



New rules for a new media landscape – modernising television regulation in Australia



Response to Media Reform Green Paper First Nations Media Australia



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First Nations Media Australia (FNMA) is the peak body for the First Nations media and communications industry. Our purpose is empowering Australia’s First Nations people through our culturally connected media industry. Our head office is in Alice Springs, complemented by some team members working remotely from different corners of the country.

First Nations Media Australia supports and amplifies the First Nations media sector and its objectives. Our activities include resource and policy development, skills development, networking events and meetings, content-sharing, promotion, regular communications, annual awards, research activities and representation. As part of its industry leadership role, FNMA seeks to ensure First Nations communities have access to information required to make informed decisions. The crossover of infrastructure, digital literacy and access to information between telecommunications and media is significant. Therefore, First Nations Media Australia advocates for the digital inclusion and connectivity needs of all Aboriginal and Torres Strait Islander people.

As at May 2021, FNMA’s membership includes 62 organisations and 167 individuals who work in or alongside the industry as broadcasters, freelance journalists, photographers, filmmakers and allies.

This submission is made by First Nations Media Australia. Some members may make individual submissions in which case the First Nations Media Australia submission should not be taken to displace those submissions.

The scope of the First Nations media sector includes:

- **Television:** National free-to-air (NITV); satellite delivered narrowcast (ICTV) TV services; local narrowcast TV services (Goolarri TV at Broome, ICTV in Alice Springs and Broome and Larrakia TV at Darwin). The ICTV satellite TV service reaches 371,846 smartcards nation-wide as at April 2021, not including terrestrial services in Alice Springs and Broome.
- **Video & film production:** Production of culture and language-based content for broadcast & online distribution.
- **Print and Online:** A national newspaper (Koori Mail) alongside a strong web presence of journalistic sites such as IndigenousX, National Indigenous Times.
- First Nations media organisations have a strong **social media** following and publish content online daily.
- **Radio:** Over 230 radio broadcast sites coordinated by 35 licensed, community-owned, not-for-profit organisations. These radio services able to reach around 320,000 First Nations people, including around 100,000 very hard to reach people in remote Indigenous communities, or approximately 48% of the First Nations population. Radio services are prevented from providing a primary radio service to all Aboriginal and Torres Strait Islander peoples due to a lack of funding and spectrum availability. Established stations broadcast live shows, plus interviews, radio documentaries, news, emergency information, community events, government and other messaging within community broadcasting guidelines through these platforms:
 - 157 stations broadcasting on FM
 - 4 stations broadcasting on AM
 - 13 broadcasting via VAST satellite, in addition to FM services.
 - 5 metropolitan services broadcasting via DAB+, in addition to FM services in Sydney, Melbourne, Perth, Brisbane and Darwin.
 - Almost all offer online streaming via a dedicated station website.
 - Many offer on-demand content either through the station's own website, or Soundcloud or podcast sites.
 - 26 stations can be streamed via the indigiTUBE website and app. Some stations also have their own application or use the TuneIn or iHeartRadio apps to reach audiences.
- These channels offer a wide range of programming, including news and current affairs reporting from a First Nations perspective, in over 25 Indigenous **languages** nationally, including the first language of many people in remote communities.

The sector reaches significant audience share with 91% of people in remote Indigenous communities being regular listeners to radio services and watching ICTV at least once per month.¹ In the remote context, First Nations media is the most reliable and ubiquitous radio and media service available to audiences.

First Nations broadcasters are not-for-profit community organisations providing a primary and essential service to their communities. First Nations media organisations are based in local communities and employ local people as broadcasters and media producers. They are local and trusted voices, attracting listeners who want to hear about their own communities, in their own

¹ McNair yellowSquares, *Indigenous Communications and Media Survey*, 2016,

language, sharing positive Indigenous stories.² Social Ventures Australia found that strengthening First Nations broadcasting strengthens community through communication, culture and employment. For this reason, First Nations broadcasting returns an average \$2.87 in social outcomes for every \$1 invested, with many organisations returning a rate much higher than this nearly 3:1 average ratio.³ The communications sector provides enabling services to support opportunities and outcomes in service sectors, such as health and education, and promotes inclusiveness and participation.⁴

A strong First Nations owned media industry enables Aboriginal and Torres Strait Islander people to **access to relevant news, information services and emergency warnings and to actively participate in the appropriate delivery of media and information services** for their communities.



Introduction

First Nations Media Australia (FNMA) welcomes the opportunity to contribute a response to the Media Reform Green Paper. First Nations audiences are significant consumers of free-to-air television, broadcast video-on-demand services, streaming services and other internet-based media services.

Overall, FNMA supports media sector reform in principle and is pleased to see the Government recognizing the role of media in informing citizens and underpinning democracy – this is our daily work. Like many Australians First Nations people rely on free-to-air television. Withdrawal of services would harm consumers, particularly those in regional and remote areas who are less likely to use alternatives to free-to-air television, such as subscription television and SVOD services. First Nations communities would be disproportionately affected by the withdrawal of a service. FNMA endorses the intent to build long-term sustainability for free-to-air television broadcasting.

FNMA does not seek to address all issues raised in the Media Reform Green Paper in its response, but to provide additional information about the opportunities this reform might present for Indigenous employment and business development within the community-controlled media sector. It provides context for media reform policy from a First Nations media perspective, responds to some of the specific issues raised where relevant to this part of the media industry and offers some queries and commentary for the Government's consideration in approaching this regulatory amendment.



² *ibid.*

³ Social Ventures Australia, *More Than Radio – a community asset: Social Return on Investment Analyses of Indigenous Broadcasting Services*, 2017

⁴ Department of Communications and the Arts, *The Communications Sector: recent trends and developments*, Bureau of Communications Research, Commonwealth Government, Canberra, October 2016

Media reform policy context in the First Nations media sector

Audience behavior


While there is limited data to differentiate between First Nations and non-Indigenous consumers, there is some data related to viewing and Indigenous television services that reflect the importance of First Nations delivered television services.

National Indigenous Television (NITV) started in 2007, becoming a part of SBS in 2012. The channel now reaches over two million unique viewers per month. In May 2013, shortly after NITV became a part of SBS, it was revealed through a Question on Notice that:

NITV has an average reach of 433,388 viewers over 31 weeks. In its first 19 days, NITV brought an additional 270,000 viewers to the SBS network. As its peak, in March 2013, NITV added an additional 330,000 viewers to the SBS network. NITV accounts for 4.4 per cent of SBS's total viewing audience. NITV has 51 staff, 38 of whom are Indigenous.⁵

Figure 1 overleaf shows the breakdown of television channels viewed by Indigenous audiences. The small sample size of the survey should be noted however it does give a picture of viewing patterns.

Figure 1 - Television channels viewed⁶



Television - Viewing

	TOTAL		Nett	Demographic				3G	No 3G	
	Indigenous Population	Regular Listeners		Men	Women	18-39	40+	3G	No 3G	
	No. Pop:	13,878		8,358	8,855	11,313	5,899	4,535	2,386	
	Sample:	143		80	94	99	75	73	38	
All people with TV Access										
TV Viewing	n=	17,212	%	%	%	%	%	%	%	
ICTV (percentage on NT, SA & WA only)		13,189	91%	92%	97%	86%	94%	85%	83%	95%
NITV		14,544	84%	84%	88%	81%	87%	79%	77%	87%
Westlink (ONLY WA)		93	1%	1%	0%	1%	0%	0%	0%	0%
ABC, ABC2, ABC3, ABC News 24		12,511	73%	73%	68%	77%	70%	78%	73%	70%
Imparja		6,056	35%	34%	26%	44%	37%	32%	71%	85%
Commercial channels, eg 7, 9, 10, 7mate 7TWO, One, Gem, Go, 11		15,305	89%	89%	92%	86%	90%	87%	87%	92%
SBS, SBS 2		6,846	40%	46%	44%	36%	33%	53%	43%	46%
A Pay TV Channel on Foxtel or Austar										
Others		65	0%	0%	0%	1%	0%	1%	1%	0%
None of these		453	3%	2%	3%	2%	4%	0%	0%	4%

Q5. Which of these TV stations do you watch regularly?

Australian Government research commissioned in 2014 found television consumption was found to be high among First Nations audiences with 91% of remote respondents reporting that they watched ICTV in the previous four weeks, 89% of all respondents watched NITV and 32% reporting that they had watched subscription television over the same period. Those who reported watching free-to-air television mostly watched commercial television channels such as Seven (76%), Nine (75%) and Ten (59%) to a lesser extent.

⁵ M Ebeid, 'Answer to Question on Notice: SBS', [Questioner: S Ludlam], Question 109, Senate, 30 May 2013

⁶ Source: McNair Ingenuity Research, [Remote Indigenous Communications and Media Survey](#), Indigenous Remote Communications Association, 25 November 2016, p. 17.

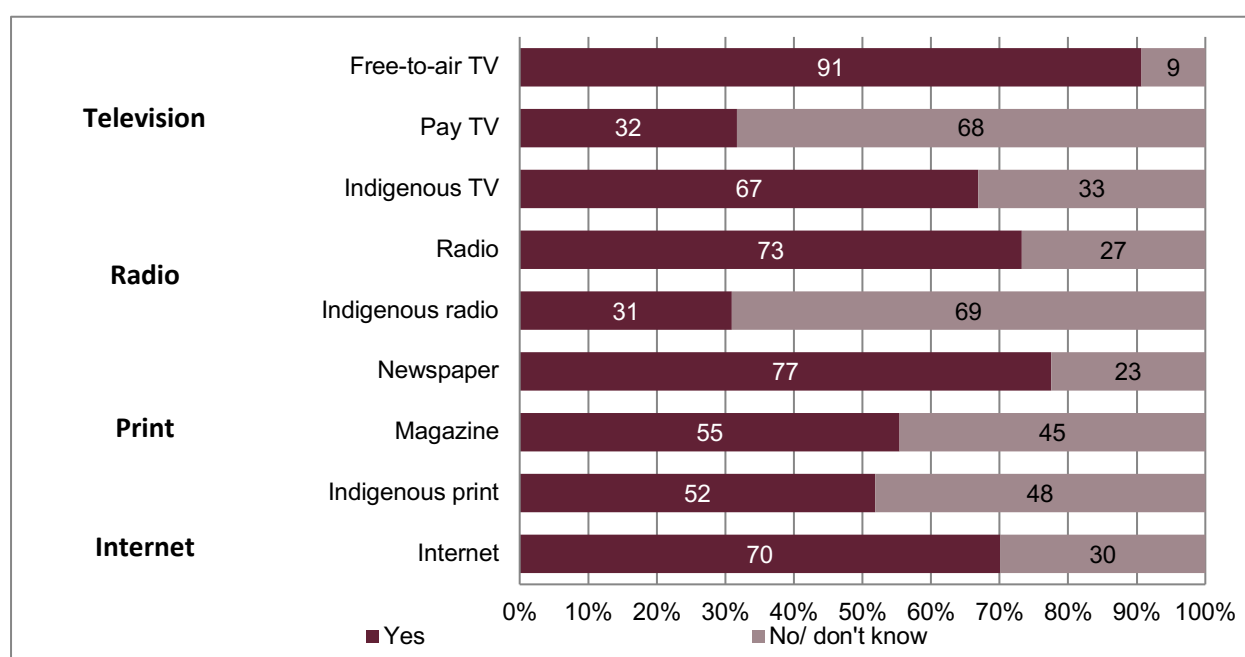
The ABC, SBS and the new digital channels were less popular, although between a third and a half of free-to-air television viewers watched:

- ABC/ABC 1 (50%)
- SBS One (41%)
- 7 Mate (35%), and
- Go (34%)

Over half (54%) of respondents reported watching at least two hours of commercial free-to-air television per day. This was primarily consumed in the evening (i.e. after 6pm), with the most popular programs being news, movies, current affairs and sports programs.

By comparison, consumption of Indigenous television stations and programs was found to be high, with over two thirds (67%) of respondents reporting that they watched at least one Indigenous station or program in the previous 4 weeks.⁷

Figure 2 Media preference among Aboriginal and Torres Strait Islander audiences⁸



Access to information

Discussion of media delivery formats must consider digital inclusion as it relates to access to media platforms and subsequently, access to locally relevant information. Access to television services via streaming and online platforms is impacted, especially in regional and remote areas, by internet access and digital literacy. Some of the issues the Government identifies as particularly relevant to ‘older Australians’ (page 3) are also applicable to First Nations communities in less affluent, regional and remote settings.

The [Australian Digital Inclusion Index \(ADII\) website](#) contains a 2021 report, [Connecting on Country](#), produced jointly by World Vision Australia and The Australian and Literacy and Numeracy Foundation. This report considers the challenges facing First Nations peoples with regards to the Digital Divide, specifically in light of the COVID-19 pandemic and changes to the delivery of

⁷ Department of Finance, [Media consumption and communication preferences of Aboriginal and Torres Strait Islander audiences](#), Australian Government, September 2014, p.5

⁸ Source: Department of Finance, [Media consumption and communication preferences of Aboriginal and Torres Strait Islander audiences](#), Australian Government, September 2014, p. 24.

education. The report found that one in four First Nations households do not have access to the internet, not only limiting access to education, but also to job opportunities, eHealth and Government services.⁹

While the ADII does not capture data from remote Indigenous communities, it found that overall, *Indigenous Australians living in urban and regional areas have relatively low digital inclusion and recorded no increase over the past year. In 2020, Indigenous Australians' ADII score remains 55.1 and is 7.9 points below the national average. Affordability is a key issue, driven by a disproportionately high use of mobile-only and prepaid connectivity, which carries higher costs per gigabyte than fixed connections.*¹⁰

The ADII also found that in 2020, Indigenous Australians recorded an Access score of 68.5, compared to the overall national score of 76.3. Limited access to the NBN is highlighted as a key reason behind the lower access score, while relative expenditure per household was also raised as a core barrier.¹¹

Longer term, the ADII has found that:

*Since 2014, the digital inclusion gap between Indigenous Australians and the national average has fluctuated. The gap peaked in 2015 at 10.1 points and was at its lowest in 2018 at 6.1 points. In the past year the gap has widened from 6.8 points to 7.9 points. Overall, the 2020 digital inclusion gap between Indigenous Australians and the national average (7.9 points) is narrower than it was in 2014 (8.8 points).*¹²

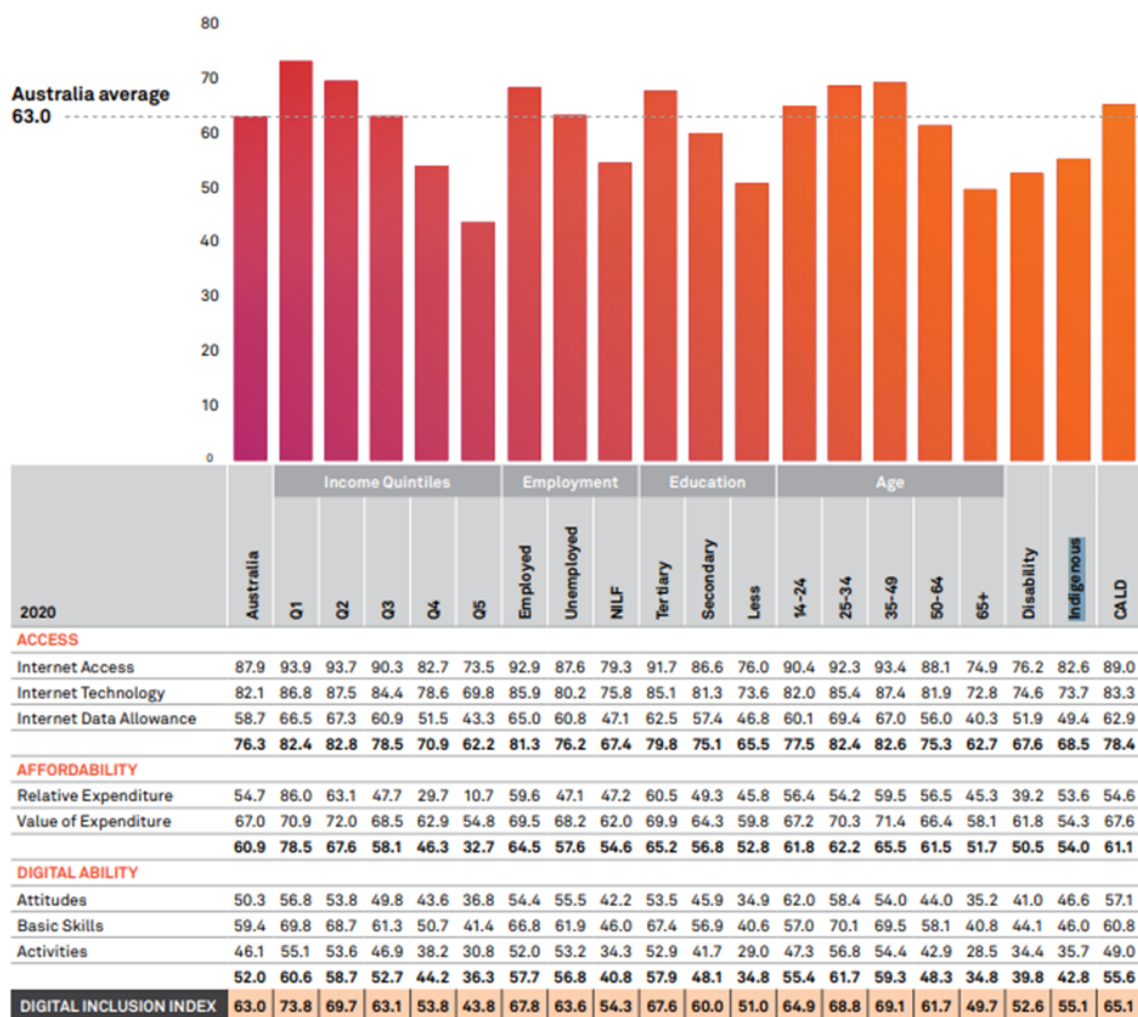
⁹ World Vision Australia and The Australian and Literacy and Numeracy Foundation, '[Connecting on Country](#)', 2021, p. 4.

¹⁰ J Thomas, J Barraket, CK Wilson, I Holcombe-James, J Kennedy, E Rennie, S Ewing, T MacDonald, '[Measuring Australia's Digital Divide: The Australian Digital Inclusion Index 2020](#)', RMIT and Swinburne University of Technology, Melbourne, for Telstra, p. 7.

¹¹ Ibid. p. 19.

¹² Ibid.

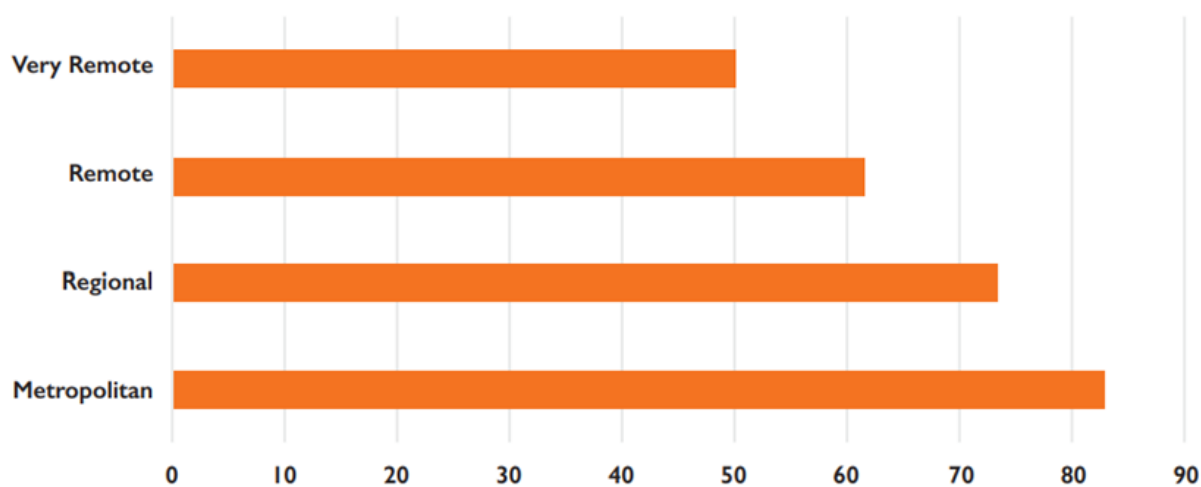
Figure 3: Australia: Digital inclusion by demography (2020)¹³



Source: Roy Morgan Single Source, March 2020.

Remoteness is also a significant contributing factor behind internet access.

Figure 4: 2016 Census First Nations peoples' online access by remoteness



¹³ Source: J Thomas, J Barraket, CK Wilson, I Holcombe-James, J Kennedy, E Rennie, S Ewing, T MacDonald, [Measuring Australia's Digital Divide: The Australian Digital Inclusion Index 2020](#), RMIT and Swinburne University of Technology, Melbourne, for Telstra, p. 21

According to the Australian Bureau of Statistics:

In 2016, nearly three quarters (72%) of Aboriginal and Torres Strait Islander households had at least one person access the internet from the dwelling, compared with 84% of other households. This could have been through a desktop/laptop computer, mobile or smart phone, tablet, music or video player, gaming console, smart TV or any other device.

The proportion of Aboriginal and Torres Strait Islander households able to access the internet from their dwelling in 2016 was highest in urbanised areas. The Australian Capital Territory reported the highest proportion of households (85%) able to access internet from their dwelling, followed by Victoria (78%), and Tasmania (77%). Aboriginal and Torres Strait Islander households in the Northern Territory reported the lowest (55%).¹⁴

In this context, the importance of television services for the provision of information is amplified by the lack of internet access with VAST services playing a particularly important role in the provision of televised news and information.

Consideration of VAST services

FNMA notes the Green Paper does not refer to Viewer Access Satellite Television.

In 2018, VAST was servicing 200,000 households and over 30,000 travelers. These users were predominantly in regional and remote Australia.¹⁵ While listed in the [Department of Infrastructure, Transport, Regional Development and Communications' 2020-21 Portfolio Budget Statements](#), the costing for the program's extension is listed as not for publication.¹⁶

However, it is stated in the [2020-21 Budget](#) that:

The Government will provide funding over four years from 2020-21 to extend the Viewer Access Satellite Television program to ensure around 700,000 Australian viewers who are currently unable to receive terrestrial digital broadcasting services can continue to access free-to-air television services.

*The costs of this measure will be partially met from within the existing resources of the Department of Infrastructure, Transport, Regional Development and Communications.*¹⁷

The [Indigenous Communications and Media Survey](#) asked questions concerning the use of VAST, as well as challenges associated with it.




¹⁴ Australian Bureau of Statistics, '[2011.0 - Census of Population and Housing: Reflecting Australia - Stories from the Census, 2016](#)', 31 October 2017.

¹⁵ Department of Infrastructure, Transport, Regional Development and Communications, '[Review of the Viewer Access Satellite Television \(VAST\) service](#)', *Australian Government*, 29 May 2018, accessed 19 April 2021.

¹⁶ Infrastructure, Transport, Regional Development and Communications Portfolio, '[Portfolio Budget Statements 2020-21, Budget Related Paper No. 1.10](#)', p. 30.

¹⁷ Budget 2020 – 2021, '[Budget 2020 - 2021: Budget Paper No. 2: Part 2: Payment Measures](#)', 6 October 2020, p. 144.

Figure 5: Technology access - television¹⁸

		TOTAL		Nett	Demographic				3G	No 3G
		Indigenous Population		Regular Listeners	Men	Women	18-39	40+	3G	No 3G
		No.	Pop:	15,820	9,742	9,927	12,951	6,718	5,142	3,531
Indigenous Population Aged 18+		Sample:		177	105	113	119	99	92	58
	TV	n= 19,669		%	%	%	%	%	%	%
	Own	15,914	81%	83%	82%	80%	78%	87%	85%	61%
	Share at home or community centre	676	3%	2%	3%	4%	5%	1%	2%	0%
	Access friend's or relatives	744	4%	4%	2%	6%	6%	0%	3%	7%
	Do not use at all	2,457	12%	12%	14%	11%	13%	12%	12%	32%
	Net accessible	17,212	88%	88%	86%	89%	87%	88%	88%	68%
		Sample: 205		167	99	106	114	91	92	58
	VAST TV (Percentaged in NT, SA & WA only)	n= 16,828								
	Working and in use	10,790	64%	71%	65%	64%	62%	68%	58%	35%
	Doesn't work or is not in use	1,800	11%	8%	14%	7%	11%	9%	10%	26%
	Don't own	3,851	23%	18%	21%	25%	24%	20%	29%	33%
	Don't know	388	2%	2%	0%	4%	2%	2%	3%	7%
CAUTION SMALL SAMPLE SIZE		Sample: 22		15	14	8	10	12	10	10
	Reasons for VAST TV not working	n= 1,800								
	Satellite dish on roof damaged or missing	222	12%	20%	7%	21%	18%	0%	0%	24%
	Set top box (UEC box) missing or damaged	1,079	60%	39%	77%	29%	70%	37%	43%	54%
	Smartcard missing or damaged	205	11%	19%	5%	24%	3%	32%	11%	16%
	Smartcard needs to be reactivated	85	5%	8%	0%	13%	7%	0%	16%	0%
	Cable between set top box and satellite dish missing	45	3%	4%	4%	0%	4%	0%	9%	0%
	Don't know	163	9%	10%	7%	12%	0%	30%	22%	5%

Q1a. Which of these do you own or have access to at home (shared) at a friend or relative's home?

Q1e. Do you have a VAST TV Receiver? (Government provided satellite dish and set top box in your home, installed in or around 2013)?

Q1f. What is wrong with your VAST receiver?

VAST is still relied upon significantly as a transmission for television services in regional and remote areas. For example, Indigenous Community TV has been funded as a full-time, satellite-delivered television service through the support of the Australian Government since 2012.

ICTV has since expanded to provide a multi-platform service with the addition of their on-demand internet-based service, ICTV PLAY, and the new resource, inLanguage. ICTV's in-house productions, live broadcasts, commissioning and outsourcing are integral elements of ICTV's overall service. ICTV provides important access to cultural and locally-produced video content and more recently to television news in Indigenous languages. ICTV programs up to 100 different Indigenous languages and 50 per cent ICTV television programming is in an Indigenous language.

The repair and maintenance of VAST receivers and associated infrastructure has been an ongoing challenge since the rollout of the technology. There is currently no coordinated support for maintaining television services to remote households, causing significant interruption to the flow of news and other essential information in remote communities. FNMA recommends that some of the funds raised through the sale of television spectrum be allocated to continue VAST services for a minimum of 5 years and to undertake urgent repairs and maintenance for the delivery of VAST services to individual houses.

¹⁸ Source: McNair Ingenuity Research, [Remote Indigenous Communications and Media Survey](#), Indigenous Remote Communications Association, 25 November 2016, p. 16.

First Nations media response to the COVID-19 Pandemic

The importance of services such as ICTV was apparent during the initial COVID pandemic response. ICTV produced a total of 27 individual messages, the majority in language, about the importance of remaining on community and hygiene practices and broadcast them repeatedly across the network. ICTV has broadcast a total of 58 individual messages since the beginning of the pandemic as pro bono community announcements. In addition, a significant number of paid spots were scheduled on ICTV specifically addressing the pandemic response for communities. ICTV worked closely with Yirara College in providing a daily education program, Yirara2U, via ICTV and ICTV Play, for Yirara students that were sent back to community that did not have access to internet.

The National Aboriginal Community Controlled Health Organisations (NACCHO) recognised the vital role First Nations media organisations played in keeping Indigenous Australians safe and informed during the critical phase of the pandemic.

Like many other businesses and organisations, FNMA members were impacted negatively by COVID. The First Nations media sector was under increased pressure within relatively small teams to deliver essential information services to First Nations communities deemed particularly vulnerable to COVID-19-related deaths. First Nations media organisations remain at the frontline of the response to the COVID-19 pandemic, working extended hours for months to ensure communities had the information they needed, in a manner audiences could understand.

First Nations media organisations immediately transitioned their operations to facilitate remote broadcasting and increasing hygiene processes for workspaces to protect their teams' health. At the same time, broadcasters faced a significant increase in workload to effectively respond to rolling announcements and relay information specific to Aboriginal and Torres Strait Islander audiences. This included a significant increase in translation requirements and a fast turn-around on information such as the closure of remote communities which was undertaken with 12 hours-notice.

Summary of contextual information

The information presented here is intended to give a clear picture of why First Nations media matters in the broader context of Australian media reform. First Nations licensed television services attract both First Nations and non-Indigenous audiences, providing a clear alternative to commercial and mainstream public broadcasters through storytelling and reporting from a First Nations perspective. *'Showing Our Way'* is the catch-cry of ICTV. This role is well established in audience research data.

First Nations communities are particularly impacted by digital inclusion in relation to the delivery of media services. This should be a key consideration when approaching regulatory reform relating to online forms of screen broadcasting.

The importance of VAST services and the role of First Nation television stations in responding to the COVID-19 pandemic is highlighted as background information relevant to considerations television regulation in Australia.



Responses to Specific Issues Raised

Technical matters relating to re-purposing of spectrum

FNMA defers to the Community Broadcasting Association of Australia (CBA) submission in relation to the re-purpose of spectrum for television. FNMA supports the extension of existing community television licenses throughout the proposed timeline for planning and spectrum reallocation arrangements for television moving to a multiplex model similar to digital radio. However, FNMA cautions the Government to act on lessons learned during the implementation of digital radio by maintaining equitable spectrum for essential community services, such as First Nations broadcasting which contributes to the social cohesion outcomes the Government seeks.

Access to digital radio space has proven difficult from both a spectrum availability and affordability perspective in some markets and we would seek to avoid these issues in relation to television spectrum by adopting a principle based approach to spectrum allocation. FNMA advocates for First Nations control over broadcast infrastructure and content in all instances possible. Weakening the community-controlled aspect of the broadcast chain by requiring a multiplex transmitter relationship with other broadcasters steps First Nations broadcasting further from the principles of self-determination and would therefore be a concern to FNMA.

Support for public interest journalism

The availability of local news and information services is an important policy objective, reflected as a priority for FNMA through our sector's call for action to [strengthen news services](#). Similarly, the objective of making Australian stories available on television, including First Nations stories, is important not only to reflect our society as a whole, but also in the process of truth-telling.

FNMA supports the Green Paper's aims of:

- supporting the free-to-air television sector to move to a sustainable operating model, in both metropolitan and regional Australia;
- reducing the regulatory imbalance between free-to-air television and internet-based competitors;
- securing a new funding source to support Australian news and Australian content; and
- sustaining the continued delivery of news and other Australian content across different platforms that Australians view.

FNMA welcome moves to secure further funding to support Australian news and content and continued delivery of news and content across viewing platforms. This must include First Nations produced news and content. Native American journalism scholar Bryan Pollard noted,

*Indigenous media does more than distribute news. It serves as a community forum that can help reinforce cultural values and languages. Ultimately, it holds the potential to reaffirm an Indigenous community's identity.*¹⁹

First Nations Media Australia has identified opportunities for future employment expansion in community news and journalism. We share the Government's concerns at the reduction of localised

¹⁹ B Pollard 2020 <https://www.americanindianmagazine.org/story/Indigenous-media>

news services in regional and remote Australia. The First Nations media sector has needed to fill the gap in news and weather services for many remote and regional communities, as the ABC has scaled back its local news and weather coverage for these less populous areas over the past five years. First Nations Media Australia seeks to increase the news and current affairs capacity of First Nations broadcasters both to address this geographic deficit at a national level and to increase the diversity of news reported.

Journalism must include the full range of First Nations media voices in mainstream media and in First Nations radio, television, print and online news services. A news capacity building project has been implemented to foster collaboration between existing news services and develop opportunities for employment for both cadet journalists and experienced reporters. This project has already successfully trained community journalists who are making and sharing content. A national multimedia platform for sharing news content is currently in development.

ICTV has received limited funding from Indigenous Languages Australia for a pilot Community News service in language and has recently broadcast its first programs. The news service is employing and training journalists and technical staff and has been very well received by the audience.

The challenge with these services is to move beyond short term grant funding to a more sustainable and long term funding model that will allow not just the news service but the employment and training opportunities to develop beyond the scope offered by a limited funding life.

Employment Opportunities

First Nations content production aligns with Government objectives for Indigenous employment and growing Indigenous tourism through promotion of filming locations. It is important that equitable portion of the funding generated through these reforms is allocated to community television production to benefit producers at the community level. This will support the growth of First Nations content and employment opportunities in the sector. Small budget productions assist in developing new talent and skills that flow into all sectors of the media industry.

The First Nations media industry currently resources 43 organisations and over 120 licensed services with between 500-600 staff around 79% of whom are Aboriginal and Torres Strait Islander people. This includes part-time and casual employees, working in organisations in urban, regional and remote locations.²⁰ Approximately 28 per cent of those positions are full time, with 72 per cent are part-time or casual.²¹ While primarily a function of budget restrictions, this workforce structure allows flexibility to meet the discrete needs of workers in different settings. Social Ventures Australia noted, “Broadcasters offer flexible working arrangements in culturally safe environments. They create work opportunities that are aligned with the interests of individuals, and there is pride associated with working for these organisations.”²²

The majority of employees in the First Nations media sector are employed as broadcasters and administrators. However, the sector also provides opportunities for employment as technicians, IT

²⁰ Clague, P, Employment and Skills Development Strategy Report, Jumbunna Institute of Indigenous Education and Research, December 2018

²¹ Survey Matters, Financial Health of Community Radio Survey, Community Broadcasting Association of Australia, October 2017

²² Social Ventures Australia, November 2017

specialists and a broad range of audio and screen production roles. The First Nations media industry has responded to an evolving media landscape by expanding operations beyond traditional radio and television broadcasting to include newer communication formats such as podcasting, online formats such as websites, streaming and social media publication. Audiences demand multimedia content delivery, which has resulted in the expansion of media worker skills to a broad range of screen, online and audio formats which in turn generates employment and economic development opportunities.

First Nations media organisations draw on the skills developed for broadcasting to broaden income sources and retain staff. For example, Goolarri Media in Broome offers commercial film production services, training services and runs events such as the internationally recognized Kimberley Girl Program and A Taste of Broome annual tourism event.

The First Nations media industry has strong links with a broad range of creative industries, providing a platform for the promotion and career development of First Nations musicians, entertainers and artists. First Sounds is one example of a partnership between First Nations Media Australia's indigiTUBE platform and the Community Broadcasting Association of Australia's Amrap project to increase airplay for First Nations musicians, resulting in economic benefits to both the musicians and the broader music industry. Indigenous musicians and film producers benefit from mentorship and the facilities available to them through First Nations media organisations. Social Ventures Australia found that, "other stakeholders experiencing significant value from Indigenous Broadcasting Services include employees, volunteers, Indigenous musicians, artists and the Australian Government. Value was split relatively evenly across outcomes themes, which reinforces the interrelationship of outcomes."²³

Barriers to content production

FNMA commends the Government's approach to seeking new ways to support Australian content production. The primary barrier to growth across the First Nations Media sector is access to funding. First Nations media organisations around the country have consistently met and/or exceeded the objectives of various funding programs for up to 40 years, ensuring continued funding support. While this support has been welcomed and has provided a stable base for media organisations to develop supplementary income streams, they are still largely reliant on Government funding and are unlikely to become independently sustainable.

While First Nations media organisations derive some income through sponsorship (including Government messaging), production services, translation services and other specialist expertise, they generally operate in regions and low socio-economic demographics with little commercial appeal.

Over the past 15 years, economic pressure and a shift to online campaign delivery has resulted in shrinking sponsorship income opportunities. While funding support has been relatively stable, Australian Government funding for the Indigenous broadcasting sector has not increased in real terms since 2006-07.²⁴ This is despite the number of First Nations media organisations increasing

²³ Social Ventures Australia, November 2017

²⁴ Australian Government, Review of Australian Government Investment in the Indigenous Broadcasting and Media Sector, 2010

significantly and the demand for funding more than doubling since 1996. The effect of a stagnant funding environment has been a continual squeeze on operational funding with service delivery costs rising (electricity, wage rates, rent, etc) and audience expectations expanding such that media organisations who are funded to deliver radio only, must deliver multiplatform content to retain audience currency. A lack of CPI increases over the past decade has meant a loss of around \$4.4m to the sector in real terms.

First Nations screen content makers also face similar funding constraints. There is enormous unmet demand for funding of First Nations screen content. The NIAA has not provided funding for television content production leaving remote services reliant on alternative means to fund content production through language or youth programs not really intended for media production purposes. Screen agency guidelines often exclude community productions through previous experience requirements for projects targeted toward feature film productions. Funding sourced through the Department of Communications and distributed via the Community Broadcasting Foundation is significantly oversubscribed. In 2019-20 more than \$530,000 was applied for through the Community Broadcasting Foundation across 19 applications - only 10 applications were successful for a total funding allocation of \$131,700.

A new transparent and accessible funding model that is inclusive to First Nations media resulting from the reforms proposed in the Green Paper would be welcomed by FNMA. In fact, we see it as an imperative. Prioritising support for First Nations produced content, including public interest journalism, provides the Government with an opportunity to demonstrate a real commitment to media diversity in Australia.

PING Program

Restricting a portion of the proceeds from the auction of digital dividend spectrum to PING and CAST as outlined in the Green Paper would have minimal benefits for First Nations media organisations. In its current form, all licensed community media (including Indigenous radio and television) would be excluded from the PING program. FNMA suggests guidelines for the PING program be broadened to include all news entities and community media broadcasters/producers.

Any expansion of PING, and capitalisation of CAST, must include FNMA representation in consultations, to ensure First Nations media organisations and individuals needs and circumstances are reflected in any funding guidelines and so barriers to participation are not incorporated into the operations of the proposed funding vehicles. FNMA considers the First Nations media sector a key stakeholder in the design of guidelines and subsequent distribution of funding to support public interest journalism and/or Australia content production for television.

The PING Trust should include First Nations representation, including from the community media sector. We have distinct requirements and operating environments, as outlined in this submission, and these need to be reflected if a PING is to meet its aims of supporting public interest journalism. FNMA recommends a separate, third pool in CAST be established to focus on community and independent productions and/or adjustments to the Screen Australia eligibility criteria requirement for screen credits which does not acknowledge ICTV or other narrowcasters as a career pathway. This would enable First Nations individuals and organisations to apply in an equitable but still competitive environment. It would also provide a career pathway for emerging producers to feed

into larger budget production agencies, growing their skills and experience to engage in screen industry processes.

Alternatively, FNMA advocates that part of the monies raised through the sale of spectrum be allocated to grant-making process similar to that of Indigenous Languages Australia or the Community Broadcasting Foundation (CBF) for community and First Nations' produced content. These organisations already have structures established to operative competitive funding processes for community production. Currently CBF only has funding capacity to meet about one-third of the demand for community-produced content. The allocation of more funding for distribution to community broadcasters, run via competitive grant rounds would enable more sustainable growth and development in the First Nations media sector.

Content Production & Archiving Activities

The First Nations media sector's call for action seeks the establishment of an [annual content production fund](#). The capacity for content production in the sector has been significantly compromised by the loss of video content funding through changes to the Indigenous Broadcasting Program in 2007 and inadequate funding under the Indigenous Advancement Strategy flowing to broadcasting. An annual competitive funding pool would enable increased production outputs, improved production values and opportunities for integrated training of First Nations media producers and industry placements.

In addition, the Australian Government may like to consider allocating some of the funds raised from the sale of spectrum into protecting the investments it has made into First Nations media over the years through supporting digital archiving.

FNMA has developed a National Archiving Plan and developed resources to assist First Nations organisations to archive important cultural, historical and language resources. We have received funding to establish a facility that will be used as training and support for First Nations community audio visual collections in Alice Springs. But, like all media, the First Nations media sector is up against a deadline in 2025 to retain materials recorded around the country over the past 40 years. New Zealand is active in its archiving and protection of Maori screen content, particularly in regard to access and the protection of intellectual property. The projects not only protect and ensure the future longevity of important cultural resources, the materials are also utilised by scholars and researchers.

Australia has a wealth of recorded materials in the libraries and storerooms of First Nations media organisations but without rapid action to preserve the resources, they will be lost. Utilising some of the funds from the reforms to save this rich resource would be a wise investment.

Closing the Gap

As part of the new National Agreement on Closing the Gap, a target has been set around First Nations people having access to information and services enabling participation in informed decision-making regarding their own lives. It states by 2026, First Nations people have equal levels of digital inclusion.

This Access to Information target measures Aboriginal and Torres Strait Islander people's access to the information and services that can enable participation in informed decision-making about their lives. This target will measure improvements in Aboriginal and Torres Strait Islander people's access to the internet and digital inclusion, accessibility of online services, and the availability and use of culturally relevant media. Progress toward achieving this target will have a positive enabling effect on other Closing the Gap outcomes including health, social and economic outcomes.²⁵

In line with this target, FNMA would support the reform proposals including the provision of reporting on the amount of First Nations' content funded and produced by all major television outlets as part of their Australian content obligations.

Such a provision would support employment growth and opportunities for First Nations content makers, journalists and technical operators and assist in developing the industry and commercial opportunity. It would also reflect First Nations' stories and experiences as part of the wider cultural representation.



Summary of Responses to Issues

FNMA's position is that the unique circumstances and interests of First Nations media organisations and consumers must be taken into account when framing these media reforms. Our organisations must have equitable access to funding and revenues generated through a new licensing framework. If they are not, media reform risks leaving First Nations people and organisations with little to no benefit and may in fact erode a sector that is looking to build and expand, supported by an engaged audience base. Failure to include First Nations interests in the reforms also risks creating a larger digital divide and may impact on Closing the Gap reforms that rely on a robust First Nations media sector to disseminate important information regarding social and economic programs and policies.

FNMA is pleased to see the Government recognizing and acting on policy objectives to support public interest journalism and Australian content and applauds the intention to spend revenue raised to support public policy initiatives for media. This could include protecting investment in media over the past 40 years through urgently needed support for archiving, annual content funding to drive increased Indigenous employment and important truth-telling outcomes for the nation, support for First Nations journalism as public interest journalism and the provision of funds to support community-level productions that contribute to the diversity of Australian media and provide career pathways for emerging media workers. FNMA would support the collection and public reporting of data on First Nations content production as part of Closing the Gap data measures to demonstrate linkages between increased Australian content production and increased job opportunities for Aboriginal and Torres Strait Islander producers.



²⁵ <https://www.closingthegap.gov.au/people-have-access-information-and-services-enabling-participation-informed-decision-making>