



COMMUNITY
BROADCASTING
ASSOCIATION OF
AUSTRALIA

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Inquiry into the economic and cultural value of Australian content on broadcast, radio, and streaming services – Submission from Community Broadcasting Association of Australia

The Community Broadcasting Association of Australia (CBAA) welcomes the Australian Government's inquiry into economic and cultural value of Australian content on broadcast, radio and streaming services. As the peak body and the national representative organisation for community radio and television stations in Australia, we value the opportunity to emphasise the importance of Australian content in today's competitive and global media landscape.

The CBAA champions community broadcasting by building stations' capability and creating a healthy environment for the sector to thrive. We work toward 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 open society, strong democracy and cultural vibrancy. To this end, we are eager to make our case to Government that the economic and cultural value of Australian content is significant, and that local content protections are necessary to ensure the sustainability and growth of Australian community broadcasting.

This submission focuses on the following areas of the Inquiry's terms of reference:

- b) the contribution the Australian television and music industries make to the economy;
- c) the value and importance of local content requirements for television, radio and streaming services in Australia.

Further, to assist the Committee in its deliberations we take the opportunity to note our views on the *Broadcasting Legislation Amendment (Foreign Media Ownership and Community Radio) Bill 2017*, which recently passed the Senate.

The CBAA and community broadcasting in Australia

Since our creation, CBAA has been committed to giving a voice to those otherwise not heard on air in Australia, with an eye to maintaining and supporting a diverse sector, supported by volunteers and community-minded individuals.

Community broadcasting is a vital and growing part of the Australian media landscape. The 2016 National Listener Survey reported the highest listening levels for community radio on record – 5.3 million Australians tuned in to the over 450 not-for-profit, community-owned and operated radio services operating across the country each week. This is up from approximately 3.8 million in 2004.¹

¹ Community Broadcasting Association of Australia (2017). Community Radio National Listener Survey- Summary report of findings January 2017 [online] Available at: <https://www.cbaa.org.au/broadcasters/get-data-national-listener-survey-station-census>



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At a time where authenticity, confidence, and diversity in the media is more important than ever, the responsibility of Australia's media outlets to fulfill the public need for quality Australian content in a manner that is sufficiently competitive with major media organisations to meet the demands and interests of a culturally, socially, and economically diverse audience is paramount.

Numerous public surveys show that Australians acknowledge the need for, and community broadcasting's role in providing, local news and information, particularly at a time when many commercial media services are focused on state, national and international news. Audiences feel they cannot receive localised or community-specific information from other media sources. Community stations provide programming that caters to the needs and interest groups of their communities and, if properly supported, will continue to contribute to and reflect an Australia that is an open society, a strong democracy and a vibrant culture.

In our most recent Community Radio National Listener Survey, 48 per cent of respondents said that their key reason for listening to community radio was that stations have "local information/local news" (48%).² In regional Australia, 89% of respondents said that having access to local content is important to them. 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. Further, community broadcasting is the largest component of Indigenous media production in Australia and half (48%) of people who identify as Aboriginal or Torres Strait Islander listen to community radio during a typical week. On a day-to-day basis, Indigenous radio is the only provider of news and information that directly affects the lives of Indigenous Australians (e.g. information about community events, meetings, deaths, funerals, tombstone openings, local sporting results and coverage).

The contribution the Australian television and music industries make to the economy

The economic contribution of community radio is substantial and unique. \$880 million is contributed annually to the economy by the community broadcasting sector. This is in part due to the significant value of the 20,000-strong volunteer effort that powers community radio stations through administration, library coordination, technical work, and on-air presenting. Special interest programming, local content, and community-based broadcasting are all arguably important incentives that operate to attract the volunteers that keep community radio afloat, standing as testament to the importance of the sector in the eyes of active participants and listeners.

Community radio also adds significant value as a conduit for training and education of its participants and employees. Community radio stations operate in towns and cities across Australia with the largest proportion located in regional areas (41%), a further 25% in rural areas and 34% across metropolitan and suburban locations. These stations directly support approximately 1020 full-time equivalent (FTE) jobs across the country – over 250 of which are in regional and rural communities. Further, the sector consistently reports between 19,000-20,000 people volunteering at community radio stations each year. This is an average of 74 volunteers at each community radio station, putting in the hours of 13 FTE shifts per station. This varies strongly across stations and station types.

In general, the sector's key role can be summarised as offering a complementary channel to the mainstream media: providing smaller, minority groups with representation, access to the airwaves, and content that caters to niche audiences and tastes. In this regard, community broadcasting may be viewed as a contributor to the diversity of media content and media services available to Australians. The community broadcasting sector also provides a degree of ownership diversity across the broader media industry, to the extent that stations are owned and operated by local community organisations and not commercial media organisations.

The value and importance of local content requirements for television, radio, and streaming services in Australia

Community radio makes a significant and meaningful contribution to the strength of the Australian media landscape in three major ways. First, it gives Australian content a platform to access an otherwise crowded and internationally competitive industry in music, television, and news media. 72% of content broadcast on community radio is locally produced, with a median of 142 hours of locally

² Community Broadcasting Association of Australia (2017). Community Radio National Listener Survey- Summary report of findings January 2017 [online] Available at: <https://www.cbaa.org.au/broadcasters/get-data-national-listener-survey-station-census>

produced content broadcast per station each week, and over 1000 unique interviews are conducted on the national radio news service over the course of a year.³ Findings from 2017 Melbourne Live Music Census, showed that more music fans in Melbourne listen to community radio stations Triple RRR and PBS FM, than any commercial station, particularly for Australian Music content.⁴ This happens in no other major city in the world.

Second, the community broadcasting industry also provides greater access for small players in the media industry to pursue special interest causes and serves to promote public interest journalism. By its very nature, community broadcasting is vital in delivering public interest journalism, especially to under-served markets like regional Australia, and culturally and linguistically diverse communities. Community stations provide programming that caters to the needs and interest groups of their communities and contribute to and reflect an Australia that is an open society, a strong democracy which embraces multiculturalism. Further, these stations play an important role in providing a voice for communities that aren't adequately serviced by other broadcasting sectors.

Importantly, community radio also allows minority and special interest groups to communicate with their own communities and increase media diversity in the broadcasting industry. 26% of community radio listeners speak a language other than English at home, reflecting a cultural need for special interest stations that cater to particular areas of Australian society while increasing the accessibility of the media to immigrant populations and promoting Australian media diversity on the whole.⁵

The Broadcasting Legislation Amendment (Foreign Media Ownership and Community Radio) Bill 2017

Given the right policy settings, the community broadcasting sector can continue to deliver its unique value to the Nation and further champion the production and broadcasting of local Australian content. To assist the Committee in its deliberations we take the opportunity to note our views on the *Broadcasting Legislation Amendment (Foreign Media Ownership and Community Radio) Bill 2017*, which recently passed the Senate.

The CBAA supports the intent of the legislation to strengthen localism in community radio broadcasting and understands the need for the proposed changes to strike a balance between providing clarity to the community broadcasting sector and the Australian Communications and Media Authority (ACMA) on what is sought, while avoiding overly prescriptive or burdensome requirements.

However, we believe that the wording of the legislation does not make the link between the changes, the desire to ensure local content and the outcome sufficiently clear. In particular, the wording of Section 84(3) to define material of local significance would benefit from further clarification. This section defines that material is of local significance if:

- a) it is hosted in the licence area of the proposed licence; or
- b) it is produced in the licence area of the proposed licence; or
- c) it relates to the licence area of the proposed licence.

The CBAA believes that:

- The term 'hosted' cannot be effectively interpreted – if intended to mean 'broadcast on a community radio service' then all material broadcast would be classified as material of 'local significance'. If interpreted literally – that a 'host' of a program has to be in the licence area – this would require the interviewee and interviewer being in the local area. There are many examples in the commercial sector where the local 'host' is not actually local.
- The term 'produced' is inappropriate. Though there are situations where it is appropriate that material be 'produced' in the licence area there are many cases where it is not, for example RPH (radio programming for Australians with a print disability), indigenous programming and other specialist community of interest services.

³ CBAA Annual Review Community Broadcasting Association of Australia (2017). Annual Review 2016-17 [online] Available at: <https://www.cbaa.org.au/sites/default/files/media/CBAA-AnnualReview-1617.pdf>

⁴ 2017 Melbourne Live Music Census. Available at <https://www.musicvictoria.com.au/news/melbourne-live-music-census-full-report-released>

⁵ CBAA Annual Review Community Broadcasting Association of Australia (2017). Annual Review 2016-17 [online] Available at: <https://www.cbaa.org.au/sites/default/files/media/CBAA-AnnualReview-1617.pdf>

- The term 'relates' is so broad and subjective it renders it fairly much meaningless when it comes to the application of this legislation.

For CBAA, material of local significance refers to material (or content) which is relevant to local communities and the community interest served by the licence. This clearer definition (if adopted by ACMA in implementation) supports the Government's intent to see more local content on community radio and is consistent with the other broad areas the ACMA has regard to under 84(2).

In raising this view with the Department of Communications and Arts before the Bill's passage, they expressed their confidence that the Bill's drafting covers material related to the licence area in either a general geographic sense or in relation to a particular community interest within the licence area. They have also provided assurance that this intent was reinforced in the Explanatory Memorandum for the Bill (now passed).⁶ Despite this, the CBAA still believe that the subjectiveness of the current wording in the legislation needs to be addressed by a clear intent statement. We would be happy to follow up with the Committee on this matter.

Conclusion

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. With an ever-increasing need for media diversity and a level playing field for local content producers, the sustainability and growth of the community broadcasting industry is more important than ever.

Much has been achieved and great confidence gained in the last year as a result of the Government's commitment to community broadcasting. Even so, the year by year budget allocations continue to be a significant source of challenge and uncertainty for community radio in Australia. Given that the diversity of media and access to relevant media content for all Australians is under intense scrutiny, it seems timely to make a permanent commitment to community radio by moving the sector's funding allocation from the budget cycle process and making it ongoing.

The CBAA are committed to working with Government to create a more certain funding environment in order to optimise the benefits of community radio for Australia. We appreciate the Committee's support here and in regard to the local content legislation issues raised in this submission.

As the peak body and the national representative organisation for community radio and television stations in Australia, CBAA's thanks for the committee for the opportunity to voice our view alongside other key stakeholders in the Committee's inquiry into the economic and cultural value of Australian content. We welcome any opportunity to appear before the Committee or assist in other ways in its reporting.

Kind regards,



Jon Bisset
Chief Executive Officer

⁶ The Parliament of the Commonwealth of Australia, Broadcasting Legislation Amendment (Foreign Media Ownership and Community Radio) Bill 2017, Explanatory Memorandum, 45.