

Community broadcasting sector sustainability review

Response to Discussion Paper submitted to the Department of Infrastructure, Transport, Regional Development, Communication and the Arts

August 2024

The Local and Independent News Association (LINA) welcomes the opportunity to respond to the community broadcasting sector sustainability review discussion paper.

LINA is a not-for-profit industry association supporting hyperlocal and independent digital news publishers. As at August 2024, its membership includes 75 digital news publishers, producing 124 mastheads in all States and Territories across Australia. To be eligible for LINA membership, publishers must be distributing, via a digital channel, public interest journalism that covers a range of topics and meets professional editorial standards. Publishers must engage journalists who are embedded in the communities they serve and must be independently owned. While some LINA members are not-for-profits, most are operating small digital businesses with a community service approach. Many LINA members also distribute news content via printed newspapers, radio formats and social media, however LINA's member services focus on the digital distribution of news content, filling a gap that complements other associations in the industry. Five LINA members are community radio stations, indicative of the crossover in support needed for community broadcasting and public interest news reporting.

LINA's objectives align with the community broadcasting sector in that its vision is a vibrant and diverse local news landscape, providing news services to communities across Australia. LINA seeks to increase the diversity of topics and perspectives available to audiences, and create a news ecosystem that is reflective of the geographic and cultural diversity represented in our communities. In short, we work toward **accessibility to timely, relevant and accurate news sources**, and also, given all news is local to somewhere, ensure stories that would not otherwise be reported are amplified for impact.

LINA supports the four key priorities identified in the **Community Broadcasting Sector Roadmap 2033** to grow the sector's capability; celebrate the sector's identity and demonstrate impact; amplify diverse voices; and secure capacity to meet community need. In addition, LINA encourages consideration of community-based media as a trusted voice in a landscape where trust in media has declined year on year over decades. The Edelman Trust Barometer's 2024 Report shows a global shift toward trusting people within our own communities, over experts and politicians in many instances. We want to receive information from 'people like us' and community media provides an excellent opportunity to re-engage audiences in news content and verified media content being media produced under professional editorial standards.

Challenges to traditional business models for news media have been well documented over decades. Business models sustained by advertising and user-fees have weakened globally.

Audiences have shifted to digital media consumption over time. Media markets have consolidated to the extent that Australia is now one of the most concentrated media markets in the world. Community-based media, in any format, is an important counter to increasingly syndicated, monocultural news services.

Local media is not immune to these sustainability challenges. While the community broadcasting sector has received and continues to receive funding support from the Commonwealth for its contribution to social cohesion, emergency resilience and media diversity, this support has been focused exclusively on not-for-profit, licensed radio and television broadcasters. The small pool of available funds has encouraged ring-fencing around licenced services, at the exclusion of other media channels regardless of audience behaviour. 79% of adult Australians accessed news content online in 2023, compared with 58% for TV, 37% for radio and 18% for print. (ACMA, December 2023)

Aligned with an outcomes-focused funding environment, increasing resourcing to the community broadcasting sector may provide opportunity to broaden the scope to other not-for-profit, community-based media provided they are operating within the professional editorial standards outlined by LINA, the Australian Press Council, the MEAA's Journalistic Code of Ethics, the Community Broadcasting Codes of Practice and/or the ACMA's Public Interest Journalism register. LINA supports the CBAA budget request for greater support for community broadcasting workforce and capability, especially relative to funding for news and journalism that would have a positive impact on the independent news ecosystem and the potential for expanding collaborative opportunities across news services.

LINA benefits from a parent-company arrangement with the Community Broadcasting Association of Australia (CBAA), a **collaboration generating efficiencies** between the two industry associations. A significant portion of our work focuses on networking and shared services between news publishers, producing economies of scale across independent organisations. From this perspective, collaboration is a key tenant underpinning LINA's work and makes sense in any industry with scant resources.

LINA seeks to build relationships between digital newsrooms and community radio stations where organisations can **share journalism resources**. A good example of this is First Nations Media Australia's journalism program, which provides training to Aboriginal and Torres Strait Islander journalists to report news in text, photograph and audiovisual formats, meaning journalists in regional and remote communities have skills to produce reports for television, radio, print and/or online formats when a story is relevant beyond their local community. There is potential to share journalism resources across broadcasting and digital news outlets, viewing journalists as a key community asset like other services (eg. nurses, vets, teachers, weather services) to be utilised across whichever medium best serves communities with relevant and timely information. A principles-based approach to recognising local news as an essential community service generating significant public benefit would enable cross-industry

collaboration in communities and strengthen existing radio and digital newsrooms while easing the start-up runway in current news deserts for emerging news services.

While there are many benefits to **industry collaboration**, we must be alert to an over-focus on networked content unintentionally increasing syndication levels in an already concentrated media landscape. If standpoint diversity, geographic and cultural diversity are important as principles, programs and supports should primarily focus on increasing participation in content production. Market forces have resulted in increased syndication of content state-wide and nationally, even within the ABC and SBS. Local and community-based media provides an opportunity to mitigate the impact of reductions in the number of voices represented in the media, and the range of content available to Australian communities. Local media matters from a representation and relevance perspective, and absolutely underpins trust in media.

However, there are **significant efficiencies** in the 'back-end' of media organisations that lend themselves to collaboration to increase sustainability. LINA categorises these under three functions of sustainability:

1. Infrastructure

When it comes to the mechanisms required to distribute content, opportunities for collaborative efficiencies could include: website hosting, data storage, app development, cyber security, transmission towers and some hardware, maintenance and technical personnel required to address outages and keep services running effectively (increasingly a remote, digital function across all mediums) and shared services such as SEO audits, electronic newsletter distribution platforms, best practice design implementation for audience engagement – all of these are things that focus on the technicality of being able to deliver content directly to audiences. Co-location and consortium models can be effective for community broadcasters and other local media outlets from this perspective.

2. Management

There is opportunity for collaboration in capacity building actions for small media outlets (eg. shared training services), out-sourced functions for common requirements such as HR management and bookkeeping services, and shared business development actions. Business development (or sales) is an area where volunteer or partly volunteer organisations often struggle because the role is less attractive to volunteers than content production or event production which are often seen as more fun than approaching potential clients and sponsors. There is opportunity to grow revenue through media production services for corporates and individuals, event coordination, sponsorship and digital advertising sales. Even fundraising such as LINA's Our News, Your Voice campaign can be centrally coordinated across two to 200 media organisations depending on the project. The limited resources of small media outlets mean that by necessity there is a focus on maintaining content outputs, usually supported by a single manager, or a handful of administrative staff. While there is revenue to be earned through the services community-based media can offer, there is no capacity within the sector to generate business. Investment in even a handful of roles that

carry out this function across the independent media landscape would make a significant difference to the ongoing sustainability of local media services.

3. Content

While exercising caution over unnecessary syndication, there are some efficiencies to be accessed through collaboration in the pre-production of content, particularly relating to public interest journalism. For example, investment in AI tools to gather and analyse data, pre-publication legal support, emergency response information and free access to freedom of information requests are each examples where partner organisation and/or group investment could increase the quality of public interest journalism being produced in local communities. Similarly, audience engagement activities can be centrally coordinated, or at least reviewed based on industry best-practice, to reduce reliance on third-party platforms (such as Meta) for content distribution.

Across these three key areas there are opportunities to collaborate from a technical perspective, a distribution and engagement perspective and an administrative perspective, providing opportunities to generate economies of scale 'behind the scenes'.

LINA's key actions to **build the sustainability** of local and independent news organisations are categorised by impact: immediate, medium-term and perennial.

Immediate impact supports include fast-paced tech innovations, events, journalism programs (content production) and short-term intensive sprints such as our 12-week Revenue Growth Program and AI Mentoring Program.

Medium-term impacts often focus on capacity building such as design and technical audits, impact tracking, extension programs and our annual collectivr fundraising campaign, Our News, Your Voice which includes capacity building training in delivering a digital campaign, using payment platforms and value messaging.

Perennial sustainability building programs LINA plans to deliver in the coming year include:

News REAM

Income from classified listings has moved online and away from news services, leaving a significant gap in revenue for news businesses and limited engagement with local audiences. In partnership with regional news publication Newspost, LINA has a business plan to develop a plug-in for news websites, enabling a new revenue stream for news publishers. An investment of \$120k is required to support development and start-up costs in the first year. This bespoke publishing tool is conservatively estimated to return \$3.385 million in profit to the local news media industry over the next 10 years. This software tool would also be useful to the community radio sector as a complementary income source through websites.

Accessing advertising revenue

While many news publishers are drawing income from online advertising, around 70% of LINA's member publishers are yet to unlock potential earnings through display advertising on websites, newsletters and multimedia channels. These publishers require coaching support to implement Google Ads Manager and adjust websites to meet industry standard sizing and reporting requirements for media buying agencies. There is opportunity for community broadcasters to expand their sponsorship revenue through digital ad sales using similar upskilling and collective representation models, potentially as an addition to the service provided by Spots & Space.

Sustainability Audit Program

Newsrooms often struggle to step back and evaluate which activities are boosting their sustainability, and which might just be taking up time. Taking its lead from the successful LION Publishers partnership with Google in the United States, LINA seeks to support Australian newsrooms to utilise a Sustainability Dashboard auditing the sustainability of business development activities and providing specific indicators on areas of focus for increased revenue. This also could be extended to the community broadcasting sector as a useful tool for prioritising revenue development activities.

Emerging journalists pathways program

LINA has developed a skeleton concept to support emerging journalists beyond cadetships and into sustainable roles in hyperlocal newsrooms. This is a multi-year, scalable program involving partnerships with educational institutions, digital news publishers, other community media and individuals. The work needs project management to bring partners together and undertake development work to progress this concept and explore future co-funding opportunities. This is an enabling piece, laying the foundations for a significant piece of work to follow.

While these programs primarily focus on ongoing revenue development, **personnel sustainability** remains a key challenge in partially volunteer environments. Many LINA members function through subsidising personal income through other roles in the early development phase of their newsrooms (generally one to five years). To date, the only members who have stopped operating since LINA's establishment have been due to health issues for founders. In the community broadcasting space this issue is partially mitigated by a requirement to have a Board or Committee of Management, diluting the reliance on any one individual to an extent. However, it is common for media outlets to burn out key individuals, struggle to attract skilled recruits and jeopardise the sustainability of the organisation through personnel issues integrated with revenue challenges. Investment in business development and other mid-tier roles across the community media landscape would provide some buffer for this ongoing challenge, allowing for leave, illness and the greater flexibility to respond to staffing changes.

LINA notes significant investment from the government in the ACMA's Media Diversity Measurement Framework and suggests it should lead the **collection and aggregation of industry data** as a function of the Authority. That said, some media organisations will be reluctant to share information considered commercially sensitive (income levels, employment figures) with a

government body. There is a role for organisations such as the CBAA, the Community Broadcasting Foundation, LINA and others to support the collection of this type of information and share it with the Authority as aggregated information where appropriate to feed into the Media Diversity Measurement Framework. In this way, the framework has the opportunity to be greater than the sum of its parts.

LINA notes the possibility of including social media reach and listener data as an indicator of community participation as a question in the discussion paper. While these measures do provide some insight into community engagement for media organisations, social media is dependent on third-party platforms and reliant to a large extent on algorithm functions to generate impact. Recent changes at Meta to deprioritise news content provide an example of reduced social media reach that is beyond the control of broadcasters or publishers. Therefore, they are an unreliable measure of participation.

LINA recognises that the issues and ideas raised in this response are not exclusive to the community broadcasting sector, but contributes this information as contextual information for the Department's consideration when thinking about mechanisms for addressing the ongoing sustainability of community-based media more broadly.

LINA is heartened by conversations relating to the development of the News Media Assistance Program (**News MAP**) and encourages urgency on the rollout of this work to address the significant needs of the news industry in meeting community expectation for timely, accurate and relevant news services.

We would be happy to discuss these potential impacts further and thanks the government for its consideration of this matter.

Sincerely,



Claire Stuchbery
Executive Director