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Department of Infrastructure, Transport, Regional Development,  
Communications and the Arts

Friday 30 August 2024

To Whom It May Concern,

**Community Broadcasting Sector Sustainability Review - Joint 3RRR,  
3PBS and 3CR Submission**

Thank you to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts staff for their thorough and open-minded consultation throughout this process. We really appreciated the opportunity to take part in workshops and particularly the departmental staff's commitment and interest demonstrated when visiting our stations.

CBP funding, structure and outcomes

We wholeheartedly support a substantial increase of government funding to the community broadcasting sector. The current level of government support means the community broadcasting sector, and existing key sector projects, are not sustainable. Furthermore, the current funding level caps the positive impact the sector could have. Many innovative community broadcasting projects with positive benefits for the general public are only possible with greater government support.

We support funding for community broadcasting's sector bodies, but note the need to be mindful of maximising the funding and project benefits to individual stations. We also need to be mindful of the risk of stations and sector organisations competing for government funding.

We would like to see impact maximised by an increase in direct funding to stations as well as increased funding to sector projects. The shortfall to stations is evident in the amount requested via CBF grants versus what is allocated as noted by the CBF following the 2024-2025 Round 1 grant round. \$17.7 million was allocated, while \$28.6 million was requested.

<https://cbf.org.au/round-1-delivers-17-7million/>

Furthermore, we know anecdotally that some stations are very reluctant to apply for funding due to the knowledge that the sector is underfunded, so we suspect this shortfall is actually vastly underestimated

We support the ideal of greater collaboration between community broadcasters, but also identify that we need to be careful not to dilute the points of difference and diversity of individual stations serving unique communities across the country. We should not assume that collaborations are more efficient or inherently better within our diverse sector. When stations have such limited resources, collaborations can add a degree of difficulty that is restrictive on much-needed local, station-based content production and activities.

Sector-wide resources and funding should be allocated towards better data collection and reporting so that more comprehensive quantitative and qualitative

data can be collated that accurately tells the story of meaning and impact of the sector. This needs to be resourced by both sector-wide support and funding for stations to implement collection methods and appropriate frameworks. Data collection and analysis is vital and requires clear lines of resourcing.

All increases in funding to the sector should clearly demonstrate benefits to stations, and be tightly aligned with the sector's Guiding Principles <https://www.cbaa.org.au/sites/default/files/media/Community%20Radio%20Broadcasting%20Codes%20of%20Practice%202008.pdf> regardless of station turnover.

We acknowledge that the CBF's model of peer-review grant decision making is mostly effective and efficient as noted in the Evaluation of the Community Broadcasting Program <https://www.infrastructure.gov.au/sites/default/files/documents/evaluation-of-cbp-final-report-june2024.pdf>. Funding a diverse sector requires diverse decision-making with a broad range of participation and involvement.

The COVID-19 pandemic followed by the current cost of living crisis has had major impacts on the financial sustainability of individual community broadcasters' revenue streams. In the experience of our stations, independent revenue growth (through sponsorships and subscriptions and donations) is not keeping up with the growth of expenses, and independent revenue streams are much more volatile than they were pre-pandemic.

We would like to see community broadcasters recognised for the impacts we have on other sectors and public good. As independent NFP community broadcasters, we have major positive impacts in terms of Diverse Reach & Representation, Media Plurality, Skills Development and Career Pathways, Social Engagement and Wellbeing, and Cultural Contribution including major social and economic impacts on the Australian music and arts industries. We would like these impacts to be rewarded by the Government ensuring that community broadcasters can apply for grant funding programs released by other government departments where community broadcasters can demonstrate positive impact.

### **Legislative and regulatory issues**

We acknowledge that there have been calls from some community broadcasters for significant changes to the way community broadcasting sponsorship is legislated and administered, and the way community engagement is measured. While we support the need for stations to be financially sustainable and to fund and govern their own services as is appropriate to their community of interest, we believe it is imperative that the points of difference between community broadcasters and commercial and public broadcasters are maintained and celebrated. Content that is produced locally via volunteer participation, station independence in terms of content and administration, and the use of non-commercial language are all community broadcasting hallmarks that demonstrate our difference from commercial stations and that we believe are key to our values. We fear that erosion of these points of difference would be bad for the sector in the long term.

Our stations feel the existing 5-minute limit is appropriate to our needs and in alignment with the sector's values. Any proposed changes need to be carefully considered in terms of their alignment with sector principles and guidelines.

We believe it's important that staff employed to produce content for the community broadcasting sector are employed by stations, to ensure they are steeped in the culture of community broadcasting and understand our audiences. We would like to see funding to bolster the training and retention of paid staff within the sector be made available to stations for these purposes.

### **First Nations funding and licensing**

The availability of financial support for First Nations presenters should remain strong and robust for all community broadcasting stations. We're in support of further funding for First Nations licensed organisations, but strongly believe that this should not come at the detriment of First Nations content and participation across other areas of the community broadcasting sector.

It is imperative that First Nations presenters have equal opportunity to be financially supported in return for their participation at any station in the sector, be that a First Nations licensed station or not. This is self-determination in action within our sector and in the community more broadly. Many First Nations presenters choose to participate and have a voice at community broadcasters that are not First Nations licensed stations, and financial support should not be sacrificed as a result.

Yours sincerely,

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Rachel Kirby, Station Manager, 3CR Community Radio  
Kristen Paterson, General Manager, PBS 106.7FM