



COMMUNITY
BROADCASTING
ASSOCIATION OF
AUSTRALIA

8 March 2024

Director, News and Journalism Section
Platforms and News Branch – Online Safety, Media and Platforms Division
Department of Infrastructure, Transport,
Regional Development, Communications and the Arts
GPO Box 594
Canberra ACT 2601

Dear Director

News Media Assistance Program (NewsMAP) Consultation Paper

Thank you for the opportunity to comment on this consultation paper.

Our sector in the Australian news landscape

The Community Broadcasting Association of Australia (the CBAA) represents 450+ not-for-profit community broadcasters across Australia, delivering 500+ radio services on AM, FM and DAB+ platforms, as well as streaming, podcasts and catch-up online, which are accessed and enjoyed by around 5 million Australians each week.

We share the concerns raised in the paper about pressures on the ongoing sustainability and diversity of Australian media and we need to ensure that our sector can continue to play a significant role in delivering trusted news to Australian communities. Our key concerns are summarised on page 2.

As recognised in the National Cultural Policy *Revive: a place for every story, a story for every place*, community broadcasting is a vital part of the Australian media landscape. Produced by over 17,800 volunteers and 1000 employees across Australia, community radio provides a lifeline and platform for diverse Australian communities including First Nations people, culturally and linguistically diverse communities, education, faith-based communities, people with disability, LGBTQIA+, youth and seniors. We are a key point of support for social cohesion and civic engagement.

It is a strategic priority of our sector's 10-year plan [Roadmap 2033](#) that "Broadcasters are connected and resourced to produce trusted, independent, locally relevant news and current affairs particularly for underserved communities".

Community broadcasting plays an essential role in local news, emergency resilience - particularly in rural and remote areas - and as a training ground for emerging talent in journalism/news production:

- o 158 community radio services are operated by 51 First Nations organisations across Australia;
- o Australians from Aboriginal and Torres Strait Islander background are 37% more likely than the general population to listen to community radio;¹
- o 77% of licensees are based in regional and remote areas;
- o news and information is the number one reason 62% of our listeners tune in to community radio²
- o community radio broadcasts in over 110 different languages;
- o 1.35 million Culturally and Linguistically Diverse (CALD) people listen to community radio (27% of total audience) for an average 16.5 hours per week;³ and
- o as recognised in the Royal Commission into National Natural Disaster Arrangements, community radio stations "offer an important source of information during emergencies, particularly for Australians living in remote communities"⁴ For case studies, see the CBAA's [Beyond Broadcasting](#) report.

¹ [Community Radio Listener Survey – Dec 2023](#)

² *ibid*

³ *ibid*

⁴ <https://naturaldisaster.royalcommission.gov.au>

Our sector plays a role in *Closing the Gap* Target 17, which references First Nations media and community-controlled media organisations, sources of news, diversity of content and employment opportunities in media.

More broadly, the work of our sector is completely aligned with and contributes to Government policy aimed towards a healthy and functioning Australian news sector.

Our key concerns

Our main contention in this submission is that the community sector's contribution needs to be understood and properly measured and that objectives, analysis and eligibility criteria for assistance need to be inclusive of our members.

Our key concerns about the future design of NewsMAP are that:

- Community radio news is included and properly measured in any assistance program.
- Gaps in definitions and evidence available in the ACMA's *Media Diversity Framework* or other sources should not disadvantage or disqualify community broadcasters who wish to apply under the program.
- Definitions of "professional standards" which are used as a threshold, for example in funding criteria, need to explicitly include the Community Radio Broadcasting Codes of Practice.
- Community radio data, such as the Community Radio Listener Survey conducted for the CBAA by McNair Yellow Squares, should inform evidence-based decision making and need to be considered along with other credible sources of evidence about the news market.
- NewsMAP should support longer term workforce development, with a view to building capacity in news production, and recognise and, where possible, support the launchpad role played by community radio.

We also refer to and support submissions made by the Community Broadcasting Foundation and Local and Independent News Association.

QUESTIONS ON DEFINITION AND SCOPE

We refer to your questions on page 6 of the consultation paper seeking feedback on definitions of "news", "journalism" and "public interest journalism" and whether the definition of "public interest journalism" in the ACCC Digital Platforms Inquiry Final Report 2019 p 285⁵ is appropriate.

We note the diversity of views on these questions over the years in different forums. The ACCC definition is inclusive of the important work done by community broadcasters, which is regulated by professional standards in the *Community Radio Broadcasting Codes of Practice* registered with the ACMA.

However, that definition may be too limited in its focus on "decision making at all levels of government" rather than on matters relating to citizenship and community engagement in daily life that may not directly concern government. We refer to broader definitions, including ACMA's definition of local public interest news which may more accurately capture the breadth of news that is important and significant to the community and which we believe is appropriate for support under NewsMAP.

As outlined in more detail below, community radio news may be produced in different ways and will often, due to the sector's large volunteer workforce, involve the work of volunteers or those who have not received professional journalism training.

We argue in several places below that organisational adherence to professional standards such as Codes of Practice should be the threshold, rather than assessment of the qualifications of particular individuals involved in journalistic production.

⁵ "Journalism with the primary purpose of recording, investigating and explaining issues of public significance in order to engage citizens in public debate and inform democratic decision making at all levels of government."

FRAMEWORK AND OBJECTIVES

1. Access

Q1.1 Is access to news the right objective?
Q1.2 How should the access objective be understood, and to what extent should this include access to, or availability of, news and journalism relevant to each level of government, including national, state/territory and local? What do citizens require at each level of government?
Q1.3: What are the appropriate roles for government and industry in pursuing this objective?

We agree the objective of access to news is appropriate. It should include access to issues concerning government at all levels but also access to information relevant to local communities that enable them to engage as citizens with local issues of importance, whether or not those issues concern government. It is appropriate for government to continue to ensure ongoing access to a diversity of news sources for the public benefit. Any definition of access should be centred around the most pressing news and information needs of Australian audiences and prioritise those whose needs are not reflected or served in existing mainstream media. Emergency news broadcasting is a critical resource for many Australian populations and should be considered a priority news category. The objectives should also take into account "access" in the sense of availability on the platforms where audiences are looking for news and information, which may for example, include on-demand apps of terrestrial services.

As outlined in our introduction, community broadcasters serve diverse communities and regions, many of which are underserved and/or underrepresented in other Australian media. Community broadcasting offers the unique ability to tailor news for the needs and interests of station's local communities of interest, as required their licences, including vital news during local emergencies.

The following case study shows why supporting locally-based and community-integrated journalism as a key point of access is critical and why limiting the definition to "government" can miss out on matters that are important to Australians in their daily lives:

Community broadcasting news-breaking

Community broadcaster, Ngaarda Media delivered award-winning coverage of the kidnapping of four-year-old Cleo Smith's and gave a voice to wrongly accused First Nations man, Terrance Flowers (who used the name Terrance Kelly on Facebook).

After Cleo Smith was taken from a campsite in Carnarvon Western Australia in late 2021, Channel 7 wrongly identified Mr Flowers as the alleged abductor by widely broadcasting a photograph of him across several news programs. The alleged abductor's name was spelled Terence Kelly, not Terrance, and the commercial broadcaster had not verified that the photo they sourced from social media was in fact an image of the other man. As a result, Mr Flowers suffered serious harassment online and locally.

Ngaarda Media was the first organisation to identify and report on the erroneous identification and did the first interview with Flowers when hospitalised as a result of panic attacks he experienced as a result of being wrongly linked to the disappearance of Cleo Smith.

Ngaarda Media's team including journalist Tangjora Hinaki demonstrated best practice skills in independently researching, investigating, and reporting on a story responsibly by offering correct information to audiences. Ms Hinaki said: "We broke this story. We led the national news and were proud to see our story on Media Watch".

Reference: Media Watch 8 November 2021

2. Quality

Q2.1: Is quality the right objective?
Q2.2: How should the quality objective be understood? Is it the same for all forms of journalism?
Q2.3: What are the appropriate roles for government and industry in pursuing this objective? Assessments about the quality of news content raise concerns about the independence and freedom of the press. What approaches might government consider to measuring, safeguarding and promoting the quality of news content? What content, procedural and organisational factors might be taken into consideration?

In principle, quality is a relevant and appropriate objective. Relevantly to our sector, the existing regulatory framework under the *Broadcasting Services Act 1992 (BSA)* ensures community broadcasting meets community expectations through the registration of the Community Radio Broadcasting Codes

of Practice with the ACMA. In recent years, the CBAA has consulted widely with its members, industry stakeholders and the ACMA to develop and submit proposed revised Codes of Practice to the ACMA for registration. These professional standards support the provision of quality journalism and meet contemporary expectations of Australian news consumers, as required under the BSA.

In terms of the approaches needed for government to “measure, safeguard and promote “quality news content”, we contend that threshold for any standard should be compliance with professional Codes of Practice, such as those registered for our sector. This will ensure that eligibility requirements or policy analysis underlying a NewsMAP program does not exclude the “quality news” or “quality journalism” produced by volunteers and non-professionals in community radio working under the supervision of professionals or within the framework of professional recognised ethical standards.

In this regard, we note that our sector’s Codes of Practice are not explicitly referred to in the eligibility criteria for the News Media and Digital Platforms Bargaining Code, a matter which needs to be rectified. Unfortunately, this definitional omission extends to the ACMA’s News Media Diversity Framework⁶ and the *professional news content* definition in the *Communications Legislation Amendment (Combating Misinformation and Disinformation) Bill Exposure Draft 2023*.

In the context of the news bargaining Code, we are advised that the ACMA considers our sector’s Codes analogous to the editorial standards specified in subparagraphs 52P (1)(a)(i), (ii) or (iii) of that Code. This, in effect provides our sector with a “workaround” to enable organisations in our sector to fall within these definitions. However, this creates an unnecessary lack of clarity. We comment further on this in the “Establishing the Evidence Base” section below.

62% of our audiences (5 million per week in total) rate news and information as the most important reason for listening to community radio⁷. This indicates the value of and trust listeners place in community radio news and underpins why it should not be inadvertently excluded from support by unduly proscriptive or unclear definitions of quality news or professional standards.

For news to be diverse, NewsMAP needs to support all types and forms that are part of Australia’s future news ecosystem, not just replicate mainstream and larger news producers. To ensure our sector can properly contribute to the objectives of NewsMAP, the Community Radio Broadcasting Codes of Practice need to be clearly and explicitly included in any NewsMAP eligibility standard.

3. Media diversity

Q3.1: Is media diversity the right objective?
Q3.2: How should the media diversity objective be understood? How might the media diversity objective be promoted in the contemporary media environment?
Q3.3: What are the appropriate roles for government and industry in pursuing various elements of this objective? For example, is it the role of government to monitor media diversity and regulate ownership and control?

Media diversity is a relevant and appropriate objective of this program. Australia’s diverse communities need to be exposed and have access to a range of viewpoints and interests, including those that reflect their lived experience and their local concerns. In emergency situations, local community media are uniquely positioned to provide critical news and insights that supports the welfare and resilience of their local communities. More broadly, we acknowledge the public good in audiences understanding and assessing different perspectives as part of the democratic process and for their civic engagement.

In an environment where disinformation and misinformation are proliferating through social media and online campaigns, we need to ensure that the existing range of trusted media sources, including community broadcasters, receive adequate support to challenge this.

It is therefore important that, as above, any funding or legislative assistance under NewsMAP properly recognises and accommodates contribution of the community broadcasting sector to a diverse Australian media.

⁶ [A new framework for measuring media diversity, ACMA](#) p10

⁷ [Community Radio Listener Survey 2023](#)

4. Engagement

Q4.1: Is engagement the right objective?
Q4.2: How should the engagement objective be understood? How might the engagement objective be promoted in the contemporary media environment?
Q4.3: What are the appropriate roles for government and industry in pursuing this objective? For example, does government have a responsibility to foster citizens' critical engagement with news content?

Critical engagement with news content is a necessary element of a healthy democracy. We refer to and broadly agree with the engagement considerations suggested in the LINA submission to this consultation – quantitative engagement, participation, understanding and impact. By its nature, community broadcasting is about directly meeting the needs of the communities of interest that stations are licensed to serve, and the sector is uniquely placed to deliver this engagement at a local level.

Our sector's strategic plan *Roadmap 2033*⁸ includes "demonstrating impact" as a strategic priority, supported by strategic objectives aimed at building resources that allow deep understanding of our communities and measurement of outcomes. It is appropriate and necessary for government to support sectors such as community broadcasting which demonstrably deliver direct engagement with Australian audiences.

SECTION 2: POTENTIAL MEASURES

The CBAA acknowledges and appreciates the funding of the community broadcasting sector through the Community Broadcasting program. As noted in the consultation paper, we are working closely with the Government on the current Sustainability Review of this sector. We refer below to aspects of the measures mentioned at page 18 of the consultation paper.

The media landscape will continue to evolve and the NewsMAP program should offer opportunities for our sector to contribute to broader policy goals and meet specific challenges as they arise. Regardless of the outcome of the Sustainability Review or other funding measures, it should be a matter of principle that media organisations in our sector can participate in NewsMAP so they can contribute to the objectives of the program as they evolve, over and above baseline sector sustainability measures.

Responses to your questions:

5. Funding programs to support public interest journalism

Q5.1: In what circumstances is it appropriate for government to intervene in the form of direct funding? What are the competitive impacts of Government funding?
Q5.2: How can any government support for public interest journalism be structured to maintain the editorial independence of recipients and avoid undue influence over news content? What factors should be taken into consideration, and how do these factors change between short-term and ongoing support?
Q5.3: How should any support for public interest journalism be targeted? For what purposes and to what entities and why? For example, should regional areas and local news be a focus of Australian Government support? What other factors are relevant to targeting? Serving particular communities or addressing particular issues? Organisational form such as not-for-profit organisations or commercial providers? What are industry or private interests best-placed to deliver?

Government funding is an essential source of support for the community broadcasting sector. More broadly, it has been well established in the multitude of reviews referred to in the consultation paper that it remains a critical support for the Australian news sector under increasing pressure. For reasons well canvassed in other reviews, we consider that regional and local news, and news for underserved communities should be priorities of the NewsMAP program.

In our sector, funding has for many years been successfully delivered through the Community Broadcasting Foundation. This type of trusted intermediary structure overcomes any issues around editorial independence from government. For more detail, we refer to the CBF's submission to this consultation.

⁸ [Community Broadcasting Roadmap 2033](#) p7

In terms of where support is best targeted, we note that Australians are already well served by larger and established commercial media. We support funding being targeted to communities that are underserved and that the priority of NewsMAP should be to address market gaps rather than simply amplifying existing media. We also support greater investment in workforce training and development.

Local voices are critical for community building, emergency resilience, and as a training ground and launchpad for media careers.

In response to question 5.3, community broadcasters operate as not-for-profits and under registered Codes of Practice setting the ethical standards for news production. However, the choice of structure is less important than identifying who best can deliver on the local needs of Australian communities who are missing out, underrepresented and/or underserved.

7. Tax-based incentives

Q7.1: What are key advantages and disadvantages of tax-based incentives to support public interest journalism?
Q7.2: Are tax-based incentives preferable to other mechanisms, such as grants?

Different forms of support may be appropriate; the question of grants vs incentives does not need to be an either/or. We note that the Productivity Commission's *Future Foundations for Giving Draft Report*, released in November 2023, includes a recommendation to create a DGR category for public interest journalism and we support this being implemented in policy.

8. Government advertising

Q8.1: What are key advantages and disadvantages of government advertising to support public interest journalism?
Q8.2: Is government advertising preferable to other mechanisms, such as grants?

Under the *Broadcasting Services Act 1992*, community broadcasters cannot accept advertising but can receive sponsorship, up to a limit of 5 minutes per hour. Due to the nature of its audiences, sponsorship of community broadcasting offers the ability for government advertisers to reach targeted and local audiences from diverse backgrounds and in regional and remote areas.

We support the principle of a share of government advertising being allocated to local news organisations such as community broadcasters. We are aware of proposals to legislate mandated percentages to be allocated to local news publishers and given the scale of annual government spend, agree that this has the potential have a measurable impact across the sector.

10. Media literacy

Without commenting in detail, we acknowledge the importance of media literacy to citizenship and participation in democracy. There is a significant opportunity for government to engage community broadcasters, which are well placed, through their nature and community engagement, to play a key role in building media literacy in communities, including those that may not be reached by larger media. We note and support the observations on this in the LINA submission.

SECTION 3: ESTABLISHING THE EVIDENCE BASE

Measuring media diversity

The CBAA contributed to the reviews mentioned in this section of the consultation paper. As outlined earlier, the design of NewsMAP should provide for the contribution of community broadcasters.

While the Government has accepted the ACMA's Media Diversity Framework, we are concerned that there are still gaps in its methodology which may not fully capture the contribution of our sector.

We refer to the ACMA's statement:

"Noting the lack of consensus on scope, we consider an initial focus on 'professional' or mainstream news sources, based on similar criteria adopted in the News Media and Digital Platforms Mandatory Bargaining Code, should be undertaken"⁹

⁹ A new framework for measuring media diversity in Australia, ACMA p10

As mentioned earlier, by applying "similar criteria" to the News Media and Digital Platforms Bargaining Code definition¹⁰, the Media Diversity Framework inadvertently excludes mention of the Community Radio Broadcasting Codes of Practice. (As outlined above, while the caught by the catch-all provision in that definition can be interpreted to include our sector, we hope to work with ACMA to achieve a clearer and more inclusive definition). The ACMA's statement continues:

Similarly, any focus on news workforce should initially be based on those contributing towards journalism at professional news outlets. However, as more evidence is collected over time about the professional and alternative sources of news and information most relied upon by Australians, the assessment can be expanded accordingly".¹¹

For the reasons outlined elsewhere in this submission, we believe it is important to include the substantial workforces contributing to community radio news production across all parts of Australia, some of which may be volunteer or not professionally trained, but all of which working under professional standards of our industry Codes of Practice. We will continue to work with the ACMA to refine and expand its measures but are concerned to ensure in the meantime that NewsMAP eligibility is not similarly constrained.

Further, the list of possible third-party data sets in the Media Diversity Framework¹² does not include the valuable datasets gathered by McNair Yellow Squares for the Community Radio Listener Survey. This information can contribute to NewsMAP's evidence base and program design.

As part of the sector's *Roadmap 2033*, we are working to further refine the research done on the news production work of this sector and will be happy to make this available where possible as part of the evidence base to support NewsMAP interventions.

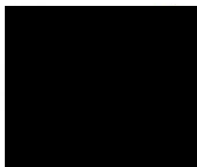
Finally, we refer to the intention of NewsMAP to rely on industry databases, such as the PIJI news mapping and visualisations. These sources are valuable for industry analysis but are by their nature as secondary sources. It is essential that a media organisation's eligibility for NewsMAP assistance and other analysis can be determined and/or validated by primary sources of information from the organisation itself and that our sector has the opportunity to directly engage with NewsMAP around this data, alongside continuing our collaboration with organisations such as PIJI.

Evaluation

We refer to the last paragraph of the consultation paper and request that the department include our sector as a key stakeholder in identifying research and data collection. This will ensure the evidence base for public interest journalism interventions accurately captures all sectors, including community broadcasting, and in doing so, supports the most needed and appropriate interventions.

Thank you for considering these matters. If you need any further information or wish to meet to discuss further, please contact our Head of Advocacy and Communications Reece Kinnane ■

Sincerely,



Jon Bisset
Chief Executive Officer CBAA

¹¹ [A new framework for measuring media diversity in Australia, ACMA](#), p10

¹² *ibid*, p21