

Director, Media Programs
Online Safety, Media and Platforms Division
Dept of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594,
Canberra ACT 2601
communitybroadcasting@infrastructure.gov.au

TO WHOM IT MAY CONCERN

Goolarri Media Enterprises is a uniquely integrated multi-media and arts company which is 100% owned by the Broome Aboriginal Media Association. Goolarri and its parent corporation were established to provide platforms for cultural expression. On behalf of BAMA, Goolarri manages the following vehicles for the expression of First Nations people:

- Community Radio Station Radio Goolarri 99.7fm (6GME)
- Open Narrowcast Television Station GTV
- Productions (commercials, sponsorships, corporate etc)
- Music Development
- Events Management
- Young Indigenous Women's Leadership and Pathways Program
- Writers Program
- Registered Training Organisation

Sitting alongside Goolarri is Ramu Productions, a company established by BAMA in 2010 to meet Screen Agency funding requirements. Goolarri also accommodates and is a member of the Pilbara and Kimberley Aboriginal Media Network which provides coordination, technical and broadcast support to over twenty remote communities. BAMA is also a founding member of both the National Indigenous Radio Service (NIRS) and First Nations Media Australia.

Within the operations, Goolarri Media celebrates and shares First Nations values by empowering the community through communication and the arts'. This ethos drives the integrated operations of the organisation across the various distribution platforms ensuring voices and expressions take full advantage of the vehicles available to reach target markets. These platforms are vital tools to the continued development and support of First Nations creatives.

Taking into consideration the organisations mandate and integrated operations, Goolarri Media on behalf of BAMA and Ramu Productions submits the following submission for consideration regarding the Federal Government's Community Broadcasting Sector Sustainability Review. In line with the Discussion Paper we have only addressed apply for our organisatoin.

"Nothing about us without us!"

Your sincerely,

Jodie Bell CEO/Producer

29th August 2024

Our Sustainability

Goolarri Media (through our parent organization – Broome Aboriginal Media Association) is one of the 49 organisations that receives funding through the Indigenous Broadcasting and Media program (IBMP) administered by the National Indigenous Australians Agency to help meet the objectives of the Indigenous Advancement Strategy (IAS) Cultural and Heritage stream and Closing the Gap (CTG) targets. This funding represents less than 10% of our annual income – and represents less than 50% of the staffing and operational costs of our 24 hour radio service, let alone contributing to any other areas within our organization. Our community television service is completely unfunded yet has the potential to be a huge resource for the community in meeting CTG targets through provision of reliable, culturally safe and appropriate information and stories to our mob.

There have been a number of reviews into the Indigenous Broadcasting Sector over the past two decades, the two most significant being the Stevens Review in 2010 and the Watson Review in 2021. Goolarri has always committed time and resources into participating in all these reviews, through participation in working groups, roundtables and preparing submissions, in the eternal hope of change being enacted within the sector to make us a more sustainable sector. Sadly, very few, if any, of the many excellent recommendations that emerged from these reviews have ever been implemented.

For the most part, Goolarri Media has received the same level of funding to run our service, since around 2009, with the exception of a small increase in 2020 (of around 2%). Until 2023/24 there has not been any CPI indexation applied to this funding despite the continued increase in the cost of living nor has there been any review on how the base level of funding was decided upon in the first place.

To further hinder our ongoing sustainability, prior to 2006, Goolarri Media was able to access Community Development Employment Program (CDEP) workers in Broome who we could train and upskill to become community media workers. Under this program we received the base level CDEP wage rate for each participant which we then "topped up" to award rates to make these people full time employees. Attached to each person also came training and support dollars to ensure that these workers were able to undertake accredited media training (usually at a Certificate III and IV level) and industry specific professional development. Under this framework, Goolarri employed and trained many First Nations media workers many today who have illustrious careers in the industry around Australia, including working for national media organisations. In 2006 the Federal Government made a policy decision that declared that the town of Broome had a big enough labour market that CDEP support was not needed for First Nations individuals that lived within 50 kilometres of the town. With this decision, overnight we lost close to \$1 million in salaries and support dollars which led to us having to retrench 8 workers – a blow that we have never fully recovered from. At the same time, a different new Federal policy decided that where community controlled arts organisations were utilizing CDEP workers but topping their salary up to a full wage, these people would be taken out of the CDEP program and these positions would be funded direct to the community organisations. This led to funding for 3 – 5 positions being added to most community radio stations and media organisations across remote Australia with the exception of Goolarri Media who, due to the earlier decision around CDEP, no longer had CDEP workers. This has led to a huge inequity of funding where much smaller stations, who have a much smaller listenership and footprint, are getting more than double the funding that we do.

The Indigenous Broadcasting and Media Program has failed to grow with the times and recognize the fundamental shifts that have occurred in the industry to adapt to digitization whilst diversifying services to meet community needs.

The First Nations Media and Broadcasting sector is an essential service for our people. This sector not only directly addresses Outcome 17 of Closing the Gap but is a fundamental service that does have the potential to assist most of the other Closing the Gap targets if resourced properly. This sector is also intricately linked to Target 17 because without a sustainable First Nations Media and Broadcasting sector the ongoing support including innovative approaches with being digitally connected will be missed.

Due to a lack of funding and policy foresight, Goolarri joined other members of the First Nations Media Australia in 2018 to develop 9 Calls to Action to help renew the Australian Government policy for First Nations Broadcasting and Media. Since the development of these Calls to Action, it is obvious that very little traction

has been gained, particularly from Government. This lack of support maybe due to the fact that the sector is within a department that has full responsibility for all First Nations matters and up against basic essential service demands does not see it as a priority. It may also be about this department not having the specialized skills and knowledge of the Broadcasting and Media industry as a whole. Goolarri is fully supportive of FNMA's 9 Calls to Action.

Priority Area 1: CBP funding, structure and outcomes

What should the funding priorities and granting streams be for the CBP from 2025 onwards?

Goolarri feels that this funding is best placed to be targeted towards career pathways and creation of meaningful work in media organisations. If we can create more meaningful jobs then a natural flow-on of this will be more First Nations content and stories being made and distributed.

How can services be supported to collect and report on data?

This is an essential element of the broadcasting sector that we don't do enough of or well enough. Better data can provide us with the ammunition we need to show how much of an essential service we are, but at the moment, across the sector, we don't have the resources to undertake this in a meaningful way. This could be tackled as a sector wider initiative or locally – either would work and provide better data than what we currently have.

Priority Area 2: Legislative and regulatory issues

What are the advantages and/or disadvantages of the current sponsorship limit and/or process?

The current sponsorship limit of 5 minutes per hour can mean we miss out on sponsorship opportunities that can assist in our ongoing sustainability. Often the issue is that many sponsors want their messages broadcast in peak times so these slots fill quite quickly, but then we have a good 10 hours per day that are considered non-peak and we barely manage to fill these spots. An alternative way of managing this could be to aggregate the minutes across a 24-hour period rather than hourly – ie. Can have up to 120 minutes sponsorship in a 24-hour period. This would mean that when opportunities arise to have more than 5 minutes in an hour, we could take that opportunity to earn additional revenue. It does mean that technically a station could run up to 120 minutes straight of paid sponsorship if they chose to, to maximise revenue, but this would also be considered a disastrous programming decision.

Priority Area 3: First Nations Funding and Licensing

What are the main funding, licensing and revenue challenges; and how might they be addressed?

There needs to be a complete overhaul of how organisations are funded. Currently funding is largely historical and there has been no review of this to take into account actual operational needs, cost of delivering the services or actual outputs and outcomes that services are producing. For the most part, organisations are severely underfunded and this is creating a bigger and bigger impact as the cost of delivery is rising. The First Nations broadcasting sector has the potential to offer increased employment outcomes but can only do after the need for adequate operational and employment funding is addressed. This includes the confirmation that CPI indexation will now be applied annually and not just be a "one off".

What should the funding priorities be for the IMP from 2025 onwards?

There needs to be an innovative program to expand First Nations radio to unserved areas with significant First Nations population including the three capital cities without a dedicated First Nations service (Hobart, Canberra and Adelaide).

There is a huge need for an increase in the news and current affairs capacity of First Nations broadcasters through a targeted funding program. This program to include training and mentorship, operational support for a national news and current affairs service including community reporters and development of a news sharing platform.

Most organisations are currently using old, outdated equipment that takes huge amounts of dollars to keep maintained to a good working order. There needs to be an upgrade to broadcasting and digital infrastructure to meet current industry standards and work, health and safety requirements including a facilities upgrade program and provision for repairs and maintenance for VAST in remote communities.

Archiving is an urgent and essential need. Goolarri is one of the oldest First Nations Media organisations, having been operational since 1989. There are a few others that are older. We all have a huge archive collection of important stories and content that needs to be conserved, preserved and then maintained. This is vitally important as a tool to sustain culture and language but also, it creates another stream of potential ongoing employment within media organisations.

There needs to be support for expanding training and career pathways within the First Nations sector. This could be achieved through updating, funding and implementing FNMA's Training and Employment Strategy which includes implementing award rates for all, training and skills development along with employment and career development plans. Wages are currently a huge issue – in general, across the board, wages in the media and arts sectors are a lot lower than other sectors and so when we are competing for workers, particularly in regional and remote areas, we do not have the resources to match sectors like the health or mining sector. Goolarri is constantly losing trained staff members to better paying jobs in the mining sector and all of the staff that have left say it is purely around salary rates.

Also in line with the FNMA Calls of Action, there needs to be a sustainable content production fund to First Nations people to tell First Nations Stories. Funding to be made available for an annual and competitive content production fund for First Nations Broadcasters and media producers.

Which funding model and/or grants structure would best support the First Nations sector?

- Which Australian Government department could administer the IBMP?
- Which organisation could distribute/make decisions on First Nations funding?

Goolarri believe the IBMP would be better supported if it was relocated to be run from the Department of Infrastructure, Transport, Regional Development, Communications and the Arts. We feel that the specialized knowledge around the Broadcasting sector is really needed to manage this program and this expertise sits within this Department. It would also mean that the needs of Indigenous Broadcasting are not competing with the needs of sectors such as health, education and employment as it feels like they currently are within NIAA.

Funding and service agreements should be co-designed between the funding body and each individual service so that it reflects the reality on the ground for that particular service. At the moment there are very generic agreements with generic KPI's, which can often be meaningless to the service organisation.

At some point in the funding decision process there needs to be a First Nations lens on the decision, whether this is through a First Nations assessment panel (similar to how Creative Australia assess First Nations funding) or there is some Joint Assessment process (similar to how NIAA works with the Empowered Communities framework in some of their programs – though not broadcasting). This process could be codesigned with FNMA though it would be appropriate for the decision making to sit with FNMA as they are the peak advocacy body for the First Nations Media Sector.

What are the advantages and/or disadvantages of introducing a license type for First Nations broadcasters over the current licensing model?

How would the First Nations License differ from existing license types?

Goolarri is supportive of the FNMA Call to Action that calls for the recognition of First Nations Broadcasting as a separate category of broadcasting under the Broadcasting Services Act 1992 and make the necessary changes for spectrum allocation and codes of practice.

There needs to be recognition that the First Nations broadcasting and media sector as the preferred channel and supplier of First Nations targeted information campaigns which includes production, customization and distribution. For the funders of these campaigns, this could then be easily identified by the fact that a station is licensed as a First Nations license – takes all doubt out of the equation.