



18 December 2020

Committee Secretary
Senate Standing Committees on Environment and Communications
PO Box 6100
Parliament House
Canberra ACT 2600

By email: ec.sen@aph.gov.au

Submission re: media diversity in Australia

Dear Committee,

Community radio is a strong supporter of media diversity across Australia.

Community broadcasters are key parts of the wide-ranging media ecosystem – producing and broadcasting both hyperlocal and national news for millions of listeners across Australia; creating significant employment, training and pathways opportunities; and, ultimately, strengthening Australia's democracy by sharing diverse content from diverse and underrepresented voices.

Across the country, community radio stations have faced significant challenges due to the COVID-19 pandemic, which has impacted significantly on broadcasting resources, staffing and volunteers, revenue sources in sponsorship, donations and fundraising.

Greater public funding certainty and an optimised regulatory environment for the community broadcasting sector will enable local stations to flourish and grow their ability to support media diversity across Australia.

As the peak body for the community broadcasting sector, and an active participant in research, policy and planning, the CBAA is committed to further sharing our ideas, experience and knowledge with this Committee and the Australian Government.

We thank the Senate for referring this important inquiry and welcome any opportunity to appear before the Committee or assist in other ways in its reporting.

For further information on this submission, please contact Jon Bisset, CEO,
or Holly Friedlander Liddicoat, Project Coordinator – Government Relations,
via email, or on | .

Kind regards,

Jon Bisset
Chief Executive Officer

Media diversity in Australia

CBAA Submission

11 December 2020



COMMUNITY
BROADCASTING
ASSOCIATION OF
AUSTRALIA

Table of contents

1.	Introduction.....	3
2.	CBAA champions community broadcasting across Australia.....	4
3.	Community radio's unique role in Australia's media landscape and wide listenership	4
	Sector's size and point of difference – a key to media diversity.....	5
	Broadcasting diverse content	6
4.	Hyperlocal providers of information, news and public interest journalism	6
5.	Increasing news and public interest journalism in the community radio sector	8
	CBAA's Enhanced National News Project.....	8
	The importance of a newswire to community broadcasters	10
	First Nations Media Australia's news sharing platform	11
	NEMBC's Multilingual News Service	11
6.	Community radio's contribution to media skills and training.....	12
	CMTO's National Training Project.....	12
7.	Barriers, changes and challenges faced by community radio – and the sector's response.....	14
	Digital disrupting media business models	14
	Community digital radio contributing to media diversity.....	16
	Community radio and the 2019-20 bushfires	16
	Community radio and COVID-19	17
8.	Recommendations.....	19
	Optimised funding arrangements for the sector	19
	Regulatory reform to enhance the sector's impact	20
	The role of Government in supporting a viable and diverse public interest journalism sector	21



1. Introduction

The Community Broadcasting Association of Australia (CBAA) – the peak body and national representative organisation for over 450 community radio broadcasters across Australia – welcomes the opportunity to participate in the Senate Environment and Communications References Committee’s inquiry into media diversity in Australia.

Community broadcasting is Australia’s largest independent media sector, a key pillar in the Australian media landscape, and recognised internationally as one of the most successful examples of grassroots media.

Community radio plays a vital role in supporting media diversity, independence and public interest journalism across Australia – broadcasting both hyperlocal and national news to millions of listeners nationally; creating significant employment, training and pathways opportunities; and, ultimately, strengthening Australia’s democracy. Further, community broadcasting is an important conduit for skills, training and employment in the media industry and is a launchpad for many Australian journalists and media makers.

Alongside commercial and public media and broadcasters, community broadcasting is one of three important pillars in Australia’s media landscape. It plays a critical role in providing a voice for Australian communities that are underserved by commercial and public broadcasters – including First Nations Australians, communities in regional and remote Australia, culturally and linguistically diverse communities, faith-based communities, youth and seniors’ communities, the LGBTIQ+ community, people with a disability, and diverse arts and music communities. In doing so it promotes the diverse identities of Australians that enriches the social, cultural and democratic fabric of Australian society.

Like many Australians, community radio services have faced significant challenges due to the COVID-19 pandemic which has impacted significantly on broadcasting resources, staffing and volunteers, and revenue sources in sponsorship, donations and fundraising. Many community radio stations have struggled to maintain operations.

This inquiry provides an opportunity to better understand the community broadcasting sector’s critical role in Australia’s media landscape; the effect of various media industry changes and disruptions including COVID-19 on our sector; and recommend policy and regulatory reforms that would allow the sector to flourish and enhance its role in supporting media diversity and public interest journalism across Australia.

Our submission focuses on:

- Community radio’s unique role in Australia’s media landscape and its wide listenership;
- Community radio’s role providing hyperlocal news and information;
- Increasing news and public interest journalism in the community radio sector;
- Community radio’s contribution to media skills and training;
- Barriers and challenges faced by community radio; and
- Recommendations to ensure the community radio sector can be fully resourced and thrive in an optimised policy and regulatory environment.

In doing so, this submission contributes to the Inquiry’s terms of reference and adds to the many voices calling for greater support and certainty for Australia’s community broadcasters who contribute to media diversity across Australia through high-quality and distinct public interest journalism, particularly in underserved markets.

In its deliberations and report, we hope the Committee:

- Recognises the critical role that community radio plays in Australia’s media landscape and its contribution to media diversity.
- Recognises the impact various changes to the media landscape, as well as challenges such as COVID-19, have had on the community broadcasting sector.
- Recommends the Government provide greater funding certainty and an optimised policy and regulatory environment for the community broadcasting sector to flourish.



The CBAA would welcome the opportunity to appear before the Committee to discuss our submission, and to do so alongside station representatives, who can speak first-hand about their unique role in Australia's media landscape.

2. CBAA champions community broadcasting across Australia

The CBAA is the peak body for community broadcasting stations in Australia and an internationally recognised, not-for-profit cultural organisation. The CBAA has always prided itself on maintaining a diverse sector, supported by volunteers and other community-minded individuals. Since its inception, the CBAA has strived to uplift the voices of those otherwise not heard on air.

The CBAA champions community broadcasting by building stations' capability and creating a healthy environment for the sector to thrive. We work towards ensuring that community broadcasting is recognised as an excellent, innovative, sustainable, accessible, trusted and diverse industry, and a key pillar in Australian broadcasting that contributes to Australia's media diversity, democracy, an open society and cultural vibrancy.

The CBAA proudly works with the Department of Infrastructure, Transport, Regional Development and Communications (DITRDC), and the Australian Communications and Media Authority (ACMA), to strengthen and support Australia's community broadcasting sector in delivering on the Government's desired policy outcomes.

As the peak body for the community broadcasting sector, the CBAA consults widely with its membership base of over 300 community broadcasting licensees – representing all community interest types, in all states and territories, broadcasting in the cities, regional Australia and in remote regions. The CBAA also liaises with the five community broadcasting Sector Representative Organisations (SROs) and the Community Broadcasting Foundation (CBF) by chairing the Community Broadcasting Sector Roundtable. The Roundtable consists of representatives from:

- The Australian Community Television Alliance (ACTA)
- Christian Media & Arts Australia (CMAA)
- The Community Broadcasting Association of Australia (CBAA)
- First Nations Media Australia (FNMA)
- The National Ethnic and Multicultural Broadcasters' Council (NEMBC)
- RPH Australia (RPHA), and
- The Community Broadcasting Foundation (CBF)

The Roundtable identifies and discusses sector needs, emerging issues, policy positions, funding requirements and joint advocacy initiatives. The CBAA supports submissions made to this inquiry by Sector Representative Organisations, including CMAA and FNMA.

3. Community radio's unique role in Australia's media landscape and wide listenership

By its very nature, community broadcasting is a vital contributor to media diversity and producer of public interest journalism, especially to underserved markets like regional Australia, and culturally and linguistically diverse communities. Our community broadcasters are united by six guiding principles – we work to:

1. Promote harmony and diversity, and contribute to an inclusive, cohesive and culturally diverse Australian community
2. Pursue principles of democracy, access and equity, especially for people and issues not adequately represented in other media
3. Enhance the diversity of programming choices available to the public and present programs that expand the variety of viewpoints broadcast in Australia



4. Demonstrate independence in programming as well as in editorial and management decisions
5. Support and develop local arts and music
6. Increase community involvement in broadcasting

Sector's size and point of difference – a key to media diversity

Community stations provide programming that caters to the needs and interests of their communities and contribute to and reflect an Australia that is an open society and a strong democracy, which embraces pluralism. Community stations play an important role in providing a voice for communities that are not adequately serviced by other broadcasting sectors. These include:

- First Nations Australians
- Ethnic and multicultural communities
- Educational services
- Faith-based communities
- Print disabled communities
- Music, arts and cultural services
- Youth and seniors' communities

The most recent National Listener Survey of more than 15,000 Australians shows that the top reason listeners give for tuning in to community radio is to hear local information and news (52%). The other top reasons include listening to local voices and personalities (36%) and for independent voices not owned by big business or government (25%).¹

The size and importance of the community radio sector to the Australian media landscape is significant, yet frequently underestimated.² Over 5.8 million listeners aged 15+ across Australia tune in to community radio stations each week (29% of the Australian population).³ This is up from approximately 3.76 million in 2004. Each year, community radio's listenership grows – up from 24% of the population in 2004 to 29% in 2019.⁴ **Of these listeners, over 1.5 million do not listen to any commercial radio and, further, 918,000 (5% of the Australian population) listen exclusively to community radio (that is, they listen to community radio but not commercial radio or ABC/SBS radio).**⁵ Outside of major cities this is even higher at 7% of the population.



¹ Community Broadcasting Association of Australia (2019). Community Radio National Listener Survey 2019 – Australia Fact Sheet Wave #2 – December 2019 [online] Available at: www.cbbaa.org.au/sites/default/files/media/McNair%20YellowSquares%20-%20NLS%20Fact%20Sheet%20-%20Australia%20-%202019%20-%20Wave%20%232%20-%2020190101.pdf

² Maddy Macfarlane, 8 June 2018, "Community radio is growing the music industry", The Industry Observer, Available at: <https://www.theindustryobserver.com.au/community-radio-is-growing-the-music-industry/>

³ Community Broadcasting Association of Australia (2019). Community Radio National Listener Survey 2019 – Australia Fact Sheet Wave #2 – December 2019 [online] Available at: www.cbbaa.org.au/sites/default/files/media/McNair%20YellowSquares%20-%20NLS%20Fact%20Sheet%20-%20Australia%20-%202019%20-%20Wave%20%232%20-%2020190101.pdf

⁴ Community Broadcasting Association of Australia (2020). Community Radio National Listener Survey 2019 Summary report of findings February 2020 [online] Available at: www.cbbaa.org.au/sites/default/files/media/NLS%20-%20Main%20Report%202020.pdf

⁵ Community Broadcasting Association of Australia (2019). Community Radio National Listener Survey 2019 – Australia Fact Sheet Wave #2 – December 2019 [online] Available at: www.cbbaa.org.au/sites/default/files/media/McNair%20YellowSquares%20-%20NLS%20Fact%20Sheet%20-%20Australia%20-%202019%20-%20Wave%20%232%20-%2020190101.pdf



Community radio draws its audience from a wide cross section of the community with a reach of at least 25% of most demographic groups – across gender, age, location, employment and income – tuning in to community radio during a typical week. Community radio listeners are more likely to identify as LGBTIQIA+, have a disability or reading difficulty, and/or hold a religious faith.⁶ Over one third (35%) of people who regularly speak a language other than English in their household listen to community radio during a typical week.

Community broadcasting is the largest component of First Nations media production in Australia and four out of ten of people who identify as Aboriginal or Torres Strait Islander (43%) listen to community radio during a typical week.⁷ On a day-to-day basis, First Nations community radio is the only provider of news and information that directly affects the lives of Aboriginal and Torres Strait Islander people (e.g. information about community events, meetings, deaths, funerals, tombstone openings, local sporting results and coverage).

Broadcasting diverse content

The sector's participatory nature ensures that underrepresented voices get an opportunity to contribute to the national dialogue. The sector's guiding principles also ensure that station programming decisions "enhance diversity", "present programs that expand the variety of viewpoints broadcast in Australia" and "support and develop local arts and music".

Spoken word content broadcast on community radio meets a variety of need. Broadcast content includes news and current affairs, First Nations content (2,467 hours weekly), multicultural programming (1,829 hours weekly), faith-based programming (2,858 hours weekly), and radio reading services for people with a print disability (1,436 hours weekly). Other specialist content broadcast includes LGBTIQIA+ programming, seniors programming, sports and programs produced by people under the age of 26.⁸

Community radio plays an important role in supporting and promoting Australian music. Reflecting a consistent long-term average, 37% of the music broadcast by community radio stations each week is Australian music. This exceeds the industry Code requirement of 25%.

Rural and remote stations dedicate a higher percentage of their music programming to Australian music than stations in other locations, with 43% of all music broadcast by stations in rural and remote areas being Australian.⁹

4. Hyperlocal providers of information, news and public interest journalism

In this time of greater concentration of media power and control, community media is emerging as a safeguard for local content, news and alternative voices. Importantly, 76% of community radio stations operate in regional and remote parts of the country.¹⁰ Community radio stations outside capital cities are by their very nature, hyperlocal conduits for information and news. These stations are well-known for broadcasting regional public interest journalism; information regarding local government; about upcoming elections, at all levels, including local candidate interviews; broadcasting live from local council meetings; and emergency coverage. For example, Bay FM's 'community newsroom' in Byron Bay NSW is an active gatherer and presenter of local news, reporting on issues of importance to the Byron Bay and Northern Rivers, including public interest journalism on a range of social, political and cultural issues.

⁶ Ibid

⁷ Community Broadcasting Association of Australia (2020). Community Radio National Listener Survey 2019 Summary report of findings February 2020 [online] Available at: www.cbaa.org.au/sites/default/files/media/NLS%20-%20Main%20Report%202020.pdf

⁸ 2018 CBAA Programming and Technology Survey. Available online:

www.cbaa.org.au/sites/default/files/media/CBAA%20Programming%20Technology%20Survey%202018%20Report.pdf

⁹ Ibid

¹⁰ 2019 CBAA State of the Community Sector Report. Available at: www.cbaa.org.au/article/state-community-radio-sector-report



In our most recent Community Radio National Listener Survey, 65% of respondents in regional/rural Australia said that their top reason for listening to community radio was for 'local information and local news'.¹¹ This finding is particularly noted in regional areas (compared to 46% for metro listeners) likely because of the financial pressure faced by commercial news outlets, seeing the closure of local newspapers and newsrooms. Such changes in the media landscape often mean that community broadcasters in some regions, are now the only broadcasters of local public interest journalism. For example, in Bourke in NSW, 2WEB are now also publishing The Western Herald, saving that iconic paper from closing. This means the station is sharing local news and journalism both on air and via the paper. In Tamworth, NSW, 88.9 fm broadcasts 33 regional news bulletins weekly covering Armidale, Gunnedah, Quirindi and towns across the region. These stories are also posted online and via social media, broadening the reach of the community station's regional and local news.

Community radio's strength is found in its localism and representation – on a local community radio station, a listener will hear news and stories from trained broadcasters they consider neighbours, friends, local political representatives and local experts. Local stories and local people reflect local identity, which helps foster a sense of self-representation and recognition. Australian academic researchers, as outlined in the ACMA's recently commissioned research 'News in Australia: diversity and localism', have noted that local media has a special function in terms of community cohesion.¹² It is the processes of local community building which are central to the success of community radio.¹³

The community broadcasting sector has a long history of delivering local news and public interest journalism to communities across Australia, and is well-placed to continue providing and enhancing this offering. Community stations are also able to do so in a community-appropriate way, as stations are apt at serving diverse communities such as First Nations, culturally and linguistically diverse, people with a print disability, youth and seniors. For example, Ngaarda Media is the only First Nations media outlet in the Pilbara in Western Australia and delivers news and journalism via radio and online about local issues. The station was recently successful in securing philanthropic funding from the Judith Nielson Institute for Journalism and Ideas to support a roving reporter to further the number of news bulletins produced.

Poor representation or marginalisation of minorities in mainstream media is understood to contribute to the worsening or fragmentation of social cohesion.¹⁴ As one example, First Nations media organisations exist due to the failure of mainstream media to adequately reflect Aboriginal and Torres Strait Islander people in news and public discourse. As a result, First Nations media organisations continually work to address stereotypes in mainstream culture by strengthening culture within communities and through sharing responses to current events from Aboriginal and Torres Strait Islander people's perspectives. In this way, they are actively empowering local voices to share their own experiences, challenges, strengths and truths.

Being of the community and for the community means that community broadcasters go above and beyond in delivering public interest journalism, news and information. In the 2019-20 summer bushfires, over 80 community radio stations broadcast to fire-affected regions. In late November 2019, station volunteers at Braidwood FM broadcast 14 days of near continuous emergency coverage of the Tallaganda National Park fire, and Braidwood's and community radio's efforts were recognised in the Senate Finance and Public Administration Committees' interim report into the bushfires.¹⁵

¹¹ Community Broadcasting Association of Australia (2019). Community Radio National Listener Survey 2019 – Non-Metro Australia Fact Sheet Wave #2 – December 2019 [online] Available at: www.cbba.org.au/sites/default/files/media/NLS%20-%20Main%20Report%202020.pdf

¹² ACMA commissioned research, Centre for Media Transition, 'News in Australia: diversity and localism', December 2020, p.72. Available: www.acma.gov.au/sites/default/files/2020-12/News%20in%20Australia_Diversity%20and%20localism_Review%20of%20literature%20and%20research_1.pdf

¹³ Meadows (2013), 'Putting the citizen back into journalism', Journalism, vol. 14, no. 1, pp. 43-60. Referenced in ACMA commissioned research, Centre for Media Transition, 'News in Australia: diversity and localism', December 2020, p.72. Available: www.acma.gov.au/sites/default/files/2020-12/News%20in%20Australia_Diversity%20and%20localism_Review%20of%20literature%20and%20research_1.pdf

¹⁴ Jakubowicz, A., 'New groups and social cohesion in Australia', in Higley, J., Nieuwenhuysen, J., & Neerup, S. (eds.), Nations of Immigrants: Australia and the USA Compared, 2009.

¹⁵ Senate Finance and Public Administration Committees' inquiry "Lessons to be learned in relation to the Australian bushfire season 2019-20", interim report, recommendation 8.88 "The committee understands that prompt and accurate emergency and warning information saves lives, and acknowledges the important role that the ABC, commercial radio, and community radio play during bushfire emergencies. The committee applauds the vital work that all three sectors do in informing communities at risk each year."



During the devastating flooding in Townsville in 2019, Christian community broadcaster 99.9 Live FM provided 24-hour on-air live coverage of the event as it unfolded and was able to open a call centre at the station. The call centre enabled listeners to call in and assist them with cleaning supplies, lifting heavy items, cleaning, and emotional support. As the community moved through recovery, Live FM was able to continue supporting the community in the 'Recovery Hubs' and at the 'Barbies in the Burbs' initiatives.

5. Increasing news and public interest journalism in the community radio sector

Numerous public surveys show that Australians highlight their need for, and community broadcasting's role in providing, local news and information, particularly at a time when many commercial media services are solely focused on state, national and international news. It is well documented that audiences feel they cannot receive localised or community-specific information from other media sources, particularly long-standing local mastheads. Community stations provide programming that caters to the needs and interest groups of their communities and, if properly supported, will continue to contribute to Australia's media diversity.

The community broadcasting sector – with over 450 independent licensees delivering over 500 services in all states and territories – is an industry which is fertile for strategic investment to enhance media diversity and public interest journalism. The below section highlights some examples of current, coordinated sector initiatives, which enhance community radio station collaboration; capitalise on the sector's economies of scale; build capacity for journalistic reporting; and enhance the reach of diverse news stories.

CBAA's Enhanced National News Project

The CBAA is collaborating with community radio stations and other media organisations around the country to increase coverage of local and state-wide issues and boost reporting from underserved regions.

By facilitating the collaboration of the community radio sector's newsrooms and journalists, the CBAA is ensuring more local news reaches more people. This in turn is boosting community engagement throughout Australia and creating new opportunities for the next generation of journalistic talent.

This is revolutionising the way community radio stations and other media partners engage their audiences. Collaboration is key. Stations across the country are sharing resources and producing more of the journalism that their communities need.

The Enhanced National News Project has a dual focus – to ensure that community radio listeners get access to national and state news bulletins that are representative, balanced and independent, while building local newsroom capacity to tell more local stories.

The Enhanced National News Project – with Federal Government funding support – commenced in April 2019. Since then, it has:

- Increased the number of stations broadcasting the independent National Radio News service from 80 to 119.
- Increased the number of Australians aged 15+ listening to National Radio News each month from 2.3 to 4.7 million.¹⁶
- Added five contributing community newsrooms (including a Press Gallery journalist) to the sector's Collaborative News Hub. In 2021, at least four more are scheduled to join, in addition to First Nations Media Australia and 40+ First Nations media organisations.
- Employed or contributed to the wages of 10 journalist and news personnel, including the new Federal Politics Reporter, the National Radio News Director, casual and student journalists, the NRN Manager and a Technical Officer.

¹⁶ McNair yellowSquares, National Listener Survey data from wave 2 (December 2020), compiled for the CBAA in October 2020 based on updated list of subscribing stations.



National Radio News

The CBAA is increasing the amount of news reaching listeners through the National Radio News – enhancing the 20-year news service partnership with Charles Sturt University, to ensure it is a true ‘community’ news service, representative of the communities to whom it broadcasts whilst remaining nationally relevant in the stories presented. The expanded partnership has improved editorial policy guidelines, ensuring self-representation and regional stories with a national focus are central to the journalistic process. 84 bulletins are produced per week and daily State-based bulletins.

The partnership provides the students at Charles Sturt University with a training environment and the use of rare news infrastructure so important to the development of the next generation of broadcast journalists. This ensures community radio continues to provide a pathway for aspiring journalists. Alumni include new ABC Q&A host, Hamish McDonald, sports journalists Amanda Shalala and Jennifer Browning and many more.

The new National Radio News Director works in the national newsroom. The Director has extensive broadcast media experience and is making significant improvements to the service by providing enhanced story oversight and guidance to the team’s junior journalists, including three full-time journalists and journalist cadets.

For the first time, the CBAA has also appointed a Federal Press Gallery journalist to work with NRN and the sector’s newsrooms via the Collaborative News Hub. Filing multiple stories a day, collaborating with the sector’s current affairs program *The Wire*, and working with stations to create bespoke pieces, the Federal Politics Reporter connects community-led stories with decision-makers.

Collaborative News Hub and Build a Bulletin

Stations in the new Collaborative Radio News Hub are linked by a cloud-based online system which increases the sector’s journalistic capacity through the sharing of resources and content and encouraging sector collaboration via the latest virtual newsroom technology. This aims to increase coverage of local stories, ensure a greater availability of news sources, provide wider story coverage, and maximise local expertise and local voices.

There are currently five community newsrooms in the Hub, including the sector’s Federal Politics Reporter, and the National Radio News. Each are now able to share and collaborate on stories. Four more stations are slated to join in 2021, as well as 40 organisations through the First Nations Media Australia network.

But not all stations possess the resources to generate complete news bulletins and/or contribute stories to the Hub. To assist these stations, the CBAA is facilitating more local news read by more local voices through a bespoke software solution, ‘Build a Bulletin’.

Build a Bulletin is a web portal of daily news scripts, interviews, content and audio files created by the Hub’s contributing stations and contributing journalists.

Subscribing stations will then use these scripts, as published, to build their own news bulletin. To curate a truly unique news update for their audience within minutes, subscribing stations will have the flexibility to decide which stories in what order, which sports, and the length of the bulletin.

Impact of the Enhanced National News Project

Fostering this expanded news culture across the sector has already seen a new wave of participants interested in news and current affairs at local stations. The sector has seen an increase in local and community news provision to communities throughout 2019/20 and particularly, throughout the COVID-19 period.

For example, several CBAA members have expanded newsrooms and commenced news services, including Hope Media in Sydney (serving a faith-based audience), 4RPH’s SolutionWire in Brisbane (serving a print-disabled audience), 88.9 in Tamworth, NSW (increasing news gathering in Liverpool Plains, due to expansion of broadcast coverage to that region), and Ngaarda Media in Roebourne, WA (increase news reporting capacity to a First Nations audience). In 2021, 4ZZZ in Brisbane will also



commence employing paid journalists in their newsroom, while joining the Collaborative Radio News Hub.

Federal Government funding for this project currently ends June 2021. Continued funding for the enhanced national news project, would ensure the continued sustainability of the project – including the production of 84 weekly bulletins from Bathurst NSW; the continued employment of 10 journalists and news production personnel; agile support for community broadcasting stations affected by COVID-19; and the ongoing maintenance of vital infrastructure and subscriptions to software solutions at the cornerstone of the community sector's news production. Further the CBAA would like to hire a National Producer to lead volunteers and staff within the network – ensuring maximum impact of resources and reach of news stories.

Regional News Hubs

Government funding is the backbone of our sector's news. By securing ongoing funding, the CBAA can explore new avenues to build on the strong base of the Enhanced National News Project to ensure more news reaches more local communities. Several ideas are currently in scope, and the CBAA is seeking support and partnerships for two specific initiatives for community radio journalism.

There are opportunities to foster and develop Regional Journalism Hubs to link, for example, six geographically close community radio stations. Regional Journalism Hub stations will work together and share resources on a local scale. A professional journalist, based in a lead station in each Hub, will produce local news content to be shared and used by all stations and other local media organisations, such as local newspapers.

Editorially sound content will be shared locally and nationally via the CBAA's Collaborative Radio News Hub. The hub journalist will also deliver journalism training to stations across the regional hub.

This model will ensure one journalist's expertise has the greatest and most sustainable impact across a region, whilst ensuring enthusiastic local volunteers have the editorial oversight to ensure high quality journalism.

The importance of a newswire to community broadcasters

Community broadcasters rely on newswires to supplement local news gathering. The main newswire utilised is AAP – and utilising the sector's economies of scale, the CBAA has negotiated on the sector's behalf a reasonably-affordable subscription rate for stations. Both individual stations with the capacity to create their own news bulletins and the National Radio News subscribe to the AAP.

As a predominately volunteer-driven sector, access to an affordable newswire is vital for gathering and broadcasting national and state news stories. This means that news-creating stations can divert their minimal resources to collecting local news stories. Stations without the ability to create their own news or wanting to broaden the breadth of information reaching their audiences, can subscribe to the National Radio News. In both scenarios, AAP is a vital tenant of news-production in the community sector.

Increasing the number of community-driven, representative stories created in diverse regions is a goal of the CBAA's Enhanced National News Project. The new Collaborative News Hub outlined above, enables the sharing of stories and resources across the sector. Contributors are currently based in both metropolitan and regional areas. Smaller stations can then access these stories via Build a Bulletin – which effectively becomes the sector's own newswire. This increases the amount of news in the sector while providing a valuable training resource for community sector journalists.

The National Indigenous Radio Service (NIRS) is another sector-driven newswire, used within the First Nations sector and by non-First Nations community broadcasters who want to share representative First Nations' stories. NIRS produces hourly news bulletins, as well as a 24-hour content service of networked audio material for rebroadcast on First Nations radio stations. NIRS provides a vital function for the national distribution of news and adds to the diversity of news stories reaching audiences.



First Nations Media Australia's news sharing platform

To enhance the First Nations media sector's sharing of state and regional-based news across multiple outlets, First Nations Media Australia is currently building a news sharing platform. This platform will compliment NIRS and feed into the CBAA's Enhanced National News Project, sharing First Nations stories with a wider audience. The First Nations news sharing platform will enable greater sharing of content, the contribution of stories for rebroadcast, and build journalistic capacity in regional and remote areas.

The project is funded through the ACMA's Regional Innovation Fund until May 2021. Its objectives are to:

- Build regional journalism capacity and increase employment opportunities where other media outlets are withdrawing from regional areas;
- Address a market gap for regional and remote participation in our national news paradigm;
- Increase efficiencies in existing news services through collaboration;
- Provide opportunity for organisations to tailor news content as relevant to the region;
- Provide opportunity for Aboriginal and Torres Strait Islander reporters to access and share professionally produced content, including sovereign messages and issues at a national level;
- Provide accessible information for all audiences to engage with news, as told from a First Nations perspective; and
- Develop partnerships for the delivery of multi-platform news content (radio, television, print and online) to provide real careers for community journalists remaining in regional areas, adding value to the Government's existing investment with NITV.
- Include the full range of First Nations media voices in mainstream media and in First Nations radio, television, print and online news services.
- Develop opportunities for employment for both cadet journalists and experienced reporters.
- Provide opportunity for Aboriginal and Torres Strait Islander people to contribute to a national platform without having to move away from their community.

NEMBC's Multilingual News Service

The National Ethnic and Multicultural Broadcasters' Council (NEMBC) is a member of the Community Broadcasting Sector Roundtable and represents and supports multilingual community broadcasting around Australia. The NEMBC contributes to media diversity in Australia by maintaining and connecting people to their language, culture and identity.

It has been well documented this year, the challenges in Victoria regarding appropriate and in-language health messaging reaching diverse multicultural communities.¹⁷ As a response to the COVID-19 pandemic in May 2020, the NEMBC commenced production and coordination of a national daily Multilingual News Service (MNS) to ensure there was a consistent flow of reliable information for multicultural communities in different languages. The news service was broadcast in seven initial languages – Spanish, Hindi, Arabic, Punjabi, Greek, Mandarin and Pacific Islander English (covering Fijian, Cook Islands, Maori, Samoan and Tongan).

Due to COVID-19's significant impact on communities in Melbourne, the Victorian Government supported the NEMBC to produce a daily news bulletin in seven different languages in September, expanding to 22 languages by October.

Reaching culturally and linguistically diverse communities and vulnerable language groups in Melbourne and Victoria, the news bulletins focus on COVID-19's main stories, health and safety issues and multicultural stories.

The news writing and production is undertaken by News Editors who provide scripts to the producers/translators each morning, each contributing from around the country. The Arabic and Greek Producers are from community radio station 5EBI in Adelaide, the Spanish and Hindi Producers

¹⁷ <https://www.abc.net.au/radio/programs/am/covid-message-not-reaching-melbourne-ethnic-community/12381428>



from 3ZZZ in Melbourne, the Pacific Islander English and secondary Greek presenter from 4EB in Brisbane, and the Mandarin is written and produced in 2TripleO in Sydney.

The NEMBC also provided 'explainers' in different languages and same-day in-language warnings for the Shepperton and Northern suburbs outbreaks in October. The daily news is distributed across 12 radio stations in Victoria and has over 80 play outs a week. The Multilingual News Service (MNS) connects and informs diverse communities, assists in informing community and individual decisions and helps communities to be safer.

These initiatives demonstrate the significant contribution community broadcasting makes not just in supporting local media, but also demonstrates the interconnectedness of community broadcasting into the foundations of Australia's media industry and landscape.

6. Community radio's contribution to media skills and training

Importantly, the community radio sector is powered by the efforts and dedication of approximately 688 full-time equivalent (FTE) jobs and 22,200 volunteers.¹⁸ This means that the community radio sector is an important conduit for media skills, training and employment opportunities across a range of topic areas relevant to broadcasting, management and operations. This includes in-station training opportunities, and accredited and non-accredited training, as well as through conferences, partnerships, mentorships and scholarships. Such opportunities develop and nurture media professionals, with many volunteers and employees gaining skills in broadcasting, management, marketing, media, networking, community building, governance and more. It is not uncommon for community broadcasters to go on to have long careers in the media, arts and cultural industries, or other related (and non-related) fields.

The First Nations media sector is another key example of part of the community sector that nurtures and supports aspiring media and cultural professionals. First Nations media organisations offer Aboriginal and Torres Strait Islander people culturally-safe environments in which to develop 'work ready' skills; a place to continually upgrade those skills; and the opportunity to define their own career paths. Through the training, mentoring and continued professional development that First Nations media organisations invest in their people, these organisations often launch the careers of many Aboriginal and Torres Strait Islander journalists. But it's not only journalists. Many First Nations media organisations operate school-based programming opportunities to engage and provide skills to young people and deliver or facilitate the delivery of pathways and accredited training. Through their commitment to training and education, the sector sees employees within the media industry transition into communication roles in other industries, such as the mining and resources industry, politics and the public service.¹⁹

CMTO's National Training Project

The Community Media Training Organisation (CMTO) is responsible for the delivery of the National Training Program, and enhanced targeted funding (via the Government's Community Broadcasting Program) has enabled them to deliver a new program of activity that focuses on the development of business, leadership, management and social enterprise skills for participants in the community broadcasting sector. In an evolving media landscape, where community broadcasters are expected to deliver more content in more formats to meet new community need, this has been a welcome investment from the Federal Government.

In 2019/2020 the CMTO delivered training to 2,487 community media workers (paid and volunteers) across 270 community media stations and organisations. 60% of stations that received training were in rural, regional and remote locations.

¹⁸ CBAA People and Community Survey Report for the 2018-2019 Financial Year.

¹⁹ First Nations Media Australia submission to the House Standing Committee on Indigenous Affairs 'inquiry into pathways and participation opportunities for Indigenous Australians in employment and business', January 2020 [online]. Available at: <https://firstnationsmedia.org.au/sites/default/files/files/Submissions/First%20Nations%20Media%20Australia%20submission%20on%20Employment%20%26%20Economic%20Development%20for%20Indigenous%20Australians.pdf>



CMTO's 2019/2020 Pathways and Accredited training had a strong emphasis on leadership training for the sector, with 1,654 training places delivered in leadership and enterprise courses. CMTO's 2019/2020 training round also allocated 180 training places in accredited courses, including Certificate III and IV in Screen and Media, 380 in technical training, 410 in broadcast training and 310 in RPH Radio Reading specialised training.

Several larger scale leadership and enterprise projects are also underway and in development, including:

- Leadership and Enterprise Training project – 710 training places at 58 stations allocated in June 2020 for courses in business, leadership and management skills.
- The Think Big Mentorship – a three-year online learning and mentorship program for targeted station managers/coordinators to develop their stations as successful social enterprises, which commenced early 2020.
- Delivery of the nationally recognised qualification, CUASS00043 – Community Broadcasting Marketing Skill Set in 2021.
- 'Secrets of Successful Community Broadcasting Boards' delivered in partnership with Our Community – a one-day workshop covering the unique opportunities and challenges for community broadcasting organisations.
- 'Community Broadcasting Fundraising Campaigns' delivered in partnership with the CBAA and Start Some Good – a one-day workshop covering digital fundraising campaigns for community broadcasting organisations.
- 'Community Media as Social Enterprise' delivered in partnership with Centre for Social Impact, Swinburne – a workshop about developing community broadcasting organisations as social enterprises.
- The development of leadership projects for youth, women, gender non-binary, culturally and linguistically diverse and First Nations volunteers and workers in community media. Recent workshops have been conducted at the National Ethnic and Multicultural Broadcasters' Council Youth Conference in Brisbane, the First Nations Media Conference in Alice Springs and the SYN Media Bootcamp in Melbourne for over 70 youth leaders and station managers from across Australia.
- Professional development forums for trainers and mentors in the sector, to increase the number of trainers with business, leadership and management skills in community media. Recent forums have been conducted at the Brisbane Indigenous Media Association for trainers in the south-east Queensland region, RTR FM and Harvey Community Radio for trainers in Perth and South West WA and at the South Australian Community Broadcasting Conference for trainers across SA.
- Nationwide Virtual and Face-to-Face Leadership summits planned for years two and three of the project.

Community radio is often lauded as a skills developer, an incubator and a pathway for many young Australians that go on to work in diverse parts of the media industry. The CMTO's 2020 Graduate Destination Survey surveyed 28 graduates who completed training more than 12 months prior to December 2019. Of these respondents, 40% had engaged in paid work since completing a CMTO course in broad industries including media, music, education and finance. Many respondents in the 2020 and 2019 versions of this survey reported being able to transfer skills to similar creative media pursuits, including voice-over work, radio documentaries, radio management and governance roles.

The National Training Program has been supported by additional targeted funding announced in August 2017 of \$0.6 million per annum over four years. **The 2020/21 Budget marks the final year of targeted Government funding to enhance leadership and small business skills in the community broadcasting sector.** Many of the enhanced leadership skills programs outlined above will cease or be curtailed without a commitment to continuing the sector's existing levels of funding beyond June 2021.



7. Barriers, changes and challenges faced by community radio – and the sector’s response

Community radio stations are facing many of the same challenges as colleagues in the commercial radio and public radio sectors. As noted in the ACCC’s Digital Platforms Inquiry - Final Report, the digital environment has disrupted media organisations’ traditional operating models.²⁰ Here, we discuss a number of these challenges and the impacts of those across our sector.

Digital disrupting media business models

Online services are driving change in the way audio content is produced, distributed and consumed, and this is having a material impact on the media industry as a whole, including community radio. As a medium, radio is weathering the storm better than traditional newsprint and, to an extent, advertising-sponsored television. This is partly due to the ubiquity of radio receivers (particularly in cars) and the fact that radio as a medium is well suited to providing local content.

Music streaming and podcast services are growing rapidly and providing audiences with a legitimate means of accessing alternative programming. As Australian telecommunications networks continue to roll out, internet-enabled phones and other mobile devices are making a plethora of audio content available.

The community sector’s revenue sources have also been impacted by the diversion of sponsorship/advertising revenue to online platforms. Income from sponsorship (small businesses paying for broadcasting ‘spots’ on-air) has fallen significantly in the past five years – see Table 1:

Table 1 - Revenue from sponsorship, per financial year

Financial year	Sponsorship Revenue	% of total revenue
2015/16	\$45,798,001	44
2016/17	\$38,203,546	40
2017/18	\$35,440,279	33

Income from fundraising/gifts has also slipped markedly – see Table 2:

Table 2 - Revenue from fundraising/gifts, per financial year

Financial year	Revenue from fundraising/gifts	% of total revenue
2016/17	\$20,716,076	22
2017/18	\$17,044,539	16

As sponsorship revenue is diverted to online platforms, the costs associated with running a community radio station have increased. Community and listener expectations have changed right across the media industry – community radio listeners now expect stations to be online, offer on-demand services, podcasts, live streams, DAB+ digital radio services, be available on apps, on social media, and provide relevant and trustworthy local and national news. This is particularly so in communities where other news outlets have ceased local operations. Accordingly, community radio station personnel require the training and support to develop and enhance both their operational and business acumen, and their management capabilities, in to adapt in this evolving landscape.

In 2016-17, community radio stations broadcast terrestrially 55,812 hours each week – 36,000 hours of which (or 65%) is locally produced. In the same year, stations produced 11,559 hours of podcasts uploaded online, or an average of 34 hours per station (up from 24 hours per station in 2015-16). A

²⁰ Digital platforms inquiry – final report, available here: www.accc.gov.au/system/files/Digital%20platforms%20inquiry%20-%20final%20report.pdf



large proportion of these podcasts are produced in regional, rural and remote Australia – a total of 7,850 hours, an increase of 75% since the year prior. Stations also produced 62,139 hours of online only content for listeners, up 91% since 2015-16.²¹

Yet the sector is excited to continue to meet evolving community need. With funding support from the Federal Government via the Community Broadcasting Program, the CBAA is supporting the sector's transition to multiplatform delivery to meet listener and community expectations.

The CBAA is committed to the digital broadcast platform, complementary online content, and digital content delivery mechanisms. Ultimately the integration of digital platforms and technologies offers flexible and effective outcomes to produce content and the delivery of radio services.

The CBAA's Multiplatform Distribution Project offers stations affordable, industry standard solutions for:

- encoding, streaming and on-demand; a central database to capture station metadata;
- an API to feed community radio station websites, station apps and platforms like TuneIn;
- an aggregated sector-wide app; and
- improved analytics to better measure and track station community engagement.

Through this project the CBAA will:

- Futureproof stations to remain competitive in a disruptive media landscape,
- Increase listener access to community radio,
- Increase time spent listening to community radio,
- Increase the cumulative monthly listeners to community radio,
- Increase interest and volunteerism in community radio,
- Reach younger audiences by providing access via new and emerging technology,
- Highlight and champion community broadcasting to Australians,
- Increase the discovery of local Australian music and diverse independent content to the Australia population, and
- Increase donation and sponsorship revenues across community radio.

This project is supported by targeted funding announced in August 2017 of \$0.6 million per annum over four years. **The 2020/21 Budget marks the final year of targeted Government funding for assisting the community broadcasting sector to enhance its online presence.**

ACCC's News Media Bargaining Code

First Nations Media Australia (FNMA) and the CBAA made two joint submissions to the ACCC's consultation processes regarding the News Media and Digital Platforms Mandatory Bargaining Code. We were pleased to see the Government's recognition and action regarding the imbalance in negotiations between Google/Facebook as global corporations and Australia-based news services. Such action in establishing a Code, goes a little way to ensuring appropriate revenue sources reaches Australian news producers.

The CBAA and FNMA urged the ACCC to take a principles-based approach regarding how news would be treated within the Code. Regardless of whether the original source relies in whole or in part on advertising revenue, the Code should be designed in a way that secures fair remuneration for the redistribution of quality news content. This would ensure that diverse media organisations with diverse business models – including the not-for-profit media sector and public broadcasters – are all fairly encompassed and treated within the Code.

Given the Australian Government has provided grant support to many commercial newsrooms across the country through its Regional Innovation Fund and Public Interest News Gathering Program, tying inclusivity or exclusivity to the Code depending on principal funding source appears flawed.

The CBAA and FNMA broadly supported a four-part test framework to ensure minimum standards for the participation of news businesses. However, we advocated strongly for all Codes of Practice – as

²¹ 2018 CBAA Programming and Technology Survey. Available online: www.cbbaa.org.au/sites/default/files/media/CBAA%20Programming%20Technology%20Survey%202018%20Report.pdf



registered by the ACMA – to be included under the Code's Professional Standards Test. This would ensure that the community broadcasting sector – and its Codes – be recognised alongside the commercial industry's Codes as a set of industry rules that outline minimum broadcast standards. While we were pleased to see the late inclusion of the ABC and SBS into the Professional Standards test – recognising that while they do not secure advertising revenue, they do require fair remuneration for the journalism and news they create – we were disappointed that our sector was not explicitly included.

The CBAA and FNMA continue to seek specific inclusion of the community broadcasting sectors' Codes of Practice (for both radio and television) under s52P (1)(a)(ii), alongside that of the commercial and subscription broadcast industries.

Community digital radio contributing to media diversity

The inclusion of community broadcasting in the framework and legislation for digital radio, and funding to support the delivery of community digital radio services, was announced under the Howard Government. The announcement reflected the Government's long-term public policy commitment to ensure access to digital broadcasting platforms on a basis that is affordable to community broadcasters.

The availability of community radio services on the digital broadcast platform also meets public policy objectives in relation to free-to-air broadcasting, local content, media diversity and news, information and stories that reflect Australian identity, character and cultural diversity.

Digital radio is increasingly the way to ensure delivery of free-to-air radio services on an economic basis. It provides an alternative free-to-air broadcast platform and the capacity to minimise increasing costs of analogue transmission.

Locally produced community digital radio services make a valuable and unique contribution to media diversity and social inclusion. Digital radio reaches close to 70% of the Australian population with community services in Melbourne, Sydney, Brisbane, Adelaide and Perth, and on-air under implementation in Canberra, Darwin and Hobart.

The CBAA's Digital Radio Project coordinates and supports over 55 digital radio services nationally, managing platform infrastructure and service delivery under joint transmission arrangements with commercial operators.

The CBAA is seeking a commitment to maintain current existing levels of Federal Government funding, as from July 2021, targeted to support community free-to-air digital radio on an ongoing basis, indexed and capped at or near \$4.5 million per annum.

This is the total targeted funding sought and required to support digital platform and infrastructure costs for data, linking, multiplexing and transmission for the delivery of community digital radio services, coordinated nationally by the CBAA Digital Radio Project.

In the absence of a new funding commitment beyond June 2021, there is immediate planning instability for community digital radio services and regional expansion, and potential disruption to existing services in 2021-22.

Community radio and the 2019-20 bushfires

Community radio stations play a critical role in communities, particularly regional communities, both during natural disasters and in the recovery. The devastating bushfires that impacted much of Australia towards the end of 2019 and into 2020 saw over 80 community radio stations broadcasting in fire affected areas or to fire affected communities.

These stations are closely linked to their local areas and communities, drawing their announcing, producing and support volunteers and staff directly from the towns and locales where they broadcast. Many stations, while not directly affected, have had station volunteers and members who have been directly impacted through the loss of property and sadly at times, even friends or family.



Community radio stations in regional, rural and remote parts of the country are by their very nature, hyperlocal conduits for information and news. In many fire affected areas when power, internet and mobile reception went down community radio stations played a critical role in emergency broadcasting and delivering local information on fire threats, road closures and available community evacuation and relief services. In many cases this included dedicated airtime for updates from local emergency services.

Community radio is complimentary to other broadcasting services, particularly the ABC. Where the ABC often has wide-area coverage, community radio offers nuanced, hyperlocal expertise and information. During the bushfires, the ABC did not always have announcers in the affected regions and at times, could not possibly get announcers into hotspots such as Mallacoota. To broadcast updates, the ABC utilised the community radio announcers in Mallacoota, who continued emergency broadcasting knowing that they would lose their own homes in the process.

In some areas, emergency broadcasting by community radio was the only source of local information. About 60 km from Canberra, Braidwood's community radio station, Braidwood FM, had only just expanded its transmission range when fires threatened the town of about 1,600 people. In late November 2019, station volunteers broadcast 14 days of near continuous emergency coverage of the Tallaganda National Park fire. Volunteers put hourly updates to air from the Rural Fire Service, directly connecting listeners to the information source. Portable battery-powered radios sold out in town. The new transmission range meant that locals in more remote areas could now hear the station's information and updates.

During the bushfire threat, many of these stations faced severe pressure on their people – volunteer staff struggling with exhaustion and trauma – and damage and loss of power to broadcasting equipment and resources. For example, on 31 December 2019, fires destroyed the main transmitter and link tower at Mt Wandera for Eurobodalla's community radio station 2EAR FM – also taking out the ABC's transmitter. 2EAR FM was off air until the station technician and support team were able to temporarily install a transmitter at the station premises one week later, at a reduced output.

With the process of rebuilding both community infrastructure and spirit underway, local community radio stations have continued to play a critical role assisting communities to recover – through fundraising efforts, acting as catalysts for community dialogue and building resilience, helping combat social isolation and, importantly, connecting people to the critical services they need.

Community radio and COVID-19

Community radio stations act as catalysts for community dialogue and resilience through tough times, helping to combat social isolation and, importantly, connecting people to the critical services and information they need. Community radio has played an important role in broadcasting public health and information related to COVID-19 due to the sector's unique listenership, ability to develop and share in language messaging and central role played in First Nations and remote communities (where community radio is often the only media source).

The pandemic has undoubtedly highlighted community radio's role as a community connector and trusted informer. The sector has risen to the challenge of continuing its work, with several innovative creative projects and programs commenced to continue informing communities throughout this changing time. Some highlights include:

- Sydney's FBi Radio started an online 'In It Together: A COVID-19 Community Relief Directory' outlining activities and initiatives by Australian creative communities. This includes online events, digital content, mental health support, online resources, online community groups and more.
- Melbourne 3CR's *Beyond the Bars* is a prison radio show connecting people in prison with their wider communities. While this year their usual live broadcasts could not take place, 3CR continued broadcasting the voices of Aboriginal and Torres Strait Islander men and women from the inside – sharing their poems, stories, songs and voices.



- Sydney's Eastside Radio created *For the Duration* – a live and local program covering COVID-19 from that community's perspective. Including interviews with local politicians, businesses and community organisations to help make sense of the developments.
- The CBAA's Community Radio Network (CRN) partnered with JOY FM (Melbourne and Australia's only LGBTQIA+ station) to share with national listeners *The Informer Daily* – a daily current affair show covering news and information about COVID-19 with a focus on its impact on the LGBTQIA+ community. This could be played by stations to supplement their local programming.
- Over 47 stations also broadcast content shared by the CRN from 'Radio Reimagined' the annual Victorian Seniors Festival – presented by the Victorian State Government. Produced for senior audiences and stations across Australia, programs include a monthly selection of high-quality radio plays, spoken word, poetry and music features from the 40s to the current day, including interviews with performers and presenters.
- CBAA's Amrap has collaborated with the music industry through a new Australian music radio show, *Aussie Music Is Bloody Great*. Broadcast across the CBAA's Community Radio Network, the program showcases the incredible range of Aussie acts, many of whom have lost their livelihoods due to the cancellation of concerts, festivals, tours and shows.

Despite these efforts community radio services have faced, and continue to face, significant challenges due to the COVID-19 pandemic.

The severity of the impact of COVID-19 has accelerated pressure on local community radio stations to find ways to deliver key broadcast services efficiently and economically, while transitioning to an entirely or partially remote content-production and broadcast model. It is impacting significantly on broadcasting resources, staffing and volunteers, and revenue sources in sponsorship, donations and fundraising.

The economic impact of the pandemic as well as the necessary social distancing measures have had serious and ongoing impacts on the community radio sector and have left many stations struggling to maintain operations. Station revenues, which are particularly reliant on sponsorship from local small businesses and the music and arts industries, are down in many cases over 80%. Events-based fundraising opportunities have understandably been cancelled. In some cases, larger metropolitan stations have secured significantly higher donations than previous years through their annual fundraising drives. While this shows the value listeners place on these community assets, stations report that these increased donations do not fill the gap left by declining sponsorship. Further, due to the sector's seasonal nature of these large fundraising campaigns, many of these same stations are now ineligible for JobKeeper 2.0. Many volunteer workers, particularly in vulnerable groups, are understandably staying home.

The Community Broadcasting Foundation (CBF) was set up in the 1980s to distribute Federal Government funding to the community broadcasting sector via the Government's Community Broadcasting Program. In response to COVID-19, the CBAA, along with the other Sector Representative Organisations and the CBF, have been consulting widely with stations across the country. Together, the sector responded immediately by establishing a Crisis Taskforce to understand the challenges faced; consider the best way the sector can respond using our available resources; and identify where gaps exist and where Government assistance is required. Measures taken by the sector to date include:

- Providing an automatic six-month extension on reporting requirements for all current CBF Development & Operations and Content grants.
- Allowing CBF grant applicants time to re-evaluate and recast their applications to accord with operation under crisis conditions.
- Establishing a new COVID-19 Crisis Fund with existing sector funds and pursuing contributions from Government and the private sector to provide stations with targeted financial support to maintain operations. Our intention is to build on the initial \$2.2 million investment – towards the \$8 million target – through government and philanthropic support.
- Establishing a CBF COVID-19 Quick Response Grant Fund to ensure that volunteer-only stations can apply for a grant up to \$2,000 to assist with maintaining operations under social distancing requirements.



- Securing a partnership with the Judith Neilson Institute to increase the amount of news reaching Australians via community radio. This has allowed the CBAA's National Radio News service to be free for all member stations for the next six months. The number of stations broadcasting National Radio News across the country has increased to 118 (up from 83) with an estimated audience of 1.7m listeners per week.
- Sharing Department of Health Community Service Announcements through the CBAA's Community Radio Network, including in First Nations languages and a variety of languages other than English.

The CBAA is working with the Government on appropriate funding support measures for the sector and on establishing a fit-for-purpose regulatory environment through much-needed reform. We outline the sector's priorities below.

8. Recommendations

Optimised funding arrangements for the sector

The 2020/21 Budget marks the final year of targeted funding, supporting sector projects and initiatives across community digital radio, enhanced news programming, online streaming and skills development. To provide the required certainty for planning and expanding these successful projects, the CBAA had sought early notice of a funding renewal in the October Budget at an appropriate and ongoing level per annum beyond 2020/21.

Early notice of funding renewal would still be extremely valuable. Without a commitment to providing this funding ongoing the sector will face an annual shortfall of around \$3.7 million, as from July 2021. On top of the severe impact of COVID-19, this drop in Federal funding support will be a further and critical blow to key projects and the sustainability of community radio services across the country.

In addition, due to the required response to COVID-19 through new grants (as well as support for stations impacted by bushfires earlier in the year) the Community Broadcasting Foundation is facing a funding gap that will impact the sector's capacity to continue delivering community impact into the future. The effect of the pandemic has meant that stations who were previously less reliant on Government funding via the CBF now need greater funding to support core operations. Requests for the recent CBF grants, which included the first 2020/21 Content and Development & Operations grants, the COVID-19 Crisis Grant and COVID-19 Quick Response Grant, far surpassed the available funding.

The CBF's initial COVID Crisis Grant fund was created with \$2.2 million using repurposed 2019/20 and 2020/21 funding, as well as drawing on CBF reserves. In April, the CBAA initially estimated the sector would need an additional \$5-\$7 million investment to meet the sector's need as impacted by the pandemic. The past CBF grants rounds indicate the unmet need is closer to \$10 million.

Before the pandemic, the CBAA had requested that public funding to the CBF be increased by \$5.1 million annually to allow a larger and more adaptable grants pool to meet the growing needs of the sector, particularly those in regional and remote areas. With ongoing uncertainty around COVID-19 and public restrictions, it is hard to forecast what the sector's need is for the next 12-24 months, and we would welcome the opportunity to discuss with Government the amount of additional funding that could be provided through the Community Broadcasting Program to assist station recovery and future sustainability.

We note that in its February 2018 final report the Senate Select Committee on the future of public interest journalism recommended:

Recommendation 2: The committee recommends that the Commonwealth provide additional surety in future funding for the community broadcasting sector beyond the forward estimates, in particular what component will be set aside for training and education, and ensure that the sector is fully consulted in the national rollout of digital services.

In its response the Government noted this recommendation and stated its support and recognition of the valuable service community broadcasting brings to groups in the community that are not



specifically served by commercial, subscription or national broadcasters and its contribution to the diversity of the media landscape.

Recommendation 1: The CBAA is seeking a commitment to maintain current existing levels of Federal Government funding, as from July 2021, targeted to support community free-to-air digital radio on an ongoing basis, indexed and capped at or near \$4.5 million per annum.

Recommendation 2: The CBAA is seeking a renewal of funding for sector-wide projects beyond June 2021 – for enhanced news programming, improved online presence and enhanced national training.

Recommendation 3: The CBAA is seeking collaboration with Government, in line with its priorities, regarding the amount of additional funding that could be provided through the Community Broadcasting Program to assist the sector's future sustainability and vibrancy.

Regulatory reform to enhance the sector's impact

For community radio stations to continue best serving communities and Australia's media diversity in a time of intense digital and physical disruption, stations need to be appropriately regulated and empowered as not-for-profits. They also need a regulatory environment that supports, not hampers, diverse operational and income generation models. A regulatory framework that embeds and reflects best practice not-for-profit governance will ensure sustainability and viability.

Broadly, the CBAA and the community broadcasting sector recommends that the Commonwealth Government undertake a review of the regulatory environment for the community broadcasting sector in partnership with the CBAA.

There are four key aspects of regulation we would like to review and reform with Government:

1. Regulatory instruments
 - a. Codes of Practice (in progress)
 - b. Community Broadcasting Guidelines, specifically the Participation Guidelines and the Not-For-Profit Guidelines
 - c. Licence renewal and application process
 - d. Co-designing a set of guiding principles to drive the ACMA's approach to regulating the community broadcasting sector.
2. Standardise not-for-profit regulation
 - a. The CBAA wishes to bring consistency to the way not-for-profit community broadcasting licensees are regulated by the ACMA in terms of their structures and operations.
 - b. The CBAA contends that the meaning of the terms not-for-profit and profit-making enterprise should be entirely consistent with the extensive definitions prescribed and regulated by the Australian Charities and Not for Profit Commission (ACNC) and assessed by the Australian Taxation Office (ATO).
3. Encourage risk-based and outcomes-focused regulation
 - a. Regulation should be sufficient to ensure that community broadcasting services:
 - i. represent a community interest and serve that community,
 - ii. operate in accordance with a community 'charter' or public good purpose, and
 - iii. serve that purpose as a charitable organisation or social enterprise,
 - iv. contribute to media diversity, and
 - v. meet relevant standards as a non-profit organisation.
4. Community interest and community participation
 - a. ACMA currently places a restrictively narrow definition on the dual considerations in the Broadcasting Services Act to both represent the community interest and to



encourage members of the community to participate in the operations and selection and provisions of programs.

- b. Stations should be able to demonstrate the participation of their community interest (and the related notion of engagement) in a greater variety of ways, referring, among other things, to:
 - i. levels of support through donors, subscribers, members and volunteering,
 - ii. social media engagement,
 - iii. correspondence (letters, emails, texts, voicemail),
 - iv. listener surveys,
 - v. audience (quantity) research,
 - vi. participation in community events, etc.

Recommendation 4: The CBAA and the community broadcasting sector recommends that the Commonwealth Government undertake a review of the regulatory environment for the community broadcasting sector in partnership with the CBAA.

The role of Government in supporting a viable and diverse public interest journalism sector

True media diversity is only possible through the provision of diverse free-to-air and readily-available media content – across community, commercial, public, print, online and narrowcast services. The CBAA has been pleased by the Australian Government's recognition of the challenges faced by all types of media organisations across the industry. The CBAA also appreciates the Australian Government's long-standing commitment to and investment in community broadcasting as a vibrant contributor to media diversity.

The CBAA supports the Australian Government pursuing a holistic, whole-of-industry approach to investing in and supporting media diversity, news and public interest journalism. For example, the ACCC's Digital Platforms Inquiry Final Report recommended grants for local journalism – which the CBAA wrote in support of. However, iterations of Australian Government grants for journalism – starting with the ACMA's Regional and Small Publishers Innovation Fund through to the Public Interest News Gathering (PING) Program, have explicitly excluded the community broadcasting sector. These programs have either focused on funding 'publishers' of content (excluding broadcasters) and/or excluded not-for-profit entities from applying.

A holistic approach to supporting public interest journalism will ensure greater public benefit. As outlined above regarding the ACCC's News Media Bargaining Code, the community broadcasting sector is also not explicitly included under the Professional Standards test.

Throughout the pandemic and in the face of local newsrooms shutting, the community broadcasting sector is broadcasting more news to fill that gap. The CBAA supports a Government approach that considers the role of public interest news and journalism holistically – not by focusing on service or industry segment.

Recommendation 5: That the Federal Government invests in public interest journalism and media diversity holistically, focusing on funding organisations that undertake the desired news gathering activities in the benefit of their communities.

Recommendation 6: That the community broadcasting sector's Codes of Practice (both for TV and radio) are included in the Treasury Laws Amendment (News Media and Digital Platforms Mandatory Bargaining Code) Bill 2020 under the Professional Standards Test, s52P (1)(a)(ii).

