

The Public Interest News Gathering (PING) Trust: Addressing the Need for Media Diversity in Australia and Lessons from Abroad

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EXECUTIVE SUMMARY

This Paper has two key research aims. They are:

1. **To assess to what extent the proposed PING Trust will address the concerns raised in the current Senate Environment and Communications References Committee regarding Media Diversity in Australia.**
2. **To assess whether similar overseas models have effectively helped fund Public Interest Journalism, and what amendments could be suggested to the proposed PING Trust based on feedback from other jurisdictions.**

To address these research aims, this paper analysed 15 key submissions and accompanying oral evidence to the Inquiry. The submissions were analysed for: Issues raised; Evidence or examples given to confirm the presence of such issues; Recommendations made; and Other notes or points of information relevant to the PING Trust. Three elements of the PING Trust proposal were examined: its funding source, its implementation timeframe, and its proposed governance structure. The known and unknown elements were revealed and discussed in reference to the Inquiry findings. Finally, two key case studies were explored: the Canadian Local Journalism Initiative and the United Kingdom's Local Democracy Reporting Service. When analysing the case studies, the elements of the PING Trust that are as yet unknown were focused upon for the purposes of assisting the recommendations process for the PING Trust. They were Funding Source, Funding size, funding duration, governance, focus/purpose, predominant funding use, and outcomes to date.

This Paper finds that there are four key issues facing the provision of PIJ in Australia. Two are practical issues: Decline in advertising revenue; and regulatory imbalance. Two are 'manifested issues' resulting from PIJ closure: reduction in the quantity of PIJ production; and reduction in geographical and/or cultural representation. Regulatory imbalance would not be fixed by a Grant system. However, decline in advertising revenue, and issues resulting from it, could be directly and effectively relieved by a grant program.

The Paper also finds that the PING Trust proposal in its current form has not provided enough information to inform whether or not it would address these concerns. However, it has potential to address almost all concerns provided with the right governance, and size. However, the issue of the funding timeline remains a significant barrier, and more urgent funding is needed than the current 3+ year timeline through funding by the Spectrum Auction.

The two case studies provide examples of how the trust could be governed, and the outcomes that can be expected from different funding models. The Local Journalism Initiative's method of involving industry non-profits is an excellent idea, but providing each non-profit with large discretion over their funding has led to bias problems. The BBC's Local Democracy Reporting Service is an excellently sized and planned fund, although its governance structure cannot be replicated in Australia.

This paper concludes that the PING Trust has the potential to support the provision of non-profit, independent PIJ as a public good. The Trust will be successful, provided that:

- Appropriate representatives of industry bodies and non-profits are elected to the central board, and set funding pools and outcomes are agreed upon and allocated accordingly.
- The funding is allocated to the areas of the PIJ industry according to need, as outlined by the Inquiry
- The funding is of sufficient size and duration. This Paper recommends the creation of an investment fund of \$300 million, which will fund PIJ into the future through investment returns.

This Paper is limited by its research resources and length restrictions. It has only considered a small portion of the Senate Inquiry Findings, and condensed down significant overseas case studies into brief summary form. However, it can be taken as an important preliminary summary of the Inquiry issues, a concise assessment of the PING Proposal in relation to these issues, PING Proposal in relation to these issues, and an outline of a viable Grant funding model based on the key features of overseas models.

This paper concludes that the PING Trust has capacity to alleviate issues faced by PIJ providers who have either suffered a loss of advertising revenue, and the resulting 'flow-on' issues from these financial problems. The Trust's greatest chance of success lies in creating an ongoing investment fund, with an independent board comprised of leaders of industry bodies and non-profits, and separate funding pools that can address different needs within the industry.

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INTRODUCTION

This Paper has two key research aims. They are:

1. **To assess to what extent the proposed PING Trust will address the concerns raised in the current Senate Environment and Communications References Committee regarding Media Diversity in Australia (“the Inquiry”).**
2. **To assess whether similar overseas models have effectively helped fund Public Interest Journalism, and what amendments could be suggested to the proposed PING Trust based on feedback from other jurisdictions.**

This paper focuses on issues facing PIJ provision. PIJ is defined most simply as news which ‘the public has a right to know’.¹ There are two news categories that fall under this: Independent or investigative journalism (which exposes wrongdoing by Central Government or corporate officials); and regional or local news (which keeps citizens informed of issues particular to them and their electorate). This Paper will thus focus on the problems facing both categories of Public Interest Journalists and News-Gatherers.

The key messages of this paper are that the PING Trust has capacity to alleviate issues faced by PIJ providers who have either suffered a loss of advertising revenue, or are failing to begin PIJ operations in the current financial climate. The trust will also alleviate the resulting ‘flow-on’ manifested issues from these financial problems. However, the Trust will only succeed if it:

- Secures a reliable funding source and creates an ongoing investment fund,
- Governs the fund with an an independent board comprised of leaders of industry bodies and non-profits, and
- Ensures separate funding pools that can address different needs within the industry, with priority given to PIJ provision in areas with the biggest contractions.

‘Public interest journalism gives people the information they need to take part in the democratic process. It informs and contributes to policy and practice. It holds power to account, and amplifies the voices of those who are not well served by the current distribution of power.’

Croakey Health Media, Submission No 24 to Senate Environment and Communications References Committee

‘Public interest journalism may be defined as that class of journalism that provides citizens with a bedrock of reliable information that enables them to participate in political, economic and social life. Its most important constituents are those which are concerned with the exercise of power, with the functioning of parliament, executive government, the judiciary and local authorities, and with the revelation of matters which otherwise would remain undisclosed, what is called investigative journalism.’

The Centre for Advancing Journalism, University of Melbourne, Submission No 64 to Senate Environment and Communications References Committee

¹ Carson, Andrea, ‘Explainer: what is public interest journalism?’ *The Conversation*, (Webpage, 15 June 2017) <<https://theconversation.com/explainer-what-is-public-interest-journalism-78996>>.

CONTEXT

Government Intervention in Public Interest Journalism

In the presence of market failure that cannot support the production of PIJ, its view as a 'public good' that must be funded by the government has grown.² The Australian Government shows early signs of commitment to this responsibility. Concerns about the purity of a free and independent media are still frequently raised in rebuttal of this proposition.³ If the government subsidises media, then the provision of news may not be independent.⁴ However, in the operation of the free market, Australia is facing Media monopolisation, news 'deserts', misinformation, and popular division through partisan platforms. Thus, the free market has created just as many problems as it has allegedly meant to solve. This paper wishes to investigate solutions to these problems through of government assistance that retains media independence.

The Purpose and Scope of this Paper, and the Inquiry into Media Diversity in Australia

This Paper's starting point is the Inquiry into Media Diversity in Australia, which began in the Senate Environment and Communications References Committee upon referral on 11 November 2020. This Inquiry aims to provide a platform for evidence of all issues that affect media diversity in Australia. Examples Include:

- The Murdoch News Outlet Monopoly, and the political ramifications of this Monopoly;⁵
- The dissemination of Australian News content on Google and Facebook and the different regulatory models required to balance this dynamic;⁶
- The economic issues facing independent and local news production (Public Interest Journalism), both due to competition and imbalance in regulation across the industry.⁷

Due to the sheer breadth of the inquiry, this paper will focus on issues specific to Public Interest Journalism (PIJ), which is a subset of media production as defined and illustrated in Figure 1.

² Barnett, Steven, 'Journalism, Democracy, and the Public Interest: rethinking media pluralism in the digital age' (Working Paper, Reuters Institute for the Study of Journalism, September 2009).

³ Merschetz, Paul Clemens, 'State Aid for Independent News Journalism in the Public Interest? A Critical Debate of Government Funding Models and Principles, the Market Failure Paradigm, and Policy Efficacy' (2020) 8(6) *Digital Journalism* 720.

⁴ Ibid.

⁵ See for example Evidence to Senate Environment and Communications References Committee, Parliament of Australia, Main Committee Room, Parliament House, Canberra, 12 April 2021 (Malcolm Turnbull).

⁶ See for example Australian Competition and Consumer Commission, Submission No 48 to Senate Environment and Communications References Committee, Parliament of Australia, *Inquiry into Media Diversity in Australia* (3 December 2020).

⁷ See for example GNM Australia Pty Ltd, Submission No 13 to Senate Environment and Communications References Committee, Parliament of Australia, *Inquiry into Media Diversity in Australia* (December 2020).

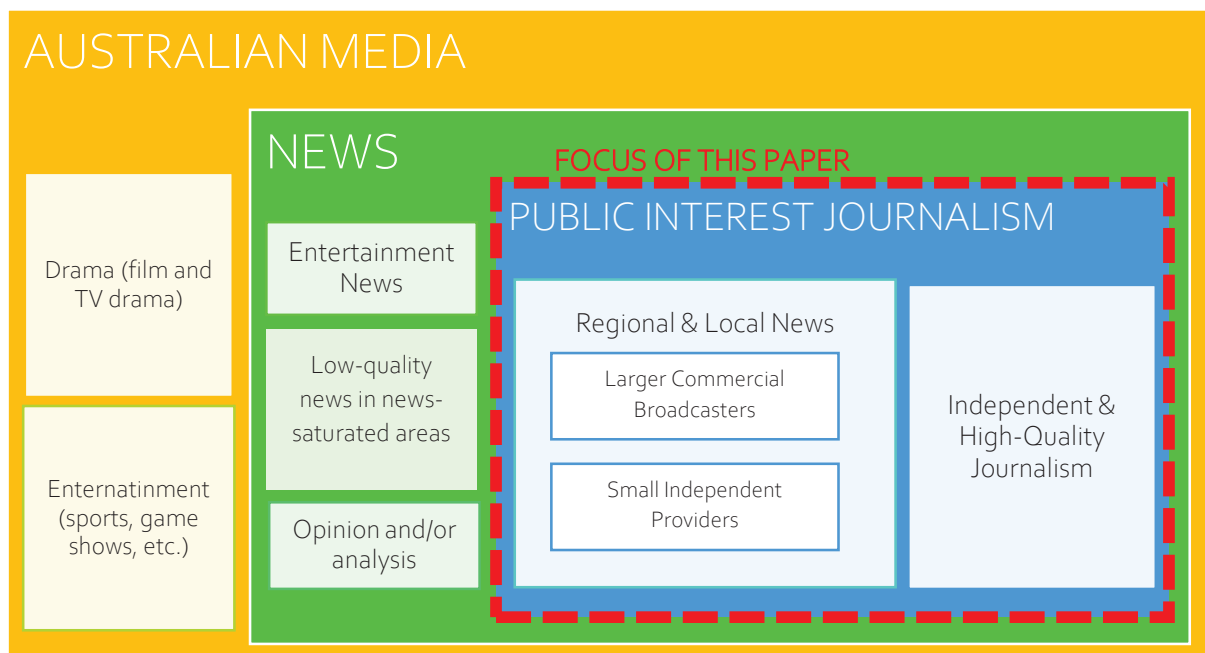


Figure 1: Breakdown of the Focus of this Paper Showing Public Interest Journalism in Context with the Broader Media Landscape

The PING Fund, The Green Paper, and the PING Trust

This paper will discuss the way in which reform outlined by the Department of Infrastructure, Transport, Regional Development and Communications (the Department) in the Media Reform Green Paper (the Green Paper) of December 2020 will address the concerns raised by Public Interest Journalists in the Inquiry. The PING Trust is an element of reform contained within the Paper.

The Green Paper states the Trust will provide a grant program for Public Interest News Gatherers. The PING Trust has its genesis in the PING Grant, which was a \$50 million dollar emergency fund given to Public Interest News Gatherers during the COVID Pandemic.⁸ The PING Grant was distributed directly by the Government with an emphasis on high-quality journalism and regional providers.⁹ The Trust poses as a longer term funding source serving similar areas of the industry as the PING Grant.

However, many details of the Trust are undetermined as the Department asks for consultation on the Green Paper. There is thus opportunity for this Research Paper to provide consultation based on both the concerns raised in the Inquiry and funding models overseas.

⁸ Department of Infrastructure, Transport, Regional Development and Communications, Government of Australia, 'Relief for Australian Media During COVID-19', *Australian Government Department of Infrastructure, Transport, Regional Development and Communications, Government of Australia* (Web Page, 2021) <<https://www.communications.gov.au/what-we-do/television/relief-australian-media-during-covid-19>>.

⁹ Ibid.

Overseas Models

The concerns raised in the Inquiry, and the solution posed in the PING Trust, are not unique to Australia. Countries with similar media and political landscapes have experienced similar problems amongst their Public Interest Journalists.¹⁰ The funding models implemented overseas can thus provide useful feedback for the PING Trust. For this reason I have picked two case studies, the UK (which has implemented a Local Democracy Reporting Service) and Canada (which has a Local Journalism Initiative amongst other funding models). These countries provide two useful case studies as they have a similar political and social structure to Australia that poses the most similar problems to Public Interest News Providers.

KEY ISSUES RAISED IN THE SENATE INQUIRY INTO MEDIA DIVERSITY IN AUSTRALIA

Focus and Treatment of Inquiry Evidence

The Inquiry received 864 submissions.¹¹ As discussion of each submission is beyond the scope of this paper, this Paper instead focused on 15 key submissions (see Appendix 1), consisting of:

- 5 submissions from PIJ providers (or groups of providers);
- 7 submissions from non-profits or industry bodies; and
- 3 submissions from individuals (or groups of individuals).

Initial choice of submission was based off of the programs for the first three Inquiry hearings on the 19th of February, the 12th of March and the 12th of April 2021. Where available, accompanying transcripts from the hearings were considered alongside written submissions.

The remaining chosen submissions were consistently referenced or discussed in the initial chosen submissions. In this way, the chosen subset of submissions is relevant and authoritative given the limited nature of this Paper. As such, the media of the chosen submissions included 1 oral only, 7 written only, and 6 both written and oral submissions.

Once chosen, each submission was analysed for four different elements:

1. Issues raised;
2. Evidence or examples given to confirm the presence of such issues;
3. Recommendations made; and
4. Other points of information relevant to the PING Trust Model.

These four points of each paper were then summarised into the key findings below.

¹⁰ See for example Cairncross, Frances, and UK Government, *The Cairncross Review: A Sustainable future for journalism* (Final Report, 12 February 2019).

¹¹Department of Parliamentary Services, 'Media Diversity in Australia' *Parliament of Australia*, (Web page, 2021)

<https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/MediaDiversity>.

Practical Issues

Decline in Advertising Revenue

The problem/issue	<ul style="list-style-type: none"> The emergence of social media and other digital technologies has reduced the economic viability of funding PIJ through traditional advertising.
Particular PIJ providers affected	<ul style="list-style-type: none"> Both commercial and non-profit broadcasters and providers
Reccomendations made	<ul style="list-style-type: none"> Create a Fund that could supplement lost revenue or assist the development of non-profit models for public interest journalism.
Other notes or opposing views	<ul style="list-style-type: none"> Large commercial providers no not wish to transition to a non-profit model.

Figure 2: Summary of Decline in Advertising Revenue

Decline in advertising revenue was an issue facing almost all providers of PIJ. Many PIJ providers used to rely heavily, if not solely, on advertising revenue to fund news.¹² With the rise of the internet, advertising markets such as printed classifieds have moved online.

Turning instead to the growing digital advertising market has been attempted. However, this market is currently dominated by Google and Facebook, with the ACCC stating that \$81 out of every \$100 spent on digital advertising went to one of the two companies in 2019.¹³ PIJ Provider the Guardian stated in its submission that its digital advertising revenue has been ‘flat’ for three years despite the growth of the industry.¹⁴ It is unlikely in the current market that digital advertising will be able to supplement the role that traditional advertising played.

Whilst the digital bargaining code requires remuneration for Australian News content being displayed on Google and Facebook, it does not directly address the large share of digital advertising market that Google and Facebook enjoy. As the News Media and Digital Platforms Mandatory Bargaining Code passed after submissions to the Inquiry closed, discussion regarding the impact of the code beyond this point cannot be conducted in this Paper.

With the reduction of traditional advertising, and the digital advertising market unlikely to provide a replacement, this leaves a fundamental hole in the economic viability of producing Public Interest Journalism.

¹² See for example GNM Australia Pty Ltd (n 4).

¹³ Australian Competition and Consumer Commission (n 3).

¹⁴ See for example GNM Australia Pty Ltd (n 4).

Regulatory Imbalance

The problem/issue	<ul style="list-style-type: none"> Digital and online content providers are not subject to the same regulatory requirements as broadcasters. These place restrictions on content standards and Australian Content requirements
Particular PIJ providers affected	<ul style="list-style-type: none"> Commercial Broadcasters (TV and Radio) that operate on traditional platforms
Reccomendations made	<ul style="list-style-type: none"> Amend the <i>BSA</i> to provide traditional boradcasters more freedom
Other notes or opposing views	<ul style="list-style-type: none"> Providing broadcasters with more freedom will potentially weaken the quality of commercial broadcasting. Imposing more regulation on digital platforms could also equalise the balance, though this would be harder to implement.

Figure 3: Summary of Regulatory Imbalance

An issue raised by commercial broadcasters and their industry bodies was regulatory imbalance between traditional broadcasters and digital platforms. For example, Commercial Radio Australia explained that digital content providers have no obligations to ensure certain levels of Australian content are represented, and face no restrictions on political advertising.¹⁵ In their submission, the Prime Media Group, Southern Cross Austereo, WIN Network and Imparja Television stated that regulations creating the ‘one-license to a market’ rule and the ‘voices test’ under the *Broadcasting Services Act* prevent investment and growth across their industry, and that their digital competitors face no such impediments.¹⁶

These two bodies also stated that, contrary to other PIJ providers, ongoing Government funding is not a solution, and instead regulatory change to the broadcasting licenses is the only way that traditional broadcasting platforms can remain commercially viable.¹⁷ However, the goal of Community Radio Australia and the TV broadcasters is different to that of other PIJ providers. These broadcasters wish to provide regional news in a profitable business model. This differs from other providers and industry bodies such as the AAP, the Guardian, Croakey Health Media, or the Public Interest Journalism Initiative, whose goal is to provide PIJ in a non-profit or ‘public good’ context. Within the PIJ sector, different issues are faced. Different reforms are needed to address the different goals of providers.

¹⁵ Commercial Radio Australia, Submission No 25 to Senate Environment and Communications References Committee, Parliament of Australia, *Inquiry into Media Diversity in Australia* (December 2020).

¹⁶ Prime Media Group, Southern Cross Austereo, WIN Network and Imparja Television, Submission No 39 to Senate Environment and Communications References Committee, Parliament of Australia, *Inquiry into Media Diversity in Australia* (December 2020). (‘*TV Broadcasters Submission*’).

¹⁷ Commercial Radio Australia (n 12); TV Broadcasters Submission (n 13).

Manifested Issues

Reduction in Quantity of Public Interest Journalism Produced

The problem/issue	<ul style="list-style-type: none"> • The number of newsrooms around Australia has been declining since 2008 and was exacerbated by the COVID-19 pandemic. • The number of people in journalism-related professions has also declined amidst job cuts related to closures.
Particular PIJ providers affected	<ul style="list-style-type: none"> • Predominantly small/independent providers, also predominantly in regional areas.
Reccomendations made	<ul style="list-style-type: none"> • Establish a Fund to ensure important PIJ providers remain in operation and encourage new PIJ entrants. • Provide tax rebates to alleviate the cost of producing PIJ.
Other notes or opposing views	<ul style="list-style-type: none"> • There has been a greater decline in traditional print media than in other media.

Figure 4: Summary of Reduction in Quantity of Public Interest Journalism Produced

The first issue evidenced in the submissions that has resulted from the economic issues facing PIJ Providers has been a reduction in the quantity of PIJ produced. For example, the ACCC evidenced in their submission that 106 local and regional newspapers closed from 2008 to 2018. The PIJI stated that this reduction has exacerbated since, with 182 contractions to newsrooms (masthead or station closures, or suspension of services) recorded in the last 2 years. The ACCC further evidenced that the number of people in journalism-related occupations has fallen by over 9% since 2006, and traditional print journalism has fallen by at least 26%.¹⁸

The concentration of remaining media also affects the quantity of public interest journalism produced. Comparing 2005 to 2018, the remaining major metropolitan and daily Newspapers, primarily owned by NewsCorp, reported on 28% fewer articles on local government, 40% fewer articles on local courts, and 42% fewer articles on science. These are all topics relevant to PIJ.

A decrease in the quantity of PIJ creates a number of flow-on problems. For example, according to the PIJI submission, 68% of contractions occurred in regional areas.¹⁹ The issue of contraction thus compounds geographical representation issues (detailed page 11).

¹⁸ Australian Competition and Consumer Commission (n 3).

¹⁹ Public Interest Journalism Initiative, Submission No 79 to Senate Environment and Communications References Committee, Parliament of Australia, *Inquiry into Media Diversity in Australia* (January 2021).

Reduction in Diversity and/or Geographical Coverage

The problem/issue	<ul style="list-style-type: none"> • Closure of regional newsrooms is leaving some local areas without coverage of local issues • Closure or merging of independent newsrooms is leaving both metropolitan and regional areas with higher media ownership concentration and without bipartisan news.
Particular PIJ providers affected	<ul style="list-style-type: none"> • Smaller and/or independent providers, particularly in regional areas
Recommendations made	<ul style="list-style-type: none"> • Provide for funding and other measures (such as Direct Gift Recipient Status) to establish a non-profit PIF sector. • Ensure the production of PIJ as a public good outside of the ABC and SBS.
Other notes or opposing views	<ul style="list-style-type: none"> • This also affects important ethnic and cultural representation across Australian media. Increased media concentration is associated with increased concentration in Anglo-celtic representation.

Figure 5: Summary of Reduction in Diversity and/or Geographical Coverage

The fourth issue raised in the submissions was the reduction in geographical coverage of local and regional news. As mentioned, 68% of contractions in newsrooms in the last 2 years have occurred in regional areas. This issue is distinct from a simple reduction in the quantity of PIJ produced as it creates its own unique issues. It means that the operations of entire councils or local governments have no media scrutiny or public knowledge. Broader social aims such as community spirit, connection, and celebration are also lost.

Both contraction and loss of geographical coverage weakens the opportunity for cultural and ethnic diversity in PIJ. Proportional to the population, there is currently over-representation of Anglo-Celtic reporters and under-representation of non-European and Indigenous backgrounds.²⁰

The provision of, and access to, PIJ is thus facing four main issues: decline in advertising revenue, regulatory imbalance, resulting reduction in the quantity of PIJ produced, and resulting lack of diversity and geographical representation. The PING Trust has potential to address these issues, and the extent to which it will do so is the next focus of this paper.

²⁰The Conversation Australia and New Zealand, Submission No 7 to Senate Environment and Communications References Committee, Parliament of Australia, *Inquiry into Media Diversity in Australia* (2020).

THE GREEN PAPER AND THE PING TRUST PROPOSAL

The Green Paper outlined parts of the Trust in quite specific terms, and others in quite broad terms while it asks for consultation on the proposed reforms. This Paper discusses three elements of the proposal which will determine the Trust's success.

Funding via by Spectrum Auction

The proposal states that the Trust will be funded by a radiofrequency spectrum auction. The spectrum, currently used by media broadcasters, will be auctioned to telecommunications companies after a 'spectrum stacking' process. Detailing the technicalities of spectrum stacking and auction are beyond the remit of this Paper. In short, the Green Paper outlines a plan in which the 5 television networks in each market would be consolidated from 5 to 3 spectrum multiplexes. This would free up a portion of 600MHz spectrum for auction to telecommunications companies.

Spectrum sales in other countries have yielded billions of dollars. A sale of a similar amount and frequency of spectrum in the US yielded over \$19.8 billion USD,²¹ and in Canada yielded over \$3.4 billion CAD.²² Thus, it is likely that a spectrum auction in Australia would generate at least \$1 billion AUD, which is sufficient to create the PING Trust.

However, the spectrum stack would be optional to broadcasters, and as such the spectrum auction is not guaranteed. It must also be noted that this plan would involve:

- Costs for broadcasters incurred when upgrading to the required transmission technology and equipment;²³
- Unprecedented channel-sharing arrangements between networks that would share spectrum;
- Reduction in the number of television channels able to be offered (although it is not known by how much);²⁴
- Limited scope for expansion, and even potential reduction, in picture quality;²⁵
- Potentially complex arrangements for existing contracts between broadcasters and distributors when new multiplex broadcasting licences are rolled out, and;
- A transition period in which services would be disrupted.²⁶

To mitigate these detractors, the Government will incentivise the optional move to the new multiplex sharing arrangements through new broadcasting licence arrangements. The Government also states that spectrum stacking would benefit broadcasters, namely through

²¹ Federal Communicators Commission, 'Broadcast Incentive Auction and Post-Auction Transition' *Federal Communicators Commission* (Webpage, 9 May 2017) <<https://www.fcc.gov/about-fcc/fcc-initiatives/incentive-auctions>>.

²² Sarkissian, Haig and Berge Ayvazian, 'The Canadian 600 MHz Spectrum Auction by the Number (Analyst Angle)' *RCRWireless News* (Webpage, 15 April 2019) <<https://www.rcrwireless.com/20190415/americas/canadian-600-mhz-analyst-angle>>.

²³ Ibid 29.

²⁴ Tanner, Giles and Jock Given, 'Television on the Line', *Inside Story* (Webpage, 8 December 2020) <<https://insidestory.org.au/television-on-the-line/>>.

²⁵ Green Paper (n 20) 25; Tanner and Given (n 22).

²⁶ Green Paper (n 20).

financial savings through sharing infrastructure and the costs associated with transmission and power.²⁷ The additional incentives are:

- No commercial broadcasting tax;
- No Australian content obligations on ‘multichannels’ (secondary channels), although the content obligations would remain on primary channels.
- A contribution to the costs (unknown how much) of moving to the shared multiplex arrangements made after the spectrum auction.²⁸

It is unknown if the incentives outlined by the government are enough to guarantee the spectrum stacking and auctioning process. Thus, whilst a spectrum auction would create enough revenue to create a Trust, there is no guarantee of securing this revenue if broadcasters are not incentivised to participate in spectrum stacking. On top of the uncertainty of relying on the implementation of the spectrum stacking process for the creation of the Trust, it is unknown:

- how much of the money raised from the spectrum auction will be used to create the Trust;
- how much of this money will be allocated each year; and
- how long the trust will be in operation.

These are key details that will determine the scale of this Trust and its strength as a source of funding for the industry.

Implementation 3 years away

The next element of the proposal to be examined is the timeline of implementation. The Government has stated that, provided that all broadcasters transition to the new broadcasting licence immediately (which is unlikely, given the issues with incentivising the move), the spectrum restack could be completed in 18 months to two years. The spectrum auction would take place at least 12 to 15 months later.²⁹ Thus the earliest the Trust will be created is in 2.5 years’ time. Given the aspirational nature of that timeline, the Trust will realistically be created in at least 3.25 years.

Administration by a PING Trustee

Finally, the totality of the Government’s proposal for the governance of the Trust is that it:

‘could be administered by a dedicated PING Trustee (an incorporated entity), with a board including people with relevant industry and subject matter expertise. The board would have oversight of the Trust’s operation, be responsible for funding decisions, and have regard for prevailing market conditions.’³⁰

This leaves questions as to how people would be appointed to the board, and leaves unanswered much of the operation of the Trust, such as how beneficiaries would be chosen, how funding would be balanced between Radio, TV, Print and digital providers, new entrants versus established providers, and regional/remote versus investigative or metropolitan news provision.

²⁷ Department of Infrastructure, Transport, Regional Development and Communications, Government of Australia, *Media Reform Green Paper* (Paper No. 1, 1st December 2020) (*‘Green Paper’*), 25.

²⁸ *Ibid* 29.

²⁹ *Ibid* 25.

³⁰ *Ibid*.

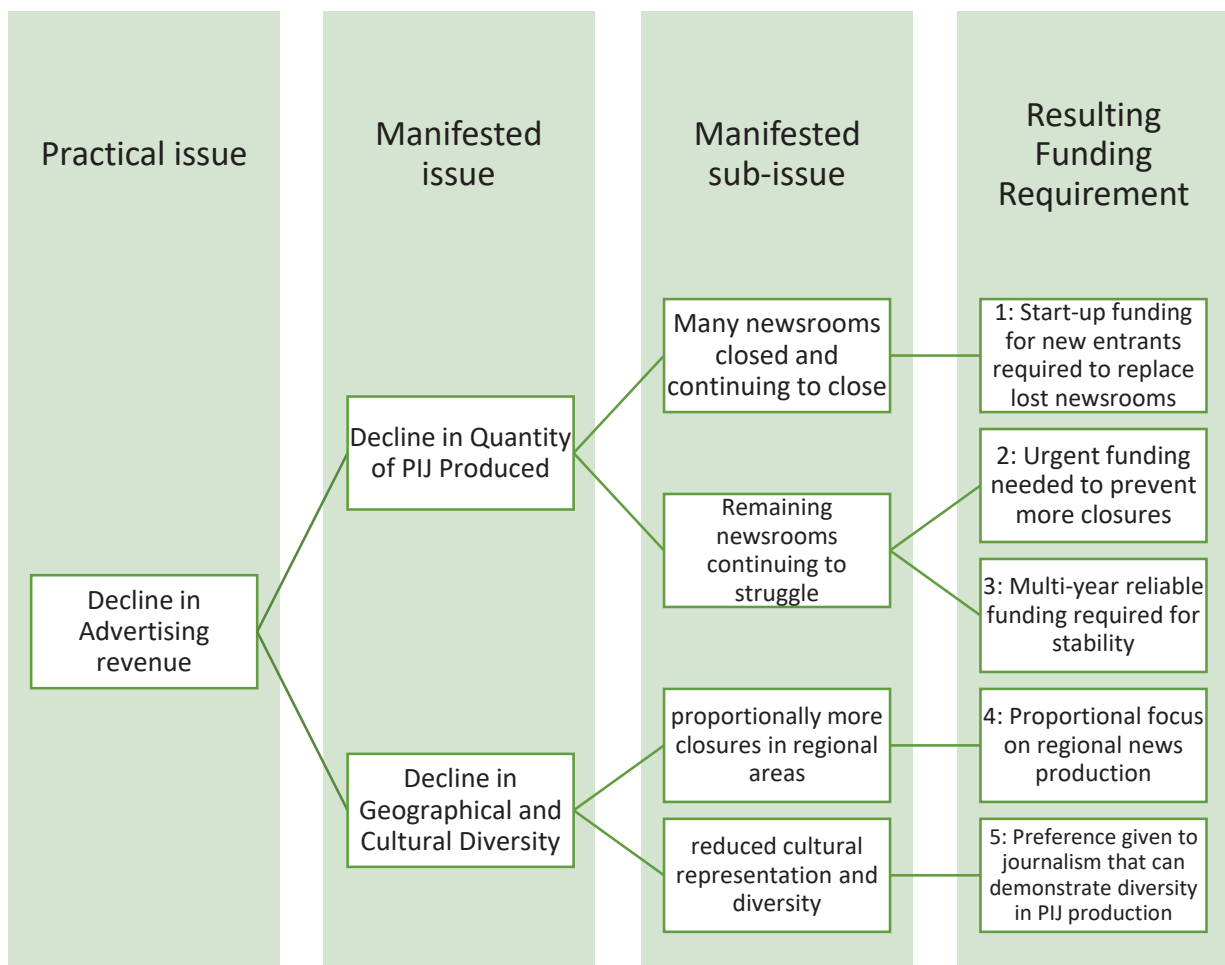
Whilst more information from the Government is needed regarding the operation of the Trust, the present lack of information provides opportunity for the issues raised in the Inquiry to inform the consultation process. A summary table, from which analysis on solutions can be based, is presented below:

Public Interest News Gathering (PING) Trust Proposal Details			
Element	Known	Unknown	Outstanding Issues
Funding Source	Funding will come from a portion of Spectrum Auction proceeds, following a Spectrum Stacking Process.	1. Whether the current benefits available will encourage broadcasters in enough numbers to allow the stacking process to occur 2. When the Spectrum Auction would occur and when the Trust would be created from proceeds (in at least 3 years).	The spectrum stack may not occur at all. If it does go ahead, the timeline for implementation of the Trust will need to be known by the PIJ industry.
Funding Size	Spectrum Auctions overseas have consistently yielded billions of dollars, so adequate funding would be raised to create a large Trust.	1. How much of the proceeds from the Auction will be contributed towards the creation of the Trust 2. How much funding would be made available each year.	The scale of the Trust will significantly impact its success and strength as a funding source
Funding Duration	That the funding would be available 'over time'.	How long the Trust would be in operation.	The duration of the funding must also be known in order for the industry to plan effectively for its future post-Trust.
Governance	Could involve an independent (incorporated) Trustee Board, consisting of people with industry experience, which would oversee the Trust and decide on beneficiaries.	How board members would be appointed, and how this board would decide upon beneficiaries.	The make-up of the board will influence the operation of the Trust, particularly with regard to deciding beneficiaries.
Funding Focus/Purpose	Has been left open for consultation. Emphasis given to direct employment of journalists or training of cadets, and priority given to regional Australia.	What the final arrangements for funding will be, and how these will be decided upon.	There are different areas of the industry that the Trust could service depending on these procedures, and the findings from the Media Inquiry should inform these procedures.

THE EXTENT TO WHICH THE TRUST WILL ADDRESS THE ISSUES IN THE SENATE INQUIRY

From the outset, it is clear the PING Trust will not serve some PIJ providers. In their submissions, Commercial Radio Australia, the Prime Media Group, Southern Cross Austereo, WIN Network and Imparja Television were vocal about the fact that they aim to produce regional and local journalism for profit. A continuous ‘Government handout’ was not a solution for running a profitable business model.³¹ Their main financial burden, regulatory imbalance, would thus not be served by the PING Trust model beyond the minimal reduction to content obligations offered to incentivise spectrum stacking.

However, for the remaining PIJ sector, who wish to provide local or investigative journalism in a non-profit capacity, a Government Fund was consistently recommended in submissions to the Inquiry. The largest financial issue that these smaller providers face, a loss of advertising revenue, can be supplemented by government funding program such as the PING Trust. The relationship between this main issue, subsequent issues, and ways in which the PING Trust could intervene is thus as follows:



³¹ Commercial Radio Australia (n 12); TV Broadcasters Submission (n 13).

The adaptability of the current PING Trust proposal could accommodate most, if not all, of these funding requirements facing PIJ. This has been explored in below:

Funding requirement	Could the current proposal assist the problem?	How could the Trust be informed/amended to provide assistance?	What elements of the PING Proposal need guaranteeing?
1: Start-up funding for new entrants required to replace lost newsrooms	Yes	Set aside a portion of funding to provide one-off payments to new entrants.	Enough funding to create multiple pools of beneficiaries.
2: Urgent funding needed to prevent more closures	No	EITHER Source the funding for the Trust in a different way- one in which funding and implementation can be guaranteed - OR pledge ongoing emergency funding until the Trust can be implemented.	EITHER a new funding source, OR the guaranteed implementation of the spectrum stacking, a timeline for doing so, and emergency funding until implemented.
3: Multi-year reliable funding required for stability	Yes	Set aside a portion of funding for multi-year (eg: 3-5 year) funding guarantees for established media organisations.	Enough funding to operate the Trust for a number of years, and ensure multiple pools of entrants.
4: Proportional focus on regional news production	Yes	Proportionally allocate initial funding according to geographical loss, and prioritise new entrants in 'news deserts'.	Board implementation of a beneficiary decision process that would take this into account.
5: Preference for journalism that can demonstrate diversity in PIJ production	Yes	Prioritise PIJ providers that can demonstrate diversity, or provide PIJ to underrepresented segments of society.	Board implementation of a beneficiary decision process that would take this into account.

This analysis thus informs several key findings:

- that the PING Trust is able to help with certain areas of the PIJ industry experiencing loss of revenue from reduction in advertising; but
- that a substantial and secure funding source, and concrete governance, is required for the Trust to be effective so that it may create multiple entrant pools.

LESSONS FROM OVERSEAS MODELS

The last function of this Paper is to examine overseas PIJ funding models to see if they may inform the finer details of the PING Trust. For this reason this Paper discusses two case studies, the UK and Canada. These countries provide the two most useful case studies as they have a similar political and social structure to Australia. They also have a similar media landscape to Australia that poses the same problems to Public Interest News Providers in terms of lost advertising revenue and media concentration.

Canada

The Local Journalism Initiative in Canada is Canadian Heritage Fund. A summary of the Canadian Local Journalism is presented below.

Local Journalism Initiative (Canada)			
Element	Details	Positives	Negatives
Funding Source	Canadian Heritage (Canadian Government) Fund	This is a positive acknowledgement of the Government for the need of this funding.	The funding <i>decisions</i> will need to be sufficiently independent from the government if the journalism is to be trusted as impartial (as it will need to be with the PING Trust)
Funding Size	\$50 Million CAD	This is an adequate start to addressing the problems facing PIJ.	This is not enough to provide a sustainable solution for the industry.
Funding Duration	5 Years	This timeframe provides more than simple emergency relief, and allows PIJ Providers time to find other funding sources.	Still does not provide a permanent, long-term solution.
Governance	7 non-profit organisations representing different segments of the News Industry: News Media Canada, Association de la presse francophone, Quebec Community Newspapers Association, National Ethnic Press and Media Council of Canada, Community Radio Fund of Canada, Canadian Association	This creates independence between the government source and the recipients, and places funding decisions with industry professionals. Placing decision-making with professionals with this kind of expertise will be essential if the PING Fund will retain confidence in its independence.	Each non-profit organisation has allocated its funding differently, even when using similar standards for decision making. NewsMedia Canada has been accused of allocating a disproportional amount of funding to NewsPapers (93 of 105 recipients), even though most independent local news outlets operate digitally

	of Community Television Users and Stations, and Fédération des télévisions communautaires autonomes du Québec ³²		in Canada. Several 'local' newspapers given funding are owned by large media outlets, raising concerns about funding going to undeserving recipients. ³³
Funding Focus/Purpose	To increase local civic journalism in underserved communities ³⁴	These kinds of communities are the most in need of access to PIJ.	Independent and investigative journalism must also be supported.
Predominant funding use	Hiring of Journalists or Paying Freelance Journalists to Produce Local News. ³⁵	Ensuring the presence of journalists on-the-ground was a recommendation made in the Australian Inquiry. ³⁶	Minority-language services may not be the only areas of PIJ in need of urgent funding, particularly in the presence of geographical news deserts. It also has not supported start-ups, only established news organisations. ³⁷
Outcomes to date	106 Journalists hired in the first year.	This is a significant provision of service.	There is still room for expansion, particularly given the geographical size and diversity of Canada.

The key learning from the Canadian Initiative is that:

- The initiative fails to support start-up providers, which means that new local PIJ providers are not service. This is needed in an Australian context to replace lost PIJ.
- Each of the seven non-profit organisations appointed as administrators allocated their funding differently and preferred media (between radio, screen etc) differently. So whilst outsourcing the administration to industry non-profits is a great idea to ensure both independence and industry expertise of the fund governance, ensuring consistency and equal distribution between media is a good lesson to incorporate into the PING model.

³²Canadian Heritage, 'Local Journalism Initiative', *Government of Canada* (Web Page, 19 June 2020) <<https://www.canada.ca/en/canadian-heritage/services/funding/local-journalism-initiative.html>>.

³³Sarah Scire, 'In Canada, a government program to support local news tries to determine who's most deserving' *NiemanLab* (Webpage, 8 May 2020).

³⁴Ibid.

³⁵Ibid.

³⁶Ibid.

³⁷Deja Leonard, 'Is Canada's Local Journalism Initiative effectively addressing news deserts?' *Indiegraf* (Webpage, 4 September 2020) <<https://indiegraf.com/indie-publisher/is-canadas-local-journalism-initiative-effectively-addressing-news-deserts/>>.

United Kingdom

In the UK, the Local News Partnerships which are funded by the BBC comprise multiple projects, the most relevant of which is the Local Democracy Reporting Service. A summary of the Local Democracy Reporting Service is presented below.

Local Democracy Reporting Service (United Kingdom)			
Element	Details	Positives	Negatives
Funding Source	Currently comes out of the budget of the BBC, which itself is funded by the television licencing fee. ³⁸	This provides relatively secure funding for the continuous provision of PIJ.	This cannot be implemented in Australia, which does not have an equivalent funding source for the ABC/SBS.
Funding Size	£8,000,000 p/a ³⁹	This is large amount of funding. It has capacity to make a genuine contribution to the industry.	This funding is shared over all three BBC projects – it is unclear how much of this goes to the LDRS.
Funding Duration	12 years ⁴⁰	This is a significant amount of time. This will allow future industry planning for beyond the funding.	PIJ may need government support as a public good even beyond this.
Governance	BBC provides the funding for the journalists, who are hired by, and work for, local news organisations. The Program is subject to periodic review from the BBC.	A centralised agency that ensures the funding but removes itself from the oversight of the program ensures consistency of funding decisions whilst remaining independent of the product. The review process allows the program to be adjusted as it develops.	Organisational bias can influence decision making. Ensuring some level of cross-institutional representation may lead to a more accurate address of the needs of the industry.
Funding Focus/Purpose	Local democracy reporting in regional areas – reporting on local government, council, and civic matters.	This is an important element of PIJ that has particularly suffered in Australia.	Approximately 90% of the contracts went to 'local' newspapers that were in fact owned by three large publishers. The first review of the program stated that the

³⁸ BBC, 'A review of the BBC Local News Partnership' (Review Paper, BBC, 2020).

³⁹ George, Tara, 'How the BBC quietly built one of the world's largest collaborative journalism efforts focused entirely on local news' *Centre for Cooperative Media, Monclair State University* (Webpage, 31 October 2018) <<https://medium.com/centerforcooperativemedia/how-the-bbc-quietly-built-one-of-the-worlds-largest-collaborative-journalism-efforts-focused-7adfe27819f2>>.

⁴⁰ Ibid.

			program should expand to be more inclusive of smaller local publishers. ⁴¹
Predominant funding use	Funding Independent local Journalist positions	Again, ensuring the presence of journalists on-the-ground was a recommendation made in the Australian Inquiry.	There are other ways in which funding could be provided in a more flexible (and thus useful) way to new entrants, etc.
Outcomes to date	Currently 130-140 journalists employed at any one time. ⁴²	This is one of the largest scale services of its kind in the world. ⁴³	There could still be room for expansion (which is in fact the BBC's goal)

There are several key learnings from the UK model:

- The size and duration of the funding is a) possible, and b) suitable for implementing a project of the size that Australia needs given its geographic size and cultural and linguistic diversity. Ensuring the consistency and availability of this kind of funding should be a goal for the PING Trust;
- Periodic review of the program allows for the program to be improved in the long term; and
- The funding governance should be centralised (for example, into a 'board' structure as proposed by the government) but institutional diversity needs to be reflected in the governance.

These models provide us with examples of other liberal democratic nations that provide PIJ funding, and the scale and duration of funding required for appropriate outcomes. Australia should aim to at least match the scale and duration of these funding models, particularly the UK model, for its own PIJ sector.

⁴¹ David Sharman, 'BBC report calls for smaller publishers to be able to recruit more LDRs' *HoldtheFrontPage.co.uk: News, Jobs, Courses and resources for UK Journalists* (Web Page, 29 June 2020) <<https://www.holdthefrontpage.co.uk/2020/news/make-democracy-reporter-scheme-fair-for-smaller-publishers-bbc-says/>>.

⁴² BBC (n 35).

⁴³ George (n 36).

RECOMMENDATIONS AND CONCLUSION

Recommendations

In light of the modes of Governance of the Canadian and UK funding models, the following recommendations are made to the Governance of the PING Trust:

- **The PING Trust be governed by a central board, but Trustee Board members** be appointed from **industry bodies** that represent **areas of the PIJ industry the Trust aims to serve**, particularly bodies that represent local, regional and/or diverse media, as in the Canadian Model.
- **A set purpose be allocated** for the funding that would be set and **provided by the Trust** but **administered by the host organisation**, provided the funding outcomes **meet pre-determined standards**. This follows the UK's LDRS scheme. However, unlike the LDRS there could be **several funding purposes possible**, such as hiring journalists, training cadets, or purchasing infrastructure/equipment.

In view of the submissions made to the Inquiry and learning from the overseas models, the following recommendations are made regarding the prioritisation of Trust funding:

- **Separate funding pools** for both **new entrants** and **existing providers**, with **one-off, 'boost' grants** and **longer, multi-year grants** within each pool.
- Proportional allocation according to recent loss of media (ie: **prioritisation of civic journalism in regional areas** followed by consideration of independent and/or investigative PIJ providers).
- Funding priority given to organisations with a demonstrated and **visible commitment to cultural and ethnic diversity**.
- **An independent review** of the funding distribution efficacy after the first two years of implementation, and every three years after, to ensure the funds are being allocated in the most effective, impactful way.

In view of the size and scale of the PIJ funding models in Canada and the UK, This Paper recommends

- That the Government **invest a capital fund of \$300 million** (which is a **small portion of the projected revenue from the spectrum auction**) to create an **ongoing grant program** funded by investment returns. To use a simplified example, the average investment return for Australian shares over the last 10 years has been 6.5%.⁴⁴ Even with a **conservative projection** of 5% a year, a sum of \$300 million would generate **\$15 million a year, indefinitely**, for PIJ. This is in line with the size of the BBC's LDRS.
- This kind of funding model would create a lasting **legacy for the Government**. It would **also drastically reduce ongoing funding required from the government** to the sector in the future. This would have to come from the 'public purse'.

⁴⁴ Australian Securities and Investment Commission, 'How to choose your investments', monetsmart.gov.au, (Webpage).

Finally, in light of the urgency or funding required in Australia's PIJ industry, I furthermore recommend:

- **Continued emergency funding of at least \$10 Million AUD per annum until the Trust can be implemented.** The emergency funding could continue to service the same areas of the industry as the COVID-19 PING Grant until the PING Trust program can begin.

Conclusion

This Paper had two key research aims. They were:

1. **To assess to what extent the proposed PING Trust will address the concerns raised in the current Senate Environment and Communications References Committee regarding Media Diversity in Australia ('the Inquiry').**
2. **To assess whether similar overseas models have effectively helped fund Public Interest Journalism, and what amendments could be suggested to the proposed PING Trust based on feedback from other jurisdictions.**

To complete these research aims, this Paper presented and summarised the issues facing Public Interest Journalism in Australia as evidenced in the current Senate Inquiry. The Paper outlined the four main issues discussed in the Inquiry: decline in advertising revenue, regulatory imbalance, reduction in the quality of PIJ produced, and reduction in the geographical representation and diversity of PIJ.

This paper also analysed the current proposed solution to this problem – the PING Trust outlined in the Green Paper. The Paper assessed the extent to which the current proposal could accommodate the concerns raised in the Inquiry. The PING Trust will not fix the regulatory imbalance facing commercial broadcasters. However, it does have the potential to provide a minimum level of Public Interest Journalism as a 'public good' to the Australian People by independently funding non-profit or charitable providers.

Finally, the Paper gathered information from overseas models in the UK and Canada to further inform the governance, size and duration of the PING Trust. The Canadian Model highlights the importance of involving representative bodies of under-represented communities in the funding governance. The UK's Local Democracy service demonstrates the impact that substantial and sustained funding can have on the coverage of local councils.

The implementation of a functional PING Trust would be a legacy to leave as leaders in Parliament. This issue should be bi-partisan and a-political, as a healthy PIJ sector is vital to the health of Australian Democracy irrespective of political preference.

This paper contains the key message that the PING Trust will some alleviate issues faced by PIJ providers as raised in the Inquiry if it:

- Creates an investment fund to provide ongoing funding of a similar size of the UK's LDRS;
- Governs the fund with an independent board comprised of leaders of industry bodies and non-profits, and
- Ensures separate funding pools that assists priority groups first, but also ensures funding across both start-up and established news services that operate through a range of media.

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APPENDICIES

Appendix 1:

Submission Type	Submission Organisation	Written Submission Number	Accompanying Oral Testimony?
Provider	The Conversation	7	No
Provider	Australian Associated Press (AAP)	60	Yes
Provider	Prime Media Group, Southern Cross Austereo, WIN Network and Imparja Television	39	Yes
Provider	The Guardian	13	Yes
Provider	Croakey Health Media	24	No
non-profit or industry body	The Public Interest Journalism Initiative (PIJI)	79	No
non-profit or industry body	Journalism Research & Education Association Australia	37	No
non-profit or industry body	Centre for Advancing Journalism	64	Yes
non-profit or industry body	Media, Entertainment and Arts Alliance	26	Yes
non-profit or industry body	Community Radio Australia	25	No
non-profit or industry body	Australian Competition and Consumer Commission	48	No
non-profit or industry body	Australian Press Council	41	No
Individual	Monica Attard, Eric Beecher, Peter Fray, Bruce Guthrie, Wendy Harmer, Andrew Jaspan and Alan Kohler	10	Yes
Individual	Kevid Rudd	52	Yes
Individual	Malcolm Turnbull	N/A	Yes – Oral Only