



Australian Government

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

Community broadcasting sector sustainability review

Discussion Paper

June 2024



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Make your views known

The Department of Infrastructure, Transport, Regional Development, Communications and the Arts (the department) is seeking input from interested parties on the Community Broadcasting Sector Sustainability Review, with the submissions period closing on Friday, 30 August 2024. Submissions received by the department as part of this consultation process will be used to inform reform options.

Making a submission

The department is welcoming written comments and submission on the matters outlined in this paper. Comments and submissions should be received by 5:00pm AEST on Friday, 30 August 2024.

The department encourages you to respond to questions and issues outlined in this paper as relevant to you.

You can make an online submission at infrastructure.gov.au/have-your-say.

You can send submissions via mail to:

Director, Media Programs
online Safety, Media and Platforms Division
department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594 Canberra, ACT 2601

If you have any questions, please email communitybroadcasting@infrastructure.gov.au.

Publication of submissions and confidentiality

All submissions will be made publicly available by the department unless a respondent specifically requests that a submission, or part of a submission, be kept confidential. Comments will not be published.

The department reserves the right not to publish any submission, or part of a submission, which in its view contains potentially offensive or defamatory material, or for confidentiality reasons.

The department is subject to the *Freedom of Information Act 1982* and comments and submissions may be required to be disclosed by the department in response to requests made under that Act.

Introduction

This discussion paper is part of the **Community Broadcasting Sector Sustainability Review** being conducted by the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (the department) in partnership with the community broadcasting sector.

The Australian Government committed to working with the sector to identify a sustainable funding base for the future, in the context of the May 2022 Federal election. The commencement of the sustainability review was announced in October 2022¹ and is being undertaken in two phases.

Phase 1 evaluation

Phase 1 commenced in March 2023 with an independent evaluation of the Community Broadcasting Program (CBP), commissioned by the department and undertaken by the Social Research Centre.² The evaluation found that while the CBP is mostly effective, has a range of positive impacts and funding has been vital for continuation of operation, it has not achieved significant impact in terms of promoting sustainability through reducing reliance on grant funding and building station resilience.

The evaluation found that the CBP is only partially achieving its objectives. This includes that:

- the grants assessment and decision-making processes could be more effective
- the CBP can more effectively help grantees undertake day-to-day operations, development, capacity building and sector wide projects, and
- the CBP can better identify and address emerging and unmet needs in the sector (e.g. operational costs, capacity building, self-sufficiency, promotion, community engagement, digital transformation and infrastructure).

The evaluation further found that there are opportunities to:

- tailor funding to organisational needs
- fund long-term, larger-value grants that allow for strategic initiatives to facilitate diversification
- expand the scope of CBP grants (e.g. news, journalism and emergency broadcasting), and
- focus on partnerships and networking to support content, knowledge and skill sharing in the sector.

Phase 2 sustainability review

This next phase seeks to identify options to support the sustainability of the sector by gathering views and ideas on funding, administration and legislative environments for the CBP and the Indigenous Broadcasting and Media Program (IBMP).

This discussion paper is a key element of stakeholder consultation, and will help to inform options for government consideration. There will also be other consultation opportunities through roundtables and meetings.

In parallel, the Government has also been undertaking related work to promote the sustainability of the media sector and support Closing the Gap in digital inclusion for First Nations Australians, including:

- News Media Assistance Program (News MAP) consultation and development³
- First Nations Digital Inclusion Advisory Group (FNDIAG) establishment, which has released an initial report and is now consulting on a roadmap.⁴

¹ [Media release: Albanese Government backs community broadcasting](#)

² [Evaluation of the Community Broadcasting Program: Final Report](#)

³ infrastructure.gov.au/media-communications-arts/news-map

⁴ digitalinclusion.gov.au

Community broadcasting

The *Broadcasting Services Act 1992* (BSA) regulates community broadcasting services in Australia. Community broadcasting services:

- are provided for community purposes; and
- are not operated for profit or as part of a profit-making enterprise; and
- provide programs that:
 - are able to be received by commonly available equipment; and
 - are made available free to the general public; and
- comply with any determinations or clarifications under section 19 of the BSA in relation to community broadcasting services.⁵

There are over 450 community radio services and 2 community television services operating across Australia.

Community Broadcasting Program (CBP)

The CBP is the Australian Government-funded grants program to support a diverse, innovative and resilient community broadcasting sector. Since 1984, the Community Broadcasting Foundation (CBF) has distributed CBP funding to services through a merit-based grants process. The department currently provides \$22.5 million per year for the CBP.

There are 3 grant streams under the CBP:

1. content
2. development and operations, and
3. sector investment grants to support sector coordination and sector-wide development projects.

There is a First Nations Community Broadcasting Fund in the CBP, which is \$1.4 million of overall funding.

Indigenous Broadcasting and Media Program (IBMP)

The First Nations broadcasting sector is also funded through the Indigenous Advancement Strategy. The National Indigenous Australians Agency (NIAA) currently provides \$21 million per year in operational and employment funding to 49 organisations that support First Nations broadcasting.

Roadmap 2033

In 2023, the community broadcasting sector released its own roadmap, which identifies 4 key priorities:

- grow the sector's capability
- celebrate the sector's identity and demonstrate impact
- amplify diverse voices
- secure capacity to meet community need.

Roadmap 2033 outlines key strategic priorities. These include:

- community broadcasting infrastructure being able to withstand disruption and natural disasters
- increasing the prominence of First Nations media
- utilising community media to counter the rise of misinformation and disinformation
- increasing collaborative capability and capacity to secure sponsorship, fundraising and other revenue
- increasing access to technology, resources and skills to deliver content across platforms
- a clear, evidence-based case for funding shifting from activities to outcomes, and
- developing a skilled and sustainable workforce that can adapt to evolving community needs.⁶

⁵ [Broadcasting Services Act 1992, s 15](#).

⁶ [Roadmap 2033](#), 18.

Consultation scope

In scope

The scope of this consultation includes:

- how to increase sector sustainability, capability and capacity
- identifying emerging needs, for example, local news and disaster response
- a shared outcomes framework to help measure impact and inform decisions
- consideration of regulatory issues under the BSA, and
- First Nations broadcasting funding and licensing.

The department is seeking input on **3 key priority areas**:

1. CBP funding, structure and outcomes
2. Legislative and regulatory issues
3. First Nations funding and licensing.

Out of scope

These areas are out of scope:

- the sector's implementation of Roadmap 2033
- state and territory laws regarding incorporated associations and deductible gift recipient (DGR) status
- the Australian Charities and Not-for-profits Commission's review of charity size thresholds, reporting and compliance obligations
- the Productivity Commission's public inquiry into philanthropy
- the Department of Finance's review of the Australian Government advertising guidelines, and
- the Treasury's review of the DGR Register to streamline reporting arrangements.

Priority area 1: CBP funding, structure and outcomes

The sector is reliant on grants to meet funding needs

Approximately 33% of broader sector revenue, and 67% of First Nations broadcasting sector revenue, is from grants. Of all CBP applicants in 2022-23, 77% view grants as very important to ongoing service viability.

The CBF reported a 37% increase in grant applications in 2024, particularly for local news and journalism in regional and underserved areas, and the First Nations Community Broadcasting Fund.

The sector reports funding needs are unmet

The CBF reports that \$9.5 million in funding requests have not been met each year since 2017. The sector reports not applying for grants due to time and skills required, or perceived ineligibility due to higher revenue.

The Community Broadcasting Association of Australia (CBAA) has identified there is an opportunity for multi-year grants through the CBP, which would allow services to work towards longer-term and strategic outcomes.

The CBAA also requested a 100% increase in current funding, with a portion targeted at priority outcomes under Roadmap 2033.

The sector has called for an outcomes framework

Since 2017, the CBF has been using an outcomes-based funding model to support services to achieve greater long-term impacts. However, Phase 1 identified a lack of outcomes data and limited ability to evaluate objectives. A shared outcomes framework could enable better data collection and impact measurement to show if and how the sector are achieving its goals.

It also allows the department and CBF to:

- measure the impact of grants
- support continuous improvement
- support the sector to address strategic, business planning and governance issues, and
- make data-driven funding decisions that contribute to the sustainability of the sector.

Consortium and partnership models present an opportunity

Consortium and partnership models, where 2 or more organisations work together on shared goals and/or are co-located, have been identified as a key enabler of sector sustainability. This will allow the sector to pool their resources and share risk, but not change the ownership or governance of services. Partnerships may focus on sharing premises, infrastructure, news provision, fundraising activities or grant applications.

Questions

- What should the funding priorities and granting streams be for the CBP from 2025 onwards?
- What are the advantages and/or disadvantages of:
 - 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?
- Which quantitative and/or qualitative outcomes should the framework consider?
- How can services be supported to collect and report on data?

Priority area 2: Legislative and regulatory issues

The sector reports that restrictions limit revenue opportunities

Community broadcasters are prohibited from carrying any advertising, but are permitted to promote sponsors. The BSA currently limits sponsorship content to 5 minutes in any hour of radio broadcasting and 7 minutes in any hour of television broadcasting.

The sector receives 33% of their revenue from sponsorship, and report that increasing the sponsorship limits under the BSA would increase sponsorship opportunities. The First Nations sector also has limited opportunities to generate revenue through membership, fundraising and sponsorship; particularly in remote areas.

Community participation is a challenge

The sector relies on a 93% volunteer workforce. Not all stations have the same access to resources, with metropolitan services attracting more volunteers, sponsorship and members than their non-metropolitan counterparts. However, volunteering declined during the COVID-19 pandemic and has not rebounded.

Another challenge is growing the membership or subscriber base. High listenership does not always translate to paying members or subscribers, with only 6% of revenue coming from membership fees. Community television stations do not have a membership base that they can call upon for support.

It is difficult for First Nations broadcasters to meet the current participation obligation under the BSA using volunteers, as there is an emphasis on paid staff to support Closing the Gap measures.

A volunteer workforce is not a sustainable workforce

Further, volunteer models are not a sustainable option for those seeking paid employment. Services commonly report high turnover of volunteers, being unable to offer paid work, and losing staff to other sectors that can offer pay or higher pay. This is often after the service has invested in the developing the capabilities of its staff and volunteers, with no longer-term return on investment.

Across the sector, 50% of services overall and 70% of services in regional, rural and remote areas report a need for training. In turn, this increases pressure on and reduces the capacity of paid staff; particularly in regional, rural and remote areas. As a result, these services are more likely to rely on core operational grants under the CBP.

Questions

- What are the impacts of current licensing conditions on your organisation's sustainability?
- What are the advantages and/or disadvantages of:
 - introducing community participation tiers for remote, rural, regional and metropolitan services?
 - including social media reach and listener data as part of community participation?
 - introducing fixed-term programs to train and retain paid staff in the sector?
 - the current sponsorship limit and/or process?

Priority area 3: First Nations funding and licensing

Renewing a Vital Indigenous Voice and Community Asset

The NIAA-commissioned Hugh Watson report 2021, *Renewing a Vital Indigenous Voice and Community Asset*, found that sector capacity to meet community and government expectations is limited. This is due to no real funding increase in a decade and revenue constrained by ACMA regulations; ageing equipment and facilities impeding service delivery, and limited staff training and development opportunities available.⁷

The sector reports funding needs are unmet

IBMP funding has remained consistent in the last 10 years, although indexation was introduced in Budget 2024-25. Successive reviews concluded that the IBMP was substantially under-resourced. The First Nations Community Broadcasting Fund under the CBP is indexed, however the CBF reports that it is oversubscribed.

Services funded under the IBMP are not eligible to apply for core operations grants under the CBP. The First Nations sector commonly cites this as a barrier of the current funding model. A recommendation of Hugh Watson Report 2021 was that the Indigenous grants element of the CBP should be directed to First Nations sector-wide projects, rather than individual services.

The sector wants funding to be brought under one department

Successive reviews into the First Nations broadcasting and media sector have called for consolidation of Commonwealth investment to maximise impact.⁸

Calls for a First Nations entity to deliver IBMP grants

There have been calls to work in partnership with the First Nations community-controlled sector to share decision-making, in line with Priority Reforms 1 and 2 under the National Agreement on Closing the Gap. The CBF is not a First Nations entity but has 100% First Nations peer assessors on First Nations applications.

The sector proposes a new licence category

First Nations broadcasting services are generally licenced as community broadcasters under the BSA. Successive reviews since 2001 have recommended creating a separate licence for First Nations broadcasters.

Questions

- What are the main funding, licensing and revenue challenges; and how might they be addressed?
- What should the funding priorities be for the IBMP from 2025 onwards?
- 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?
- What are the advantages and/or disadvantages of introducing a licence type for First Nations broadcasters over the current licensing model?
 - how would the First Nations licence differ from existing licence types?

⁷ [Renewing a Vital Indigenous Voice and Community Asset 2021](#)

⁸ [First Nations Digital Inclusion Advisory Group Initial Report 2023](#); [First Nations Media Australia Calls for Action 2018](#); [Review of Australian Government Investment in the Indigenous Broadcasting and Media Sector 2010](#); [Digital Dreaming: A National Review of Indigenous Media and Communications 1999](#)