



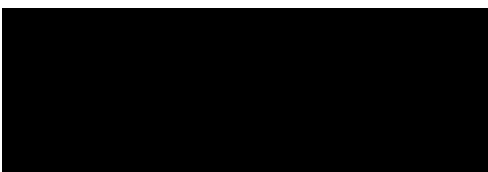
News Media Assistance Program

Response to Department of Infrastructure, Transport, Regional Development, Communications and the Arts Consultation Paper

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“The availability of a wide range of high-quality news and journalism provides significant benefits to Australian society and is important for the healthy functioning of democracy... Journalism provides significant and unique benefits to individuals who consume it, and to society more broadly.”
- Australian Competition and Consumer Commission, Digital Platforms Inquiry Final Report, 2019

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“It is widely recognised that Australia has one of the most concentrated media markets in the world. While it was hoped that the rise of the internet would democratise access to information, the business model that underpins public interest journalism is coming under great stress in the internet age... The concentration of media ownership is inherently corrosive of democratic practice because it places control over the sources of information and opinion in far too few hands.” – Senate Environment and Communication References Committee, Media Diversity in Australia report, Commonwealth of Australia, December 2021

This submission is made on behalf of LINA’s membership following consultation and broad discussion of priority issues and barriers. Some members may make individual submissions in which case the LINA submission should not be taken to displace those submissions.

Executive Summary

The Local & Independent News Association (LINA) welcomes the development of the News Media Assistance Program (News MAP) and the opportunity to provide input on behalf of its membership group.

LINA shares the government's concerns about the impact of newsroom closures and consolidations on media diversity and political engagement. LINA's very inception is born of these concerns and a desire to support a growing digital news sector for the delivery of local news services. We applaud the government's initiative to take this work forward and encourage urgent action to support an industry with the potential to provide significant public benefit to Australian communities.

LINA is pleased that the government is approaching the News Media Assistance Program as a program of work over a period of time, rather than a single grant program. News media is an industry in transition which has been constrained by operating in economic crisis-mode, with many of the issues facing the industry now 40+ years in the making. The news media industry has been rapidly shrinking in response to audience migration to digital transformation, the collapse of traditional business models that supported the distribution of print newspapers, and syndication of content in response to economic pressures. There is a converging crisis between this, the growing threat of misinformation and disinformation and increasing emergencies requiring distribution of timely and accurate information to keep communities safe, and an under-resourced journalism sector. This provides the government with a strong impetus to introduce policy supports that facilitate the emergence of a new sector of independent news publishers and the transition to new business models.

Despite the challenges, there are green-shoots in the journalism industry that have quietly emerged in recent years to fill gaps in news delivery for communities in every state and territory. These newsrooms are embedded in communities, providing trusted and relatable sources of news to highly engaged audiences. This submission outlines a range of opportunities for the government to partner with industry to grow a vibrant news media sector that serves Australian communities through:

- Supporting the production of quality public interest journalism through local and independent news publishers;
- Drawing on international examples of success to resource public interest journalism, as well as domestic models of service provision for public good;
- Enabling a not-for-profit news sector in Australia through recognition of public interest journalism as a public good in the Charities Act, with an aligned deductible gift recipient (DGR) category for public interest news publishers;
- Legislated government spend ratios for campaign and non-campaign advertising across all levels of government to locally controlled and produced media services;
- Updated Local Government Acts and Planning Acts to include digital and other local media services in the distribution of public notices;
- Support for capacity building measures to grow the sustainability of existing small newsrooms; and
- Start-up support for emerging newsrooms, particularly in identified news deserts.

Government has provided support through a range of programs to help the news industry meet audience demand for digital distribution of news. The challenge now is to find and adapt sustainable business models to ensure the longevity of existing news services and support the emergence of newsrooms in news deserts where no local news service exists.

In this context, the government is considering its role in the regulation of news media and where and how support is appropriate without regulation disrupting editorial independence. Meanwhile, misinformation and generative AI loom as global threats to democracy and to the health, social cohesion and resilience of our communities. The risk of inaction is huge. Risks associated with Commonwealth intervention are comparatively manageable as they have proven to be in relation to public broadcasters. Therefore, LINA encourages the government to take immediate action to curb the trend of media concentration that has plagued our media landscape for decades.

The News Media Assistance Program (News MAP) provides an excellent opportunity for the government to:

- enable emerging newsrooms to enter the market, particularly in areas of economic market failure where the need for local news is a public safety issue;
- foster a skilled workforce of journalists producing strong public interest news services; and
- address rising concerns about the spread of misinformation through media literacy.

LINA encourages the government to commit funding in 2024-25 and beyond to the implementation of the News MAP and to utilise the growing network of local digital news publishers to help turn the tide on newsroom closures in Australia and grow media diversity.

About the Local & Independent News Association

LINA is a national industry association supporting hyperlocal and independent digital news publishers. Its job is to help news publishers increase the diversity and relevance of news services in communities across Australia. It seeks to grow existing, and encourage new, hyperlocal media entrants by providing capacity-building support, expert advice, and access to critical third-party services, providing a deep level of hands-on support to its members.

LINA was established in 2021 in response to industry demand for representation and coordination to assist small digital publishers to build their sustainability and provide quality public interest news services to their communities. As of February 2024, LINA represents 62 digital news publishers, producing 104 mastheads in all States and Territories across Australia. LINA membership is open to all digital news publishers who meet our membership requirements. However, most of its services are tailored to capacity building for small publishers, with most LINA members having an annual income of less than \$350k and operating with fewer than five staff.

LINA members are locally owned and controlled news publishers, creating high-quality news content that meets the LINA Editorial Standards, by and for a defined community. While publishers might also have a print publication and/or other distribution platforms, LINA members are digital-native and our member services focus on strengthening online news distribution and responding to audience demand in digital spaces. The role of the association is to help news publishers provide local, diverse, and trusted news to Australian communities, and to grow workforce participation in sustainable local journalism in the process. To do this, we focus on capacity-building support and generating economies of scale across a collective of independent businesses.

LINA sees these news businesses as the 'green shoots' of the news industry, observing the expansion of digital newsrooms in the wake of newsroom contractions. This change reflects an audience shift to digital news consumption over decades and the weakening of business models sustained by advertising and user-fees on a global scale. It seeks to curb the trends of media concentration and syndication that have been growing concerns for government and communities.

LINA Member Snapshot

As individual publishers:

Average annual income 2022-23: \$350k

Average number of paid staff FTE: 3

Average number of volunteers: 8

Collective reach:

Over 3.3 million unique viewers each month

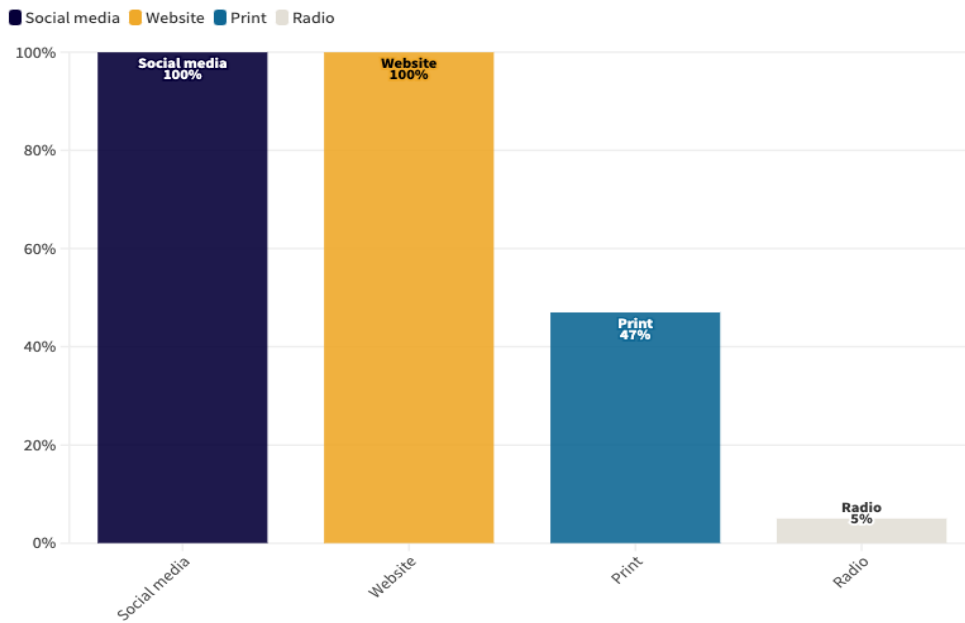
Over 575,000 social media followers

An average 20,000 printed copies distributed by 47% of LINA members, in addition to their online services.

Collective production:

An average 1,589 stories per week

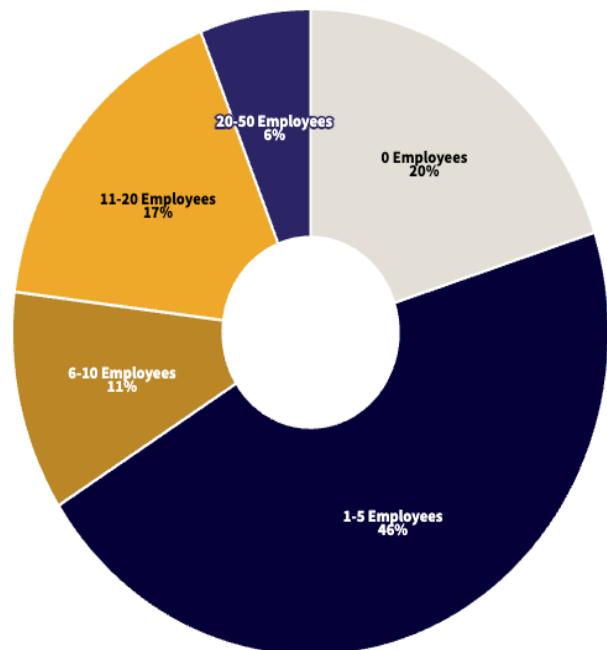
76,268+ stories per year



0 Employees 1-5 Employees 6-10 Employees 11-20 Employees 20-50 Employees

“Hyperlocal media operations are geographically-based, community-oriented, original-news-reporting organizations indigenous to the web and intended to fill perceived gaps in coverage of an issue or region and to promote civic engagement.”

– David Harte, Rachel Howells and Andy Williams, *Hyperlocal Journalism: The decline of local newspapers and the rise of online community news*, Routledge, London, 2019



The green shoots of news distribution

LINA agrees that a holistic approach is needed to respond to the interlinked social, economic and technological drivers shaping news and journalism in Australia. While audiences absolutely need access to international, national and state-wide news, LINA considers its members vital to the news ecology at a local level and therefore a significant consideration in any holistic approach.

Australia is ranked as the 10th most concentrated media market in the world (Brevini and Ward 2021, Standford 2021), an issue highlighted by elected representatives from all political persuasions. Nearly 300 Australian newsrooms have downsized or, more often, closed completely since the Public Interest Journalism Initiative started tracking newsroom changes in January 2019. At least 30 areas across Australia are considered to be news deserts with no local print or digital outlet at all (Dickson, 2022).

Diverse voices and regional audiences remain underserved. Mainstream media continues to consolidate, syndicate and/or remove regional services while under-representing Australia's diverse communities. Simultaneously, the need for very localised information has been continually highlighted since 2020 by the pandemic and by increasingly common extreme weather events challenging community resilience and safety. However, this undeniable crisis in journalism represents an opportunity that many local communities have recognised. In the wake of local newsroom closures, community members have stepped up, establishing news services to fill a gap in local news coverage and/or to provide free access to local news when paywalls are introduced by other media outlets. "When it comes to local, community-based journalism, a quiet revolution is underway" (Sunderland, 2022).

This growing hyperlocal and independent news sector exists and is well placed to address the news and information needs of local communities, strengthen Australia's democracy, reduce the spread of misinformation and disinformation, provide timely and locally specific information to communities in times of crisis, and build community. LINA supports these, and other emerging news start-ups, to increase media plurality and diversify news sources for Australian communities.

Digital newsrooms in particular offer more flexible distribution channels and associated diversified revenue streams. Around 20% of hyperlocal newsrooms have launched in the past four years, demonstrating an encouraging rate of growth in response to an audience shift to digital news consumption over decades. Half of Australian news consumers (51%) now source their news content online, with just 19% now accessing news through print-based media (Hughes, 2023).

LINA supports these emerging digital platforms, and other emerging news start-ups, to increase media plurality and diversity news sources for Australian communities.

"The fate of communities and local news organizations are intrinsically linked, journalistically and economically. From our very beginnings as a nation, newspapers have played a vital role in both educating us and building community. Researchers in disciplines such as political science, sociology and economics have identified three ways newspapers historically built a sense of community and trust in grassroots democracy. Each is under economic assault."

- Penny Muse Abernathy, Why Local News Matters, and What We Can Do To Save It, New York State Bar Association, New York, cited 23rd February 2023

News and Government

A common misconception about press freedom is that the media must be free from government intervention in order to maintain independence and best serve the public. This theory fails to recognise the government's responsibility to help guarantee public access to healthy and diverse information and communications systems. A healthy media sector, and public interest journalism in particular, has been well established in academic literature as a fundamental pillar of democracy. However, public interest journalism — including sharing local information, providing a platform to under-represented voices, and acting as a watchdog to corruption or misconduct — has “always been in tension with commercial imperatives” (Pickard, 2019). As such, it struggles to maintain financial viability, particularly in the wake of recent market disruptions, including the collapse of the traditional advertising model for media, the shift of audiences online, and effects of the COVID-19 pandemic.

There is therefore an obligation for the government to support the media not only for its democratic value, but for its role in fostering social cohesion, civic engagement, community health and safety (including emergency preparedness and resilience) and workforce development. With suitable policies in place, maintaining editorial independence for newsrooms does not need to come at the expense of policy intervention that will support the news media system required to maintain a healthy democracy.

In recent years, the Commonwealth has attempted to curb a trend of newsroom closures through:

- Creating the Regional and Small Publishers Innovation Fund;
- Developing the News Media and Digital Platforms Mandatory Bargaining Code;
- The Public Interest News Gathering fund;
- Tax relief measures for the commercial broadcasting sector;
- A print relief assistance program for print newspapers;
- Direct funding support to the Australian Associated Press; and
- Funding support for one year to LINA.

These actions are yet to deliver direct funding support to hyperlocal and independent publishers who have been overlooked in the eligibility requirements for some of these programs and have faced capacity barriers to effectively engage with others. LINA encourages a more comprehensive approach to supporting the news industry which includes measures to grow the sustainability of localised news services and taking a platform-agnostic approach to the delivery of public interest journalism.

The provision of accurate, timely, relevant news services is also essential to the health, safety and engagement of Australian communities, yet has not enjoyed anywhere near the same level of support for individual practitioners and publishers. While the government has provided ongoing funding for public broadcasters to produce news (including in digital formats) and for community broadcasters to expand their operations to the provision of public interest journalism in some locations, neither has been able to adequately serve the news and information needs of disparate communities across Australia. A collaborative network of grassroots news operators is needed across public broadcasters, community broadcasters and community-based local news publishers to expand local news production both to, and representative of, as many locations as possible. To do this, place-based news publishers must receive workforce development support to employ local journalists and develop news entrepreneurship skills as detailed in our response to Q3.3. LINA encourages the government to take an ongoing and active role in fostering a sustainable news media industry in Australia, allowing for innovation, evolution and diverse participation in news reporting.

Definitions and Scope

The question of defining public interest journalism has been posed in a range of government consultations relating to media policy, measurement frameworks for evidence gathering and philanthropy, and is repeatedly met with hand-wringing and anomalies. Government and its agencies have tended toward definitions of journalism that emphasise ‘professionalism’, as measured by income level and/or distribution method, including in the News Media Bargaining Code. This excludes emergent and small newsrooms from the process and results in imperfect implementation of the Public Interest Journalism register maintained by the ACMA and not adhered to or accepted by digital platforms. LINA suggests a more appropriate view of journalism is to focus on the process of reporting, considering journalism as a series of actions which includes news gathering, source checking, analysis and takes a platform-agnostic view to publishing.

Consideration of what is or is not public interest journalism will at some point be subjective, given there are exceptions to almost every parameter one could suggest on the issue. The question then really becomes, who decides? LINA recognises the idea of government deciding who is or is not considered media is problematic. Similarly, LINA does not support the notion that one set of editorial standards, endorsed by the government, would be suitable or appropriate to the whole news industry.

LINA suggests the government look at models of industry self-regulation and management, such as the Australia Council for the Arts, the Community Broadcasting Foundation and industry steering groups focused on film and television. Such examples provide precedent for a collective of industry representatives to provide advice to government in areas requiring judgement calls on subject-matter expertise. A similar collective of expert industry representatives could consider applications for a register of public interest journalism publishers and make recommendations on whether applications should be accepted or declined based on a set of parameters and industry experience. LINA does not support the notion that one set of editorial standards, endorsed by the government, would be suitable or appropriate to the whole news industry. A set of Editorial Standards produced by the industry could be registered with the ACMA (as per some of the current Codes and Standards) meaning that news organisations bound by any one of those editorial standards, such as the Australian Press Council, the MEAA’s Journalistic Code of Ethics, the Community Broadcasting Codes of Practice, the ABC and SBS’ Editorial Charter and/or LINA’s Editorial Standards, would be considered professional in its production and distribution of news content. Each of these standards are industry-developed and focus on the types of things you might reasonably expect to see in good journalism, ie. accuracy, fairness, transparency etc.

LINA notes references in the consultation paper to the ACCC’s definition of public interest journalism as:

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

LINA suggests that while the first part of this definition is accurate, the second part can be interpreted either as informing decision-making by voters, or by elected representatives. It is our view that journalism is not so much about government decision-making as it is about ensuring audiences are well-informed to make decisions about their own lives – which includes democratic processes, but also emergency preparedness, civic engagement, education opportunities, health and safety actions. These are a wide range of topics that

each increase the resilience and cohesion of Australian society. As such, the definition would be better worded as:

Journalism with the primary purpose of recording, investigating and explaining issues of public significance in order to engage citizens in public debate, strengthen accountability and support informed, democratic decision-making about readers' own lives.

Broadly, LINA agrees with the content definitions of local public interest news previously used by the ACMA to include matters of health, education, crime, court reporting and local governments; and would add some reporting on local businesses, arts and community group activities to that list where they are news reports as opposed to entertainment pieces.

Case Study: Murray Bridge News

“The Public Interest Journalism Initiative has taken a look at Murray Bridge, SA – my patch! – for its Australian News Sampling Project, analysing how much public interest journalism local publishers produce and how ‘local’ their stories are. For this analysis, PIJI looked at four publishers: ABC Adelaide, ABC Riverland, the ACM-owned Murray Valley Standard and my own independent Murray Bridge News. Here’s how we went...

Murray Bridge News produced the **highest percentage of public interest journalism** of the four orgs (95%). We published slightly fewer stories than the Standard (87-77), but more unique ones about crime and public services, and a similar number about government and community.

Murray Bridge News also had the **highest percentage of local stories** (95%) and stories local to the Murray Bridge district in particular (88%).

We included the **lowest percentage of content syndicated from elsewhere** too (0%).

When we talk about creating community, empowering people, being positive, being local, this is the stuff we’re talking about. But it’s great to have all that talk backed up by data.”

– Peri Strathearn, Managing Editor, Murray Bridge News (LINA member)



Consultation Questions

Framework and Objectives

LINA agrees with the benefits generated by public interest journalism outlined in the consultation paper, being: informed democratic participation; informed public administration and policy; trusted and accountable institutions; tested and shared ideas; greater inclusion and social welfare; and informed decision-making by individuals. However, LINA would expand the notion of inclusion and social welfare to include the contribution that the sharing of diverse perspectives makes to social cohesion and civic engagement. This concept has formed the basis of government support for community and multicultural media and associated media policy. As well as providing avenues for people from culturally diverse backgrounds to report on the issues and events that matter to them, a diverse news industry includes the perspectives of people living in regional and remote regions, greater age diversity and a broader range of perspectives on things that are happening in any given place or community. This leads to a richer understanding of the people we each live alongside and stronger community engagement. Media diversity is not only about the scope of information available to audiences, but the opportunity for people in different parts of the country to report on matters that are important to them and their communities. It's as much about giving voice to things that would otherwise remain silently unreported and unrecorded, as it is about providing a variety of information wide enough to dilute bias' so that citizens may draw their own views on matters of public debate.

"The best local news organisations introduce us to people we don't know, who share our concerns and aspirations. It connects people in a community to one another, and to the outside world." - Penny Abernathy, The State of Local News, Local News Initiative, August 2022

Audience engagement with news is dropping globally, impacted by some mistrust of (primarily mainstream) news media and a deliberate attempt to protect mental health by shying away from news that is perceived to be depressing. News avoidance in Australia remains above the global average (Parks, 2023). Local and independent news has a role to play in reversing this trend by:

- a) Reflecting the balance of everyday life that people see in their own communities, the good news stories along with the bad, noting that 56% of Australians surveyed for the Digital News Report 2023 are interested in positive stories;
- b) Building levels of trust in media through their community connections and expertise;
- c) Reflecting identifiable voices in media, the concept of the reporter being someone 'like us'; and
- d) Growing media literacy within the communities news publishers serve through providing relatable discussion of trusted sources and identification of misinformation and generative AI content, particularly for adults.

Finally, in considering factors that moderate the benefits of news and journalism in Australia, the government should remain cognisant of the risks journalists face in reporting within their own communities. There is an immediate accountability associated with publishing work in and about the community in which you live that can be very positive and builds trust, but can also be uncomfortable, disruptive and at worst, dangerous when reporting uncovers deception, corruption and/or unbalanced power dynamics. Similarly, there is often a wellbeing toll on managing audience engagement with topics, such as moderating social

media comments in response to stories published. LINA works to provide supports to its members in navigating such issues and recognises the government cannot fully solve this issue but raises it as a factor that uniquely impacts reporters producing news within their own communities.

“The work is often exceptionally difficult – the personal cost is high – because the people who do it necessarily live in the pots they stir.”

– Alice Dreger and Steve Schewe, Report out of the Shoptalk Retreat in Eden Prairie, Minnesota, Hyperlocal Nonprofit News, East Lansing, Michigan, 2023

“Our cultural consumption, and in particular our media consumption, teach us about our society and how to act in it.”

– John Hartley, *Communication, Cultural and Media Studies: The Key Concepts*, Routledge, London, 2002

Case Study: The Pineapple

The Pineapple is hyperlocal news service operating in the Gympie region, Queensland. Owner/Editor Vivienne Wynter, brings her journalism background to focus on public interest journalism with a positive lens and showcasing non-fiction writers. The Pineapple will reach its aim of 10,000 newsletter subscribers in its first year of operation within the next month.

In October 2023, the Pineapple was telling the local story of a glamorous fashion shoot in the town of Gympie. Recognising that this was more than just clothes and models, The Pineapple provided a platform to those involved. It gave them an opportunity to speak to their motivations and aims for the event, which was an effort to showcase the beauty of the town of Gympie to those outside the area, while bringing visibility to the diverse identities within it.

The Project and the Today Show would later pick up the story, reporting on the two Gympie local producers Cindy Voegls and photographer Brea Martin. The photos would feature in Avant-garde French magazine *Moevir Paris*. But it was The Pineapple that was first on the ground, amplifying the beauty and diversity of their region.



Access

Q1.1 *Is access to news the right objective?*

Access to locally produced news content should be a key objective for the government to ensure the benefits of public interest journalism are enjoyed equitably across Australian communities. Typically, there is a role for government to intervene in areas of market failure that impact public good. It is LINA’s view that public interest news reporting is a public good due to the benefits it produces, which are recognised in the consultation paper and cannot be underestimated.

Around one in five digital newsrooms in Australia have started publishing in the last four years, many in response to the closure of newspapers and/or a lack of locally relevant information during the pandemic.

Many LINA members are responding to the gap in locally relevant news highlighted by the COVID-19 pandemic in both regional and metropolitan areas.

The production and distribution of news services by and for defined communities absolutely fits that space. If we assume the benefits of public interest journalism are broadly agreed, the barriers requiring focus include:

- Supporting individuals and communities with low socio-economic status to have equitable levels of access to news and information as affluent communities. The introduction of paywalls and fee-for-service news delivery, while in many ways necessary for the sustainability of privately-owned news services, excludes low-income people and communities from accessing essential information. Northwester Medill Local News Initiative finds that regions with an average household income of more than \$120k (AUD) can support news outlets, where regions with an average income less than \$82k are much more likely to be news deserts (Karr, 2024). Government has a role to play in addressing market failure in areas with a population sizable enough to warrant a dedicated news service, but not large enough and/or wealthy enough to sustain it.
- Producing news content in languages other than English and/or tailored to the needs of people with a disability is often more resource-intensive due to additional translation, technology and time requirements to ensure the work meets the needs of the audience it serves. Generally, this is hard to commercialise due to limitations on other funding sources for what is seen as an operational expense in the regular and ongoing production of news that serves diverse audiences. Several LINA members publish news in languages other than English to serve multicultural groups within their regions. Government is well placed to resource news production, enabling newsrooms that don't have the means to produce this content themselves to meet the needs of diverse audiences and strengthen social inclusion.

Many LINA members have chosen not to paywall content based on the ideological position that news is a service provided to the community. Further, some have benefited in audience traffic from the implementation of paywalls by other media in their region. To a large extent, LINA members step into news production with a community-service perspective best suited to not-for-profit or social enterprise business models. For many, if they were not providing news information services to their communities that would likely be found in other public service-oriented roles. However, while this position does provide accessible news to anybody with access to internet data (acknowledging this is a big assumption in some parts of Australia), it removes subscription as an income stream, the primary source of income for most newsrooms globally. Instead, LINA members have a heavier reliance on volatile advertising income, voluntary contributions from their community (donors/supporters) and other, often more time-consuming income streams such as running community events, copywriting services and producing sponsored or branded content.

Notably, in an era where consumers have a growing expectation that news media is free, publishers are faced with difficult decisions to find the balance between meeting audience demand and sustaining their businesses. Government has an opportunity to ease this tension by supporting community-led news services that fill an identified gap in local news to ensure communities are served with information that is timely, accurate and relevant to their needs.

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?

There are strong connections between civic engagement and the fourth estate. Without re-canvassing the role of news media in holding decision-makers to account, which is well established in academic literature and likely to be well understood by the individuals involved in the development of the News MAP, LINA's response to this question will focus on the role of its members at varying levels of government.

Firstly, local news publishers report on election processes in ways that no other media does. Many local news publishers will run profile pieces covering all candidates in an electorate, at all levels of government, giving communities access to the full range of options available to them at a local, state and federal level. Further, they are likely to ask questions of those in, or seeking power, that reflect the concerns of the audience directly within a relevant electorate. LINA members are currently actively undertaking this role in the lead-up to the Tasmanian state election and are struggling to cover minor costs associated with hosting public panel discussions involving all candidates, which they view as part of providing a news service to their communities.

Secondly, local news covers local government in a manner that is often time-consuming (poring through documents, sitting in council meetings, fact-checking claims) and is also not covered by any other media. Local councils appear to attract some of the lowest levels of scrutiny of any level of government, and yet they are responsible for decisions that very directly impact all residents in their area. LINA members regularly hold local government to account and shine light on both the good and the questionable aspects of local decision-making. Again, they are well-positioned to investigate and clarify topics that matter to their communities. However, they are regularly faced with push-back from local councils through refusing to provide media accreditation to publishers not providing favourable coverage, by favouring positive reporting with advertising support, excluding other publishers from any promotional spend and/or refusing interview requests from local media. Hyperlocal and independent news publishers are regularly the only source of information on local issues available to residents outside of the council's own communication channels and yet councils are free to disregard or abuse this relationship should reporting become uncomfortable. LINA encourages the Commonwealth to establish policy that guides a more productive relationship between councils and local and independent news publishers, recognising them as a valuable asset within their area.

Finally, the level of engagement with local media serves government through providing an active and engaged forum for public debate, the testing of ideas, raising awareness of concerns or misinformation circulating within communities that may impact their leadership decisions. At all levels of government, feedback through media engagement is valuable.

“Journalists can no longer be seen simply as content creators, but increasingly must also be seen as community builders who can enable and catalyse reciprocal exchange in social media spaces in numerous ways: directly for their readers, indirectly among the broader community, and repeatedly over time in a sustained way.” – Lewis, Seth C, Reciprocity as a key concept for social media and society, *Social Media + Society*, Vol 1, No 1. 2015

Q1.3 What are the appropriate roles for government and industry in pursuing this objective?

There is a gap between the commercial drivers that resource news based on general interest and entertainment and the funds required to produce the type of public interest journalism that generates the benefits identified in the News MAP consultation paper. In short, the ‘scarecrow’ function of public interest journalism – watching over those in power to support accountability and transparency - has proven commercially unviable in many regions. Government has a role in providing access to public interest journalism through:

- a) facilitating the production of public interest journalism at a local level where news items are not being covered by other forms of media;
- b) supporting start-ups in areas considered to be local news deserts;
- c) extending support to local news publishers for the production of news content in languages other than English and tailored to the needs of people with a disability;
- d) incentivising individual giving to newsrooms through extending deductible gift recipient status to help newsrooms increase their sustainability, effectively subsidising a requirement for subscription fees to ensure access to local and independent sources of news;
- e) providing ongoing (at least medium-term) support for news production in areas of market failure where a local community can reasonably produce its own news service; and
- f) continuing to increase digital inclusion levels across the country to ensure audiences can access online news distribution platforms.

LINA acknowledges and supports freedom of the press and an ongoing requirement for editorial independence, transparency and accountability and fundamental requirements for public interest journalism. However, the risk of inaction is dire, as exemplified by coordinated mis- and disinformation campaigns associated with COVID-19 vaccines and the Voice to Parliament referendum. Government cannot effectively do its job without the ‘myth-busting’ role of news organisations with a finger on the pulse in their local community identifying and addressing misinformation. From this perspective, disruption caused by the circulation of misinformation on digital platforms in some ways supersedes nuanced concerns regarding regulation of the press which can be mitigated through clear editorial policies and practices.

“Given the wealth of research internationally highlighting the importance of local watchdog journalism for the proper functioning of democratic societies (Ali, 2016; Nielsen, 2015) and Australian research pointing to the decline of local fourth-estate reporting (O’Shea, 2019), it is hardly a surprise that our respondents were unanimous in describing the importance of investigative and research-based reporting and almost unanimous in their belief that there needed to be more of it. Mimicking case-study research of a regional town in Denmark, which found that a large number of stories about local politics produced by the local paper never appear anywhere else (Nielsen, 2016), one of our respondents said that ‘if a journalist doesn’t put something in a paper about a government decision we might never find out.’ Interestingly, in these interviews, fourth-estate reporting was not seen as separate to community building but as part of it. - Attard, M., Dickson, G., Jehangir, A. Regional News Media. Centre for Media Transition, University of Technology Sydney, November 2022

Quality

Q2.1 Is quality the right objective?

Quality is a relevant objective for audiences and underpins trust, engagement, and all aspects of public interest journalism.

Q2.2 How should the quality objective be understood? Is it the same for all forms of journalism?

Quality should be understood through the lens of editorial standards. It should support the production of accurate reporting that audiences can trust. LINA's own [Editorial Standards](#) demand measures of independence, accuracy, fairness, diversity, harm and offence mitigation, privacy, advertising transparency, accountability and corrections, and the moderation of comments in online spaces as essential to quality news publishing. Further, audiences should expect quality public interest journalism to be verified, draw on expert sources of information to ensure accuracy and to include a level of analysis, not just the re-publication of media releases.

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?

A requirement to maintain audience trust has traditionally served as a counterweight to the production of poor-quality news content. However, in a 'post-truth' era where the rise of mis- and disinformation is proving detrimental to our democracy, audience trust as a measure of quality journalism has reduced effectiveness. Many audiences are ambivalent and/or suspicious of news media. There is a role for both government and local news publishers in growing media literacy to identify methods of verification and legitimate sources of news for audiences.

Broadly, LINA takes the view that government should foster, rather than regulate, news media. As stated in our response to question 1.3, the government could take an active role in keeping a register of industry-produced editorial standards, without regulating the content of those standards. Similarly, government could work in partnership with industry to assess applications for a register of public interest journalism publishers which are decided by a group of industry representatives (eg. PIJI, MEAA, Australian Press Council, LINA) so as to maintain an arm's-length between government and a decision-making process on what is, or is not, considered quality journalism. LINA has pointed to precedents within Australia for government decision-making informed by industry expertise earlier in our submission. In this section we note Finland's Council for Mass Media as a mechanism for maintaining freedom of the press while providing significant support to public interest news publishers.

"Reporters get to be eyewitnesses at the great moments in history, but they also get to be observers and storytellers of all the little moments that make up the varied and fascinating lives we share together as a community."
– Alan Sunderland, *Ten Rules of Reporting*, 2022

Media Diversity

Q3.1 Is media diversity the right objective?

Media diversity, sometimes expressed as media plurality, is a relevant objective in considering the relevance of news media to Australian communities. Firstly, audiences should be provided with a range of views and perspectives on newsworthy matters to form their own, informed ideas and opinions about a given topic. Secondly, it is imperative to the social fabric of Australian communities that people from culturally, linguistically and geographically diverse perspectives can report on matters of importance to their communities as a vital component of our media landscape and a significant contributor to social cohesion. Thirdly, and of most relevance to LINA publishers, localism is a factor in considering media diversity. It is not enough to measure how the news is published, but also where it's coming from; who is reporting and their knowledge of the relevant community is extremely impactful in relation to trust in news.

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 should be considered in dual terms: the range and relevance of information available to audiences; and the range of voices and perspectives represented in the media landscape. Effectively, information in and information out of communities, both of which are vital.

Market forces have, over decades, consolidated the news industry to the extent that Australia now has one of the most concentrated media markets in the world. Government support is required to address market failure as the antidote to dangerously skewed media coverage controlled by private interest. Left vacant, this void is filled with barely moderated rumour mills which are vulnerable to the spread of misinformation and do not serve the best interests of Australian communities. Media diversity provides audiences with reporting that meets editorial standards and draws from a range of sources, from which individuals can make their own decisions on any given topic.

In relation to local and independent news, media diversity provides an opportunity to draw on local expertise, deep subject matter knowledge and community connections to include perspectives in news reporting that would not otherwise be shared. It also provides a nuanced level of coverage that state-wide or national media are unlikely to be able to attain.

LINA suggests the amplification of local issues is a feature of quality news that should be recognised for its contribution to media diversity. As the often-heard catch-cry states, 'all politics is local' so too are all news stories. Sometimes those stories are only of interest to people directly affected, but many news stories grow from local events and issues into subjects relevant across Australia and sometimes globally. For example, the proposed extension of the Trans-Atlantic pipeline through protected lands in Canada and the US became global news despite being an issue that impacted a relatively small group of people in rural Alberta.

Similarly, Australians take an interest in extreme weather events (cyclones, floods, fires) which are localised to certain areas. Reporting on environmental issues, corporate misbehaviour and corruptions of power often require requires a spotlight drawing attention from outside the area to generate impact. As such, many LINA publishers see their role as drawing attention to the happenings in their region both within, and outside of their own communities. Reporting must be of a high quality to do this effectively.

Further, local news publishers actively contribute to community building and social cohesion. Take for example, coverage of Cyclone Jasper around Port Douglas, Queensland. While the cyclone was covered by national media outlets, the focus was on potential damage and interruptions to travel and lasted roughly 24 hours. The local news publisher, Newsport worked closely with the Douglas Shire Council to provide hour-by-hour updates to residents, had live stream cameras broadcasting from five beaches in the region, produced a live blog on its website and video coverage to an engaged Facebook following throughout the cyclone threat. Then, in the days following the cyclone, the Newsport team provided information about road closures and repairs, businesses that were re-open and those requiring support, instructions on water safety, ongoing weather updates, information on community meetings and opportunities for residents to access support for repairs. Although the cyclone hit in December 2023, Newsport is still providing follow-up coverage, including monitoring the council's recovery response, to help the community rebuild. This is just one example of many instances where local news goes beyond the headline story to support community resilience in the lead-up to and after emergencies. Similar examples can be found in IndyNR's coverage of the Lismore floods, In the Cove's coverage of water outages in Sydney, Tasmanian Inquirers expose on the use of antibiotics in offshore salmon farming, and Yanchep News' coverage of recent fires in Gin Gin, WA.

The community-building aspect of local news stems largely from journalists reporting on matters that they know the community cares about. They know it because they are embedded in the community. This role should not be underestimated in the health of communities and should be recognised more widely as a key outcome of media diversity. Voices are shared, perspectives are heard, people are better understood. This is news that shifts us from being people who just live near each other, to people who know and care about the people we live alongside. Therefore, media diversity should be understood as both a plurality of media options available to audiences and standpoint diversity represented in news reporting.

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?

There is an opportunity for the government to take a workforce development role in pursuing media diversity. To access the benefits of media diversity, we need a strong workforce of journalists with the skills and connections to undertake this work. Recruitment remains a challenge for all areas of the news industry, especially as many journalism graduates find more lucrative and stable roles in communications roles. Employers are understandably prioritising candidates with journalism training for communications roles, while the media industry (broadly) has self-promoted a sense of instability and scarcity. Journalism degrees increasingly include aspects of news entrepreneurship, but those revenue streams take time to grow, particularly in small markets. The government has provided funding support for cadetships in regional areas, which is very helpful. LINA suggests this program be extended to suburban and metropolitan-based small newsrooms that also face challenges in providing career pathways for emerging journalists.

However, support for cadets is not enough to meet the dual challenges of career pathways and newsroom sustainability. A workforce development program is required to establish journalists in sustainable roles over a period of three years, with tapered funding support and entrepreneur mentoring, to allow a realistic timeline to develop and launch news products and make roles sustainable. LINA is developing a pathways program to support emerging journalists into sustainable roles with news entrepreneurship training support in partnership with universities, digital publishers, and other community media partners. The 'Emerging Journalist Pathways Program' is designed to provide early-career journalists with broad experience through

placements in local and independent newsrooms, while complementing their day-to-day activities with a training program to help build their news product skills and build self-sustainability around those roles over three years. The host newsroom would receive a wage subsidy, tapering over the three years, with the expectation that journalists would continue to be employed by the publisher beyond the program length. LINA has requested pilot funding for this program totalling \$1.4 million over 2024-2026 (three years inclusive). However, the program is entirely scalable pending funding investment.

In addition to paid opportunities, LINA suggests that government grants aimed at increasing volunteering could be beneficial to some newsrooms should they operate under not-for-profit business models. The Philanthropy Inquiry currently underway is exploring opportunities to increase giving through the donation of time (volunteering). LINA member publishers currently engage an average of eight volunteers per news outlet in the production of local news services. There is potential to increase this resource pool with support for the oversight, training, equipment, insurances and compliance requirements involved in the management and facilitation of volunteers. LINA encourages the Department of Communications to coordinate with other departments on the availability of grants to local and independent news publishers to increase volunteerism as a pathway for skills development to address recruitment barriers faced by news publishers, particularly in regional areas.

Beyond funding stimulus to support grassroots journalism and address news deserts, government is increasing its role in the monitoring of media diversity in Australia through the ACMA's Media Measurement Framework. LINA supports this work and discusses mechanisms for monitoring media diversity further in the Establishing an Evidence Base section of this submission.

One of the basic tenets of LINA membership is a requirement for publishers to be owned and operated within the community that they serve. While LINA recognises the commercial and sometimes practical imperative to syndicate news content, the concentration of media ownership in Australia is concerning as a potential barrier to diversity of news and the many benefits flowing from public interest journalism. Government has a role in regulating ownership of news media across platforms and markets to ensure audiences are well served with a range of news sources.

Equipping citizens with the necessary skills and awareness to be responsible producers and consumers of content and supporting fact-based, rigorous, and independent journalism are key elements of building sound media and information environments. Media diversity, particularly at the local level, has suffered with the rise of social media platforms and the related decline in advertising revenues, whereas clickbait and sensationalistic reporting has grown (Matasick, Alfonsi and Bellantoni, 2020). This trend aggravates the vulnerability of the information ecosystem and undermines an essential avenue for trustworthy news and government accountability.

- OECD Public Governance Policy Papers N30, Good Practice Principles for Public Communication Responses to Mis- and Disinformation, OECD, 2022

“When asked what types of news people were interested in, nearly two-thirds chose local news (67%) – Sora Park, Digital News Report: Australia 2022, University of Canberra News & Media Research Centre, June 2022

Engagement

Q4.1 Is engagement the right objective?

In short, of course. News does not exist in a vacuum. That said, public interest journalism does not always generate the same levels of audience engagement that more sensationalist, entertainment-based content might attract. Some of the functions of journalism, particularly the deterrence of corruption or wrongdoing, for example, can produce benefits without significant levels of audience engagement. Similarly, some local news publishers feel obligated to cover community events such as sport, even if it draws little readership.

Q4.2 How should the engagement objective be understood? How might the engagement objective be promoted in the contemporary media environment?

LINA understands engagement through the following considerations:

- Quantitative engagement – the percentage of population who are reading/watching/hearing news content.
- Participation – the number of people who are responding to news stories through comments, feedback and discussion, the number and scope of people inputting leads and stories ideas to news outlets and the number and diversity of sources quoted in news stories.
- Understanding – the level of analysis audiences are capable of applying to news, media literacy.
- Impact – the actions promoted by news stories within communities.

LINA has been working with US-based company, [Impact Architects](#) who specialise in impact tracking for local newsrooms. A technical resource and training has been developed to support LINA members to build impact frameworks and dashboards to monitor not only the quantitative data that guides their newsrooms, but also measure qualitative data to understand the way audiences respond to news stories. Effectively the ‘so what?’ beyond the news stories.

In relation to ‘understanding’, LINA expands on the role of local news publishers in media literacy in the section ‘support for media literacy’.

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?

Whether it is government’s role to foster citizen engagement with news content could be debated. But there is no doubt the impact of a lack of critical engagement with news services has direct and adverse outcomes for government. Government cannot effectively do its job if it is consistently met with mis- and disinformation campaigns both domestic and foreign. Therefore, regardless of whether it is government’s responsibility to act, it is imperative that it does.

LINA suggests appropriate roles for government in this space are:

- Support for media literacy training programs in schools and for adults;
- Support for awareness campaigns that socialise the value of media diversity and trusted news sources; and
- Leaning on government advertising campaign processes as a tool for consultation with voters.

Summary of Framework and Objectives

LINA supports the objectives of access, quality, media diversity and engagement as the right areas of focus for a principles-based approach to media policy.

A theme underlying these objectives is the concept that public interest journalism is a public good. While this is implied through the consultation paper, it is not articulated clearly and should be made apparent in the policy framework as a guiding principle.

LINA suggests appropriate actions for government would include:

- Making policy adjustments to enable a non-profit news sector in Australia, with access to deductible gift recipient status to grow fundraising and philanthropic capability, particularly for community-led news production;
- Focusing a proportion of government advertising spend in locally produced news media as a mechanism for reaching diverse audiences and supporting media diversity;
- Providing workforce development support for emerging journalists to address a skills deficit and create pathways to sustainable journalism roles;
- Providing start-up support for emerging news services in news deserts; and
- Supporting local and independent news providers to deliver media literacy programs within their communities.

CASE STUDY: NEWSPORT CYCLONE COVERAGE

Based in Port Douglas, Newsport is a digital-only publication serving the Douglas Shire and tropical Far North Queensland communities since 2007. Four journalists and two regular columnists cover breaking news in the region, along with sport, entertainment, business and tourism news. The site hosts 'Beachcam' allowing visitors to check live conditions on the Port Douglas beaches and they also publish a quarterly tourism magazine, Port Douglas Travel Planner.

When Cyclone Jasper hit the region in December 2023, Newsport provided live blog updates during the disaster on its website and social media feeds, including hour-by-hour emergency updates, road conditions and providing essential information about emergency services. The need for this information was demonstrated by the 5 x increase in traffic to the site during the week of the disaster, with 158,000 unique visitors to the site.

Newsport Editor, Michael Warren says, **“Our role was to update, inform and engage in the moments when our community needed it most.”**

Newsport continues to report on clean-up actions, repairs and support to Help the community rebuild following the disaster.



Potential Measures

LINA notes the significant investment in reviews and inquiries relating to the news sector over the past decade, and that the findings in Australia broadly align with global trends in news delivery. LINA recognises and supports the need for striking a balance between providing support and maintaining independence of the press. To date, this has been achieved (mostly) through the government's relationship with its public broadcasters through the inclusion of editorial protections in ABC and SBS's respective Charters.

LINA acknowledges with gratitude the government's actions over the past year in particular, including providing \$1.5 million in funding to LINA and support for the Australian Associated Press. While this support has been a fantastic start to capacity-building within the local and independent news sector, it is a one-off, one-year grant. Ongoing support is required to capitalise on this initial investment and continue growing media diversity in Australia. The issues facing news media have emerged over a 40 to-50 year time period, with changes occurring exponentially along that timeline and continuing to evolve at a scale and pace that is profoundly difficult to navigate with limited resources. Government should take at least a medium-term view to supporting the transition of industry through this period of disruption. Responding to the impacts of audience migration to digital platforms, building new business models for newsrooms and addressing workforce barriers cannot be resolved within any 12-month program.

There is precedent for government supporting industry through periods of transition to sustain and grow employment and services of public benefit, such as:

- \$378 million provided to help taxi license holders transition to a new framework as a result of industry disruption with the introduction of ride-share apps, as well as a \$75 million 'Fairness Fund' to provide targeted support to participants experiencing immediate financial hardship during the transition period;
- A \$48 million package provided to the Australian tourism and travel industry, including \$10 million to fund a digital hub to serve as an online skills and employment platform for tourism, travel and hospitality workers;
- Ongoing support for the aviation industry, amplified during COVID-19 to maintain the minimum connectivity necessary to help people travel across the country. The \$1.5 billion envelope includes funds for airports and other services associated with aviation travel;
- The Australian Industry Energy Transition Initiative to support workforce development to meet the needs of a renewable energy industry by growing an industry of 26,000 workers in 2020 to 193,900 workers in 2050 with considerable ongoing and sustained funding support; and
- The More Doctors for Rural Australia Program supporting doctors to access increased Medicare items and workforce development programs to resolve an identified need in regional Australia.

These are just some examples of government investment over medium to long-term periods to resolve workforce barriers facing essential industries. LINA encourages the government to seek resources to support grassroots journalism over a number of years and offers the following suggestions of potential funding sources that may complement existing funds:

- Income generated from the sale of spectrum to telecommunications companies;
- Workforce development support from training and career pathway programs/envelopes;
- Small business and employment funding, particularly in regional areas such as the incubator support programs offered to Australian businesses seeking export development support;
- Emergency preparedness and community resilience funds;

- A proportion of tax income from other sources, such as in France where taxes on tobacco sales are used to fund journalism.

LINA notes that the \$60.4 million package established in 2018 to help small metropolitan and regional publishers has to date focused almost exclusively on regional print publishers and remains underspent. While the Regional and Small Publishers Innovation Fund was intended to support the availability of Australian civic journalism, its implementation focused on print news distribution, suffered from inconsistent guidelines between grant rounds, and primarily focused on tech development activities rather than journalism. LINA encourages the Government to allocate funds remaining from this package to the support of locally controlled and produced, independent media. There is an opportunity for government to support a growing local digital news sector to generate public interest journalism, increase employment and strengthen democracy by leaning into this emerging news space to ensure all communities are adequately served by local news sources.

Business Models

As discussed in our response to questions on Access, typically, LINA members support free access to public interest news content as a community service and have mostly opted not to implement paywalls, unlike many of the national and state-based news outlets. Instead, they encourage small, voluntary contributions to complement advertising revenue and support their work using online donation tools (widgets) such as 'Buy Me a Coffee' and PressPatron. Readers can give one-off payments or make regular contributions and some publishers provide additional content to paying newsletter subscribers or engage with financial contributors in other ways through community events. To date, these very small contributions (often in the \$5-\$30 per month range) provide supplementary income to small news publishers and foster engagement with audiences but are not significantly impacting the sustainability of local newsrooms. There is an opportunity to grow this revenue stream if individual donations were tax-deductible, and significant scope for non-profit media organisations eligible for DGR to attract and maximise bequest donations.

According to a Reuters Institute study, the percentage of people donating to news organisations is 1% in the UK, and 3% in the US, where such donations attract tax relief. They found this source of funds could increase with nearly a quarter of respondents (22%) stating they might be prepared to donate to a news organisation in the future, motivated by the need to support fact-based journalism in an era of fake news and to secure a greater variety of independent voices (Cairncross, 2019).

Digital newsrooms offer more flexible distribution channels and associated diversified revenue streams. However, they are not financially viable on a user-pays basis, particularly in lower socioeconomic environments. While subscriptions generate the highest level of income for newsrooms globally, only 17% of readers pay for online news. These figures include mastheads like the New York Times. While paying for news increased to 18% in Australia in 2022, local audiences are still only just above average in their willingness to financially contribute to news and increasing cost of living pressures are likely to reduce that figure in coming years. (S. Park, Digital News Report, 2022) LINA members have therefore relied on relatively unstable advertising income as the primary source of revenue to date.

Given the evidence of market failure in the supply of public-interest news, public intervention may be the only remedy. - Frances Cairncross, The Cairncross Review, UK, 2019

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?

Small publishers are, by necessity, focused on the production of public interest journalism, covering a broad range of news topics with very small teams. 66% of LINA members have fewer than three staff.

The quandary of time spent working *on* versus working *in* a business presents a barrier to any small business. However, the pressures of providing timely news services to communities leave news businesses particularly hamstrung by the dual requirements of meeting audience expectations and reporting on current events with very little time left for business development or innovation. LINA is well placed to coordinate a response to this issue through shared business development resources such as the employment of business development staff that would work across a group of non-competitive (ie. geographically separated) publishers to establish, trial and share learnings on new revenue streams.

LINA's Revenue Growth Program (discussed further in the next section) has attracted significant interest from publishers wishing to participate in the program, yet few can afford the time even when it is immediately tied to an income outcome. People in leadership positions at smaller news organisations need resourcing to participate in such programs so that they can backfill journalism activities while they work on news entrepreneur activities.

There is also opportunity for government to enable a non-profit news sector in Australia which would increase media diversity through the establishment of not-for-profit newsrooms drawing on philanthropic investment in areas of market failure. Philanthropic support for local news services producing and distributing public interest journalism can complement government investment in media diversity to increase the sustainability of small and emerging newsrooms in local communities and coverage of topics of public interest that are underserved by mainstream media. Recognition in the Charities Act and an associated DGR category is a policy action government can make now, which would significantly impact the capacity of public interest news publishers to self-generate income into the future through bequests, non-government grants and individual donations.

Q6.2 How can government and regulators encourage and support innovation and development of sustainable business models in the news media sector? Are there any examples from Australia or internationally that could be adapted to serve this purpose?

The industry is yet to land on the 'silver bullet' formula that produces a sustainable news service, although significant work is being undertaken to uncover best practice models. There are geographic and community-based variables in developing sustainable newsrooms. Government can encourage the philanthropic community to investment in news would be beneficial, most funding comes with caveats aligned with the priorities of the funder, rather than providing scope for experimentation and innovation in newsrooms.

LINA has partnered with Bastion Agency to run a Revenue Growth Program in which newsrooms identify the expansion of a revenue stream, or a new income opportunity, and receive coaching support from an experienced industry mentor over a 12-weeks with training support to test and trial new revenue sources. The program has been subsidised by Commonwealth funding provided to LINA in 2023-24 to cover mentor fees and coordination with news publishers self-contributing for the training modules. However, it could be considerably more helpful if the newsrooms were supported for the time and resources required to

implement the revenue experiments and if the program was available to all newsrooms - not just those with the resources to self-fund their involvement.

Similarly, in the U.S. the Local Independent Online News (LION) publishers group has partnered with Google to run newsroom sustainability audits to help identify opportunities for business development growth for small publishers. Newsrooms receive \$6k to support their participation in the program and a further \$20k to address the audit findings. While Google has made the audit tool available in Australia, it has declined to provide financial support to publishers in the Australian market. This type of program is a very practical example of the type of gap the government could resolve for Australian publishers.

LINA members point to examples such as the BBC's [Local News Partnerships](#) program as a means of broadening the impact of public funded media and strengthening local news reporting. The program has employed 165 reporters to serve the needs of both the BBC and local news organisations. Meanwhile Canada is investing funds directly to local newsrooms to hire journalists in response to recent layoffs from large new corporations, as well as supporting an Online News Act to complement its Local Journalism Initiative. In the US, the state of Illinois is implementing a coordinated 'package of local journalism' including State agencies directing at least 50% of total advertising spending to local news organisations, employer credits against income tax for each qualified journalist hired, wage subsidies up to 50% for 150 qualified journalist positions in the state, small business tax credits and a Journalism Student Scholarship Program to support students working in local newsrooms for a period not less than two years (Caro, 2024).

Similar types of Government interventions across the globe have included grants supporting content production and/or journalist employment, tax breaks for public interest news publishers, operational support grants for publishers in the form of grants and subsidies. Some examples include:

- In Canada, a CAN\$595 million tax package was implemented in 2018 to help arrest the disappearance of jobs in journalism. A similar program has been introduced in France, expanding tax credits, while Tunisia, Lebanon, Colombia and Indonesia have introduced tax exemptions for local news publishers and El Salvador has deferred tax payments for news businesses. It should be noted though, that media outlets must be profitable to benefit from tax exemptions;
- In addition to tax credits, France offset €377 million to support the news industry's ecological and digital transition with additional taxes on tobacco;
- Similarly, Canada has provided \$50 million CAD over five years to support a Local Journalism Initiative, supporting 300 reporter positions;
- Sierra Leone recently launched a National Fund for Public Interest Media to help journalists produce investigative in-depth stories;
- Indonesia suspended electricity charges for news publishers and provided a 30% tax credit to promote individual subscriptions;
- The Dutch Journalism Fund, launched in 2010, receives funding from the Ministry of Education, Culture and Science and spent €35 million in 2020 on grants for newsrooms that contribute up to 50% of investigative journalism costs, as well as subsidies for news publishers, innovation schemes, professionalisation programs for local broadcasters and talent development support;
- Norway awards production grants to the industry in proportion to a newspapers' circulation and market position: every newspaper with a circulation less than 6,000 copies receives aid from the government;

- An obligation to support local press is enshrined in the Portuguese Constitution: granting money to local and regional press, but not to national press;
- In Denmark, newspapers and digital publications that publish political and cultural content and employ at least three journalists are entitled to an editorial production subsidy based on the amount they spend producing journalism;
- In Austria, the Austrian Communications Authority awards subsidies which in 2017 amounted to around €8.5 million; and
- Sweden, Canada, the US and UK have each established state assistance agencies to support independent media. (The Cairncross Review, 2019; Poynter 2022, UNESCO, 2022, KAS 2022)

Further examples can be found in [this spreadsheet](#) produced by the Global Forum for Media Development, which outlines over 50 examples of national journalism funds.

The polarisation of media has been felt particularly strongly in the US. In response, a range of agencies and mechanisms have been created to support local journalism, including the Institute for Non-Profit News, the Poynter Institute, American Journalism Project and the American Press Association. In many ways, LINA takes its lead from the highly successful example set by Local Independent Online News (LION) Publishers supporting 400+ members across the U.S. and Canada. LION focuses on start-up programs, revenue growth and news entrepreneurship as signature programs, along with other member benefits. It is primarily funded by philanthropic donations from the US-focused Knight Foundation. In Australia, where journalism does not attract tax exemptions, philanthropic support is much more difficult to secure. Therefore, government investment is required to provide similar support structures to independent media.

LINA urges the Commonwealth to provide operational support for news business start-ups, tapering across the first three years of operation. A significant barrier to addressing news deserts and increasing media diversity exists in a lack of wage support to allow businesses to launch successfully, with many operators hamstrung by attempting to operate news businesses outside alternative paid employment. A state-funded support program to sponsor start-up news publishers could look like 20 x \$150,000 per annum grants supporting publishers that fill an identified market gap community and have developed business plan, while audience and revenue development is underway to increase their opportunity to achieve sustainability. Such a program could be administered by the Department of Communications or by LINA if preferred as per the example below.

Item	No of businesses	2024-25	2025-26	2026-27
Start-up group 1 – Year 1	20	\$3,000,000	\$2,000,000	\$1,500,000
Cohort 2 – Year 2	15	-	\$2,250,000	\$1,500,000
Cohort 3 – Year 3	10	-	-	\$1,500,000
Totals	45	\$3,000,000	\$4,250,000	\$4,500,000

“The problems faced by citizens in accessing three of the most basic tenets of fourth estate journalism - informing, representing and scrutiny of the powerful – have real-world consequences for local people. From basic difficulties such as planning a route to work in the face of major road closures to the imposition of large-scale energy projects with public health implications, citizens are facing difficulty living their lives without adequate, trustworthy information about local issues.” – David Harte, Rachel Howells and Andy Williams, *Hyperlocal Journalism: The decline of local newspapers and the rise of online community news*, Routledge, London, 2019

Q6.3 How are news organisations reacting to, or leveraging, the development of more sophisticated artificial intelligence services? What are the likely consequences for news and journalism resulting from existing and novel artificial intelligence services over the coming years and decades? What opportunities and challenges are likely to emerge?

The publication of algorithmically generated news articles on sport, weather, and even finance has been a feature of the news industry for almost a decade (Nishal and Diakopolous, 2023), but is not being widely implemented at a local news level. Restrictions on localised data and implementation limitations constrain the usefulness of AI in journalism at a local level, and also directly contradict the role of trusted local and independent news providers who are connected with their communities. Therefore, LINA maintains a watching brief on developments in artificial intelligence largely from an operational perspective more so than a content generation perspective.

There are potential efficiencies to be gained through AI products relating to business management. However, to date there is little advantage to news publishers specialising in the delivery of localised and/or community-based news from the integration of generative AI content, without significant investment of the scale that is unaffordable to most local news publishers. In future, there is likely to be helpful AI usage for data-scanning relating to investigative journalism and potentially in some elements of news gathering and fact-checking. There is also an emerging role for news publishers in the identification, and common-sense cross-referencing of generative AI materials for audiences.

Tax-based incentives

The Consultation Paper references disruptions to local news in outer-metropolitan and regional areas and the emergence of news businesses transitioning from social media platforms to print and other digital news distribution channels. LINA recognises the limitations and risks arising from comparatively slim resourcing and potential knowledge gaps in this space and acts to address those issues through capacity-building activities for small newsrooms, strengthening public interest journalism and facilitating networking and shared services to encourage best practice within this emerging space. As an industry association, LINA's success in this endeavour relies on publisher participation (membership at minimum), but is currently addressing gaps in news delivery, and ensuring accessible and quality news delivery to communities in smaller markets. Our work in this space grows exponentially with funding support.

Meanwhile, recognition of public interest journalism as a charitable public good has been in discussion in communications policy forums in Australia for at least 15 years and has widespread support from industry, in both media and philanthropic communities. LINA has added its voice, through participation in the Philanthropy Inquiry, to the growing list of agencies calling for a clear pathway for independent news publishers producing and distributing public interest journalism to register as a charitable good with an associated deductible gift recipient category to help grow the not-for-profit news sector. In February 2023, LINA sent a response to the Treasury's draft DGR Registers Reform requesting the introduction of public interest journalism to the Charities Act with an aligned DGR category to support donations from individuals and philanthropists to local news services. The Future Foundations for Giving Draft Report was released in November 2023 which included a recommendation to create a DGR category for public interest journalism. LINA urges the government to act on that recommendation quickly.

Community-based digital newsrooms in Australia are disincentivised from establishing themselves as not-for-profits and/or charitable organisations by a lack of recognition for public interest news services as a public good. LINA encourages the government to enable the development of a not-for-profit news sector in Australia, following successful international examples where countries have implemented varying tax credits and concessions to support donations from both the philanthropic sector and individuals supporting public interest journalism (outlined in response to Q6.2).

In the Australian market, smaller populations and cost of living pressures will limit the potential scope of donations, however an increasing number of people are making donations to support a digital news service, up by +1 to 4% in 2022 (Parks, 2022). The feedback LINA has received from the philanthropic community to date indicates a willingness to support newsrooms with donations should DGR status be applicable. There is also scope to increase support for local news production through ancillary funds.

Q7.1 What are key advantages and disadvantages of tax-based incentives to support public interest journalism?

While LINA recognises the tax revenue implications implicit in any deduction the government decides to make, tax-based incentives offer government a relatively low-cost mechanism for supporting public interest journalism. Public interest journalism offsets this by contributing to social cohesion, emergency preparedness and resilience, increased community health outcomes and a stronger democracy, just to name a few public good outcomes. But beyond these tangible benefits to the community, it's worth noting that the potential impact on tax revenue for government that would result in a pathway to DGR status for not-for-profit newsrooms is likely to be minimal.

Firstly, most individual donations will be less than \$200 per year, meaning the tax implications on those donations are minimal. Secondly, larger donations or bequests of more than \$1,000 (for example) are most likely to come from organisations who would otherwise have donated to an alternate not-for-profit. So, while decisions on donations will be made on perceived value to the community, the impact on tax revenue for the government is null. Thirdly, Australian philanthropic foundations already require grant applicants to hold DGR status, therefore extending DGR eligibility to public interest journalism merely provides opportunity for consideration on funds that are already being expended, also having zero impact on tax revenue. Finally, international donors are increasing supporting media outlets in countries such as the UK, the U.S. and Canada and require the equivalent DGR status to their domestic equivalent (ie. section 501c in the U.S.) in order to donate to Australian newsrooms.

Australian newsrooms would be well positioned to increase giving from international donors should they have access to DGR status, generating tax-positive outcomes for Australia. And finally, the tax system is not neutral toward media outlets. Advertisers claim the cost of marketing expenses against tax even for money expended with large, for-profit media outlets who rely heavily on this income for their sustainability. The current tax arrangements favour large for-profit media companies (tax deductibility of advertising) or non-profit projects affiliated with universities (tax-deductible donations, bequests etc). Smaller outlets wanting to operate as non-profits are forced to rely on a narrower range of income streams, such as non-deductible donations and advertising. The narrower the revenue base, the greater the risk of failure, especially when serving small regional communities.

LINA notes that charities with revenue under \$250,000 receive 40% of their total revenue from donations on average. Given the average income of LINA members in 2023-24 was \$350,521, many emerging local news publishers are reliant on self-generated income that falls below the \$250k level. This suggests an opportunity to attract an average 40% increase in revenue to businesses that bring significant public value to their communities should tax-deductible donations be available to them.

Through reaching engaged audiences with high levels of trust in local news, there is opportunity to increase donations from individuals as supporters of local news services. However, dissolving trust is a potential disadvantage to tax-based incentives which must be mitigated. In order to maintain audience trust and transparency, news publishers would need to publicly identify donors, or at least ancillary fund sources, contributing to public accountability in philanthropic giving.

Q7.2 Are tax-based incentives preferable to other mechanisms, such as grants?

In the current news climate, all mechanisms that support news publishers are welcomed. Tax-based incentives can help strengthen the business models of larger publishers. However, to benefit from tax-based incentives, a business needs to be generating enough revenue to pay tax. For emerging and small publishers who are typically earning an average \$25k per year, grants and subsidies are more effective means of support.

Government Advertising

LINA acknowledges and supports government advertising in regional newspapers. In addition, government should be placing advertising in online digital news publications to reach a growing audience of readers accessing their news online.

Business models for government media agencies do not incentivise working with small publishers. Rather, they seek the broadest audiences with minimal contact effort on behalf of media buyers. Local and independent news publishers reach highly engaged, niche audiences who are most likely to respond to relevant information provided to communities through government advertising. However, they are currently excluded from bookings on the basis of agency efficiencies. LINA is working to address this administrative issue on behalf of its members and to build the capacity of its smaller newsroom members to meet the reporting and ad-serving requirements for government agencies. The larger newsrooms in our membership group are already reaching strong audience shares (up to 80% of the population in their regions) and are ready to immediately provide this service through websites, newsletters, social media and printed newspaper formats.

Many academics, industry bodies and stakeholders have recommended allocating a share of the nearly \$450 million spent in government advertising annually to local news organisations. While this can be undertaken through contracts between governments and media buying agencies, these actions are easily reversed or changed during contract negotiation or changes in government. LINA suggests a ratio of government spend should be legislated to provide medium-term support to news organisations and ensure audiences are receiving key information from governments at all levels. LINA notes calls from the Digital Publishers Alliance for 20% of government advertising to be mandated to be spent with publishers with less than \$35m in annual revenue. LINA supports the concept of a maximum revenue cap on such a measure and would add a requirement for content produced within the community the news service is serving as a requirement for mandated advertising spend.

LINA members are well placed to deliver call-to-action campaigns, but also to keep communities informed of non-campaign announcements such as community consultations, road closures, recruitment, meetings and events which governments are required to communicate broadly to residents. A legislated percentage of government advertising spend would:

- a) increase return-on-investment for government campaign spends through reaching a broader audience;
- b) incentivise government media buying agencies to familiarise themselves with local media outlets;
- c) increase transparency and engagement with local Council activities; and
- d) increase sustainability and engagement with local newsrooms.

Looking to successful examples in the US, an executive order (EO47) signed by New York Mayor Bill de Blasio in May 2019 intended to channel city advertising to community and ethnic media outlets in response to chronic underfunding. EO47 channelled \$9.9 million (or 80%) of the city's total digital and print advertising budget to 230 outlets, 21% of which had never received any city advertising at all. These included publications such as The South Asian Times and The Haitian Times and helped keep them going during the pandemic. The Haitian Times, for example received \$73,000 in 2020, compared to \$200 in 2019. (Schriffin, 2022) Following New York's lead, the Mayor of Chicago signed a similar

Executive Order in November 2021 requiring all Chicago City departments to allocate at least 50% of advertising spend to community media outlets (including print and digital publications, television and radio outlets). Both cities have reported significant success from the equity-based policy intervention.

While Victoria and New South Wales have each committed advertising expenditure in print publications, the focus on print distribution leaves many reputable digital news providers without access to potential revenue and excludes digital audiences from government messaging reach.

In Australia, less radical steps are required to produce significant impact in the news landscape. If applied at all levels of government, a requirement of 10% of all government media advertising to be spent on locally produced media outlets would be enough to shift the media landscape and better inform audiences.

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

Advertising is clearly identifiable to audiences and provides direct income to news publishers.

While Commonwealth and state-wide advertising is managed by media buying agencies, local government advertising is usually booked directly resulting in direct correlations between satisfaction with editorial content and advertising spend that is problematic for public interest journalism. Local governments in most states have moved away from the publication of notices in newspapers and should be required to engage with print and digital news publishers operating within their LGAs to ensure the public has access to consultation processes, tender notices, job opportunities, public meetings, road and traffic notifications and the like. Currently, a number of local councils have started their own 'news services' which are formatted and presented to replicate legacy news mastheads but are self-generated and do not operate under journalistic editorial standards. This is confusing for audiences, open to corruption and problematic for news services in covering contentious or contested issues.

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

Government advertising fluctuates as per the priorities and key messages the government needs to communicate to the general public at any given time. It is necessarily focused on the objectives of reaching defined audience groups as per the information needs of different communities at any given time. While in many cases this will align with publisher priorities, marketing and news are not the same thing. Advertising revenue should not replace grant mechanisms that seek to grow other revenue sources and strengthen accountability mechanisms associated with public interest journalism.

"We need to bring back those community correspondents and train them to be the eyes and ears of the professional journalists who can't be there. The only way we are going to know what is going on in these communities – what is important to people living there – is to have someone in the community." – Penny Abernathy, The State of Local News, Local News Initiative, August 2022

News independence is a strong predictor of trust in news. Low trust is linked to news avoidance. Public disengagement with current affairs is a key risk in participatory democracies. Distrust is a strong predictor of news avoidance.
– *Digital News Report: Australia 2022*, University of Canberra News & Media Research Centre, June 2022

Fostering Media Diversity

LINA is pleased to note the government's recognition of a growing online audience for news in Australia in the consultation paper. This section of the consultation paper asks a broad range of questions about the role of regulation in media diversity, which LINA has attempted to consolidate in this response.

Government should take a platform-agnostic approach to media policy due to the rapidly changing nature of the communications sector. If the government seeks a principles-based, evidence-informed approach to policy-making, the delivery mechanism by which publishers meet the needs of their audiences should not matter. In fact, publishers should be encouraged to evolve to meet audience expectations, whether that be in traditional media formats (print, radio, television) or more contemporary formats of digital news distribution. The focus on delivery mechanism has presented barriers to the success of previous programs seeking to support media diversity.

It is appropriate for media regulation to take place at a national level to mitigate the risk of localised issues impacting regulation processes. However, any regulation of news media should be flexible enough to facilitate place-based solutions to the news and information requirements of different communities within a local government area, and/or serving the needs of a defined community such as Aboriginal and Torres Strait Islander peoples.

Finally, consideration of media diversity should not only focus on the variety of sources of news available to communities, but also on diversity of participation in news-making. From this perspective, the diversity of personnel involved in producing public interest news content (both cultural and geographic) is important to all Australians for its contribution to the diversity of views, perspectives and stories available to audiences. Considering news published *to* communities leads to syndication and consolidation. Considering news reported *from* communities enhances the news landscapes and leads to great social cohesion and civic engagement.

Support for Media Literacy

LINA broadly agrees with the definitions referenced in the consultation paper on media literacy and is concerned by the low levels of media literacy reported in Australia. Local news attracts high levels of audience trust due to community connections, local knowledge and identifiable references; it is relatable. As such, local newsrooms can contribute to media literacy among adults in their communities with the dual outcome of upskilling newsrooms in building trust and audience engagement, and the education of individuals within communities to understand and identify reliable news sources. While work is underway in this space among schools, older residents who are less likely to be digital-native remain vulnerable to mis- and disinformation, and this vulnerability will likely be exacerbated by generative AI.

Local news publishers are well placed to grow media literacy within their communities. LINA members have the expertise and trust due to their community connections to provide education services to local communities to grow media literacy among adults. LINA proposes a coordinated program whereby:

- LINA partners with a registered training organisation (eg Community Media Training Organisation) to develop a curriculum framework tailored for adult media literacy education;
- Local newsrooms are engaged to deliver media literacy programs to their own communities, supported by a centralised curriculum and teaching resources;
- Newsrooms partner with community organisations (eg schools, libraries, councils) to deliver programs locally.

In its Pre-Budget Submission 2024, LINA has proposed this 'train the trainer' model of media literacy education delivery which would see local newsrooms draw on their connections with community centres, libraries, schools, senior centres and other community-based organisations to form partnerships in the delivery of media literacy training to adults. News

publishers would be supported with curriculum resources and would provide locally relevant examples to help audiences understand the processes of quality public interest journalism and identify potential misinformation. The community partners would help engage community members who are news avoidant, or more likely to be vulnerable to misinformation as they sit outside the immediate audiences of local news providers.

This program design has the dual outcome of increasing media literacy through trusted sources of information, as well as growing engagement with local newsrooms and partnerships with local organisations. It could be piloted with a small group of locations in 2024-25 and expanded in future years based on learnings and successes in the first year. Budget requirements would include program coordination, resource development, program delivery and venue/location expenses. LINA has requested \$527k in its Pre-Budget Submission to start this program in 2024-25.

LINA suggests that media literacy education is required across all areas of media engagement including access to trusted news, media technologies, evolving news consumption habits and identification of reliable sources and research. 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 that have affected the health and social cohesion of Australian society. In this context, the risk of inaction leading to democratic instability is high. While local news outlets cannot wholly solve this global issue, they can certainly contribute to rebuilding trust in evidence-based reporting.

CASE STUDY: ILLAWARRA FLAME DEBUNKS MISINFORMATION

The Illawarra Flame began as a printed business directory and expanded in 2022 into an online news service committed to sharing the voices and issues relevant to the Illawarra region on the New South Wales coast.

In October 2023, heated discussion was underway within the community about proposed off-shore wind farms. A Facebook post began circulating, claiming a University of Tasmania study had found wind turbines to be dangerous to whales. The Illawarra Flame investigated and found the entire report to be fabricated, combatting misinformation distributed through the community. The Illawarra Flame was featured on Media Watch for its role in uncovering the truth.



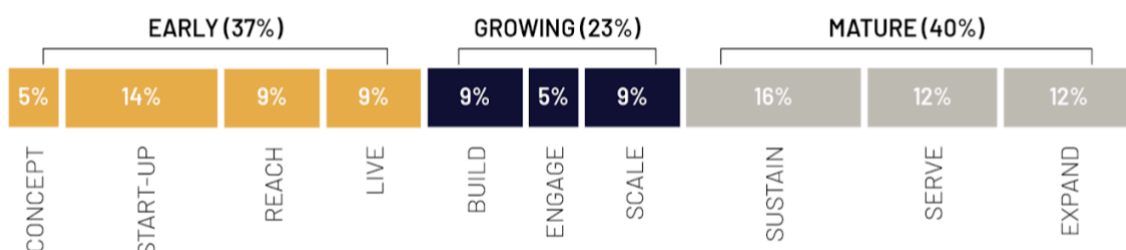
Summary of Potential Measures

Direct funding is the most desirable measure for news publishers as it empowers them to make decisions that are fit-for-purpose to their community and their environment. Other forms of support, though welcomed, come with limitations due to their own objectives. Government advertising must reach relevant audiences. Tax-based incentives rely on the generation of income to be beneficial but some could be accessed through not-for-profit and social enterprise business models should such a process be available to public interest journalism. Previous programs have focused funding in regional areas, excluding local news deserts in metropolitan and semi-rural areas such as Wollongong and Newcastle. LINA encourages the government to implement a suite of complementary measures as a package of support to independent journalism, including coordinated capacity-building activities and efficiencies provided through the industry association, direct funding to newsrooms, tax-based incentives, support for emerging journalists and newsrooms, equity-based support for media diversity and programs to increase media literacy.

LINA has identified three key stages of growth for newsrooms in which different mechanisms for support are required. This helps guide the development of LINA services and may similarly be used to consider which potential measures are most relevant to newsrooms at different stages of development, as opposed to ‘one solution for all’ thinking.



LINA asked its members to self-identify their position across 10 stages of the ‘newsroom journey’ illustrated above. LINA has used these broad development stages (early, growing and mature) to categorise traits of newsrooms. In 2023, LINA members were represented on this scale as follows:



Taking this approach to potential measures could look like:

Stage	Most relevant mechanisms
Early From identification of concept, starting-up, reaching a small audience and generating enough income for one person to draw a living wage without requiring a second job.	<ul style="list-style-type: none"> • Direct grants and subsidies • Training and best practice support
Growth Building a small team (two to three staff), developing community-based partnerships, engaging with audiences and developing multiple income streams to support the news business.	<ul style="list-style-type: none"> • Workforce development supports • Revenue experimentation programs • Government advertising • Direct grants
Mature Scaling operations with three or more staff, sustaining three to four reliable and tested revenue streams, becoming recognised as a trusted source of news and information in the community, developing content outputs beyond initial channels (eg. podcasts, multiplatform delivery) and in some cases the expansion of new mastheads and side-services.	<ul style="list-style-type: none"> • Tax-based incentives • Government advertising • Media literacy program delivery

CASE STUDY: NEOS KOSMOS SHARING COMMUNITY VOICES

Published first as a printed paper, then later online, Neos Kosmos has been serving the Greek community in Australia since 1957. The news service now offers a website, newsletters, podcasts and over 90,000 social media followers. Neos Kosmos was the first multicultural masthead to have stories in both Greek and English, covering stories relevant to their community both locally and abroad. It provides a platform for the Greek diaspora to speak on their experiences and celebrate their culture and achievements. Neos Kosmos' articles range from celebrating centenarians within their community to covering the fight to continue Greek storybook reading at a local library.



Establishing an Evidence Base

LINA notes the work the ACMA will soon undertake on establishing a Media Diversity Measurement Framework and has submitted feedback to the development of the framework encouraging the inclusion of localism and personnel diversity as necessary measures requiring further consideration. LINA encourages the analysis of local news content and employment data to guide media policy development. This data contributes to indicators of local relevance, availability of journalists and range of viewpoints. Further, it could guide future policy interventions with the evolution of news trends. LINA hopes this analysis can be shared with industry as a resource to further guide the work of support services such as LINA in the future.

LINA has a central role in the collection and analysis of industry data and research and can deliver significant value to government in supporting evidence-based policymaking in the coming years. LINA gathers data about its membership to measure its own impact and the progress of newsrooms it supports.

LINA has recently launched an impact tracking program using a digital tool developed by US-based, Impact Architects. This tool is targeted at newsrooms and journalists who want to track real time change caused by their work. A qualitative data set is collected based on individual, social and institutional impact categories. This answers qualitative data questions such as reader's trust, increased knowledge of readers, social change such as community relationships developed, institutional accountability and media amplification of news stories. The media amplification metric is also vital for local news publications to track how their local stories can set the national news agenda.

This initiative represents a significant shift from tracking impact solely through quantitative revenue metrics to focusing on the qualitative impact of public interest journalism. Impact tracking creates a culture of impact in organisations that encourages public interest journalism. The 'watch dog' role of journalism can be better performed with an impact data set that encourages it and makes it accessible to access grants and funding based on past impact and potential. This also, to some extent, helps resolve the conflict between public interest journalism and meeting market demands. LINA is currently in the process of providing the impact tracking program to all of its member publishers.

LINA is happy to contribute that information in aggregate form to a national framework given there is little data collected on hyperlocal and digital news publishers in circulation currently.

LINA encourages the establishment of an evidence base to:

- Adopt a broad definition of news which includes measuring the contribution of civic journalism, not-for-profit and small hyperlocal news publishers to the Australian news landscape in the framework;
- Ensure digital news publishers are included as a growing audience preference for new distribution;
- Consider the appropriateness of some terminology used in the draft framework and suggested alternatives;
- Develop a timeframe for repeatability;
- Collate and complement industry data sources to reduce duplication; and
- Include indicators of trust in news as a measure of impact.

In addition, LINA points the ACMA to the Digital News Report produced annually by the Reuters Institute for the Study of Journalism, University of Oxford and, for the Australian edition, the University of Canberra. This study collects and contracts data from 46 countries across Europe, the Americas, Asia Pacific and Africa on audience and journalism trends in digital news, including trust in news and local news content. The University of Canberra collects a broad range of materials in its annual survey, using globally standardised methodology. It is possible the University

of Canberra may have unpublished data it could share on digital news engagement. LINA encourages the government to engage with this research as an input to the measurement framework and considers it a source of international comparison to track alongside the measurement framework. LINA also supports the Public Interest Journalism Initiative's sampling on the provision of local public interest journalism in different regions and encourages the expansion of this data collection to as many regions as practicable.

“How should society continue to support the monitoring of, and reporting on, the activities of public bodies not just in central government, but also in localities: local councils, courts, inquests?”
This area of reporting has always been one of the most important functions of journalism and brings undeniable public benefit.
- Frances Cairncross, The Cairncross Review, 2019

Conclusion

LINA shares concerns expressed by consecutive Australian Governments about the current and potential impacts of increasing concentration of media in Australia, the spread of misinformation and disinformation and economic barriers to essential information. The actions proposed in this paper directly address the following priorities:

Access by supporting community-led news services that fill voids in local news, enabling coverage of public interest journalism essential to the functions of democracy and nurturing emergent newsrooms to provide services, particularly in areas of market failure.

Quality by enabling the amplification of local issues, supporting the provision of accurate and timely news services that encourage audience trust and act as a counterweight to misinformation.

Media diversity by enabling a not-for-profit news sector in Australia, taking a capacity-building role alongside industry in addressing skills gaps and workforce barriers and promoting social cohesion through the sharing of diverse perspectives.

Engagement by growing media literacy and working with local news publishers as a mechanism for public policy engagement, information and consultation.

LINA members are well placed to support government priorities to meet the information needs of geographically and culturally diverse audiences, address news deserts and increase media diversity. Connectedness with local communities makes hyperlocal news publishers uniquely placed to respond to increasingly frequent emergencies, as demonstrated by the pandemic and recent extreme weather events. Timely, locally relevant information is paramount for community safety in times of crisis. LINA members have capacity to provide these information services and offer significant return on investment.

Local media also provides a unique space to engage communities in the machinery of government, and this is the area of journalism most under threat (Cairncross, 2019). LINA members are well-placed to bridge this information divide between communities and governments at all levels.

The Commonwealth, LINA and its members are strongly aligned in the ambition to increase the sustainability of a diversity of newsrooms providing quality news services to communities across Australia; and therefore the diversity of local news services available to audiences. The actions outlined in this submission will significantly contribute to the sustainability of local and diverse newsrooms and strengthen Australia's democratic functions through strengthening public interest news reporting at a community/local level.

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