sources. High awareness of the CBP is very important to its success. The CBP Evaluation urges continued efforts by the CBF to raise awareness of the CBP among stations. The Evaluation found high awareness of the CBP, particularly for participants that has contact with the CBP beforehand.

1.6.6 \$10 million additional program funding to enhance CBF grant-making capability

The impact of the existing CBP budget lines can be enhanced through increasing funding to the program to meet demand and deliver these same positive impacts to more organisations, in a more effective manner.

Increased funding will:

- Meet the average \$9 million annual unmet demand from stations
- Reduce pressure to prioritise small, short-term grants to stations in the most desperate need
- Enable co-investment in innovation and growth-focused projects

Additional funding is needed to support:

- Station Development and Operations
- Content
- Sector Investment

The sector's top priority is to increase the availability and flexibility of Station Development and Operations grants. This funding is crucial for:

- Supporting sustainable organisations
- Underpinning medium to long-term business planning

Sector Investment Initiatives
<p>Australian Music Radio Airplay Project (AMRAP) AMRAP is a free platform for community radio presenters to discover and download new Australian music. This project connects community stations and program makers with musicians, record labels, and music representatives through amrap.org.au. AMRAP provides infrastructure and support to enable Australian artists to upload their new music and to be easily discoverable and broadcast by community broadcasters. The initiative also actively promotes a range of diverse artists that are commonly under-represented in mainstream media. AMRAP helps stations meet their Australian music quotas distributes new Australian music to community radio stations nationwide, helping them promote it on-air and online.</p>
<p>CBOnline The CB Online Funding line supports research into the listening habits of Australians by funding research including the National Listener Survey. This Australia-wide research (managed by the CBAA) engages 16,000 people, highlighting trends, listener behaviour and the tangible difference community radio makes in the community. The funding line also supports the Digital Delivery Network (DDN) which provides a library of regular and special programs and segments, enabling replay of Community Radio Network (CRN) and other content for live and on-demand use. The DDN provides systems for program/content makers to lodge and exchange content, as well as systems for stations to receive distributed content for local station broadcast.</p>
<p>National Training – Industry Capacity and Skills Development This funding line is for training to improve skills in broadcast media production and presentation, management, business, leadership, and social enterprise skills for community media volunteers and paid workers.</p>
<p>Multiplatform Distribution Project This initiative delivered by the CBAA provides community radio stations affordable or free access to industry-leading tools essential for reaching listeners across multiple platforms. This approach democratises access to technology, allowing our smaller stations to compete in the digital landscape through industry-leading websites, live audio streaming, and podcasting tools as well as the Community Radio Plus app, ensuring community radio content is available wherever listeners are across mobile, in-car, and smart speaker platforms. The current budget does not allow for the allocation of funds to market online listening to community broadcasters without compromising other essential aspects of the Multiplatform Distribution initiative.</p>
<p>Enhanced National Radio News Programming fund This funding supports National Radio News (NRN): Produced in partnership with Charles Sturt University (CSU), the NRN delivers 84 national and 25 state-based bulletins per week and is currently subscribed to by 88 community radio stations. The services ensure diverse representation, keeps original community-focussed content on community radio and creates meaningful journalism pathways. It also supports the News Collaboration involving 20 community stations and organisations across Australia, including 2SER, 3ZZZ, 4EB, and others to broaden the diversity of locally relevant news stories. This project extends</p>

new tools like Burlin and Build a Bulletin, which have enabled collaborators to share over 250 stories per day, improving the quality and reliability of news content across Australia.

DAB+ and Digital Radio

The Digital Radio Project (DRP) supports access and infrastructure that enables designated community radio broadcasters to provide free-to-air digital radio services. There are currently 63 live community digital radio services operated by 54 licensees in Sydney, Melbourne, Brisbane, Adelaide, Perth, Canberra, Darwin, Hobart, and the Gold Coast. These services reach approximately 70% of the Australian population. Additional, temporary and trial services are also on-air, with permanent implementation prioritised for multiple further locations.

Legislation reserves 2/9 of the capacity on each digital radio multiplex transmitter for community broadcasting purposes on a shared basis. This framework supports the growth and reach of community digital radio alongside the finalisation of national digital channel plans by the ACMA. Maintaining ongoing levels of targeted funding is critical to support affordable digital broadcasting access for community services, given long-term infrastructure contracts and commitments. Existing on-air commercial and community DAB+ digital radio transmission systems have 10-15-year contractual terms to run, having been recently refreshed and/or recently implemented. The DRP has a current targeted funding baseline in 24-25 of \$4.7M which is indexed and ongoing. Within that figure, it is possible to maintain the existing fleet of on-air locations and provide current and necessary extension of services and coverage within and adjacent to those areas. This baseline amount of targeted funding needs to be maintained, ongoing and indexed.

1.6.7 Other sector initiatives – the Community Radio Network (CRN)

CRN is a content distribution service, delivering content across a variety of different platforms to assist community radio stations to broadcast more community aligned, independent, grassroots content from across the sector. The CRN helps subscribing stations to supplement their services with additional content that is relevant to their audiences and ensures important stories and voices of underrepresented pockets of community are heard across Australia.

The CRN service delivers daily content from over 100 volunteer content creators to 139 subscribing stations, including regular weekly programs, bespoke special event content, live broadcasts, short series and special features. The CRN provides a 24/7 roster of content across the VAST satellite service and for on-demand use. CBAA is provided CBF funding to support the CRN through a Sector Investment Grant.

1.6.8 Enhancing CBP granting for sustainable and impactful community broadcasting

The community broadcasting sector faces significant challenges in maintaining critical operations and delivering essential services. Too often, community broadcasters – driven by their passion, funders' restrictions or other factors – focus their limited resources on programs or services and deprioritise investment in their capability and initiatives to maximise impact or secure long-term sustainability.

The current CBP funding falls short of meeting the sector's basic needs, particularly for at-risk stations. To address this, the CBAA proposes a comprehensive funding strategy aligned with Roadmap 2033's vision for a resilient and impactful sector.

Building on Recommendation 10 of the CBP Evaluation, we advocate for prioritising longer-term funding opportunities that focus on sustainability, staffing, and capacity-building. This approach requires an increase in program funding with new, targeted budget lines that reflect the sector's evolving needs.

We recommend a funding strategy that encompasses several key elements:

1. **Multi-year, unrestricted Funding:** Providing flexible, long-term funding allows stations to invest in infrastructure, staff, and strategic planning. This approach is crucial for building sustainable capacity and aligns with Roadmap 2033's emphasis on long-term sector resilience.
2. **Capacity-building:** Dedicated funding for organisational development (including workforce development, technology upgrades, and improved revenue acquisition) directly supports capability growth. This aligns with Roadmap 2033's focus on growing sector capability and adapting to technological changes.

3. **Operating support:** Funding core operational costs, including overheads, helps organisations maintain stability and focus on their mission. This support is critical for sustaining essential community services and aligns with Roadmap 2033's goal of securing capacity to meet community needs.
4. **Innovation:** Providing resources for stations, sector organisations or groups of stations to experiment with new approaches or technologies can boost their capabilities and potential impact, which can be extended across the sector. This supports Roadmap 2033's emphasis on innovation and adapting to future challenges.

By implementing this funding strategy, the funding will more closely:

- Meet core demand for sector sustainability
- Enhance the sector's community impact
- Deliver better return on investment to taxpayers
- Achieve key social and economic outcomes desired by stations, communities, and government stakeholders

Implementation of this funding strategy will enable longer-term investments in station and sector sustainability while expanding grant programs to support activities with greater community impact. It represents a shift from merely sustaining operations to fostering growth, innovation, and increased community engagement.

A thriving community broadcasting sector requires more than just operational funding. By investing in capacity, capability, and innovation, we can ensure that community broadcasters not only survive but thrive, delivering enhanced value to all Australian communities.

This strategic funding approach aligns with Roadmap 2033's vision of a sector that is adaptable, technologically advanced, and deeply connected to the diverse communities it serves. It positions community broadcasting to meet future challenges while continuing to be a vital source of local information, culture, and community cohesion.

Ultimately, this strategy aims to reorient CBP, especially station development and operations support, towards building core capability and operational resilience. By prioritizing multi-year and untied investments that build station capability and sector sustainability over short-term subsidies, we can protect vulnerable stations from various shocks and threats, reduce grant reliance, and increase community impact.

1.6.8.1.1 Station capability and resilience tool

The CBAA is developing a tool to help assess station capability and operational resilience. Using this tool, the CBAA will work with stations to map their needs and assist them to understand the root causes of their needs and request support to overcome capability gaps. Outcomes from this process will provide a more sophisticated understanding of station and sector resilience for stations, sector organisations and grant-making bodies.

1.6.8.1.2 Transmission costs

Throughout the Sustainability Review consultation process, stakeholders have raised concerns about the loss of specifically targeted CBF funding for transmission costs.

Many stations continue to face a particular challenge covering maintenance costs for aging transmission infrastructure or expensive transmission facility and operational costs. In locations adversely affected by the Australian Government's privatisation of the National Transmission Agency (NTA) and/or where they moved from community to market pricing structures, these costs were previously supported by specific funding. Many stations affected by the shift to market pricing quite reasonably rely on CBP Development and Operations funding to support these essential costs in a semi-regular or ongoing manner.

However, the change away from specific target funding for Transmission is problematic: funding for core costs often scores lower than for new initiatives and the reliance on undependable grant funding

creates uncertainty and risks sudden budget shortfalls if applications are unsuccessful. To address this issue, funding priorities should include:

- Establishing multi-year operational and untied funding.
- Investing in station capability and resilience.
- Encouraging collaborations where appropriate,

These strategies would help ensure the sustainability of community radio stations' operations.

1.6.8.1.3 Addressing workforce challenges

The community broadcasting sector faces significant workforce challenges, mirroring broader societal trends. While formal volunteering in Australia has declined from 36% pre-pandemic to 26% post-pandemic, our sector has shown resilience, losing only 17% of volunteers compared to the national average of 30%. However, this impact varies across different communities, age groups, and regions, leading to skills gaps, high turnover rates, and increased pressure on paid staff.

To address these challenges and adapt to evolving community needs, Roadmap 2033 prioritises the development of a comprehensive, sector-wide Workforce Strategy. This strategy will build on our sector's strengths while addressing key areas for improvement. Our analysis of the financial performance of community radio stations tells us that each dollar invested in staff salaries leverages an additional \$1.4 in self-generated revenues, which can be reinvested back into operations.¹¹

The proposed Workforce Strategy, with development to be led by the CBAA in consultation with the CBF, stations, sector organizations, and government, will encompass several crucial elements. It will identify capability gaps, foster industry collaboration, promote skills development and training, and create pathways for apprenticeships and internships. The strategy will also focus on strengthening career pathways, diversity and inclusion, and policy advocacy to ensure a supportive regulatory environment.

To measure progress and impact, we will develop industry-specific workforce metrics and anticipate future trends, particularly in technology and changing job requirements. This forward-looking approach will be complemented by a commitment to continuous evaluation and improvement, ensuring the strategy remains relevant and effective. The Workforce Strategy will align closely with the CBAA's Station Resilience Tool and incorporate models like the Community Media Training Organisation (CMTO). The CMTO exemplifies the power of collaboration, leveraging the expertise of multiple peak bodies to address the sector's training needs.

To support this crucial initiative, the CBAA's Pre-Budget Submission proposes a dedicated funding line (Station Capability and Workforce). This funding will enable stations and sector organisations to deliver tangible outcomes in workforce capability, positioning our sector to meet the challenges of the future while continuing to serve our diverse communities effectively.

By investing in our sector's workforce, we're not just addressing immediate challenges – we're building a stronger, more resilient community broadcasting sector for the future.

1.6.8.1.4 Station collaborations to achieve economies of scale and program efficiency

Community radio stations benefit significantly from collaborative efforts that maximize resources and improve operational efficiency. Where appropriate, groups of stations should be encouraged to submit joint grant applications for shared activities that take advantage of economies of scale and enhance program funding efficiency. CBP grant assessment processes should incentivise grant applications for collaborative efforts to build program efficiencies and strengthen the sector. These collaborations can take various forms, such as:

- Shared personnel: Jointly hiring technical staff or other specialists to serve multiple stations.

¹¹ Self-generating income refers to income outside of the grants received by community radio stations. Our statistical analysis of the historic financial reports of community radio stations across Australia found that salary expenses had a strong positive correlation with self-generating income. That is, higher salaries have positive impacts on self-generated income, with an average return of \$1.40 for each additional dollar spent of staff salaries.

- Shared infrastructure: Investing in broadcast infrastructure that benefits multiple stations in a geographic area.
- Collaborative programming: Partnering on live broadcasts or event partnerships that interest multiple communities.
- Administrative, financial management and training and professional development capacity.

Successful examples of such collaborations include:

- *Broadcasting Park Pty Ltd*: A shared transmission facility in Brisbane at Mt Coot-tha, serving five community radio stations.
- *Regional Tech Hub Project*: Led by Collie Community Radio and supported by CBAA, this initiative involves hiring a technician to work with 5-7 stations in southwest Western Australia.
- *The South Australian Community Broadcasting Association's (SACBA) Technology Bank* which lends equipment to their member stations, helping them stay on air during breakdowns, test new gear, bridge funding gaps, and experiment with different setups.
- *On the Road Again*: A festival facilitated by the CBAA that supports a number of stations to host live music events promoting artists in their local area.
- *Sound NSW Community Hubs*: This project transforms NSW community radio stations into hubs for musicians and live music, providing resources and support to build local music networks and audiences.

Challenges and considerations:

- **Capability Gap**: Many stations lack the capability to undertake informed and strategic negotiations for collaborations. This can lead to unbalanced partnerships or missed opportunities.
- **Role of Intermediaries**: Organisations like the CBAA play a crucial role in facilitating successful collaborations, as seen in the Regional Tech Hub Project example. Their expertise and neutral position can guide stations through complex collaborative processes.
- **Risk of Failure**: Several attempts at collaboration have failed due to lack of expertise, knowledge, or proper planning. This can result in wasted resources and strained relationships between stations. It's crucial for stations to seek advice from experts and organisations like the CBAA before embarking on collaborative ventures.
- **Strategic Collaboration**: Collaboration should not be pursued for its own sake. Stations should carefully consider when collaboration is truly beneficial. Factors to consider include:
 - Alignment of goals and values between potential partners.
 - Clear mutual benefits for all parties involved.
 - Capacity of each station to contribute to and manage the collaboration
 - Long-term sustainability of the collaborative effort.

Greater collaboration is identified as a strategic enabler for the sector to achieve Roadmap 2033. By addressing these challenges and considerations, the sector can foster more effective and sustainable collaborations, enhancing the overall resilience and capability of stations across Australia.

1.6.8.1.5 Partnering with large stations for greater impact

The Community Broadcasting Foundation (CBF) currently has in place policy that limits access to grants by stations with higher incomes. This approach, however, overlooks the complex realities faced by larger community broadcasters and their significant potential to achieve significant community impact.

Under the current system, stations with annual incomes exceeding \$700,000 must present an exceptional business case to access Development and Operations grants. This requirement effectively prevents many larger stations from accessing crucial support for business planning, workforce development, and capability enhancement.

Despite their higher incomes, these larger stations often grapple with substantial overheads and financial insecurity. They typically serve broader audiences, employ more staff and volunteers, and have more complex operational needs.

Removing this barrier to grant access has been raised in Sustainability Review consultations. The CBAA proposes that the CBF remove the cap and allow all stations to proactively apply for support to implement sound strategic and operational plans that build station capacity and long-term sustainability or achieve community impact.

Investment with larger stations offers a unique opportunity to amplify the community impact of the funding program. Their extensive reach provides an excellent platform for high-impact initiatives aligning with the Roadmap 2033 such as establishing local newsrooms, forging partnerships with arts and community sectors, or enhancing emergency broadcasting capabilities. By supporting such initiatives, we can achieve broader program outcomes and create meaningful change at scale.

By removing income-based restrictions and embracing a more inclusive approach, the full potential of all community broadcasters can be harnessed to better serve their communities and maximize the impact of public funding. This shift would ensure that the value and needs of a station are not solely determined by income, but by its capacity to serve and have an impact on its community.

Table 6: Summary of recommended CBP enhancement

Goal	Action	Impact
Improve program effectiveness	<ul style="list-style-type: none"> • Provide more grants to more stations • Better support station development and operations • Provide larger, more effective, multi-year funding grants 	<ul style="list-style-type: none"> • Reduced administrative burden for stations and CBF • More effective investments in station capability and quality programming
Work together in partnership to find new ideas to solve common problems	<ul style="list-style-type: none"> • Encourage collaborative grant applications, where appropriate • Support innovation and experimentation, thorough the establishment of an innovation fund that provides resources for organisations to experiment with new approaches or technologies 	<ul style="list-style-type: none"> • Boosted organisational capabilities and potential impact. • Shared resources improve program effectiveness and efficiency • Community broadcasting is a space for experimentation in media • Sector organisations are strong, effective and collaborative
All Australians can engage with free, independent media	<ul style="list-style-type: none"> • Secure the capacity of community broadcasters to provide free services across AM/FM, DAB+, terrestrial TV, online and emerging platforms • Develop a deep understanding of stations and audiences and measure outcomes • Celebrate our sector's identity through shared marketing • Invest in public-interest journalism and produce more independent news content 	<ul style="list-style-type: none"> • More Australians engage with community broadcasting • Stations adapt to a changing media landscape • All Australians can access community broadcasting on platforms of their choice • Expand digital radio services to 10 new radio areas • Produce content by and for underrepresented communities in media

1.6.9 New initiatives: investing in priority outcomes

The CBAA's Budget Submission proposes \$8.1 million of new investment for initiatives focussed on achieving community outcomes identified in Roadmap 2033 and aligned with Government policy priorities. The CBP should adopt these proposed new funding lines for a minimum of three years prior to a subsequent review of impact and effectiveness. New proposed funding lines include:

Area	Impact	Contribution to policy
Multicultural	Strengthen social and economic inclusion and cohesion, support settlement of new migrant groups and strengthen multiculturalism	Achieving goals of the Multicultural Framework Review

Workforce Capability	Provide more skilled career pathways into the media and communications industry and support smaller stations to employ staff to increase capability to manage volunteers, grow income, and meet financial, regulatory and governance requirements or secure technical operations	Priority under Roadmap 2033 Recommendation 3, 7, 8 of the CBF Evaluation
Music, Arts and Culture	Supporting new programs showcasing new, diverse Australian music and arts and greater station engagement and partnerships with local arts organisations, venues and cultural events.	Achieving an action under the Revive cultural policy
News and Journalism	Give more Australians access to trusted, independent, local news and information from diverse sources through increasing public interest journalism and news content provision.	Aligns with goals of News MAP, to support public interest journalism and safeguard media diversity
Emergency Preparedness	Develop station capability and sector co-ordination to increase the sector's ability to play a unique, hyperlocal role communicating emergency information and building community resilience in times of disaster.	Delivering recommendations from Parliamentary enquiries into natural disasters and COVID-19

For more information, see the CBAA's [Pre-Budget Submission 2024-25: Sustainable community broadcasting for informed, connected communities](#).

1.6.9.1.1 More effective funding of sector organisations

Roadmap 2033 identifies the need to support community broadcasters through strong, effective and collaborative sector organisations to grow the sector's capability. The CBAA supports Recommendation 11 and Recommendation 9 of the CBP Evaluation to continue to make funds available for sector-wide, and strategic initiatives.

Sector organisations are critical to community broadcasting, building scale and impact from the sum of many small and diverse parts: over 300 organisations delivering over 500 services.

The key Community broadcasting sector representative organisations include:

- The Community Broadcasting Association of Australia (CBAA)
- The Australian Community Television Alliance (ACTA)
- Christian Media & Arts Australia (CMAA)
- First Nations Media Australia (FNMA)
- The National Ethnic and Multicultural Broadcasters' Council (NEMBC); and
- Disability Media Australia (DMA)

Three fully voluntary organisations, the South Australian Community Broadcasting Association (SCABA), Technorama and the Southern Cross Media Association (SCMA) also provide a level of support to community broadcasters.

Sector organisations play a critically important intermediary role, operating between and working to support other organisations in the sector. The CBAA is the primary example of an important intermediary organisation in the community broadcasting sector. It is essential that the Government support programs better understand and engage the work and role of intermediaries and, as research recommends¹², view and fund these organisations as the deliverers of a "portfolio" of interventions and results, rather than as a service provider delivering isolated projects on behalf of the funding body.

The CBAA sees our role, in partnership with other sector organisations, is to assemble a set of mutually-reinforcing (rather than duplicative or even counterproductive) activities to address the multiple dimensions needed to ensure community broadcasting is at the heart of every community.

¹² [Social Ventures Australia research](#)

The CBAA acts as a bridge or connector, helping strengthen the community broadcasting sector. The CBAA does not run its own radio stations, but instead it:

- Represents community broadcasters to government and other stakeholders.
- Provides training, tools, resources and support to help community radio stations operate effectively.
- Leverages economies of scale to co-ordinate sector-wide initiatives that benefit many stations and could otherwise not be achieved by most stations alone.
- Shares knowledge and facilitates collaboration between different community broadcasters.

Key recommendations for how best to fund intermediary organisations like the CBAA:

- Provide long-term, multi-year core funding to enable strategic planning and sustainable operations. Aim for funding cycles of 5-7 years or longer.
- Offer unrestricted or flexible funding that allows the intermediary to be responsive to emerging needs and opportunities in the sector.
- Fund at a level that covers full operational costs, including sufficient overhead/indirect costs.
- Avoid arbitrary caps on indirect cost percentages.
- Recognise that intermediaries need resources to build their own organisational capacity and scale to effectively serve the sector.
- Support intermediaries to develop diverse revenue streams for long-term sustainability, while continuing to provide core funding support and not disincentivise these organisations from leveraging funding to develop other revenue streams.
- Fund intermediaries to co-ordinate sector-wide initiatives, not just provide direct services.
- Invest in intermediaries' capacity for learning, evaluation and knowledge dissemination to benefit the broader sector.
- Build trusting, long-term partnerships with intermediaries as key players in sector development.
- Engage intermediary organisations in strategy development.
- Recognise that intermediaries' impact often comes through enhancing others' work, which can be challenging to measure directly.
- Fund the intermediaries to undertake appropriate evaluation approaches.
- Require high governance standards.
- Deliver Recommendation 5 of the CBP Evaluation and involve professional assessors in sector-wide initiatives.

1.6.9.1.2 Community Television

Channel 31 Melbourne and Channel 44 Adelaide play pivotal roles in their respective communities by offering locally produced content that resonates with a wide range of audiences. Ongoing support through the CBP is essential, not only for ensuring the continued operation of these stations and their future sustainability but also for enhancing their capacity to serve the public interest.

Community Television has had to deal with significant business uncertainty due to previous legislation under which both stations' broadcasting licences were due to expire on 30 June 2024.

This undermined their sustainability through contractual uncertainty with sponsors, partners and staff and fighting for station survival has severely affected staff capacity. The recent legislation, and subsequent ACMA licence renewals securing their place on the airwaves enables Community TV to begin to shift from survival mode towards planning for their future impact.

Revitalising operations and rebuilding a sustainable future for Community TV will require tailored, multi-year support from Government. The CBAA supports ACTA's planning for revitalisation of the sector, including a proposed consolidation of certain operations for efficiency, scale and impact. A vibrant and sustainable community television sector is integral to achieving the goals outlined in Roadmap 2023 including: "community television is supported to be accessible to Australians in more markets and platforms".

1.6.9.1.3 Measuring what matters

[Roadmap 2033](#) outlines high-level outcomes for the sector based on broad and in-depth consultation with the sector and stakeholders.

The CBAA is developing a sector wide Evaluation Framework in consultation with the CBF, stations, sector organisations and Government. The Framework will extend Roadmap outcomes into measures that map across social impact indicators, the Federal Government's 'Measure what Matters' Framework and related policy frameworks such as Closing the Gap, First Nations Digital Inclusion Roadmap, Revive Cultural Policy etc.

At a lower level, outcomes and measures will be developed against the Station Resilience Model. These measures will be recognised by funders, stations and sector organisations.

Reporting outcomes of the CBP and IBMP against Government policy priorities should take a whole-of-government approach. Program outcomes are not limited to media and communications but impact a range of areas including arts and culture, emergency management, home affairs and multiculturalism, social services etc.

Recommendations:

1. Funding for the CBP should be increased to \$40 million annually with indexation applied over the forward estimates.
2. Increased funding of \$18.1 million should include \$10 million allocated to increased program funding across existing CBP budget lines with a priority for station Development and Operations (General and Transmission funding line) and \$8.1 million of new initiatives targeted at priority areas for community impact.
3. Improve effectiveness and reduce the administrative burden of providing these funds through allocating more multi-year, unrestricted funding.
4. Deliver more outcome-focussed grants through new funding lines available to stations best placed to deliver impact.
5. CBF grant assessments should no longer apply income-based restrictions for larger stations seeking access to Development and Operations grants. Current policy requiring an exceptional business case for organisations with average annual income exceeding \$700,000 should cease.
6. Implement the CBAA's recommendations for how best to fund intermediary organisations.
7. Provide tailored, multi-year support for the critical revitalisation of the community television sector.

1.7 2. First Nations funding and licensing

1.7.1 Sector impact

First Nations community broadcasters play a central role in telling First Nations stories from First Nations perspectives. They connect First Nations community across the country and are a critical source of information in remote communities. They sustain and strengthen First Nations' diverse culture and language. They tell stories that foster greater understanding and appreciation for Australia's unique First Nations cultural assets.

Their work is critical to 'closing the gap' between the expectations and outcomes of Indigenous and non-Indigenous Australians. Strong First Nations community broadcasters enhance self-determination of Aboriginal and Torres Strait Islander communities and close the gap in social and economic outcomes.

1.7.2 Funding

To close the gap in outcomes, funding targeted for First Nations community broadcasters must increase in line with funding for general community broadcasting services.

The Australian Government's financial support for First Nations community broadcasting is primarily delivered through the National Indigenous Australians Agency's (NIAA) Indigenous Advancement Strategy (IAS). The funding provided through the Indigenous Media Broadcasting Program (IBMP) to community broadcasters is estimated at \$21.5 million per year. This funding is critical to support indigenous broadcasting operations and programming.

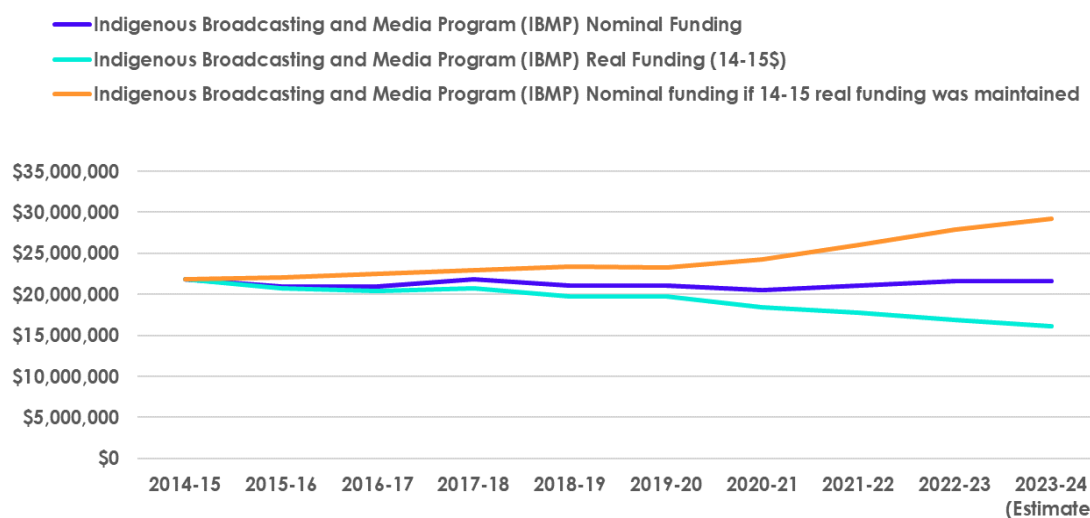
However, funding for the IBMP is not indexed, nor committed over future years and real funding levels for the IBMP have deteriorated significantly over time.

Over the past ten years, funding for the IBMP has decreased in real terms. The table below shows the nominal and real value of IBMP program funding from 2014/15 through to 2023/24. In 2023/24, program funding is \$7.6 million less than it would have been had real funding been maintained over the period.

Table 7: IBMP Nominal vs Real Funding 2014/15-2023/24

Indigenous Broadcasting and Media Program (IBMP)				
Year	CPI	Nominal Funding	Real Funding (14-15\$)	Nominal funding if 14-15 real funding was maintained
2013-14	3.1			
2014-15	1.6	\$21,817,306	\$21,817,306	\$21,817,306
2015-16	1.1	\$21,007,195	\$20,776,116	\$22,059,966
2016-17	1.9	\$21,007,195	\$20,376,979	\$22,492,068
2017-18	2.0	\$21,788,448	\$20,699,026	\$22,965,585
2018-19	1.5	\$21,068,448	\$19,698,999	\$23,334,017
2019-20	-0.4	\$21,068,448	\$19,783,273	\$23,234,618
2020-21	3.9	\$20,466,077	\$18,419,469	\$24,241,451
2021-22	6	\$21,097,335	\$17,721,761	\$25,972,983
2022-23	5.9	\$21,562,588	\$16,840,381	\$27,935,091
2023-24	3.3	\$21,562,588	\$16,128,816	\$29,167,521

Figure 4: IBMP Nominal vs Real Funding 2014/15-2023/24



Source: NIAA

Increasing funding for the Indigenous Broadcasting and Media Program (IBMP) will:

- Close the gap, through strong communities, cultures, and languages, in digital inclusion, training, skills and employment as well as providing a platform for communications fundamental to achieving health and education outcomes.
- Respond to recommendations from the Government's First Nations Digital Inclusion Advisory Group.
- Address the priority for First Nations stories to be at the centre of Australian arts and culture as expressed in Australia's cultural policy Revive.

Funding for First Nations community broadcasting should be increased to \$40 million annually with indexation applied over the forward estimates. This proposal would result in \$30 million of operational and employment funding and \$10 million to deliver priority reforms requested by First Nations media representatives in First Nations Media Australia's (FNMA) 9 Calls to Action (2018)¹³ and the new 10th action developed to close the gap in digital inclusion.

Table 8: The CBAA budget proposed for IBMP total funding

	2023/24	2024/25	2025/26	2026/27
Total	\$21,562,588	\$40,000,000	\$41,025,641	\$42,077,581

1.7.3 Program reform

Reforms for the IBMP are outlined in First Nations Media Australia's (FNMA) 10 Calls for Action to support the provision of First Nation's community radio services. This long-standing plan for the sustainability and impact of First Nations community broadcasters was developed in consultation with stations and is aligned with Roadmap 2033.

The clear priority for CBAA, FNMA and our First Nations members is to provide additional Operational and Employment funding to support organisations. First Nations Media Australia's (FNMA) Calls to Action and CBAA's Pre-Budget Submission request a \$9.5 million increase in Operational and Employment funding under the IBMP. If this is not provided urgently, all impact and outcomes delivered by First Nations community broadcasters will be under threat.

¹³ Our Media Matters: 9 Calls for action renewing Australian Government Policy for First Nations Broadcasting and Media, First Nations Media Australia (2018)

Secondly, Government should agree to implement the sector's Calls to Action.

If proposed reforms require additional deliberation, Government has the option to agree to recommendations in-principle and commence a subsequent process.

Implementation and detailed consideration of proposed reforms will involve further consultation, and this should be commenced through a co-design process with First Nations Broadcasters, with the intention of supporting self-determination and community control of program resources in a reformed IBMP.

The matter of which department (NIAA or DITRDCA) is responsible for managing the IBMP is primarily a decision for Government. Members would like to see greater community-control of program priorities, more transparency around grant allocations and accountability to community outcomes.

Many believe they will be best served by funding managed by DITRDCA with greater broadcasting and media expertise and a proven track-record of delivering the CBP in a manner that demonstrates a degree of community-control of grant funding and policy direction. If Government determines that Closing the Gap targets are best delivered by all relevant departments, then our sector is committed to work with DITRDCA to develop an IBMP program that provides greater accountability and transparency than the current program and is delivered in line with Closing the Gap Priority Reform 1: Partnership and Shared Decision-Making; and 2: community-controlled organisations.

This necessary consultation should not hold back Government from providing funding certainty and a strong policy signal to First Nations broadcasters.

Table 8. First Nations Media Australia's (FNMA) 10 Calls for Action to support the provision of First Nation's community radio services.

FNMA Call to Action/ Goal	Action	Impact	Budget increase (\$ per annum)
#1 Reform Broadcasting Act for First Nations Broadcasting	Recognise First Nations broadcasting as a separate category of broadcasting under the Broadcasting Services Act 1992	Achieve self-determination and community control of First Nations community media	\$ Nil Under consideration of the DITRDCA Review of Community Broadcasting Sustainability
#2 Increase in Operational and Employment Funding Every FN media organisation has the workforce capability and funding to cover operations and meet community obligations	Funding increase to \$30 million per annum, indexed annually for CPI, for operational and employment costs of First Nations broadcasting organisations	Return funding to a sustainable level after a decade of <i>real</i> funding cuts. For every dollar invested in First Nations broadcasting and media, \$2.87 of cultural, social and economic value is returned Strengthen Communication Provide an effective, trusted and accessible communications medium for First Nations people. Provide a voice for First Nations communities. Strengthen culture and preserve it for future generations through their broadcasts, archiving and film productions. Provide employment through flexible working arrangements in culturally safe environments and providing work opportunities that are aligned with the interests of individuals and communities.	\$9.5m

<p>#3 Expand Live and Local Radio Programs</p> <p>Expand service capacity to reach unserved communities</p>	<p>Deliver an innovative First Nations radio broadcasting expansion program into those First Nations communities without a primary First Nations radio service</p>	<p>Provide services to fifty-three percent (53%) of First Nations people without access to a First Nations radio service</p>	<p>\$1.5m</p>
<p>#4 Strengthen First Nations News Services</p> <p>Provide positive, balanced and culturally appropriate news services and increase local community representation in news</p>	<p>A targeted funding program to:</p> <p>Provide training and mentoring in journalism to First Nations media workers</p> <p>Support national First Nations news and current affairs services, including support for gathering news from First Nations community journalists</p> <p>Develop a news sharing platform, with editorial staff</p>	<p>Increase the news and current affairs capacity of First Nations broadcasters</p> <p>Enhance collaboration and improve news service quality through sharing news among First Nations broadcasters and media outlets</p> <p>Promote first nations stories and perspectives well through sharing content with mainstream media</p>	<p>\$1m</p>
<p>#5 Expand Training and Career Pathway Programs</p>	<p>Implement a workforce action plan including:</p> <p>Expanding formal and informal training programs will build much needed capacity within the sector, enable succession and career pathways, and help close the gap on Indigenous employment</p> <p>Reviewing employment funding levels is needed to bring salaries in line with Industry award rates</p> <p>Enabling a direct employment to increase youth engagement and employment throughout the remote, regional and urban sector</p> <p>Build capacity and skills in specific areas such as management, production and coordination (Many of these roles are currently filled by non-Indigenous staff)</p> <p>Support accredited training</p> <p>Provide culturally appropriate employment environments</p>	<p>More First Nations staff at stations</p> <p>Broaden the range of training significantly to upskill the workforce in higher level duties</p> <p>More First Nations people in senior management roles</p> <p>Address high unemployment rates</p> <p>Increased and improved training and employment opportunities in regional and remote areas</p> <p>Builds the culture and language skills already held by First Nations peoples</p>	<p>\$3.5m</p>
<p>#6 Upgrade Infrastructure and Digital Networks</p> <p>Infrastructure and digital network upgrade program is needed to bring First Nations radio services up to industry standard.</p> <p>A number of remote radio studios (Remote Indigenous Broadcasting Services (RIBS)) fail to meet workplace health and standards requirements.</p>	<p>Upgrade broadcasting and digital infrastructure to meet current industry standards and work health and safety requirements</p> <p>Fund broadcasting and digital infrastructure and equipment upgrade program.</p> <p>Fund of a facilities upgrade program</p> <p>Provide R&M program, through remote housing, for VAST DTH installations in remote communities</p>	<p>Remote Indigenous Broadcasting Services (RIBS) to meet workplace health and standards requirements</p> <p>Remote Indigenous communities have stable and secure access to Direct-to-Home satellite TV and radio services delivered through VAST</p> <p>Smart technologies provide for cost-effective network management and monitoring of remote broadcast facilities saving R&M and travel costs for remote Indigenous media organisations</p>	<p>\$1m</p>

<p>#7 Recognise First Nations Broadcasters as the Preferred Channel for Government Messaging</p> <p>Solidify First Nations broadcasters and media organisations as the government's provider of choice.</p>	<p>Government to establish a policy identifying First Nations broadcasters and media organisations as the provider of choice for First Nations focused information campaigns, including production, customisation and distribution.</p>	<p>Increased financial sustainability of First Nations media organisations</p> <p>Increased reach, engagement for Government public information campaigns</p> <p>More effective communication with First Nations communities and greater impact through trusted, culturally appropriate channels</p>	<p>\$ Nil</p> <p>Under consideration of the DITRCDA Review of Community Broadcasting Sustainability</p>
<p>#8 Preserve Archives</p> <p>Media assets urgently require digitisation to preserve critical archives of First Nations culture, storytelling and language</p>	<p>Conserve, preserve and maintain First Nations archives to sustain culture and language and create meaningful employment</p> <p>Maintain a digitisation program, including collection management support, training and digitisation equipment, to enable the digitisation of significant media in the collections</p>	<p>Conserve audio and video recordings from First Nations communities</p> <p>Safeguard content in magnetic tape format in digital archives</p> <p>Maintain culturally important and sensitive content in collections on-country under the custodianship of cultural law keepers</p>	<p>\$0.5m</p>
<p>#9 Establish an Annual Content Production Fund</p> <p>Content production is vital to the preservation and maintenance of First Nations language and culture</p>	<p>Establish an annual, competitive First Nations content development fund open only to First Nations broadcasters and media producers</p>	<p>Increase First Nations storytelling and program production</p> <p>Increased production outputs</p> <p>Improved production values</p> <p>Integrated training of First Nations media producers and industry placements</p>	<p>\$1 m / annum</p>
<p>#10 Improve Access to Digital Services</p> <p>Work collaboratively with the First Nations Digital Inclusion Advisory Group (the Advisory Group) tasked to investigate the digital inclusions issues and address them at national and community level</p> <p>Digital access, mentoring training programs to close the gap on digital inclusion</p>	<p>Facilitate access to media services and online platforms</p> <p>Provide training and mentoring programs in digital literacy</p> <p>Training 'community digital champions' who live and work in the community and can be at call when there are issues of access and digital literacy</p> <p>E-safety programs to accompany the technical rollout of new services, and with content providers (such as Facebook, TikTok, etc) taking more responsibility for the provision unsavoury content</p>	<p>Increased digital inclusion.</p> <p>Improved digital literacy and safety among First Nations communities</p> <p>Increased and improved training and employment opportunities in regional and remote areas</p>	<p>\$0.5 / annum</p> <p>(Initial funding proposed for 2024/25 to be reviewed following the Final Report of the Government's Advisory Group)</p>
<p>Total</p>			<p>\$18.5M</p>

Further Info: [Calls for Action | First Nations Media Australia](#)

1.7.4 First Nations digital inclusion

The Department's First Nations Digital Inclusion Advisory Group (FNDIAG) is developing a Digital Inclusion Roadmap aimed at delivering equal levels of digital inclusion for Indigenous people by 2026, to meet Target 17 of the National Agreement on Closing the Gap.

Some issues raised in the Sustainability Review Discussion Paper are also being considered by the current First Nations [Digital Inclusion Roadmap consultations](#).

Efforts to achieve digital inclusion for First Nations communities cannot be separated from supporting the sustainability of First Nations Community Broadcasters. The Sustainability Review and the Digital Inclusion Roadmap should make aligned recommendations that support First Nations communities.

The CBAA believes that meeting Closing the Gap targets cannot be achieved without:

1. Increased budget funding outlined in the CBAA's 2024-5 Federal budget submission.
2. A policy commitment to First Nations Media Association of Australia ("FNMA") 10 Calls to Action
3. Extension of First Nations radio services through short-, medium- and long-term extensions of digital radio broadcasting services to all major cities and markets moving to DAB+ transmission.
4. A plan for ongoing maintenance and upgrading of aged transmission infrastructure.
5. Relevant cultural content being made available to all First Nations communities, metro, regional or remote.

The role of First Nations Community Broadcasters was comprehensively recognised in the *First Nations Digital Inclusion Advisory Group Initial Report ("Initial Report")*. The CBAA affirms points raised in the Discussion Paper about community broadcasting, including:

"The importance of the media and broadcasting sector in addressing the digital divide must not be understated. More specifically, the media and broadcasting sector plays a vital role in providing communities with important information, and contributes to preserving culture and language through storytelling and content creation.

First Nations community media provides information, news, education and entertainment, which directly supports Outcome 17. They also provide local employment opportunities, whether through content creation, local journalism and media production, or technical positions for maintenance and IT support".

Digital Inclusion measures to strengthen telecommunications and other technical infrastructure are essential. However, their full social and economic value will not be realised if they fail to deliver culturally relevant broadcast services that support community building and engagement. This requires complimentary investment to strengthen First Nations media organisations and content services in all areas.

1.7.5 Maintaining and updating ageing broadcast transmission networks

There is currently very limited funding available to repair unforeseen damage caused by natural disasters. There is urgent need for greater support for community broadcasters to fill the gap between the cost of emergency damage and the amount covered by insurance.

There remains a pressing need for upgrades to ageing and failing technology across the sector. Ageing transmission infrastructure, along with the attendant maintenance and upgrade costs and the need to train and upskill technical personnel, are key challenges facing the sector in regional and remote areas. The CBAA supports Recommendation 1.11 of the *Initial Report* of the FNDIAG for the upgrading of broadcasting and digital infrastructure to meet current industry standards and work health and safety requirements.

1.7.6 Providing more First Nations services through DAB+

Many locations in Australia lack the benefit of a full-time First Nations free-to-air radio service, including major cities and 3 capital cities. Filling these service gaps should be regarded as an essential element of Indigenous digital inclusion, and this aligns with findings in the Initial Report.

Radio receivers, whether AM, FM or DAB+ digital radio, are readily available at a low cost, are easy to use (without the need for connectivity, data plans or location/activity tracking) and are particularly important in regional and remote communities during disasters and emergencies. Most radio receivers are now standard with FM/DAB+, presenting opportunities to use the newer DAB+ digital technologies to improve First Nations access to relevant and quality services.

First Nations free-to-air broadcast analogue FM and DAB+ digital radio services are currently available in Sydney, Melbourne, Brisbane, Perth and Darwin. Where already on-air in an area, DAB+ digital radio can provide affordable access to transmission capacity.

The Sustainability Review and Digital Inclusion Roadmap should agree to explore the immediate opportunities to access DAB+ digital radio transmission systems in Adelaide, Canberra, Hobart and the Gold Coast for First Nations services, and, following the completion of current trials, consideration of Northern Tasmania and Launceston services.

1.7.7 VAST

The Digital Inclusion Discussion Paper identifies the need to simplify use and access to Viewer Access Satellite Television (VAST), a service that carries community and Indigenous radio services, as well as television. This aligns with FNMA Call to Action#6 *Upgrade Infrastructure and Digital Networks* which includes, as an action "Provide Repair and Maintenance program through remote housing, for VAST DTH installations in remote communities" with the intended impact that "Remote Indigenous communities have stable and secure access to Direct-to-Home satellite TV and radio services delivered through VAST."

The *Initial Report* mentions ongoing concerns about the age and inoperability of some VAST reception infrastructure and notes the work being addressed in the Future of Broadcasting Working Group to audit the status of transmission and reception equipment, with a focus on remote First Nations communities.

The CBAA supports:

- o initiatives to enhance the co-ordination of repair, maintenance or replacement of local VAST reception equipment, and to ensure a pool of ready spares in hubs established in some remote areas, along with basic training on reception equipment set-up;
- o simplification of set-top box activation. All free-to-air radio or television services – national, commercial, community and Indigenous those that receive Government funding to be delivered to the public on VAST - should be available in all locations. New set-top boxes should be pre-activated with no requirement for location-based activation (whether by phone, internet or otherwise);
- o the suggested actions to simplify and improve access to the VAST service as outlined in Recommendation 1.09 of the *Initial Report*; and
- o in some remote areas, whether there is an existing broadcast tower in place which is able to be maintained, we support the trialling of rebroadcasting technologies for remote First Nations communities to locally rebroadcast services delivered by VAST, as outlined in Recommendation 1.10 of the *Initial Report*.

More information is available in the [CBAA response to Digital Inclusion Roadmap consultation.pdf](#)

Recommendations:

8. Increase budget funding as outlined in the CBAA and FNMA's 2024-5 Federal budget submissions.
9. Provide a policy commitment to deliver FNMA's 10 Calls to Action.
10. Upgrade ageing and failing broadcasting technology and digital infrastructure.
11. Provide more First Nations Services through short-, medium- and long-term extensions of digital radio broadcasting services to all major cities and markets.

1.8 3. Legislative and regulatory issues

The Sustainability Review Discussion Paper addresses current restrictions around advertising and sponsorship and challenges for stations to meet community participation obligations. It refers to declining volunteer workforce since the pandemic, differences in station resources, membership challenges and difficulties for First Nations broadcasters to meet current participation obligations. The CBAA agrees that the above issues need to be addressed.

The CBAA has also identified other legislative, regulatory and procedural issues with a significant impact on the sector's sustainability and suggest changes to create a more fit-for-purpose regulatory environment for the sector, to enable it to deliver on the goals identified in Roadmap 2033.

Table 8: Summary of legislative, regulatory and procedural issues affecting sustainability

Issue	Leg/Reg	Rationale for change	Summary of change needed
REVENUE SOURCES			
3A. Sponsorship and advertising limitations	BSA Schedule 2 Section 9(3) Section 9(5)	Current time limit structure negatively impacts station revenue diversity. The market has transformed since 1992 BSA and the advertising/sponsorship distinction is no longer relevant as it was then.	Allow use of "advertising" terminology. Maintain total minutes per day with added flexibility. Exclude community information from time limits.
3B. Government marketing spend quota	Department of Finance procurement policies	Community broadcasting is often overlooked as way to reach key demographics with trusted messages in government campaigns. Government revenue is appropriately spent reaching local communities.	Government guidelines to include quotas for spend in community categories e.g. First Nations, culturally and linguistically diverse, regional, remote and disability.
LICENCE CONDITIONS			
3C. Community participation	ACMA Community Participation Guidelines	Need to reflect contemporary operating environment for broadcasters. Enable licensees to support the management administration or operations of other licensees in need of support.	ACMA guidelines to be updated to reflect contemporary ways in which they engage communities Review legislation if needed.
3D. Not-for profit enterprises	ACMA Not-for-profit guidelines	Broadcasters are confused by different terminology and approaches between ACMA guidelines and ACNC/ATO requirements. Harmonisation will effectively reduce perceived "red tape" for stations and make it easier for them to comply.	Departmental review of related legislation to ensure consistency. ACMA guidelines to be updated to harmonise with ACNC/ATO approach and terminology.
CODES OF PRACTICE INCLUSION			
3E. Community Broadcasting Codes of Practice inclusion in key legislation and policy	s52P(1) <i>Competition and Consumer Act - News Media Bargaining Code (Bargaining Code)</i> <i>Disinformation/Misinformation Bill (Exposure Draft)</i> News MAP (under review)	Despite the sector's well recognised contribution to Australian media diversity, its ACMA-approved Codes of Practice have been incorrectly omitted from eligibility definitions in key legislation and policy. This creates a barrier to accessing policy interventions such as the Bargaining Code. Reliance on the same definition in frameworks like NewsMAP and other policies potentially excludes stations from accessing funding and policy support available to comparable Australian media.	Amendments to eligibility definitions in <i>Dis/Misinformation Bill</i> , CCA and other policies to explicitly include Community Broadcasting Codes of Practice. (We are working with the ACMA to ensure its Media Diversity Framework Reporting accurately includes the contribution of community broadcasting).
RADIO ISSUES			
3F. Permanency for long-term TCBLs	BSA ACMA spectrum planning processes	Temporary licences prevent stations from accessing key revenue sources and building sustainability. Many TBCLs wait 5-22+ years.	Expedite transition for 5year+ TCBLs by the ACMA Ministerial Statement of Expectations of the ACMA
3G. Transmission access	BSA and RadioComms Act	Transmission costs have a significant impact on station sustainability. Multiple low(er) power and in-fill facilities can cost effectively ensure coverage and resilience. Free-to-air TV has a comparable tower access regime.	Establish regime for free-to-air radio licensees to access tower facilities (incl telco) on a reasonable cost basis. Resource ACMA for this.

3H. Digital radio transition	BSA ACMA spectrum planning processes	Digital radio provides a cost effective and durable solution for community radio but there are barriers to timely rollout. Improved regulatory pathways are needed for digital transition. First Nations radio services need to be available in all major metro and regional areas.	Ministerial Statements of Expectations and directions under 8AD BSA. Consider new DRMT licence categories. Resource the ACMA to support new processes.
3I. Radio prominence	BSA (legislative amendment to BSA)	Recognised need for all Australian free-to-air radio, including community radio, to be discoverable and accessible free to station and user on connected devices in a rapidly changing listening environment	New radio prominence legislation is urgently required to extend the TV protections to Australian free-to-air radio.
COMMUNITY TV ISSUES			
3J. Community TV prominence	Ministerial determination under 130ZZJ(c)(2) BSA	Recognised need for all Australian free-to-air television services, including Community Television terrestrial and Broadcast Video-on-Demand, to be readily discoverable in a rapidly changing viewing environment. See CBAA and ACTA submissions to various consultations leading to the 2024 TV prominence legislation.	Ministerial determination of Ch44 and CTV BVOD as regulated television services. Longer term, include in regulated television service in s130ZZ(b) BSA
3K. Channel 44 transition to broadcasting licence	BSA ACMA spectrum planning	Channel 44 is a highly valued community service for Adelaide audiences. Its narrowcasting licence is a historical anomaly, which has had unintended consequences (e.g in recent prominence legislation). There is currently no clear pathway to convert to a broadcasting licence (noting barriers in current BSA framework)	Ch44 broadcast licence Review current situation and determine legislative or regulatory change needed. Ministerial Statement of Expectations.
OTHER LEGISLATION			
3L. Impact of Copyright Act changes on print disability services	2017 amendments to the Copyright Act	Copyright Act changes designed to protect the provision of radio reading services to disability audiences are unclear in their application to disability radio services and may prevent some general broadcasters from providing these critical services.	Review of Copyright Act provisions if required in collaboration with DITRDCA and Attorney-General's department.
3K. Impact of proposed new Privacy Legislation	Impending changes to Privacy Act	Proposed changes to remove income thresholds mean community broadcasters will become subject to complex new obligations and may need additional funding and training support to address new administrative processes.	Possible funding and training support, to be confirmed once proposed amendments are enacted.

1.8.1 3A. Sponsorship revenue

Under the *Broadcasting Services Act 1992 (BSA)*, advertising and sponsorship is prohibited other than as specified in Schedule 2 Section 9(3), which includes a 5-minute limit on community radio licensees. Community information is included in this limit if the licensee receives payment for it. The basic concepts have been unchanged since 1992 and the time limits unchanged since 2002, despite a significant transformation in the media, advertising and sponsorship environment in the last 20-30 years.

24% of sector revenue is received from sponsorship. As outlined in Roadmap 2033 and our 2024-5 Federal Budget Submission, our sector faces serious challenges in securing revenue for even base level operations. The above limits constrain stations' ability to access revenue.

Figure 6: Sponsorship % of Total Revenue by Region

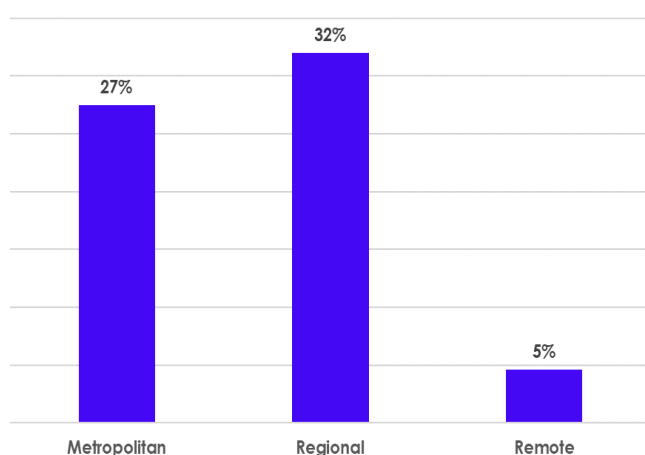
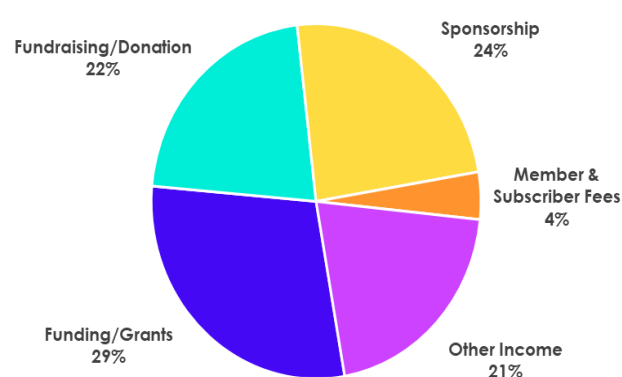


Figure 7: Sector-wide source of Station Operating Income



Source: Station Financial Data FY2022-23, CBAA

Depending on size, location and other factors, these restrictions affect different stations in very different ways. It is important for sector sustainability that stations can tailor revenue-raising activities for their circumstances and their local markets. Time limits need to be revisited to create greater flexibility and opportunity for stations to generate revenue from a variety of sources. For example, stations participating in the Roadmap 2033 development process and more recent Government consultations with the sector have reported the following challenges.

Challenges and opportunities to generate sponsorship revenue

- Timing issues:** it can be difficult to attract sponsors outside prime listening hours, making the 5-minute limit effectively meaningless. In contrast, the limit can be unduly restrictive during prime day time listening, resulting in lost opportunities to receive revenue due to unrequited demand.
- Uneven impact:** Sponsorship limits disproportionately affect regional and remote broadcasters, which are important points of media access for their local businesses, and stations in lower socio-economic areas which are not able to attract significant membership fees or listener donations. As a result, the time limits on sponsorship lead to lost opportunity both for the stations and for local business seeking to promote their services to their local communities.
- Sponsorship vs advertising distinction no longer relevant:** The policy underlying the distinction between "advertising" and "sponsorship" in the BSA is no longer fit-for-purpose in a multi-faceted media environment, as it was in the 1992 linear landscape. Some stations report that naming a promotion as "sponsorship" affects their ability to attract revenue by confusing media buyers who are used to dealing with "advertising". Even where this is understood, some organisations are deterred or even prohibited from entering into "sponsorship" as this concept may be perceived in the contemporary marketing industry as relationship or partnership marketing, creating potential conflicts of interest, as opposed to arms-length advertising transactions on a platform. Alternatively, some stations report that they appreciate the ability to distinguish their content as "sponsored". For these reasons, there needs to be a flexible approach to enable stations to meet their needs in ways that best supports their funding relationship and sustainability.

- **Tagging:** Tagging is a requirement under the ACMA's [Community Broadcasting Sponsorship Guidelines 2008](#). The concept of "tagging" does not appear in the BSA. Stations should have the flexibility to manage how they choose to present sponsorship announcements in way that is appropriate to their own broadcasting environment and their audiences, provided that that the nature of the promotional content is made clear. Tagging should not be a requirement.
- **Community service announcements:** Stations report significant lost opportunities to engage charitable partners due to the requirement in Section 9(5) of Schedule 2 of the BSA to count paid "community information" or "community promotion" in the number of allowable sponsorship minutes. Stations are keen to work more with local community charity organisations, with whom they maintain close and mutually beneficial relationships, and serve common community interests.

Given these sorts of promotions are in the public interest and advance the needs of local communities, there would be benefit in creating greater flexibility for stations to take on more of this type of revenue in addition to commercial sponsorships. To give some context, there are no time limits on commercial radio advertising and, in addition to substantially higher advertising time limits, the Free TV Codes of Practice registered by the ACMA allow for sponsorship announcements around programs (for example, of 10 seconds each up to 30 seconds per program) which are not counted towards advertising limits. Even with the suggested BSA adjustment, community radio paid promotional material – whether advertising or sponsorship – would still be a fraction of comparable material allowed on commercial radio and television networks.

- **Community Broadcasting Sponsorship Guidelines:** Many stations report confusion about the Sponsorship Guidelines and are unclear when content should be treated as a sponsorship, e.g. when promoting concerts, local business and arts events. Some report reducing their sponsorship minutes through internal policies to maintain a buffer in case they have misunderstood the Guidelines. The sector has recently completed a significant update of the Community Radio Broadcasting Codes of Practice in collaboration with the ACMA, so the Codes are simpler and make it easier for broadcasters to understand and comply with their obligations. We will be seeking a similar purposeful consultation with the ACMA to ensure that the Sponsorship Guidelines meet contemporary sector needs and are fit-for purpose.

Recommendations:

13. That community broadcasters be allowed to broadcast "advertising" or "sponsorship."
14. That a more flexible approach to minutes per day be introduced (without increasing existing overall daily limits) as outlined in the suggested amendments below.
15. That community promotional material/community information not be counted as contributing to the above limits, whether or not it is paid for.
16. That the ACMA update the Community Broadcasting Sponsorship Guidelines in collaboration with the CBAA and the sector to ensure they reflect contemporary practice and support appropriate flexibility for stations, including removal of tagging requirements.

Suggested amendments to Schedule 2 Section 9:

Subsection 9(1)	Add the words in bold : (1) Each community licence is subject to the following conditions... (b) the licensee will not (delete <i>broadcast advertisements, and the licensee will not</i>) broadcast advertisements or sponsorship announcements other than as mentioned in this clause,
Subsection 9(3)	Add the words in bold : (3) A community broadcasting licensee may broadcast advertising or sponsorship announcements on a particular community broadcasting service. However, they must not run in total for more than: (a) if the licensee is a community television broadcasting licensee - 168 minutes per day on that service, provided that there are not more than 10 minutes in any hour of broadcasting on that service; or (b) in any other case - 120 minutes per day on that service, provided that there are not more than 8 minutes on any hour of broadcasting on that service.
Subsection 9(5)	Add the words in bold and delete the last part of the subsection: (5) In working out the length of time devoted to the broadcasting of sponsorship announcements, account is not to be taken of the broadcasting by a community broadcasting licensee of any of the following:.... (c) community information or community promotional material for the broadcast of which the licensee does not receive any consideration in cash or in kind;

1.8.2 3B. Government advertising

Community broadcasters have reported to the Sustainability Review a perceived administrative discrimination in the placement of Government advertising that effectively excludes community radio stations from consistent and equitable access to paid advertising campaigns.

This unfairly restricts community broadcasters' access to sponsorship revenue and reduces the effectiveness of Government communication campaigns. It also restricts diverse community broadcasting audiences from getting access to important Government information and services, particularly those in regional and remote areas, First Nations communities, people with disability and people from a CALD background.

The current Government advertising system is designed to rely on evidence-driven advertising placement. However, in practice, campaign decisions are often made without consideration of community broadcasters. Advertisers and media buyers often do not understand how to advertise through community broadcasters or fail to recognise community broadcasting listener data.

The Department of Finance administers the Central Advertising System (CAS), a co-ordinated procurement arrangement that consolidates expenditure and buying power to secure optimal media rates for the placement of government advertising. Universal McCann (UM) is the master media agency (MMA), responsible for the placement of all advertising under the CAS.

Government agencies are required to place major advertising campaigns through a central buying process managed through the Communications Advice Branch within the Department of Finance. The agency contracted by the Department of Finance is required to follow the Guidelines on Information and Advertising Campaigns by Australian Government Departments and Agencies.

Under these Guidelines, special attention should be paid to "meeting the information needs of Aboriginal and Torres Strait Islander Australians, the rural community, people with disability and those for whom English is not a convenient language in which to receive information". As is recognised, particularly in times of crises such as COVID-19 and recent natural emergencies, community broadcasters are critical to communicating information to diverse groups. The underuse of community broadcasting as a promotional platform is a lost opportunity for Government to reach vulnerable and audiences when they most need it.

The CBAA has long advocated for a greater portion of Government advertising spend to be spent on sponsorships with community radio. This is critical to the sector to diversify income and secure long-term financial sustainability. *Towards Fairness – a multicultural Australia for all* (Multicultural Framework Review) recommends the Government provide greater access to government advertising campaigns for independent multicultural media.

Recommendations:

17. The Government's Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities be updated to include a mandatory requirement for Government to ensure communications reach disadvantaged individuals or groups identified within the target audience.
18. The Government's advertising campaign evaluations are required to measure communications reach and impact for disadvantaged individuals or groups identified within the target audience.
19. That the Government ensure relevant community broadcasting audience data is recognised and utilised by its master media agency.
20. A positive obligation be included in the Guidelines for the community radio sector to be considered on its merits at the time when advertising/sponsorship is placed.

1.8.3 3C. Community participation

Since its inception, the *Broadcasting Services Act 1992* has recognised the importance of community involvement in local broadcasting. Schedule 2 Section 9 deals with community participation:

- 2) Each community broadcasting licence is also subject to the following conditions:

 (c) the [licensee](#) will encourage members of the community that it serves to participate in:
 (i) the **operations** of the [licensee](#) in providing the service or services; and
 (ii) the **selection and provision** of [programs](#) under the licence;

The landscape of community engagement has evolved significantly since the ACMA last updated its *Community Broadcasting Participation Guidelines* in 2010 and those guidelines no longer fully reflect the realities of contemporary broadcasting or community engagement in the digital age. The ability of stations to implement them is also affected by national trends such as declining volunteerism.

Broadcasters report difficulties in interpreting and implementing the guidelines. For example:

1. Participation in operations may be at odds with sustainable collaboration models:

It should be possible to prioritise local content and outputs while leveraging opportunities for collaboration (especially for small regional stations), but this needs to be clearly addressed in the guidelines. The sector has successfully implemented collaborative management and governance models to support sustainability, particularly for smaller stations facing financial and operational challenges or those with common issues such as geographical isolation or communities of interest such as vision impaired or faith communities. For example:

- Hope Media's Co-mission model supporting stations in Brisbane, the Sunshine Coast and Gold Coast which helped stabilise financially and operationally challenged stations while maintaining local content production.
- Vision Australia's Radio Network of ten community radio stations and five digital radio services across multiple states provides content for visually impaired listeners.
- Top End Aboriginal Bush Broadcasting Association provides operational support to 29 remote indigenous broadcasting units across the Top End of Australia.

Importantly, these collaborative approaches do not diminish the fundamental requirement and point of difference of community broadcasting: the provision of local content. In fact, they can enable stations to focus more on creating quality local programming by alleviating some of the operational burdens.

2. Regional and remote broadcasters face specific challenges:

The impact of these changes is not uniform, with stations in regional and remote areas, including many First Nations broadcasters, facing unique challenges. The current membership-focused model can be problematic where traditional forms of participation may be less feasible or culturally appropriate. Audience preferences have shifted, with many stations reporting that their listeners prefer to engage as subscribers or supporters rather than as members. For example, a broadcaster serving a regional Christian community has seen its formal membership halve, at the same time as tripling donor numbers and raising 200% more through annual fundraising than 5 years ago. Despite this, the station struggles to demonstrate community participation under current guidelines, despite clear evidence of strong community engagement and support.

3. Professionalising workforce and governance:

As the sector seeks to improve governance to increase resilience and sustainability, professionalising operations through the use of professional staff or highly skilled volunteers can potentially conflict with requirement for community participation in, for example "operations" and "selection and provision of programs" stipulated in their licence conditions, as above.

The CBAA proposes working collaboratively with the ACMA to review its *Community Broadcasting Participation Guidelines* to address sector issues and contemporary practice. We envision a process similar to the successful revision of the Community Radio Broadcasting Codes of Practice.

Any update should align closely with the values in Roadmap 2033, which emphasizes the importance of diverse community participation while prioritising good governance and sector resilience. They should also align with the [Minister's 2022 Statement of Expectations](#) for the ACMA, which emphasizes the need to reduce regulatory burden, ensure practicable industry requirements, and support necessary policy or regulatory changes. Updated guidelines would contribute significantly to a "viable, sustainable and diverse" media sector by recognizing and validating contemporary forms of community participation.

The CBAA's suggested changes include:

- Broadening the definition of community participation to include:
 - Subscriber and supporter numbers
 - Volunteer involvement
 - Fundraising success
 - Participation in community events
 - Audience research
 - Various forms of community correspondence
 - Social media interaction
- Shifting focus from inputs to outcomes, considering the impact of a station's output on its local community rather than solely measuring direct participation in station operations.
- Clarifying what constitutes meaningful participation in "operations" and "selection and provision of programs" in a modern context.
- Providing examples of how stations can maintain community involvement while also implementing robust governance structures.
- Encouraging stations to develop pathways for community members to gain the skills needed to participate in more complex operational and programming decisions.
- Recognising different levels or types of participation, acknowledging that not all community members will be involved in the same way or to the same degree.

Ideally this should be able to be achieved through the Guidelines review process, but if this is not possible, it may be necessary to consider legislative amendment. This should become apparent through the consultation process.

Recommendation:

21. The CBAA and ACMA collaborate to review and update the ACMA's Community Broadcasting Participation Guidelines to:
 - create a broader, more flexible and contemporary definition of community participation.
 - support greater collaboration in station governance and management while maintaining stations' commitment to community participation and local content.

1.8.4 3D. Harmonising Not-for-Profit Regulations for Community Broadcasters

The community broadcasting sector in Australia operates under a regulatory framework that includes the *Broadcasting Services Act 1992*, which provides that community broadcasting services must not be operated "for profit or as part of a profit-making enterprise" (Schedule 2, Section 9(2)(e)) as well as a range of legislation and regulation administered by the Australian Charities and Not-for-profits Commission (ACNC) and Australian Taxation Office (ATO).

While all these regulations share the common goal of ensuring community broadcasters operate for public benefit rather than private gain, significant discrepancies in terminology and applications between them create unnecessary confusion and compliance burdens for stations. Stations have raised concerns about inconsistencies in language between the requirements issued by different regulatory bodies and are concerned that the BSA provisions may be interpreted more narrowly than under general charities/not-for-profit regulation. They have also reported confusion around potential differences between “community purposes” definitions in different regulations.

In recent years, the ACNC has worked to strengthen transparency around enterprise activities, including requirements for declaring related party transactions in annual reports. The CBAA believes that industry best practice, including guidance developed by the ACNC, should apply across the sector, even for those broadcasters who are not registered as charities, and that the most contemporary practices should be reflected in the ACMA's [Community Broadcasting Not-for-Profit Guidelines](#), which we understand have not been updated since 2011. As with other ACMA guidelines, these also need to be easy for broadcasters to understand and implement.

This proposed change aligns with the objectives outlined in Roadmap 2033, particularly the goal of increasing professionalism in the sector. By streamlining requirements across different regulatory frameworks, we can reduce confusion and potential compliance issues and improve perceptions around “red-tape”, allowing community broadcasters to focus more on their core mission of serving their communities.

Currently, approximately 66% of community radio stations hold charitable status. The CBAA is actively working with the remaining 130 stations to assist them in becoming charities, a process accelerated by recent changes to ATO reporting requirements. This shift towards charitable status across the sector further underscores the need for regulatory alignment. About 33% of stations currently have Donor Gift Recipient (DGR) status, primarily through cultural organisation provisions and the promotion of radio and television. DGR status allows these stations to receive tax-deductible gifts, enhancing their fundraising capabilities and financial sustainability. The CBAA anticipates that over 95% of stations will be eligible for charitable status, which could potentially increase access to DGR status for many more stations. The recommendations in the [Productivity Commission Report released 18 July 2024](#) that DGR status be extended for public interest journalism would also benefit some community broadcasters.

Given this trend towards charitable status and the benefits it brings, we envision a future where nearly every community radio station can easily qualify as a charity. This would not only create financial and operational benefits for the stations but also require uniform standards around transparency and governance. As the majority of community stations are already charities or moving in that direction, we see the application of ACNC standards as an appropriate benchmark over time for the entire community broadcasting sector. The transition to widespread charitable status may present challenges for some stations, particularly smaller or regional broadcasters with limited resources. However, the CBAA is committed to supporting these stations through the process and providing guidance on good governance structures, financial management and reporting requirements.

We believe that the long-term benefits - including improved financial stability, increased fundraising opportunities, and enhanced public trust - far outweigh the short-term challenges.

Recommendations:

22. That DIRDTCA with the CBAA, ACMA, ACNC and other relevant entities collaborate on a review of relevant legislation to ensure consistent and harmonious treatment of not-for-profit enterprises, consistent with the aim of ensuring that community broadcasters maintain their community-focused ethos while having the flexibility to sustain and improve their services.
23. The ACMA, in collaboration with the CBAA, review the *Community Broadcasting Not-for-Profit Guidelines* to align more closely with relevant ACNC and ATO definitions and standards where appropriate in a way that is easy for broadcasters to understand and comply with.

3E. Inclusion of Community Radio Broadcasting Codes of Practice in relevant legislation/policy

Due to apparent oversight, several recent examples of legislation and policy dealing with news produced by Australian media fail to explicitly reference community radio and TV broadcasting Codes of Practice alongside other comparable industry Codes. We have sought to have these omissions rectified so that the legislation reflects the sector's role as a key contributor to the diversity of Australian media. These omissions directly impact sector sustainability as they potentially exclude stations from funding opportunities and impact measurement.

As context, our sector (like others regulated by the *Broadcasting Services Act 1992*) is obliged to develop industry codes of practice that meet community standards. The Codes include provisions around news and information. For example, the news standards in our latest Community Radio Broadcasting Codes of Practice (which were recently submitted to the ACMA for formal approval after lengthy consultation) represent the most up-to-date standards and are likely to be referenced by the ACMA in upcoming reviews of other sectors' Codes.

Our sector's Codes have been omitted from the following:

- Section [52P\(1\)](#) of the *Competition and Consumer Act*, inserted by the *News Media (Digital Platforms and Mandatory Bargaining Act 2021)*. The News Media Bargaining Code (Bargaining Code) eligibility test (the "professional standards test") for news businesses to be covered by the News names several industry codes but not community broadcasting codes (though it allows for eligibility where there are "analogous standards" to the named industry codes).
- As the Bargaining Code is administered in part by the ACMA, potential applicants who want to [register](#) as a news business on the ACMA website confront a drop down menu that does not mention community broadcasting, as it only reflects the sector codes named in the above Act.
- The Bargaining Code definition was also referenced on page 10 of the [ACMA's Media Diversity Framework consultation](#) as the "initial focus" of the ACMA's reporting work. (We have had productive subsequent discussions with the ACMA to address this and ensure our sector's data is not excluded from that framework). The report under this framework is intended to provide the evidence base for Government policy including potentially for the News Media Assistance Program (NewsMAP), which also referenced it in its recent consultation, so it is important that community broadcasting not be inadvertently excluded or limited in access to the policy and funding support of that program. See our NewsMAP consultation [submission](#).
- The [Communications Legislation Amendment \(Combating Misinformation and Disinformation\) Bill 2023](#) Exposure Draft includes a similar eligibility definition of "professional news content" that omits mention of community broadcasting codes (although it contains an "analogous standards" provision). We note that our new radio Codes specifically address misinformation and disinformation in provisions recommended by the ACMA.

In the context of the Bargaining Code, the ACMA has advised the CBAA that it considers our sector's Codes analogous to the editorial standards specified in subparagraphs 52P (1)(a)(i), (ii) or (iii), enabling our sector to be eligible for the Bargaining Code scheme. This advice, in effect, gives our sector a "workaround". However, on a practical level, it creates a barrier to community broadcasters who go directly to official websites for the Bargaining Code, as this advice is not public.

Further, while the ACMA's opinion may apply to the scheme it is administering, it does not necessarily govern other agencies who have referenced the Bargaining Code definition in their policy documents or to the *CLA(CMD) Bill* above where a similar definition has been included in the Exposure Draft.

The sector's contribution to Australian media diversity, particularly in the provision of trusted local news for communities, is well recognised, including in *Revive: A National Cultural Policy* and this should be properly and correctly reflected in relevant legislation.

Recommendations:

24. Amend the professional standards test in the *News Media (Digital Platforms and Mandatory Bargaining Act 2021)*.
25. Amend the professional news content definition in the *Exposure Draft of the Communications Legislation Amendment (Combating Misinformation and Disinformation) Bill 2023*
26. Confirm Government expectations that community broadcasting is properly reflected in NewsMAP and the ACMA Media Diversity Framework.
27. Ensure all legislative, regulatory and other policy instruments in future which contain definitions around benchmark media standards include explicit reference to community broadcasting Codes of Practice.

1.8.5 3F. Secure community radio broadcasting licenses are key to sustainability

Temporary community broadcasting licences (TCBLs) can be a first step for new community broadcasting organisations, allowing stations to develop their offering to meet community expectations. However, the "temporary" status creates significant issues for station sustainability as it prevents the development of longer-term financial models, partnerships, revenue and engagement.

TCBL licensing is administered by the ACMA under its [Temporary community broadcasting licence guidelines for radio](#) which were updated in June 2023 following changes to the legislation. As outlined in those guidelines, the ACMA may allocate TCBLs for up to 12 months. "This does not guarantee future allocation of TCBLs or a long-term community licence, but gives aspirant broadcaster the chance to develop broadcasting skills ahead of the ACMA allocating long-term broadcasting licences".

Under sections 34 and 23 of the BSA, the ACMA must consider possible future demand for the spectrum and other relevant matters and perform certain planning functions, so to transition from temporary to long-term licence the ACMA must carry out certain planning process. This system creates a number of issues affecting the sustainability of community broadcasters, as it is not a straightforward process to transition from temporary to long-term licence:

- TCBLs cannot be renewed, but an existing TCBL holder may apply for a subsequent TCBL where spectrum has not yet been allocated by the ACMA for a long-term community licence;
- Due to the lack of long-term licence allocations, a significant number of TBCLs have been on-air for many years without the prospect of obtaining a long-term licence:
 - there are currently 34 unplanned TCBLs.
 - The average duration of a currently authorised community broadcasting service authorised by a series of subsequent TCBLs is 11.6 years.
 - 29 TCBLs holders have reapplied for their TCBL every year for at least the last 5 years.
 - One community broadcaster has had TCBLs re-issued for over 22 years.
- Existing TCBL holders wanting a new TCBL that commences immediately upon expiry of the current TCBL are expected to apply at least one month before expiry and often are granted the new TCBL License only days before their existing license expires. This creates considerable uncertainty for broadcasters and affects their financial and operational sustainability. Sponsorship agreements, staffing contracts and professional service agreements are all compromised by the annual existential threat of not being granted another TCBL.
- Stations with a TCBL are not automatically eligible to access capacity for DAB+ digital community radio services.
- The CBAA does not support stations choosing to retain a TCBL rather than participating in a CBL allocation.

The above system operates in the context of the ACMA's broader spectrum planning priorities. It has been the sector's experience that the ACMA prioritise, for example, AM/FM conversion and digital radio rollout and does not give the permanent CBL allocation process with the same priority. At the current rate of ACMA allocation, it will be more than 17 years before these services are planned and available for community broadcasters.

While the CBAA recognises that ACMA deals with competing priorities and limited resources, the above set of issues have a negative impact on the sector's sustainability. Our recommendations suggest measures improve certainty for community radio broadcasting organisations and to address the backlog. The ACMA already has a work program including preparation or variation of analogue radio Licence Area Plans in response to broader industry AM to FM conversion requests and Digital Radio Channel Plans in areas where broadcasters have committed to digital radio rollout. We believe that with prioritisation, these plans could be adjusted to address the TCBL to CBL issue.

Recommendations:

28. The Minister issue a Statement of Expectations that:
 - o the ACMA's workplans to prioritise the allocation of long-term Community Broadcasting Licences in areas where a community broadcaster has operated under successive TCBLs for at least 5 years;
 - o where the ACMA takes steps to prepare, publish or vary either an analogue radio Licence Area Plan or a Digital Radio Channel Plan that overlaps or is adjacent to the Licence Area of an existing or previously issued TCBL, the ACMA determine whether to make available a new long-term community broadcasting licence; and
 - o where the ACMA has issued TCBLs to the same organisation for the same or overlapping Licence Area for at least 5 years, the ACMA take all reasonable steps to make available a new long-term community broadcasting licence.
29. The Minister and/or the DITRDCA ensure that the ACMA is adequately resourced to undertake necessary radio planning work to enable the above to happen as a matter of urgency.

1.8.6 3G. Improving sector outcomes by facilitating the transition to digital radio

Transmission infrastructure is one of the most significant costs for stations, and in the digital environment, these costs can be significantly reduced through the ability to share Digital Radio Multiplex Transmitters (DRMT). One DRMT enables at least 18 high quality radio services and in some cities, this has been stretched to over 30 services. Costs per-service and environmental impact are many times lower compared to analogue FM, and less again compared to analogue AM.¹⁴

Digital radio transmission provides for spectrum efficient and cost-effective delivery of free-to-air broadcast services that improve sustainability for all radio broadcasters. Community broadcasters are keen to engage with the ongoing development and expansion of digital radio, as has been the case to date through the CBAA's Digital Radio Project.

Both the *Radiocommunications Act* and the *Broadcasting Services Act (BSA)* envisage community radio participation in the provision of free-to-air digital radio services throughout Australia, including the reservation of digital radio multiplex capacity for community broadcasting services. DAB+ benefits include significant spectrum efficiency and per-service cost reductions, along with enhanced outcomes for listeners and service diversity.

As the DRMT is shared infrastructure, participating broadcasters need to align coverage. Many community broadcasting services have licence areas that are within, intersect or overlap but may not align with commercial broadcasting licence areas.

Digital radio legislation, planning and licensing is on the basis of Designated BSA Radio Areas being identical to existing commercial radio licence areas.

Subsection 8AD(3) of the *BSA* includes powers for the ACMA to deem specific community radio licence areas to be the same as the relevant commercial radio licence area for the purposes of digital radio. The Minister may give a direction to the ACMA about the exercise of its deeming powers under subsection 8AD(4).

¹⁴ Energy efficiencies and environmental impact are orders of magnitude improved compared to online and mobile delivery, noting the scale of data centres necessary to support broadcast listening.

Under subsection 8AD(3) of the BSA, the Minister may give a direction to ACMA about the exercise of its deeming powers under subsection 8AD(4), to provide for specific community radio licence areas to be deemed as the same as the relevant commercial radio licence area.

The CBAA looks to the ACMA and Minister to exercise these powers in ways that support the sustainability of community stations through the efficient use of digital spectrum. This may include:

- Seeking that the ACMA deem or take other steps to ensure each digital radio licence area has a minimum of two community radio services: typically a general service and an Indigenous services, including radio reading or disability media services, to be considered on a case-by-case basis.¹⁵
- ensuring an avenue for community broadcasting to take up capacity on each DRMT reserved under the legislation. This will overcome issues, for example in Mandurah, south of Perth, where no community broadcasting services have been deemed or entitled to access capacity reserved for community broadcasters, despite digital radio already being on-air.
- ensuring a focus on specific areas such as Northern Tasmania, areas adjacent to Sydney such as Gosford, Wollongong and Newcastle with immediate demands for services including Radio Reading Network services, Queensland and Northern NSW including areas adjacent to Brisbane, Gold Coast and Cairns.
- implementing additional DRMT licences in areas such as Adelaide (which could be used to address the lack of an Indigenous service) and Sydney to address current capacity issues.
- where Foundation licences have already been declared, these additional DRMTs can be licensed as Non-Foundation. Existing and additional community broadcasters would be eligible to take up capacity on non-Foundation DRMT.

This additional support and guidance from the Minister will enhance community broadcasting sustainability by prioritising an equitable approach to DAB+ transition and, in doing so, enhance service diversity for communities in those areas.

Recommendations:

30. The Minister write to the ACMA indicating intent to issue a Direction under subsection 8AD(4) of the BSA, underpinned by a policy principle that a minimum of two community radio services may take up capacity in each digital radio licence area.
31. The Minister issue a Statement of Expectations of the ACMA to prioritise additional community broadcasting digital radio capacity.
32. The DITRDCA and the ACMA work with the CBAA on simple auction process for Non-Foundation DRMT that complies with the existing legislation. The Minister issue a Statement of Expectations of the ACMA to prioritise additional community broadcasting digital radio capacity.
33. The Minister and/or DITRDCA ensure the ACMA is adequately resourced to support prioritisation of the above digital radio planning work.

1.8.7 3H. Right of access to broadcast towers

Community broadcasters necessarily make use of tower and transmission site facilities. There are opportunities for community broadcasters to do this more efficiently if they have a guaranteed right of access to new facilities (including telecommunications towers) when they are developed.

AM facilities are a special case, and a general exception for community broadcasters. There are significant challenges to the continuation of analogue AM. It is costly to operate, receivers are difficult

¹⁵ The CBAA expects the ACMA to be positive and pro-active in exercising deeming powers consistent with the Objects of the BSA, in particular subsection 3 (1) (n) – “to ensure the maintenance and, where possible, the development of diversity, including public, community and Indigenous broadcasting, in the Australian broadcasting system in the transition to digital broadcasting.”.

to implement in cars and, while coverage can be geographically broad, audio and reception quality is not so good. The role of analogue AM radio in metropolitan and regional centres is now in sunset mode, with its listening being taken up by DAB+ digital radio where it is available, and by analogue FM where spare RF channels can be found.

Most radio receivers now come standard with FM/DAB+, including entry-level low-cost models. In effect, the distinction in user accessibility between a service being on FM or DAB+ is now minimal, except for legacy, older receivers. In cars, analogue FM is near ubiquitous, and DAB+ digital radio now comes as standard with over 80% of cars sold in Australia.¹⁶

Where it is available, in Australia, listening to DAB+ digital radio now accounts for an average of around 30% of all radio listening. For some services DAB+ digital radio listening is higher, well above 30%. These services are typically in metropolitan areas where the alternative is analogue AM radio, often the case for ABC local radio and national services and some community services; and/or where the FM service has comparatively poor coverage, often the case for community services.

Where very high-power simulcast analogue FM services are operating, listening via DAB+ digital radio can be a little lower, around 20-25%. As in-car communications technology is updated, this is expected to increase. Where DAB+ digital radio service content is not available on analogue broadcast at all, DAB+ listening figures have increased significantly, with a number of such commercial services now being realised as sustainable commercial opportunities. Live broadcast radio delivery in the form of analogue FM and DAB+ digital radio transmission has core utility and a life cycle well in excess of 10-15 years.

Ongoing access to towers and transmission facilities remains core to community broadcasting service operations and sustainability.

Arrangements to access towers and facilities nominated as broadcast sites usually involves a process of negotiation. The options are often limited due to terrain, historic and other technical factors. In many cases the infrastructure and facilities are shared with others. Digital radio uses shared infrastructure under a legislated framework¹⁷ and, in any case, for high power FM and DAB+ digital radio, engineering planning usually dictates that the transmission facilities be co-located.

Multiple low(er) power and in-fill coverage transmission facilities are increasingly the most relevant, and necessary solution to ensure coverage and resilience. This can be a very cost-effective approach to broadcast service delivery, especially in relation to digital radio and coverage extension. To secure and enhance community broadcasting service capacity, community broadcaster transmitters should have access to relevant towers on a reasonable cost basis.

This is an issue which affects FM and DAB+ digital radio, especially where targeted in-fill coverage sites are required for free-to-air broadcast radio delivery, especially for coverage in regional areas. Existing legislation provides an access regime for free-to-air broadcast television¹⁸ and DRMT licensees¹⁹ to towers and sites nominated as broadcast sites. These may be useful to review, and extend to free-to-air radio broadcasting licensees, and in respect of nominated telecommunications mobile network sites.

Recommendation: Establishing a broadcasting tower access regime that ensures right of access by free-to-air radio broadcast and DRMT licensees to tower facilities, including those facilities owned or used by telecommunications mobile network operators, and that access be on a reasonable cost basis.

¹⁶ The European Electronic Communications Code mandated provision of free-to-air digital radio in all cars sold in Europe in late 2020. While Australia benefits from that, the current lack of matching requirements in Australia should be addressed.

¹⁷ Radiocommunications Act 1992 Chapter 3, Part 3.3: Division 1, Clause 98C-98E; Division 2, Clause 102C-102F; Division 3, Clause 109B-109D; Division 4B, Clause 118N-118PP, and other related provisions in both the Radiocommunications Act and Broadcasting Services Act

¹⁸ Broadcasting Services Act 1992: Part 5, Clause 42-50; and Part 10, Clause 62-63.

¹⁹ Radiocommunications Act 1992: Chapter 3, Part 3.3, Division 4C, Clause 118Q -118QJ

1.8.8 3I. Radio prominence

It is widely recognised, including by the Government, that radio prominence is an urgent issue for the sustainability of Australian free-to-air radio sector and for the public interest. Changes in audience listening behaviours and the choices made by manufacturers of connected devices, including those used in the home and in cars, create significant risk for audience access to trusted local content and have a potentially serious impact on the delivery of critical services including emergency broadcasts.

We refer to joint submissions made in late 2023 by the CBAA with CRA, ABC and SBS around potential radio prominence solutions and comments about radio prominence in our submissions to the review of television prominence, our [oral evidence](#) to the Senate Environment and Communications Legislation Committee on this topic and we look forward to contributing to an impending consultation.

Recommendation:

34. That the Government urgently complete consultations and enact radio prominence legislation comparable to the prominence protections given to television

1.8.9 3J. Community Broadcasting television prominence

We refer to the new Part 9E of the *Broadcasting Services Act 1992* inserted earlier this year by the [Communications Legislation Amendment \(Prominence and Anti-siphoning Act 2024\)](#). The legislation will ensure that regulated television services receive certain prominence protections to ensure that they are readily findable and accessible free-of-charge on regulated television devices, as defined.

We note and are grateful for the inclusion of community broadcasting in the definition of “regulated television services” in section 130ZZJ, which has enabled Channel 31 Melbourne to receive guaranteed prominence protection.

Unfortunately, due to a historical licencing anomaly, Channel 44 Adelaide is licensed as a narrowcasting service, not a broadcasting service, and therefore does not come within subsection 130ZZJ(1)(a)(v). Further, section 130ZZJ(1)(b) does not include broadcasting video on demand (BVOD) as a regulated television service. As a result, the proposed CTV+ Community TV BVOD service is not automatically protected in the same way as those of other named sector categories.

The rationale for giving Australian free-to-air television services (and their BVOD) prominence protection is well understood. The issues specific to our sector and the importance and urgency of giving prominence to all community television services were outlined in detail in correspondence to and discussions with the Minister's office and Department and various written and oral submissions to the Senate Environment and Communications Legislation Committee:

- [25 January CBAA submission](#)
- [February 2024 CBAA and ACTA supplementary submission](#)
- [23 February ACTA and CBAA oral submissions](#)
- [6 March 2024 CBAA and ACTA second supplementary submission](#)

Recommendations:

35. That the Minister exercises her power under section 130ZZJ(c)(2) of the *Broadcasting Services Act 1992* to designate Ch44 and Community TV BVOD as a regulated television services.
36. Further, that when the legislation is reviewed in 2 years after commencement of the legislation, community television BVOD is included in 130ZZJ(1)(b).

1.8.10 3K. Transition to broadcasting licence for CTV Channel 44

We have previously raised concerns (including above) about the historical anomaly of Adelaide's Channel 44 community TV service being licenced through a narrowcast rather than broadcast licence.

While we are pleased that Channel 44's licence has recently been renewed for 5 years following amendments to the BSA in early 2024, the narrowcasting arrangement does not reflect the importance and impact of the service or its perception by Adelaide audiences as a highly valued community broadcaster.

This situation, referred to by DITRDCA in [23 February 2023](#) public hearings in the Senate Standing Committees on Environment and Communications as "a quirk of licensing arrangement" has led to unintended regulatory consequences to the detriment of both Channel 44 and the proposed CTV+ BVOD service, as outlined in the above submissions.

We understand from the ACMA that the historical reason for this was that there was previously a long-term community television broadcasting licence in Adelaide which lapsed. When the new community television service was proposed by the current licensee, the narrowcasting licence was put forward by the regulator as a temporary solution as there is no equivalent temporary community broadcasting licence for television as there is for radio. Despite the new legislation extending Channel 44's services and the widespread support for it expressed by all sides of Parliament during the passing of the recent community television legislation, we understand that there is currently no simple pathway for the ACMA under the *Broadcasting Services Act 1992* to transition a narrowcasting community TV licence to a broadcasting licence.

The CBAA would like to work with the Department and Minister on legislative solutions to enable Channel 44 to be correctly licensed in line with the expectations of Adelaide community TV audiences. This would also help simplify designation of Ch44 Community TV BVOD as regulated television services. It is important that this distinction, which arises from a historical regulatory anomaly and not as a result of considered policy, should not disadvantage C44 through unintended consequences of other legislation or regulation affecting community television in the future.

Recommendation

37. That the Minister set expectations around a pathway for Channel 44 to transition to a broadcasting licence and that we work with the Department on potential legislative solutions to enable the regulator to fulfil this expectation.

1.8.11 3L. Copyright issues for disability services

The Copyright Act was amended in 2017 to introduce new sections 113E and 113F, both of which relate to access to "copyright material" for people with a disability. Due to ambiguities in the application of these provisions, stations providing reading services are unclear on the extent of their rights to provide certain services. Importantly, the changes may now preclude stations that do not specifically have a "People with a Print Disability" community interest from providing Radio Reading Services. We do not believe this was the intention of the change, which negatively affects people with vision impairment who rely on radio reading services from other community broadcasting license types.

The CBAA has sought legal advice on this issue. It may be necessary to engage with the Attorney-General's Department on what legislative clarification is needed. We seek the collaboration and support of DITRDCA to ensure that these vital and valued services are fully supported in legislation as intended by the 2017 amendments and in line with disability community expectations.

Recommendation

38. That the Copyright Act be reviewed to ensure that it supports the provision of radio reading services by all community broadcasters.

1.8.12 3K. Privacy legislation impact on stations

The Attorney-General's Department (AGD) proposed changes to privacy legislation will remove the current financial threshold for organisations who are subject to its provisions. This will mean new compliance obligations for smaller organisations including community broadcasters.

The CBAA has raised concerns with AGD about the impact of the changes on small volunteer-run organisations and asked for not-for-profit volunteer run organisations to be included in the categories being assessed in the cost-benefit analysis associated with the legislation. Unfortunately, as far as we are aware, this did not occur. The legislation is yet to be introduced.

For the purposes of the Sustainability Review, we note that there may be significant costs and time implications for broadcasters when the new systems and processes around personal information and data capture are required to be implemented, and it may be necessary to seek funding support depending on what obligations are imposed in the final legislation.

1.9 Summary of Recommendations

1. Funding for the CBP should be increased to \$40 million annually with indexation applied over the forward estimates.
2. Increased funding of \$18.1 million should include \$10 million allocated to increased program funding across existing CBP budget lines with a priority for station Development and Operations (General and Transmission funding line) and \$8.1 million of new initiatives targeted at priority areas for community impact.
3. Improve effectiveness and reduce the administrative burden of providing these funds through allocating more multi-year, unrestricted funding.
4. Deliver more outcome-focussed grants through new funding lines available to stations best placed to deliver impact.
5. CBF grant assessments should no longer apply income-based restrictions for larger stations seeking access to Development and Operations grants. Current policy requiring an exceptional business case for organisations with average annual income exceeding \$700,000 should cease.
6. Implement the CBAA's recommendations for how best to fund intermediary organisations.
7. Provide tailored, multi-year support for the critical revitalisation of the community television sector.
8. Increase budget funding as outlined in the CBAA and FNMA's 2024-5 Federal budget submissions.
9. Provide a policy commitment to deliver FNMA's 10 Calls to Action.
10. Upgrade ageing and failing broadcasting technology and digital infrastructure.
11. Provide more First Nations Services through short-, medium- and long-term extensions of digital radio broadcasting services to all major cities and markets.
12. Funding for the CBP should be increased to \$40 million annually with indexation applied over the forward estimates.
13. That community broadcasters be allowed to broadcast "advertising" or "sponsorship."
14. That a more flexible approach to minutes per day be introduced (without increasing existing overall daily limits) as outlined in the suggested amendments below.
15. That community promotional material/community information not be counted as contributing to the above limits, whether or not it is paid for.
16. That the ACMA update the Community Broadcasting Sponsorship Guidelines in collaboration with the CBAA and the sector to ensure they reflect contemporary practice and support appropriate flexibility for stations, including removal of tagging requirements.
17. The Government's Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities be updated to include a mandatory requirement for Government to ensure communications reach disadvantaged individuals or groups identified within the target audience.
18. The Government's advertising campaign evaluations are required to measure communications reach and impact for disadvantaged individuals or groups identified within the target audience.
19. That the Government ensure relevant community broadcasting audience data is recognised and utilised by its master media agency.
20. A positive obligation be included in the Guidelines for the community radio sector to be considered on its merits at the time when advertising/sponsorship is placed.
21. The CBAA and ACMA collaborate to review and update the ACMA's Community Broadcasting Participation Guidelines to:
 - create a broader, more flexible and contemporary definition of community participation.
 - support greater collaboration in station governance and management while maintaining stations' commitment to community participation and local content.
22. That DIRDTCA with the CBAA, ACMA, ACNC and other relevant entities collaborate on a review of relevant legislation to ensure consistent and harmonious treatment of not-for-profit enterprises, consistent with the aim of ensuring that community broadcasters maintain their community-focused ethos while having the flexibility to sustain and improve their services.
23. The ACMA, in collaboration with the CBAA, review the Community Broadcasting Not-for-Profit Guidelines to align more closely with relevant ACNC and ATO definitions and standards where appropriate in a way that is easy for broadcasters to understand and comply with.

24. Amend the professional standards test in the News Media (Digital Platforms and Mandatory Bargaining Act 2021).
25. Amend the professional news content definition in the Exposure Draft of the Communications Legislation Amendment (Combatting Misinformation and Disinformation) Bill 2023
26. Confirm Government expectations that community broadcasting is properly reflected in NewsMAP and the ACMA Media Diversity Framework.
27. Ensure all legislative, regulatory and other policy instruments in future which contain definitions around benchmark media standards include explicit reference to community broadcasting Codes of Practice.
28. The Minister issue a Statement of Expectations that:
 - the ACMA's workplans to prioritise the allocation of long-term Community Broadcasting Licences in areas where a community broadcaster has operated under successive TCBLs for at least 5 years;
 - where the ACMA takes steps to prepare, publish or vary either an analogue radio Licence Area Plan or a Digital Radio Channel Plan that overlaps or is adjacent to the Licence Area of an existing or previously issued TCBL, the ACMA determine whether to make available a new long-term community broadcasting licence; and
 - where the ACMA has issued TCBLs to the same organisation for the same or overlapping Licence Area for at least 5 years, the ACMA take all reasonable steps to make available a new long-term community broadcasting licence.
29. The Minister and/or the DITRDCA ensure that the ACMA is adequately resourced to undertake necessary radio planning work to enable the above to happen as a matter of urgency.
30. The Minister write to the ACMA indicating intent to issue a Direction under subsection 8AD(4) of the BSA, underpinned by a policy principle that a minimum of two community radio services may take up capacity in each digital radio licence area.
31. The Minister issue a Statement of Expectations of the ACMA to prioritise additional community broadcasting digital radio capacity.
32. The DITRDCA and the ACMA work with the CBAA on simple auction process for Non-Foundation DRMT that complies with the existing legislation.
33. The Minister issue a Statement of Expectations of the ACMA to prioritise additional community broadcasting digital radio capacity.
34. The Minister and/or DITRDCA ensure the ACMA is adequately resourced to support prioritisation of the above digital radio planning work.
35. Establishing a broadcasting tower access regime that ensures right of access by free-to-air radio broadcast and DRMT licensees to tower facilities, including those facilities owned or used by telecommunications mobile network operators, and that access be on a reasonable cost basis.
36. That the Government urgently complete consultations and enact radio prominence legislation comparable to the prominence protections given to television
37. That the Minister exercises her power under section 130ZZJ(c)(2) of the Broadcasting Services Act 1992 to designate Ch44 and Community TV BVOD as a regulated television services.
38. Further, that when the legislation is reviewed in 2 years after commencement of the legislation, community television BVOD is included in 130ZZJ(1)(b).
39. That the Minister set expectations around a pathway for Channel 44 to transition to a broadcasting licence and that we work with the Department on potential legislative solutions to enable the regulator to fulfil this expectation.
40. That the Copyright Act be reviewed to ensure that it supports the provision of radio reading services by all community broadcasters.