



**ABC Submission in response to the  
ACMA's discussion paper on the  
development of a framework to  
measure media diversity in Australia**

**March 2023**



# ABC response to the ACMA's proposed framework for measuring media diversity in Australia

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## 1. Executive Summary

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A healthy and thriving news ecosystem is a fundamental pillar of democracy. A robust framework to baseline, monitor and analyse the news market operating in Australia would only strengthen the news ecosystem.

The ABC believes that the ACMA's proposed news measurement framework is able to substantially play that role. The ABC would welcome clarity about how the framework is intended to be used.

Further, there are a number of ways in which the framework could be enhanced, including:

- The ABC proposes that social platforms such as Instagram and TikTok are captured in the framework. Similarly, news platforms on streaming and broadcast video-on-demand (BVOD) services should also be covered by the framework (Section 3.1). While the framework attempts to capture digital sources and consumption of digital news, the ABC believes that it is not detailed enough to capture a comprehensive picture of news consumption in Australia. This is discussed further in Section 3.3.
- The ABC acknowledges the reasoning provided by the ACMA on treating LGAs with populations less than 10,000 as out of scope. However, there is concern about the potential of unintentionally and disproportionately excluding certain demographics, such as Indigenous populations and/or lower socio-economic groups and regional LGAs largely impacted by the decline of local news. This is discussed further in Section 4.1.
- In relation to Localism, the ABC's internal research consistently shows that audiences appreciate and value physical presence of news outlets in their region, as it enhances perceptions of connection and genuineness of the relationship with media outlets. As such, including a question/indicator to measure the level of local physical presence of news outlets will enable a clearer view of the level of news localism in Australia. Section 4.2 provides further details.
- The ABC believes that the indicators used to measure impact in the framework proposed by the ACMA could be improved. The proposed framework appears to suggest digital measures such as likes, comments and shares are reflective of impact, whereas the ABC believes that these measures are popularity measures which a) can be manipulated and b) may not be reflective of impact. The ABC provides its views on impact measurement in Section 4.3.
- The ABC provides a list of potential pilots and opportunities to collaborate, such as its current research collaboration with Deakin University and Griffith University on a three-year project partly funded by the Australian Research Council ("ARC"), in Section 5.6.1.

The ABC would welcome further opportunities to contribute to this nationally significant project as it develops.

## 2. Introduction

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The Australian Broadcasting Corporation (“ABC”) welcomes the opportunity to comment on the Australian Communications and Media Authority (ACMA) consultation paper “A new framework for measuring media diversity in Australia”.

The ABC has long been recognised as a cornerstone of the nation’s media landscape, providing impartial and comprehensive news coverage to the public. The ABC’s independence as a provider of news and public journalism, including investigative journalism, strengthens the nation’s civic life, and contributes to Australia’s global reputation for good governance, institutional reliability, and rule of law.

The ABC believes that a healthy and thriving news ecosystem is a fundamental pillar of democracy and that a robust framework to baseline, monitor and analyse the news market operating in Australia would only enhance the news ecosystem in Australia. The ABC has reviewed the ACMA’s proposal for such a framework and supports the initiative in principle. The ABC welcomes the ACMA’s proposed news measurement framework and appreciates the effort and thoroughness with which the framework has been developed.

## 3. Issues for comment - Diversity

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The ABC believes that the proposed framework would be an effective tool for measuring levels of diversity of traditional media (TV, radio and print), as these long-standing formats have physical attributes, such as broadcast ranges and points of physical distribution, that support measurement. In addition, the existence of established and trusted third-party research and surveys covering these platforms will undoubtedly assist in the implementation of the framework.

However, as the use of traditional media is in decline, particularly among younger Australians, the framework will need to capture the use of online, social and emerging media platforms and the emergence of a wider array of news sources if it is to accurately reflect the diversity of news media in Australia.

The ABC is aware of the scoping challenges the ACMA faces in obtaining dependable and sufficient results, while also recognising the difficulties of excessive measurement proliferation which can lead to substantial resource demands. Nevertheless, the ABC highlights key scoping areas for consideration by the ACMA.

### 3.1. Platform and Source Categories

The ACMA paper refers to social media platforms such as Facebook, Twitter, and YouTube. The ABC’s internal research and the News and Media Research Centre at the University of Canberra’s *Digital News Report* show that other social media platforms such as Instagram, TikTok and Reddit are frequently used by Australians of different ages and backgrounds, and the ACMA should consider including these platforms in its framework.

Similarly, the ABC notes that the ACMA paper does not appear to mention streaming and broadcast-video-on-demand (BVOD) services. The ABC proposes that these sources be included in the framework.

The ABC proposes that the ACMA updates the list of platforms on a regular basis to best reflect Australians' media consumption habits.

The ABC supports the ACMA's approach to incorporating into the framework international sources that may not have a local presence but are popular amongst audiences. Research on the international media outlets to capture (including sources in foreign languages) should be considered in greater detail.

The ABC also proposes the inclusion of Australian-based non-English-language news outlets. According to the 2021 Australian Census<sup>1</sup>, 22% of Australians speak a language other than English at home. As such, there is a risk that excluding non-English news sources may distort the picture of news consumption in Australia. The ACMA should explore an expansion of the framework to include foreign-language publications produced and consumed in Australia (refer to Section 5.6.2). This will ensure that a more comprehensive view of traditional media consumption outside of English-language publications and channels is captured. Similarly, consumption of non-English, non-Australian news sources (via satellite/cable/subscription) should be captured, as it is likely that they are consumed heavily within migrant communities and in communities where the language spoken at home is a language other than English. The ABC acknowledges the practical limits associated with measuring non-English sources, such as capacity and cost. The ACMA may consider limiting the measurement of non-English sources to major ones defined in terms of the proportion of Australians who use them.

The ACMA may consider including options in the framework's surveys to allow respondents to insert and comment on 'other' ways that they are consuming news. This is to address situations where audiences receive news from alternative sources such as blogs, opinion pieces, online forums, social-media content of non-professional media outlets.

### **3.2. Future inclusion of non-professional news outlets and standpoint diversity**

The current news ecosystem enables consumers to readily access and consume news content at the time and in the manner of their choosing. As a result, it is crucial to consider the sources of information Australians consume. While professional news outlets like the ABC have a long-standing reputation for delivering reliable news, it is nevertheless important to also understand the role of non-professional news sources in informing (or misinforming) Australians (refer to Section 3.3).

The ABC supports the ACMA's intent to incorporate 'standpoint diversity' as a factor that will be explored in the future. The changing demographics of the Australian population, particularly due to overseas migration, ageing, and diversity of culture and ethnicity will be important to understanding the impact of news consumption from a standpoint diversity perspective.

### **3.3. Measurement of news diversity on digital platforms**

The ABC believes that there are limitations to the framework in relation to capturing the supply and consumption of news on digital platforms, and that the resolution of these concerns would be

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<sup>1</sup> <https://www.abs.gov.au/media-centre/media-releases/2021-census-highlights-increasing-cultural-diversity>

vital to ensuring that the implemented framework presents the diversity of news in Australia as accurately as possible.

The ABC agrees with the ACMA that the availability of digital news has increased the complexity of accurately capturing the news consumption habits of Australians. The ABC's internal research shows that Australians consume news from a mix of professional news outlets and non-professional sources. Distribution platforms of professional news outlet sources include official websites, apps, and content produced by these outlets which can be accessed through news aggregators. On the other hand, non-professional news outlet sources include a plethora of sources such as online forums, social media comments, opinion videos, influencers, as well as a wide range of non-professional sources.

The ABC believes that scenarios such as the ones listed below should be captured by the framework to gain a complete picture of digital news consumption in Australia:

- Young news consumers whose primary way of consuming news is on a social media platform like TikTok through an influencer who is not associated with a professional news outlet.
- News consumers who consume news through commentary channels, blogs, online forums of interest groups not associated with or linked to news outlets.

The ABC is concerned that limiting the assessment of news diversity to professional media outlets and highly popular international sources may not be sufficient to capture a comprehensive view of news diversity in Australia. Further, without details of the method by which highly popular international sources will be determined, the ABC is unable to provide commentary on its appropriateness for the framework. A detailed description of how popular news sources will be determined needs to be shared for us to provide an opinion.

The types of information sources that should be included for measurement by the news diversity framework will be a function of the intended purpose of the framework. The ABC would welcome clarity from the ACMA on this question. If the sole intention of the framework is to map the variety of news sources available to local populations for policy purposes, the ABC supports the inclusion of news sources that are defined as professional. However, if the intention of the framework is merely to map the diverse range of information sources Australians are using to inform themselves about local and national issues (and to better understand the impact of issues such as misinformation and disinformation), the ABC believes non-professional information sources, such as influencers, should be included as a second-tier source. The ABC suggests non-professional sources should be given a name like 'alternative information sources' rather than 'news sources', for clarity.

The ABC acknowledges the risks of including independent, hyperlocal or non-professional news outlet sources and the risk associated with giving legitimacy to questionable and extreme non-professional news outlet groups by incorporating them in the framework. Having said that, it is important for the ACMA to capture and understand the level that questionable and unethical reporting proliferates the news market in Australia as part of this framework.

The ABC would like to highlight that it is becoming more common for online users to consume news through third-party environments (social media, news aggregators, etc) and notes that, within these environments, the attribution of brands responsible for the news plays a lesser role. This raises a risk that users may be less familiar with the ultimate source of a news item.

The ABC is highlighting this issue to ensure that during implementation of the framework, appropriate questions are tailored to ensure respondents' answers are captured in a way that accurately reflects their news consumption behaviour, such as the extent by which audiences accurately attribute (or fail to attribute) a news story to its original source.

## **4. Issues for comment – Localism**

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In recent years, the importance of local news has become increasingly apparent as traditional local news sources have struggled to maintain their audience and revenue stream. The ABC understands that these challenges are not unique to Australia.

In the face of these declining trends, the ABC continues to prioritise local news services by keeping communities informed about local issues and events.

The research compiled by the ACMA presents several international case studies that propose potential best practices for measuring the health of localism in news. Although Australia's media landscape differs from these global examples in various ways, it is still beneficial to gather insights and endeavour to tailor them to our local context.

Given the limitations of Australian-specific examples, the ABC supports the primary metrics for localism derived from the experience of other media entities and the expertise of qualified researchers. As time elapses and results and trends are established, there is opportunity to refine the framework to better suit the Australian news environment.

As stated previously, the ABC is aware of the scoping challenges the ACMA faces in obtaining dependable and sufficient results, while also recognising the difficulties of excessive measurement proliferation which can lead to substantial resource demands.

### **4.1. LGAs with populations of less than 10,000**

The ABC is concerned that excluding Local Government Areas (LGAs) with populations under 10,000 people may severely skew the results and fail to represent those areas most impacted by declining local news coverage.

While acknowledging the resource limitations in studying all 547 LGAs in Australia, the ABC is of the view that excluding 245 LGAs (45%) with a population of less than 10,000 would omit a significant proportion of regional and rural Australia, including areas that are predominately classified within the lower decile of the Index of relative Socio-economic Advantage and Disadvantage SEIFA scores.

According to evidence provided to the 2022 Parliamentary inquiry into Australia's regional newspapers, 68% of the 182 closures since 2020 were in regional Australia.<sup>2</sup> The inquiry also heard one in five regional Australians were impacted by the merger or closure of a news service in their area in the past five years. Additionally, 28 of the 31 LGAs identified by the Public Interest Journalism Initiative as having no local news outlets have a population of fewer than 10,000

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<sup>2</sup>[https://www.aph.gov.au/Parliamentary\\_Business/Committees/House/Communications/Regionalnewspapers/Report](https://www.aph.gov.au/Parliamentary_Business/Committees/House/Communications/Regionalnewspapers/Report)

people.<sup>3</sup> Removing these populations, therefore, excludes most of the areas identified as ‘news deserts’ from the sample. The effect would be to create a skewed data set that does not represent the reality being experienced across Australia. A complete exclusion of these LGAs is concerning, as regional and rural areas have been most impacted by local news cuts and closures.

In addition, when excluding LGAs with populations lower than 10,000, the proportion of state and territory populations affected varies significantly. For example, the excluded LGAs in Western Australia and the Northern Territory would represent 69% and 68% of the LGAs in the state/territory. In contrast, LGAs excluded from Victoria and New South Wales would represent only 11% and 30% of LGAs respectively.

The inclusion of smaller LGAs matters to the ABC. The ABC has committed to playing a key role in supporting local news sustainability in regional areas. As outlined in its Five-Year Plan 2020–25, it aims to work with ‘local media outlets and other organisations to support local news and share ABC expertise in investigative and data-driven journalism’. The ABC is working with Deakin University and Griffith University on an Australian Research Council-supported project to examine the role it can play in supporting the local news ecosystem (refer section 5.6.1). To do so, it will consider its role in regions suffering the most from a lack of media diversity and localism, which is likely to include LGAs with populations fewer than 10,000 people.

The ABC recommends that the ACMA explore ways to include small LGAs in its framework, either by including a sample of them, or collaborating with other organisations or initiatives that can assist in covering these LGAs.

## **4.2. Physical presence and the impact on local relevance**

The ABC values the significance of the ‘physicality’ of local presence of news outlets. Trends indicate a continued decline in local news presence with the closures of regional Australian newspapers, significant proportions ending print editions and shifting to digital, merging of outlets and for many, scaling back of local news services. In particular, the pandemic has expedited the already declining numbers of local news outlets in Australia. It is recommended the ACMA consider potential links between the news outlet’s physical presence and the possible impact on the availability, relevance and quality of local news.

The ABC understands that measuring this at the LGA level may not provide a meaningful result and suggest that the ACMA look into measuring this at a different level, such as a regional area or by measuring the distance between an LGA and its nearest physical news outlet. The definition of a physical news outlet would also need to be determined.

The concept of ‘localism’ and how to measure it needs to be clearly defined. The ABC understands the challenge in gathering localism data, especially with metrics relating to local relevance. Particularly, it notes the challenge of determining what constitutes local content in situations where journalist/editors live in one place but report on events elsewhere. The ABC believes news outlets need to be place-based to provide regular and original local news content. This is reflected in its commitment to strengthening its physical presence across regional Australia for local

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<sup>3</sup> <https://pji.com.au/australian-news-data-report/aus-local-news-per-lga/>

reporting purposes. A further complication is ascertaining local source/content gathered for social media platforms – particularly with the rise of hyperlocal content.

### **4.3. Defining Impact and measuring at a local level**

The ABC acknowledges the ACMA’s decision to measure impact as a key indicator to assist in determining civic journalism and connection from a localism perspective.

However, the ABC is of the view that the metrics and proposed methodology highlighted in the framework are not sufficient to accurately measure impact. The proposed measures deal with trust and popularity of sources, rather than the impact of sources and content.

Over the past year, the ABC has invested resources to determine a useful definition of impact and a methodology for measuring this key indicator. In the ABC’s view, impact is about the value that is delivered to audiences at the individual and community level. In assessing value, the ABC looks beyond digital measures such as likes, comments and shares, and attempts to capture evidence of real-world change and meaningful conversation that take place on the back of news stories. The metrics proposed by the ACMA (likes, comments, shares) are prone to manipulation online and, even if they were captured accurately, are more likely to reflect popularity as opposed to impact.

Impact metrics are largely qualitative and are based on the response to stories and changes that may flow from them, sometimes over months or years. To measure impact, the ABC interviews participants in a story, the surrounding community and expert stakeholders.

A prime example of how ‘high impact’ journalism contributes to localism is a story produced by an ABC reporter whose continued coverage on violence and poor educational outcomes at the small town of Walgett’s only high school led to the state education minister’s visit to the town to speak with community members.

Reports such as this may not be considered to be from a popular source, yet the ABC is of the view that they are impactful. Considering this, the ABC suggests the ACMA consider reviewing the impact measure in the proposed framework. The ACMA may consider renaming the proposed indicator to ‘Popularity’ or, alternatively, including qualitative research in its framework to capture impact beyond quantitative digital measures, such as likes and shares.

### **4.4. Content Originality**

The ABC agrees with the ACMA on the importance of measuring originality of news content. The concentration of media ownership in Australia means that local news outlets are effectively part of the same distribution network, and as a result, the same stories (or with minor differences) may appear in multiple local editions.

The ABC are of the view that the presence of multiple local news outlets helps guarantee that no single agenda dictates the local news agenda, as competing news outlets hold each other accountable to prevent significant stories from being missed or disregarded. The ABC maintains regional offices so skilled local journalists can expertly report on issues of critical importance to local communities, and immensely values local coverage which is unique and produced exclusively for a local community.

The ABC supports the ACMA’s proposal to measure and evaluate the extent of content originality (key indicators #1, 4 and 5) by quantifying the amount of original local content produced in a given region.

## **4.5. Determining health of Localism**

The ABC would welcome further information from the ACMA about how the health of local news will be determined based on the results of the measurements. It also seeks a greater understanding of the indicators of a healthy local news output, what constitutes an unhealthy level, and how these will be consistently compared amongst LGAs with differing populations, demographics and news output.

## **5. Other issues**

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### **5.1. Range of viewpoints**

The ABC are of the view that assessing the key indicator - ‘Range of viewpoints’, using the ACMAs outlined methodology of averaging the number of sources quoted or interviewed in news articles can be misleading. For instance, an article may contain a high count of quotes or consist of multiple interviews but with a single viewpoint. The number of quotes/interviews do not necessarily equate to a range of viewpoints.

The ABC suggests the ACMA ensure the techniques used to codify articles have the capability to distinguish the variability in viewpoints of each quote or interview used.

### **5.2. Measurement frequency**

The frequency at which these measurements are taken should be indicated in the News measurement indicators table. Particularly, consideration of the seasonal effects and the impact on the results during high-profile news content (for example, COVID-19 outbreak and war in Ukraine, etc). Sample collection during the height of the COVID-19 pandemic would have produced a significantly higher number of health-related articles affecting the results for the range of topics generated. In addition, the timing of measurement should be coordinated to correlate with the other measurement results. For example, measuring the ‘availability of sources’ at a different time to ‘availability of journalists’ would limit the insight as the results would be obtained from differing periods.

### **5.3. Additional measurements**

The ACMA may also consider the issues of news avoidance and news awareness, indicators that indirectly impact on diversity and localism.

### **5.4. Additional third-party research or data that could be relevant or emerging technologies**

The ABC does not have any specific recommendations in any additional third-party research or data, but notes that there are commonly used reports and data such as the Digital News Report, Ipsos iris digital audience measurement and Deloitte Australia’s Media Consumer Survey, which

the ACMA may find helpful to inform the final design and/or implementation of the news measurement framework.

Research conducted by the Public Interest Journalism Initiative (PIJI), such as the Australian Newsroom Mapping Project and its accompanying maps “Tracking Changes in News Production” and “Local News Publishers”, would be helpful to the ACMA when implementing its news measurement framework.

There are content tagging technologies that can be used to classify and code news articles using Machine Learning. However, the ABC is not aware of any specific current or emerging technologies that would code articles based on the criteria mentioned by the ACMA in its framework, such as ‘soft’ or ‘hard’ news.

## **5.5. Restrictions or barriers to the acquisition, sharing or use of data**

The ABC notes that for this framework to accurately measure what it intends to, all players in the market must participate equally in providing relevant information. In the event of an incomplete dataset, possibly due to a lack of contribution from other operators in the market, only a fragmented understanding of the health of news diversity and localism in Australia will be obtained and the effectiveness of the measurement tool will be greatly minimised.

## **5.6. Potential Pilots and Opportunities to Collaborate**

### **5.6.1. ABC, Deakin University and Griffith University’s ARC Linkage Project**

The Parliamentary Inquiry into the state of regional newspapers recommended partnerships between public broadcasters and small regional publishers be developed to address the local news crisis in regional areas.

The ABC is currently collaborating with Deakin University and Griffith University on a three-year project funded by the Australian Research Council (ARC) to support the sustainability of Australia’s local news ecosystem, especially in fragile and underserved areas. This project will develop and road-test innovations and initiatives aiming to address the local news crisis. The research will complement and inform aspects of the news diversity measurement framework.

### **5.6.2. Australian consumption of news in languages other than English**

The ABC is not aware of any research that measures the amount of non-English news, from Australian or overseas sources, that Australians consume. The ABC proposes that the ACMA consider this as a pilot project that would reveal an aspect of news consumption not previously explored in Australia and would also contribute to getting a deeper understanding of news consumption in light of the news measurement framework.

### **5.6.3. The rise of AI and the impact on News diversity and localism**

The use of Artificial Intelligence (AI) in journalism and news reporting is already prevalent and will likely become increasingly integrated into how news outlets report, produce and distribute news daily.

AI presents meaningful opportunities and benefits for journalism if implemented thoughtfully and ethically. It has the potential to help journalists research, write and produce stories more

efficiently and comprehensively and to help automate repetitive tasks, freeing up journalists' time and effort to focus on more in-depth reporting and writing. In contrast, there are concerns about the possibility of AI systems being used to generate news stories completely devoid of human involvement. News organisations will no doubt look into maximising and leveraging the benefits AI can bring in production of news content.

The impact that AI is likely to have on news diversity and localism is not yet known. The ABC suggests the ACMA consider studying how AI will impact media diversity, news quality, and the sustainability of local journalism.