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CMAA's Response to A New Framework for Measuring Media Diversity in Australia

About CMAA

On behalf of its 86-member organisations Christian Media and Arts Australia (CMAA) is pleased to make this submission relating to the ACMA's Consultation Paper A new framework for measuring media diversity in Australia.

CMAA has represented the interests of Christian media organisations for over 40 years. In doing so, it amplifies the interests of over 3,000 Christians in media and the arts by undertaking advocacy, empowering content creation, fostering unity and promoting excellence.

CMAA members reach culturally and geographically diverse audiences though:

- eight (8) Community Broadcast Licence (CBL) holders in state and territory capitals,
- twenty-seven (27) CBL holders in major regional and rural centres,
- a nationally networked service, broadcast on more than 700 Open Narrowcast Licences (ONL) serving parts of capital cities; major regional centres and over 600 regional and remote towns and communities,
- subscription television services on all major platforms, including Foxtel and Video on Demand,
- streaming services (VOD), and
- associated digital media.

Most significant in the context of the issue at hand is that CMAA members who operate both CBLs and ONLs have in recent years opened and expanded independent newsrooms. This is counter to the trend in the



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commercial and even public sectors where newsrooms are being closed and/or aggregated to fewer locations.

Endorsement of CBAA paper

CMAA is a Sector Representative Organisation (SRO) member of the Community Broadcasting Association of Australia's (CBAA) Sector Roundtable.

CMAA endorses and welcomes CBAA's submission to the ACMA. Our submission adds detail of particular interest to the Christian media sector.

Our submission

Overall, CMAA agrees wholeheartedly with the CBAA and others that the news measurement project will not deliver the desired policy outcomes unless community broadcasters and, we would add, open narrowcasters are included.

It is particularly important to include these sectors in the baseline data collection, as it will provide rich data about present delivery and future capacity to grow the provision of news and information services. We endorse the CBAA's comments about changing the unnecessarily restrictive language in the current approach to defining news (in the ACMA's 2020 paper).

Indeed, we note the definition of news and journalistic content contained in the ACMA's June 2022 report What Audiences Want is more inclusive:

In this paper, journalistic content refers to informative content that provides audiences with a deeper understanding of topical issues or events and matters in the public interest. It is content that is often (but not always) produced and presented by journalists, and may contain a mix of factual reporting, additional contextual information and analysis. Journalistic content is broader than just 'the news' and can appear within a range of differing content formats, from long-form investigative reporting pieces and documentaries to 'lighter' infotainment pieces and panel programming. Audiences expect



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journalistic content to adhere to principles of journalistic objectivity, making it distinguishable from opinion and commentary.¹

While acknowledging the process of a data collection may require practical limitations (for resources purposes) nevertheless our point is that the ACMA's recognition in *What Audiences Want* that all audiences need access to reliable, accurate, factual information and responsible discussion of matters of public interest requires a far broader idea of who provides news and journalistic content, regulated by Codes of Practice, than commercial and public media alone.

Localism and community interests

CMAA also contends that the definition and language around localism is too narrow, as it leaves out the vital importance of connections within and indeed between, different cultural groups. To this end the definition of level of connection framework needs to be broadened to include cultural connections (including religious faith connections) that exist across localities or are locality neutral.

Cultural and faith connections create strong bonds and are shared across a wide population. CMAA members are licensed to represent the Christian community interest. While these licences are limited as to geographic location that is not to say the Christian faith community of, say Wagga Wagga, is only interested in news and information about Christians in the Riverina. Part of being a member of a faith community is to be concerned about others of the same faith everywhere.

Secondly, it is clearly the case that for some people maintaining connections with their culture, language and faith of their place of origin means the difference between being able to settle, or not. Where change of locality has been a matter of necessity and safety rather than choice, as in the case of refugee settlement, the significance of maintaining access to relevant news about and of their faith and culture, in language is supreme.

¹ Australian Communications and Media Authority, *What Audiences Want*, June 2022, p14



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This cultural element seems not to be adequately incorporated in the current framework and is surprising, given the celebrated role community media have played in ensuring and enabling successful plurality in Australia despite, or perhaps because of, its long history of multicultural immigration.

This question is addressed in one of the papers referred to by the consultation paper. The European Commission Study on media plurality and diversity online makes the following observation in discussing the importance of media plurality and diversity...

The concept of media pluralism can be elaborated upon based on different meanings, which range from the “marketplace of ideas” of economic and political liberalism, to a definition functional of the notion of the “public sphere”. According to the latter notion, which has become a feature of the European debate on this topic, vs.the more liberal and market-oriented approach of the USA, media pluralism is associated with the definition of deliberative democracy and implies that citizens have access to a wide array of information as a precondition for their best participation in the democratic debate. Moreover, the democratic culture is broader than a concern with democratic deliberation or democratic self-government, and it encompasses also individual freedom, cultural participation and mutual influence (Balkin, 2004). Pluralism and integration are two basic functions of the media in a democratic society, according to Karppinen (2007): in this sense, media are seen to be a central tool in creating a common culture and a shared arena for public debate. ²

This not only is a wonderful endorsement of the whole idea behind community broadcasting, in which Australia, we suggest, leads the world, but points to the reason the new mapping project should look in more places in order to help inform policy that produces the enormous public good of individual freedom, cultural participation and mutual influence.

Addressing the questions

We will briefly address some of the consultation paper’s questions

² European Commission, *Study on media plurality and diversity online* accessed 24/03/2023
<https://op.europa.eu/s/yh8T> p18



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Question 1: Do you consider the framework, as outlined in the paper, would be an effective tool in measuring and tracking levels of media diversity in Australia?

Recommendation:

A new item should be added to the measures. The scope of indicator 6, local significance' does not adequately allow for the measurement of material that is significant for cultural (including religious) reasons.

One approach would be to broaden the definition of local to include and cultural (including faith) and to broaden the framing question for this item as in: "To what extent does news cover matters of local or cultural (including faith) significance?"

Another approach, which we think preferable for reason of clarity, would be to add an additional indicator: Cultural significance with the following framing question: To what extent does the news cover matters of cultural significance, including significance to people of different religions (and no religion).

Question 2: Do you consider the framework, as outlined in the paper, would be an effective tool in measuring and tracking the health of local news in Australia?

Recommendation

The framework will not be effective in achieving data to inform good policy making unless it is expanded to include Community Broadcast Licences and Open Narrowcast Licences.

Further, the framework has a gap acknowledging, and collecting data about, news content serving the needs of culture, faith and language communities.

Question 10: What are the most outstanding data gaps and how should these be prioritised?

Recommendation:



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The framework has a gap in the collection of data about news produced by community and open narrowcast licences, and this needs to be addressed.

Further, the framework has a gap in acknowledging, and collecting data about, news content serving the needs of culture, faith and language communities.

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