

# Comments on News Media Assistance Program consultation paper

Submission by Croakey Health Media  
to the Department of Infrastructure, Transport, Regional Development and  
Communications

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## 1. Overview

Croakey Health Media appreciates the opportunity to contribute feedback on the News Media Assistance consultation paper, released in December 2023. As well as making this submission, our Editor-in-Chief Dr Melissa Sweet attended an online consultation with the Public Interest Journalism Initiative on 16 February, 2023, and also an online consultation between Department representatives and Local and Independent News Association (LINA) members on 20 February, 2023.

We make this submission in a dual capacity: as an independent media organisation with a direct and urgent financial interest in the development of this program; and as a public health news organisation that advocates for and reports on public interest journalism as an upstream determinant of the health of individuals, communities, Country and societies.

### Urgency

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Croakey Health Media plays an important and unique role in the Australian media ecosystem and also has global reach and influence. We are told by a variety of influential sources that our work is useful in informing policy, education, practice, research and communities about critical health matters. However, our financial sustainability is precarious.

On 8 February, 2023, we wrote to the Minister for Communications, the Hon Michelle Rowland MP, advising that we were in a perilous financial situation and that our operations were at risk. We put forward a range of recommendations that would have been useful for CHM and other independent media organisations that are struggling. During 2023, we approached relevant government departments to request consideration for a small proportion of government advertising. To date, we have not had a helpful response from government. We have been operating on a month-by-month basis since February 2023. We know from discussions with other publishers that others are also facing significant challenges, with the threat of closure of titles.

We are sharing the details of our precarious financial situation in order to underscore the urgency of the need for support to sustain existing publishers. When news and media organisations close, a wealth of accumulated human capital and knowledge is lost and cannot be quickly or easily rebuilt. We urge the Government to ensure funding in the forthcoming May Federal Budget to sustain independent media that is commensurate with the scale of the crisis facing public interest journalism, at a time when misinformation and disinformation [are recognised](https://www.croakey.org/news-reports-identify-big-picture-challenges-for-health-locally-nationally-and-globally/) as some of the most significant global threats (<https://www.croakey.org/news-reports-identify-big-picture-challenges-for-health-locally-nationally-and-globally/>).

If the News Media Assistance Program (News MAP) has not been finalised in time to allow for a 2024-2025 budget allocation for the program, we strongly encourage the Department and Government to make interim arrangements to support the sustainability of media organisations that are struggling. At CHM, our preference for immediate support would be in the form of a two-year advertising arrangement with relevant government departments, such as health and aged care. We support recommendations from the Productivity Commission's 'The Future Foundations for Giving Draft Report' to create a DGR category for public interest journalism, and have urged that this be a standalone category. We join with our colleagues at LINA in urging the Government to act on that recommendation quickly.

The urgency of the matters at stake relates not only to the sustainability of organisations like ours. As democracies and societies around the world are undermined by coordinated and polarising disinformation campaigns, it is increasingly urgent that governments play their part in supporting a diverse and thriving news and media ecosystem. We note that a similar point was made in LINA’s submission to this consultation, which stated: “The COVID-19 pandemic and the referendum on an Aboriginal and Torres Strait Islander Voice to Parliament provide recent examples of matters impacted by coordinated mis- and disinformation campaigns which have affected the health and social cohesion of Australian society.”

## **General points about the consultation paper**

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The objectives of the proposed News MAP appear somewhat confused.

Is it:

- an industry assistance program?
- or does it have a wider public policy role, in aiming to ensure that all Australians have equitable access to public interest journalism that provides relevant and reliable news?
- or does it align with wider public interest objectives, as part of a strategic response to address misinformation, disinformation and the associated problems of the undermining of social cohesion and diminishing public trust in institutions, including the news media?

While Croakey Health Media is advocating very strongly for assistance for independent media, as an organisation whose [strategic plan](#) recognises the importance of public interest journalism for the health and wellbeing of communities (<https://shorturl.at/ekHV4>), we encourage the Department and Government to recognise the right of all Australians to have access to public interest journalism – as both contributors to news and consumers of news. It is also important to recognise that people do not have to be involved in the news process, as either contributors or consumers, to derive benefits, for example, through greater accountability of corporations, governments, and other power-holders. We also encourage the Department and Government to explicitly consider how the News MAP can support responses to the ever-increasing proliferation of misinformation and disinformation and to help build social cohesion.

Taking this wider public policy perspective would mean ensuring the News MAP is not only supporting existing media organisations but is proactive about supporting innovation and the development of new models of public interest journalism to end ‘news deserts’ and to ensure all communities are well-served. It would also mean engaging more proactively with communities that are currently under-served by public interest journalism as part of the policy process. At present, it appears that the media industry is the dominant voice in this policy development process, rather than wider civil society, including communities who are currently under-served. Other important contributors to this policy development process include First Nations advocates and communities, public health experts, and diverse representatives from rural and remote communities. The impacts of climate disruption and adaptation upon supply and demand for public interest journalism are also important to consider. Climate change experts with insights into how escalating climate disruption

(manifest in extreme weather events, and economic and social disruption) will influence communities' needs for news and public interest journalism should be included in this policy development process, acknowledging the vital importance of Indigenous knowledges in this area. In particular, we stress the importance of First Nations communities and knowledge-holders being engaged in co-design of this program, and indeed all media policy.

## **Media diversity matters**

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In this context we note also our contributions to a related policy process, the development of [A new framework for measuring media diversity in Australia](#), which the Australian Communications and Media Authority released on 12 December 2023. We underscore our disappointment that the framework did not incorporate consideration of standpoint diversity as had been strongly recommended by CHM and other organisations. We emphasise that this issue should be considered broadly; it does not only relate to the backgrounds of journalists, but also the structures and governance of news organisations. The ACMA paper suggested that CHM and others were arguing for a “diversity of reporters producing news content”, which is a narrow and inaccurate reflection of CHM’s submission. For example, we also highlighted the importance of diversity of representation in organisational governance – whether the directors and executives are representative of the diversity of Australian communities and ensure representation of First Nations peoples.

We note that ACMA signalled a willingness to revisit standpoint diversity in further iterations of the framework, and we recommend this be prioritised as a matter of urgency. In an era when access to culturally relevant and culturally safe news and information can literally be life-saving – whether considering climate crises or pandemics, for example – these concerns are pressing.

We also register our disappointment that the framework did not include our recommendation that it should consider diversity in organisational models, and distinguish between different organisational models, specifically between not-for-profit and for-profit models, and the governance of these models. This is particularly important given the potential for not-for-profit models to help supply public interest journalism to areas that are ‘news deserts’ or subject to media monopolies.

**We raise these concerns about the media diversity framework in this consultation because these are important issues when considering assistance programs for news and media organisations, to ensure that such programs support, rather than undermine, improved standpoint diversity in the Australian media landscape. We note that government policy has often undermined media diversity; for example, the News Media Bargaining Code primarily benefited large corporate media organisations. CHM has received no funding under the code.**

## 2. Specific consultation questions

Below we address some of the specific consultation questions.

### 2.1. Definitions

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Regarding the ACCC definition of public interest journalism – “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” – it is too narrow, implying that journalism purposes exist only in relation to citizens and government. Journalism also has roles in informing and ensuring accountability from all power-holders, whether individuals, corporations, NGOs, governments, or other entities. For this reason, we prefer the definition that [informs our work](https://shorturl.at/ekHV4) at Croakey (<https://shorturl.at/ekHV4>):

“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.”

Further, we note that there are different forms of public interest journalism. At Croakey, we practise and contribute to [the field of social journalism](#) (which is well recognised in the journalism literature):

“Social journalism is a collaborative form of public interest journalism that seeks to provide services to meet community needs. It can encompass services beyond traditional journalistic content production, including community organising and education.”

### 2.2. Section on Benefits

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We are concerned by the narrowness of the consultation paper’s discussion of ‘The Benefits of Public Interest News and Journalism’. As discussed above, this should be foregrounded with some contextual discussion that acknowledges:

- The roles of news and public interest journalism in an era of climate disruption and adaptation.
- The roles of news and public interest journalism in an era of escalating misinformation and disinformation, especially as generative AI proliferates.
- The impact of monopoly power upon Australians’ access to relevant, reliable news and information – specifically, the power of Big Tech companies such as Google and Meta, and the dominance of corporate media models and corporate entities.
- A more explicit acknowledgement that news and public interest journalism has a long and ongoing history of under-serving some communities, and advantaging others.

We are concerned that the six explanatory comments under the “Benefits of public interest news and journalism” are too narrowly focused, overly simplistic and also highly contestable.

**We recommend deleting the explanatory comments, and leaving the six headings as “Examples of some of the positive contributions of public interest news and journalism”.**

### 2.3. Section on Factors moderating these benefits

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1. Any discussion of availability and accessibility of news should also consider cultural safety as an important determinant of the accessibility of news. Many journalists and newsrooms have not had cultural safety training. Access is also determined by people's capacity to afford news subscriptions, as well as their digital literacy and access to the internet. People with disabilities, people who do not speak English as their first language, and other groups may have inequitable access to evidence-informed news. This has been evident during the COVID pandemic, where higher death rates have been reported in communities who have not had equitable access to relevant, reliable news and communications about key health messages, and who have been misled by misinformation and disinformation.
2. Qualities of news and journalism should also consider a commitment to cultural safety and evidence-informed practice. Impartiality is a poor criteria for assessing journalism if it means equal weight is given to climate science and climate denialists, or to anti-racists and racists.
3. Consumer interest, trust and capability. This section should at the very least acknowledge the importance of Big Tech in shaping news and information ecosystems, and in undermining public trust. Relying on media literacy alone will not only be ineffective, it will increase inequities.
4. Control over production of distribution. Again, it is very unbalanced to discuss the power of media organisations without even acknowledging the power of Big Tech companies over the production and distribution of news.
5. Substitutability. Local community groups on Facebook etc may have many useful roles but they do not replace or substitute for journalism, which has different practices, ethics, responsibilities and outcomes. (This statement should not be taken as inferring only journalists can practise and produce journalism).
6. Journalistic inputs and risk profile. Regarding the question about what factors influence the ability of journalists to access the information that underpins their reporting, or their willingness to report on certain topics or figures, we stress the importance of a strong financial situation to sustain investigative and time-consuming journalism. People who have not worked in newsrooms may not appreciate the time and resources that journalistic investigations often entail. Sometimes considerable time and resources may be invested in investigations that do not lead to an outcome that can be published. The precarious financial situation of many newsrooms discourages and undermines the important forms of journalism that take time and resources, sometimes for uncertain outcomes. Journalism is not like a production line with predictable inputs and outcomes. Financial precarity can also discourage the production of journalism that may result in legal challenges or law suits, even where there is a strong public interest in such journalistic investigations.



## 2.4. Section on Considerations for the Role of Government

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It is disappointing that this section does not acknowledge the role of not-for-profit models and the importance of the independent media sector more broadly. As CHM outlined in our [2023/2024 budget submission](#), there is great scope to develop and grow the not-for-profit public interest journalism sector in Australia ([https://www.croakey.org/wp-content/uploads/2023/01/CHM\\_Pre-budgetSubmission\\_27Jan2023.pdf](https://www.croakey.org/wp-content/uploads/2023/01/CHM_Pre-budgetSubmission_27Jan2023.pdf)).

It would also be useful to see some international context in this section, to acknowledge that other countries are far ahead of Australia in intervening to support public interest journalism, including NFP models.

## 2.5. Proposed objectives

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### 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?

Again this is an overly narrow framing of journalism and its roles. It is important to have journalistic scrutiny of all levels of government – BUT journalism is about wider accountability than simply government.

This section should also consider equitable access, acknowledging that ‘equity’ requires taking extra measures to ensure access for populations who currently do not have good access. We welcome the mention of community-led news services.

We suggest that this sentence, “This proposed objective reflects that news content must also be relevant, to locations and issues, and that journalism must be responsible” be re-worded: “This proposed objective reflects that news content must also be relevant, to locations and **communities**, and that journalism must be responsible to **communities**.”

### 2. Quality

“Media regulation in Australia has always been weak, fragmented and lacking in public visibility. Even before the internet age, it was fractured along ownership, industrial and technological lines.” A highly respected media policy analyst, Dr Denis Muller, [made this statement](#) in 2021.

It is a reminder that decisions about the quality of journalism and the media are too important to be left to journalists and the media alone, and that wider communities must be involved in assessing the quality of journalism. This underscores our point about the importance of key communities being involved in the development of this policy, and media policy more generally. This is especially important for First Nations peoples, and others who have traditionally been poorly served by mainstream media.

### 3. Media diversity

Q3.1: Is media diversity the right objective?

Media diversity in a broad sense is extremely important, as outlined previously in this submission and others by CHM. In addition to the reasons already described, a diverse news and media ecosystem is also important for policy priorities across multiple portfolio areas. For example, in the health and social care sector it is crucial for combatting misinformation, which impacts the ongoing delivery of vaccine programs, and for enabling informed public discussions about reform processes in the areas of Medicare, aged care and the NDIS.

Q3.2: How should the media diversity objective be understood? How might the media diversity objective be promoted in the contemporary media environment?

Media diversity encompasses diversity in organisational models (ranging, for example, from community controlled and NFP models to social enterprises, public broadcasters and corporate and privately owned media organisations), as well as representation in governance structures, and in the newsroom. Media diversity also encompasses explicit attention to the communities and topics covered by media; for example, Croakey Health Media has an explicit focus on health equity and communities and groups who have traditionally been under-served by mainstream media.

Greater media diversity could be supported through ensuring a media diversity impact assessment of all planned media funding and policy developments. As noted previously in this submission, previous and ongoing government policies have often undermined media diversity by favouring corporate media models.

#### 4. Engagement

This section should acknowledge and address the power of Big Tech companies to shape communities' engagement with news and public interest journalism.

The power of Big Tech in shaping news consumption trends is an increasing problem. The latest [Digital News Report: Journalism, Media, and Technology Trends and Predictions 2024](#), which is based upon a survey of 314 news leaders from 56 countries and territories, found that Facebook and other companies are deprioritising news.

Almost two-thirds (63%) of the Reuters Institute survey respondents say they are worried about a sharp decline in referral traffic from social media sites. Data sourced from analytics provider Chartbeat shows that traffic to news sites from Facebook fell 48 percent in 2023, with traffic from X/Twitter declining by 27 percent, and Instagram by 10 percent.

Other trends that will further reduce audience flows to news sites include the roll out of Search Generative Experiences (SGE), which serves direct answers to queries rather than providing the traditional list of links to websites, as well as a host of AI-driven chatbots that will offer a faster and more intuitive way to access information.

## **2.6. Direct funding to support the production of public interest journalism**

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Discussion Questions relating to 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?

The funding should be needs-based – where there is evidence that particular communities (whether geographic or around specific interests) are not well served, either because of 'news deserts' or because existing models do not meet their needs for safe, relevant news

and information, or because existing models are struggling financial or need support for growth and development.

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?

Look to models that have worked in other countries for support for journalism (eg EU and US). Look to models outside journalism where the independence of funding is important, eg grants for research, the arts, etc.

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?

The NFP sector is clearly well placed to meet community needs where there is market failure. Community-controlled models provide opportunities for supporting innovation and accountability.

Questions relating to support for business models

Q6.1: What are the key barriers or challenges faced by news media organisations in adopting innovative business models or pursuing new revenue streams? How can these barriers be addressed through policy, regulation, or industry-led initiatives?

See [CHM 2023-2024 pre-budget submission](#) for suggestions for a policy framework to support the growth and development of NFP models.

Q8.1: What are key advantages and disadvantages of government advertising to support public interest journalism?

Advantages: it brings revenue to the organisation to support the production of journalism, and provides a service to readers/viewers through access to the information in government advertising.

Q8.2: Is government advertising preferable to other mechanisms, such as grants?

Ideally, organisations such as CHM would like access to both options. However, we note that previous grant systems have been difficult to access for innovative and NFP organisations like ours that do not fit traditional news organisations structures. When we were successful in obtaining a modest grant for an editorial project, we spent as much time on completing the grant reporting paperwork as we did on doing the journalistic project. It is important that grant programs are co-designed with the sector.

CHM would like to see specific advertising and grant allocations to support the NFP sector.

## **2.7. Considerations for Future Policy, Regulatory and Program Design**

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A general comment on all the questions raised in this section of the consultation paper: communities must be involved in these discussions about regulation of the news ecosystem. These matters should not be left to media organisations alone.

## **2.8. Support for Media Literacy**

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This section should be foregrounded in a section acknowledging that the contemporary news and information is toxic and unsafe, due to the dominance of corporate power, and the dissemination of misinformation, disinformation, racism and hate speech. It is both ineffective and inequitable to rely on 'media literacy' to tackle these public health threats.

Further, we encourage the Department and Government to ensure cross-fertilisation and collaboration between policymaking around media literacy and health literacy as these are related concepts. Notably, health literacy takes a systems view that considers more than the health literacy of individuals to encompass the roles and responsibilities of health systems in ensuring equitable access. Applying this more holistic and systems view to the concept of 'media literacy' would mean greater scrutiny of media organisations' responsibility for ensuring the provision of news and journalism is accessible and safe for all.

### 3. Conclusion

We strongly urge that the 2024-2025 budget including funding support for independent media, including for Croakey Health Media. If the News MAP has not been finalised in time to allow for a 2024-2025 budget allocation for the program, we urge the Government to put interim measures in place as a matter of priority and urgency.

We reiterate the significance of the issues at stake, including democracy, social cohesion and evidence-informed policymaking. These matters are even more urgent as climate disruption escalates.

At CHM, our preference for immediate support would be in the form of a two-year advertising arrangement with relevant government departments, such as health and aged care.

We also reiterate our calls for a standalone DGR category for public interest journalism, and have urged that this be a standalone category, and we join with our colleagues at LINA in urging the Government to act quickly on the relevant recommendations from the Productivity Commission report.

CHM would like to see specific advertising and grant allocations to support the NFP sector.

We note that in our 2023-2024 Pre-Budget Submission (January, 2023), Croakey Health Media requested that the Government commit appropriate resources to develop a policy framework specifically to support and grow the NFP public interest journalism sector, with a particular focus on meeting the needs of under-served communities and topics.

The framework could include:

- A clear, transparent, equitable pathway for appropriate entities to set up as a NFP public interest journalism organisation with DGR status, meeting criteria for editorial independence and ethical professional practice. It would be important to have a rigorous review process to ensure that applicants are not serving commercial, partisan or other sectional interests.
- Support for a peak body to represent and support growth and sustainability of this under-developed sector, including support for the many small outlets that now exist that might opt for NFP structure if it was more accessible and affordable. Initially, this could be done through an existing entity, such as the Local and Independent News Association (LINA).
- Government to identify a percentage of funds from Government advertising and other campaigns to be allocated to NFP public interest journalism organisations. It is suggested that the percentage of funds allocated commence at 0.5% and rise to 2% over the budget forward estimates.
- Initiatives to encourage philanthropists and other potential funders to consider supporting NFP public interest journalism models, and to encourage public awareness of the benefits of NFP models.
- The Government's planned framework on media diversity should include data on the NFP sector, with diversity of business models being considered as one of the measures of diversity.

- The NFP sector should be eligible for all support programs for journalism and media organisations, with a specific funding pool established for the NFP sector.

We believe these recommendations are relevant for the News Map, and would be delighted for the opportunity to contribute to any further discussions or consultations to assist the work of the News MAP development.

## 4. About Croakey Health Media

Croakey Health Media is widely recognised as an innovator and leader in the emerging not-for-profit public interest journalism sector in Australia ([Public Interest Journalism Initiative, 2021](#)). We are innovative in our organisational structure, blended funding model and development of the practice of social journalism ([Sweet et al, 2017](#)). We focus on health equity, and the social, cultural and environmental determinants of health, including climate change. The voices and expertise of Aboriginal and Torres Strait Islander people are foregrounded through our work, including through [our governance](#). Our board is chaired by leading Aboriginal scholars, Professor Bronwyn Fredericks (University of Queensland), and James Blackwell (ANU). Croakey Health Media Limited was registered on 24 August 2018 as a member-based company limited by guarantee, after evolving since 2007 as an independent journalism project. The ABN is 59 628 369 335 and the company is registered for GST.

Due to the lack of a clear pathway for public interest journalism organisations to establish as not-for-profit entities, Croakey Health Media is registered with the Australian Charities and Not-for-profits Commission (ACNC) as a charity under the subtypes of Advancing Health and Advancing Public Debate. We have not been able to obtain DGR status, reflecting the lack of a transparent, equitable pathway for NFP public interest journalism organisations to do this. We have made a number of unsuccessful applications for DGR status, and have recently lodged another application. Not having DGR status has been an obstacle to our capacity to raise funds and to our efforts to become more sustainable.

Croakey Health Media's public interest journalism activities are supported by a blended funding model, including sponsorship, donations, subscriptions, the provision of professional services, advertising, and paid journalism activities, including the Croakey Conference News Service. Our funders and supporters include leading health organisations. We have firm policies on editorial independence and these are communicated to funders.

As an organisation, one of our five strategic priorities is to create a sustainable environment for public interest journalism, acknowledging the vision outlined in [our strategic plan](#), that "a vigorous and sustainable public interest journalism sector contributes to the health and wellbeing of people, families, communities, policies, societies and the environment".

We advocate for policy reform to support a sustainable public interest journalism sector, through making [submissions](#), and through [journal and book publications](#), research, and presentations to conferences. We are also proactive in engaging with other public interest journalism publishers and organisations to help build momentum for better policy to support public interest journalism. Croakey Health Media is a member of the Local and Independent News Association (LINA). Our members belong to various professional organisations, including the Media, Entertainment and Arts Alliance.

We work to increase public awareness of the challenges facing public interest journalism and its important role for the health of communities, policies and democracy. Journalistically, we cover public interest journalism as a critical determinant of health. See our [archives on public interest journalism as a determinant of health](#).

See Croakey Health Media's [previous submissions](#) to inquiries on media policy and related (2017-2023).