



# A new framework for measuring media diversity in Australia

Response to ACMA Consultation Paper

March 2023

“The availability of a wide range of high-quality news and journalism provides significant benefits to Australian society and is important for the healthy functioning of democracy... Journalism provides significant and unique benefits to individuals who consume it, and to society more broadly.”

- Australian Competition and Consumer Commission, Digital Platforms Inquiry Final Report, 2019

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News independence is a strong predictor of trust in news.  
Low trust is linked to news avoidance. Public disengagement  
with current affairs is a key risk in participatory democracies.  
Distrust is a strong predictor of news avoidance.

– *Digital News Report: Australia 2022*, University of Canberra  
News & Media Research Centre, June 2022

This submission is made on behalf of LINA’s membership following consultation and broad discussion of priority issues and barriers. Some members may make individual submission in which case the LINA submission should not be taken to displace those submissions.

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## Executive Summary

The Local & Independent News Association (LINA) thanks the Australian Communications & Media Authority (ACMA) for the opportunity to provide input to a new framework for measuring media diversity in Australia. Media policy has been hamstrung by a lack of available data in Australia, and LINA is pleased to see the Government taking steps to address this issue through developing a collaborative measurement framework.

LINA shares the Government's concerns about the impact of newsroom closures and consolidations on media diversity and political engagement. LINA's very inception is born of these concerns and a desire to support a growing digital news sector for the delivery of local news services. We applaud the ACMA's actions to track and measure changes in the Australian news media environment and look forward to constructively contributing the progress of this work.

This submission provides information about community-focussed digital news services, an area of news delivery that has grown considerably since the ACMA began work on a media diversity measurement framework in 2020. LINA encourages the ACMA to:

- Adopt a broad definition of news which includes measuring the contribution of civic journalism, not-for-profit and small hyperlocal news publishers to the Australian news landscape in the framework;
- Ensure digital news publishers are included as a growing audience preference for new distribution;
- Consider the appropriateness of some terminology used in the draft framework and suggested alternatives;
- Develop a timeframe for the framework's repeatability;
- Collate and complement industry data sources to reduce duplication; and
- Include indicators of trust in news as a measure of impact.

This submission responds to the questions outlined in the consultation paper from this perspective and provides contextual background for the ACMA's consideration without seeking to address all areas of the measurement framework, but rather concentrating on those of areas most relevant to local news publishers.

## About the Local & Independent News Association

LINA is a national industry association supporting hyperlocal and independent digital news publishers. Its job is to help news publishers increase the diversity and relevance of news services in communities across Australia. It seeks to grow existing, and encourage new, hyperlocal media entrants by providing capacity building support, expert advice, and access to critical third-party services, providing a deep level of hands-on support to its members.

LINA was established in 2021 in response to industry demand for representation and coordination to assist small digital publishers to build their sustainability and provide quality public interest news services to their communities. As at March 2023, LINA represents 47 digital news publishers, producing 75 mastheads in all States and Territories across Australia. LINA membership is open to all digital news publishers who meet our membership requirements, however, most of its services are tailored to capacity building for small publishers, with most LINA members having an annual income less than \$350k and operating with fewer than 5 staff.

**LINA members** are locally owned and controlled news publishers, creating high-quality news content that meets the LINA Editorial Standards, by and for a defined community. While publishers might also have a print publication and/or other distribution platforms, LINA members are digital-native and our member services focus on strengthening online news distribution and responding to audience demand in digital spaces. The role of the association is to help news publishers provide local, diverse, and trusted news to Australian communities, and to

grow workforce participation in sustainable local journalism in the process. To do this, we focus on capacity-building support and generating economies of scale across a collective of independent businesses.

LINA sees these news businesses as the 'green shoots' of the news industry, observing the expansion of digital newsrooms in the wake of newsroom contractions. This change reflects an audience shift to digital news consumption over decades and the weakening of business models sustained by advertising and user-fees on a global scale. It seeks to curb the trends of media concentration and syndication that have been growing concerns for Government and communities.

### LINA MEMBER SNAPSHOT:

47 publishers / 75 mastheads

#### Organisational snapshot:

- Average annual income 2021-22: \$320k
- Average number of paid staff: 5
- Average paid staff FTE: 3
- Average number of volunteers: 6

#### Audience reach snapshot: \*As at 12 January, 2023

- 611,603 collective social media followers (14,917 average)
- Approx. 4,865,622 collective website views per month, 113,154 average site visits.
- 21 LINA members distribute an average of 20,029 print copies per month (approx. 400,552 total print reach)

### The green shoots of news distribution

Australia is ranked as the 10<sup>th</sup> most concentrated media market in the world (Brevini and Ward 2021, Stanford 2021), an issue highlighted by elected representatives from all political persuasions. Diverse voices and regional audiences remain underserved. Mainstream media continues to consolidate, syndicate and/or remove regional services while under-representing Australia's diverse communities. However, in the wake of local newsroom closures, community members have stepped up, establishing news services to meet a need for locally relevant news. In this way, **hyperlocal publishers most commonly originate to fill a gap in local news coverage and/or to provide free access to local news when paywalls are introduced by other media outlets.**

"When it comes to local, community-based journalism, a quiet revolution is underway" (Sunderland, 2022). A growing hyperlocal and independent news sector exists and is well placed to address the news and information needs of local communities, strengthen Australia's democracy, reduce the spread of misinformation and disinformation, and build community. LINA supports these, and other emerging news start-ups, to increase media plurality and diversify news sources for Australian communities.

Digital newsrooms offer more flexible distribution channels and associated diversified revenue streams. Around 20% of hyperlocal newsrooms have launched in the past three years (Bones, 2021), demonstrating an encouraging rate of growth in response to an audience shift to digital news consumption over decades. Twenty-six per cent of Australian news consumers now source their news content online, with a further 19% citing social media as their primary source of news. Online news sources overtook television as the main source of news in Australia in 2020 (Roy Morgan, 2020) with the ACMA's own research noting 81% of adult Australian access news online.

The need for very localised information has been highlighted since 2020 by the pandemic and by increasing extreme weather events challenging community resilience and safety. LINA members are well placed to provide timely and locally specific information to communities in times of crisis, with valuable local knowledge.

## Policy Context

Correlations between a healthy media sector and a strong democracy are well established in academic literature. The Commonwealth has attempted to curb the newsroom closure trend through a variety of policy levers in recent years, including;

- Creating the Regional and Small Publishers Innovation Fund;
- Developing the News Media and Digital Platforms Mandatory Bargaining Code;
- The Public Interest News Gathering fund;
- Tax relief measures for the commercial broadcasting sector; and, more recently,
- A print relief assistance program for print newspapers.

With varying levels of success and engagement, these actions have provided one-off funding injections, predominantly to large news corporations. Hyperlocal and independent publishers have been overlooked in the eligibility requirements for some of these programs and have faced capacity barriers to effectively engaging with others. LINA encourages a more comprehensive approach to supporting the news industry which includes measures to grow the sustainability of localised news services across a range of delivery platforms, not only print.

On behalf of its members, LINA is asking policy-makers to make the necessary amendments to facilitate:

- Recognition of public interest journalism as a public good in the Charities Act, with an aligned DGR category for public interest news publishers;
- Legislated government spend ratios for campaign and non-campaign advertising across all levels of government to locally controlled and produced media services;
- Updated Local Government Acts and Planning Acts to include digital and other local media services in the distribution of public notices;
- Eligibility for all government programs for digital news publishers;
- Support for capacity building measures to grow the sustainability of existing small newsrooms; and
- Start-up support for emerging newsrooms, particularly in identified news deserts.

LINA commends the Government's commitment to the development of a News Media Assistance Program and encourages the consideration of the above policy interventions in the News MAP and other relevant policy development.

## Consultation Questions

### Scope of the news measurement framework

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?*

LINA broadly agrees with the ACMA's proposed approach to develop a framework of integrated set of indicators and contributing data sets with which to measure media diversity, with the following caveats:

- a) The 2019-20 research program focused on commercial influence as one of the four key topics relating to policy objectives and regulatory settings. LINA is pleased to note this language appears to have evolved during the development of the framework given commercial influence, public value and impact are not necessarily linked.
- b) Similarly, LINA acknowledges the ACMA's reflections on changes in the media environment since the news research project began nearly four years ago. At that time, it focused only on commercial television, radio broadcasting and print newspapers. LINA agrees with the ACMA's self-identified need to include digital news publishers as key contributors to the media landscape. While the consultation paper suggests the inclusion of digital news distribution in the proposed measurement framework, LINA retains some concerns about which digital news publishers will be considered in scope, and which providers of local

news are currently considered out of scope. Around 1 in 5 digital newsrooms in Australia have started publishing in the last three years, many in response to the closure of newspapers and/or a lack of locally relevant information during the pandemic. Given the significant movement of audience preferences toward online delivery of news content, the ACMA should be monitoring the growth of this news distribution model.

- c) The ACMA has outlined six key measures for a robust examination of diversity and localism within the Australian news market. LINA suggests trust should be an additional measure, or a component of the connection measure. Local media typically yields a higher level of trust in journalism than syndicated or remote content. A News Media Measurement Framework should track levels of trust as an indicator of impact under News Engagement. This is identified as a pre-cursor to a more nuanced view of media diversity and the formation of public opinion on page 46 of the consultation paper and LINA supports this position.

LINA particularly supports the assessment of content and consumption to enhance understanding of news services and encourages the ACMA to adopt this approach as outlined in the consultation paper. While the distribution platform is an important consideration in news delivery, LINA sees the perspective of the journalist reporting as equally important. It is not enough to measure how the news is published, but also where it's coming from; who is reporting and their knowledge of the relevant community is extremely impactful in relation to trust in news. To that extent, LINA is pleased to note the ACMA's intention to measure localism in the framework draft.

## *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?*

LINA supports the proposed measures of connection, originality and civic journalism for localism. The Roy Morgan research referred to in the consultation paper (page 14) echoes the findings of the Digital News Report, which show that Australian audiences have a stronger thirst for local news than most of the other 46 countries surveyed.<sup>1</sup> The contribution local news reporting makes to social cohesion and building community is evident to LINA members in reader feedback. Further, local news has a key role to play in emergency response, resilience and community rebuilding in and around increasingly frequent disasters. Local knowledge and trust is extremely valuable in providing accurate, timely and relevant information to communities in crisis. For this reason, LINA encourages the ACMA to consider the location/connection of the journalist reporting news stories as part of its measurement framework, and to include trust as a measure of impact.

LINA notes the key changes to the Australian news media market outlined in Figure 4 (page 17) and adds the significant expansion of digital news services as an emerging change since 2020. LINA acknowledges the Centre for Media Transition research quoted in the consultation paper on the rise of social media as a source of news. Since 2020, the pandemic has increased concern amongst governments and communities about the spread of misinformation and disinformation particularly through social media. In response, digital news publishers have been careful to provide accurate information with minimal editorialising to give audiences clear and concise information. This focus on non-inflammatory news reporting, from both a health and political perspective, has been well-received in audience feedback. LINA encourages the ACMA to include measurement of hyperlocal news sources in the measurement framework and to track engagement with this form of news delivery, along with social media access to news.

LINA agrees with the ACMA's definitions of local public interest news to include matters of health, education, crime, court reporting and local governments; and would add some reporting on local businesses and community group activities to that list where they are news reports as different to entertainment pieces. LINA encourages the analysis of local news content to guide media policy development and hopes this analysis can be shared with industry as a resource to further guide the work of support-services such as LINA in future too.

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<sup>1</sup> Park, S, *Digital News Report 2022*, University of Canberra, Canberra, June 2022

However, definitions of 'hard' and 'soft' news may be outdated as a mechanism for categorising content and do not align with other work in this space, such as the ACCC's work in developing the News Media Bargaining Code. LINA suggests more relevant categories could be public interest news versus entertainment news (which would include feel-good stories). The consultation paper recognises lighter/soft news as contributing to social cohesion but does not mention local 'hard' news such as investigative pieces on local development, localised environment reporting or other areas of locally and sometimes nationally relevant public interest journalism. LINA supports the ACMA's consideration of 'community information needs' as well as the ACCC's categories of public interest journalism in providing insight on local reporting.

LINA notes that the \$60.4 million package established in 2018 to help small metropolitan and regional publishers has to date focused almost exclusively on regional print publishers and remains underspent. While the Regional and Small Publishers Innovation Fund was intended to support the availability of Australian civic journalism, its implementation focused on print news distribution, suffered from inconsistent guidelines between grant rounds, and primarily focused on tech development activities rather than journalism. LINA encourages the Government to allocate funds remaining from this allocation to the support of locally controlled and produced media. There is an opportunity for Government to support a growing local digital news sector to generate public interest journalism, increase employment and strengthen democracy through leaning into this emerging news space to ensure all communities are adequately served by local news sources.

### *3. Do you agree with the proposed scope of the news market?*

In part. LINA agrees that to assess the levels of diversity and localism in the Australian news market, it is important to look beyond the broadcast media and newspaper industries. The inclusion of digital news platforms, including news websites, apps, newsletters and some social media services is imperative to gaining an accurate understanding of the news media landscape in Australia. LINA encourages the ACMA to include these 'non-traditional' mechanisms of news delivery in the proposed measurement framework, where they adhere to professional editorial standards. It will be interesting to track trends in the distribution of news content via social media over time, particularly from a news plurality perspective, and LINA agrees it should be considered a distinct category of news platform.

LINA does not agree with the ACMA's position that only news sources with a high level of consumption and/or an ongoing local presence should be included in the measurement framework. How would the ACMA define 'ongoing'? The exclusion of emerging newsrooms would leave the ACMA, and anybody relying on its data to create policy, blind to new trends in news production.

LINA also strongly opposes the exclusion of citizen journalism in the measurement framework and encourages the ACMA to consider the role of local contributors in the news ecosystem. Even the most mainstream news businesses draw on citizen journalists for news reporting, as do projects such as the ABC's Haywire program and other initiatives to expand news sources.

The ACMA has outlined an intent to measure professional news services in the framework. LINA has some concerns about the repeated use of this description throughout the framework paper and the potential for this framing to exclude smaller, volunteer-run and/or not-for-profit newsrooms in scope, particularly where they are delivering public interest news services. There are a range of terms which can often be used interchangeably to describe journalism, such as citizen reporting and community reporters, who can produce professional standard work, but may or may not hold an accredited journalism qualification or be financially remunerated for their work. LINA suggests that any service that is collecting information from a variety of sources, compiling it into a report under professional editorial standards and sharing it across any one-to-many distribution channel should be considered a news publisher. Examples of professional editorial standards include commitments to uphold the LINA Editorial Standards, MEAA Code of Ethics, membership of the Australian Press Council, the Community Broadcasting Code of Practice or equivalent. These standards differentiate quality public interest journalism from

self-interest or hobby groups and would include news publishers engaging local/community journalists in reporting.

Membership of LINA requires a commitment to our Editorial Standards, which include accountability, fairness, and accuracy among other qualities. LINA members must also be locally owned and controlled, engaging journalists from the community they serve and community-focused in their content covering a range of topics relevant to their audiences (ie, not a single-focused or Council-controlled service). The Media Diversity Framework focuses on media ownership, which is relevant to privately owned media companies, but doesn't include other business structures such as not-for-profit news services or co-operatives. LINA encourages the ACMA to consider how it might include those types of services in the measurement framework around 'ownership' to encapsulate other relevant control mechanisms and decision-making structures in news publishing. LINA agrees with comments in the consultation paper around ownership of media outlets no longer being a suitable standalone metric of diversity (page 27) with examination of the diversity of news content required to identify levels of originality or syndication and re-publication with minor tweaks alongside locally produced news content.

LINA agrees with specialised industry and trade publications being out of scope for the measurement framework. LINA's own membership criterion also excludes publications focused on single areas of interest, requiring members to cover a broad range of topics of interest to the community they serve in their news content.

LINA does not agree with standpoint diversity being wholly out of scope for the measurement framework. Notably, the framework does not include analysis of the diversity of reporters producing news content, determining perspective to be out of scope. This position is at odds with other government priorities around social cohesion and Closing the Gap, which includes indicators of employment in media, the number and location of broadcast transmitters and radio licenses among its data measurement requirements. In an era of increasing syndication and media convergence, the connection between reporter and the community they are providing news services for is important due to its direct impact on trust in news. LINA membership requires publishers to engage journalists from within their community of interest (geographically and/or culturally) and views this as an important component of localised news delivery. LINA encourages the ACMA to consider mechanisms for collecting information on who is reporting, eg. their cultural background, physical location, employment status (eg. full-time, cadet, casual) as part of the framework. LINA suggests it would be possible to undertake sample measures through media monitoring (eg 3 x 2-week periods each year) to assess the representation of culturally diverse perspectives in news reporting.

#### *4. Do you agree with the proposed key measures of diversity and localism?*

Yes. LINA also supports the geographic scales outlined in the consultation paper to examine news sources at a national, state and local level, including a range of geotype sampling for LGAs. LINA agrees that LGAs are the most appropriate disaggregated geographic unit of measurement available for the measurement of local news.

LINA notes the definition of 'local/locality' outlined in Figure 8 (page 34) does not include the location of the journalist, but rather than connection and relevance of the news story. LINA suggests the physical location of the journalist undertaking the reporting work to be a contributing factor to the connection to locality.

#### *5. Would you recommend any additions or changes to the proposed framework and/or its underlying key indicators?*

LINA agrees with the indicators in broad terms, but has some concerns about the appropriateness of language used including:

- a) Indicator 3 refers to the number of 'owners' which is intended to demonstrate concentration but jars with co-operative, not-for-profit and non-commercial media (such as the ABC). Elsewhere in the paper the phrase 'number of groups/owners' is used, which, while still imperfect, is more indicative of the relevant information the ACMA seeks to collect.

- b) It is possible that diversity of journalists could be included as a measure under indicator 5. Range of viewpoints, measured through sample monitoring.
- c) LINA encourages the ACMA to include levels of trust in news as a measure of news engagement. There are a range of global comparisons against which the ACMA could compare Australian results for context. PR company Edelman produce a trust barometer (although LINA is unfamiliar with their methodology) and the Digital News Report produced by the University of Canberra also measures trust in news within Australia and comparative to overseas markets.

*6. Do you have views on whether the framework adequately considers the impact of social media and other digital platforms on media diversity, or if new or alternative measurement approaches are required?*

LINA has expressed views on this topic in its response to question 3.

### Existing data and research

LINA was pleased to note the allocation of funding to the Public Interest Journalism Fund announced in early March and supports the work it produces through the Australian Newsroom Mapping Project and the Australian News Sampling Project. LINA encourages the continuation and expansion of both programs as a key source of data on local news services. LINA draws regularly on this information and on research from the University of Sydney's Centre for Media Transition.

*7. Is there any additional third-party research or data that could be relevant to help inform the final design and/or implementation of the ACMA's news measurement framework?*

The ACMA should consider the potential of shared data sets from associations supporting the news industry, including LINA and the Community Broadcasting Association of Australia (in partnership with McNair YellowSquares), the Australian Press Council, First Nations Media Australia, the National Ethnic & Multicultural Broadcasters Council and potentially the Media, Entertainment & Arts Alliance.

LINA notes an alternative approach to measuring exposure diversity (page 30-31) considering access issues, digital literacy and affordability, and notes an alignment between these metrics and the measurement of digital connectivity and inclusion. LINA suggests the ACMA consider the methodology used by the Australian Digital Inclusion Index in its examination of similar issues.

In addition, LINA points the ACMA to the Digital News Report produced annually by the Reuters Institute for the Study of Journalism, University of Oxford and, for the Australian edition, the University of Canberra. This study collects and contracts data from 46 countries across Europe, the Americas, Asia Pacific and Africa on audience and journalism trends in digital news, including trust in news and local news content. The University of Canberra collects a broad range of materials in its annual survey, using globally standardised methodology. It is possible the University of Canberra may have unpublished data it could share on digital news engagement. LINA encourages the ACMA to engage with this research as an input to the measurement framework and considers it a source of international comparison to track alongside the measurement framework.

*8. Should the ACMA seek to incorporate and build on existing third-party data when implementing its news measurement framework?*

This would seem to be a pragmatic approach to expediting the collection of baseline data. LINA, PIJI and peak bodies in the community media sector could each contribute data on hyperlocal and independent local news sources to quickly fill out a picture of local news sources as a baseline to reduce the level of manual searching required.

LINA supports the Public Interest Journalism Initiative's sampling on the provision of local public interest journalism in different regions and encourages the expansion of this data collection to as many regions as practicable, ideally around 100 Local Government Areas. While LINA recognises practical limitations in the

sampling of localities, it suggests the provision of local news sources should be measured for all LGAs at a high level, with the study of local news content, availability of journalists and impact being a second tier of research requiring a sampling approach. The ACMA already has a significant amount of information on the locations of broadcast services, including those operating in remote LGAs as well as news organisations registered through the Mandatory News Bargaining Code, which can be complemented by other data sources from PIJI, the CBAA and LINA. This would be a quick way to identify the amount of local news infrastructure available in LGAs.

LINA member, Murray Bridge News, was proud to share the results of the Barker region sample, demonstrating it produced the highest level of local journalism in the area. A LinkedIn post from the publisher is shared in the boxout below.

PIJI's findings on the reduction of journalists fulfilling the watchdog or scarecrow function in local areas are concerning, if unsurprising. LINA is aware of local governments in Queensland and New South Wales (although the practice may be more widespread) who have started their own 'news services', produced internally by communications staff and presented on 'masthead' style designs to look like independent news services. This practice is concerning because it gives readers the impression of an unbiased news source, while controlling the positive framing of PR content. A lack of investigative reporting leaves local government open to corruption at worst and disconnected from genuine public engagement at best. Therefore, LINA is particularly supportive of the measurement of journalism and civic reporting as distinct from self-generated public relations materials and agrees that news services should maintain independence from those it covers, as well as demonstrating a commitment to accuracy, transparency and journalism ethics.

*9. Are there any restrictions or barriers to the acquisition, sharing or use of proposed third-party research or data that we should be aware of?*

LINA is not aware of any restrictions on the datasets suggested in this submission and encourages the sharing of data between government and industry to inform policy development and, where relevant, support small business.

### Case Study: Murray Bridge News

"The Public Interest Journalism Initiative has taken a look at Murray Bridge, SA – my patch! – for its Australian News Sampling Project, analysing how much public interest journalism local publishers produce and how 'local' their stories are. For this analysis, PIJI looked at four publishers: ABC Adelaide, ABC Riverland, the ACM-owned Murray Valley Standard and my own independent Murray Bridge News. Here's how we went..."

- Murray Bridge News produced the **highest percentage of public interest journalism** of the four orgs (95%). We published slightly fewer stories than the Standard (87-77), but more unique ones about crime and public services, and a similar number about government and community.
- Murray Bridge News also had the **highest percentage of local stories** (95%)
- and stories local to the Murray Bridge district in particular (88%).
- We included the **lowest percentage of content syndicated from elsewhere** too (0%).

When we talk about creating community, empowering people, being positive, being local, this is the stuff we're talking about. But it's great to have all that talk backed up by data."

– Peri Strathearn, Managing Editor, Murray Bridge News (LINA member)



## Further measurement activities

### *10. What are the most significant outstanding data gaps, and how should these be prioritised?*

Not referenced in the framework is employment data relating to journalists and administrative staff working within news organisations. This data contributes to indicators of local relevance, availability of journalists and range of viewpoints. Further, it could guide future policy interventions with the evolution of news trends. LINA collects this information from its members and could contribute such data alongside other data sources such as Australian Tax Office, Census and company reports. Public broadcasters are already required to collect and publish this information as part of their charter.

LINA notes the measurement framework does not include timeframes for the regularity of research and/or repeat measures for tracking changes over time. The repeatability of measurement activities seems like a key component to its design and would facilitate the tendering of data collection and/or analysis of the measurement framework to an academic and/or not-for-profit organisation in future. LINA views inclusion of a timeframe and review process in the measurement framework as a priority piece of work to be completed before data collection commences.

### *11. Do you have views on potential pilot projects that the ACMA could undertake in 2023? What should be the ACMA's ongoing role in relation to these news measurement activities?*

LINA supports the development of a standalone local news map and the public sharing of datasets and would be happy to contribute information to the crowd-sourcing of this information. LINA suggests the development of a local news map could be achieved, at least as a first-run, in 2023 in collaboration with bodies already working in this field.

### *12. Are there opportunities for the ACMA to collaborate with research organisations to help implement the news measurement framework?*

LINA encourages the ACMA to consider other methods of data collection utilised by Government to collect information on news consumption. Questions on news/information sources could be included in the Census, in ATO data on income sources, health surveying and Closing the Gap data collection could each contribute contextual indicators to the measurement framework.

### *13. Are there any current or emerging technologies that could be considered by the ACMA to assist in content analysis or to help implement other aspects of the news measurement framework?*

LINA recognises that some news services will have concerns about the ACMA measuring the impact of individual news outlets. A possible solution to this is a templated model of data collection that allows publishers to share information with the ACMA on an aggregated basis. LINA is currently working with US-based company, Impact Architects to develop an 'Impact Tracker' template to measure and collate the impact of LINA members at a local and aggregated level. The 'Impact Tracker' draws on some automated data sources, such as social media figures, website traffic and re-publication and some manual input data such as story outcomes and responses from policy-makers. This type of template model could be an implementation model that serves the needs of industry in terms of demonstrating impact as well as a standardised collection of impact data for ACMA use, only shared publicly as aggregated data by the ACMA. LINA recommends that all data collected on individual news services be shared with the publisher.

LINA encourages the ACMA to talk with an organisation like Impact Architects and/or some of the tech companies operating in the analytics space such as Google and Piano to consider opt-in technical solutions to automate data sharing from news organisations direct from website/social media feeds and potentially reduce the level of self-reported usage data criticised in the Ofcom model.

## How LINA can contribute

LINA recognises the extensive work required to collect relevant data for the measurement framework and the need to run pilot programs to test various methods, particularly in low population density areas. LINA would be happy to support the ACMA's work in this space through facilitating participation in pilot studies from its members and contributing available data collected from its membership with relevant permission, such as consumption data and localities of emerging news services. LINA is happy to discuss data sharing options with the ACMA.

LINA is happy to contribute to a reference group on information gathering and/or the development of pilot projects moving forward.

## Closing comments

LINA strongly supports the development of a news measurement framework as an ongoing piece of work to guide media policy development in Australia, as well as industry response to an evolving news landscape. LINA is well placed to contribute relevant data from its membership to the measurement framework.

LINA has some concerns about the terminology and scope of the measurement framework being focused on 'professional' news outlets, producing 'hard' or 'soft' news, under the 'ownership' of individuals. LINA encourages the ACMA to include all news services upholding professional editorial standards in the measurement framework, producing public interest and/or entertainment news for communities, under a broad range of business structures to procure an accurate measurement of the news media landscape in Australia. This includes the measurement of digital news distribution in a repeatable research structure to monitor changes over time and inform policy-making and industry in an ongoing manner. Finally, LINA encourages the ACMA to consider trust in news as an indicator of impact in the measurement framework.