

**PRESIDENT**

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**MELBOURNE SECRETARIAT**

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**EXECUTIVE DIRECTOR**

Peter Kennedy

**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?**

Whilst the measurement framework is a welcome development, Country Press Australia (CPA) has concerns for the future sustainability of the local news many of our members produce should the framework be implemented without further refinement.

Our members have continued to invest in public interest journalism despite the commercial realities of declining advertising and, in some cases, subscription revenue.

It also should be noted that very few of our independent member publishers have ceased publication of any titles but instead continue to serve their communities and as a result operate on reduced profitability.

In smaller and often more remote areas, where many of our members operate, the local newspaper remains the sole media outlet providing public interest journalism and in turn, serving the local community.

Rural and regional TV and radio stations have in most cases reduced their investment in journalism and many rely on their local paper for content to broadcast local news.

As highlighted elsewhere in this response, Country Press Australia has concerns regarding the accuracy and currency of some data previously sourced for and on behalf of the ACMA.

In order for any framework to be an effective measure, it must first consider accurate data.

Whilst the data accumulation process was halted at the onset of the pandemic, it now needs to reflect what has transpired in the ensuing period.

It's CPA's belief that more work needs to be done to better distinguish the DNA of "online news" as we believe print newsrooms generate most of the news published online.

There may be a range of outlets who are disseminating news, and a better understanding of where that original content is coming from is also required.

To measure diversity, you must know if it's original content or if it's syndicated news.

The term journalist needs to be appropriately defined. Almost all CPA journalists would be tertiary qualified or have done or are completing an approved cadetship. This needs to be the definition for the ACMA's purposes.

This training promotes professional journalism which is free from bias, balanced reporting and journalism free from commercial influence. Many journalists employed by CPA members are also bound by the MEAA's Journalist Code of Ethics.

**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?**

Many CPA members are operating at low levels of profitability due to the reduction in advertising and subscription revenue. Many members defy commercial realities and continue to serve their communities with high levels of quality journalism.

This is not 'healthy local news' production and may not be commercially sustainable but the framework doesn't measure and track this commercial stress. There needs to be some qualitative measure of how proprietors see their local news output being sustained in the next 1, 2, 5, 10 years if the current trend continues.

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

CPA believes it's important to better define news and what is a professional news source.

For example, does this mean journalists have to complete a recognised training course, such as the Deakin University cadetship program?

We believe media outlets should employ at least one full time professionally trained journalist to be deemed a news provider.

We agree with the requirement for news organisations to have a minimum turnover of \$150,000 in order to be deemed a media outlet.

News created by professionally trained journalists such as many of those employed by CPA members should carry more weight than that created/shared, for example, by a click bait website or populist social media platform.

This is because professionally created news is more likely to lead to the desired outcomes of informing citizens, reporting on institutions and their actions, supporting community cohesion, and contributing to a well-functioning, pluralistic democracy.

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

There are difficulties in defining localism across the different forms of media. It's not a one size fits all platforms situation. What a newspaper defines as local can be very different to the local television station for example, as broadcast media tend to service great geographical areas than many local papers.

The traditional definition of diversity - the number of different owners in any market, is also challenged in many local markets where the paper can often be the only provider of local news and civic journalism.

Further, in regional markets serviced by CPA members, it is becoming increasingly apparent that declining revenue streams are making it more and more difficult for stand alone operators to remain viable.

This is resulting in independent newspaper groups being offered/acquiring/commencing mastheads to service regional markets.

While this may decrease the diversity of owners, it is sustaining or increasing the diversity of voices and the volume of public interest journalism to regions that otherwise may have been left without any local voice, to become a news desert.

As a result, measuring diversity must clearly consider a range of factors without a concentration on media ownership particularly in regional areas.

Place based journalism is an integral characteristic of the local media landscape.

Social media content providers can often be located hundreds - or thousands of kilometres away, and many of these organisations make no direct investment into the communities where they have a digital footprint.

Newspapers tend to cover a diverse range of local news that is important to their communities. In some cases the hyperlocal news will not be consumed by a large audience however this news is important to the particular, often small community. The newspaper will cover these stories to support the communities they serve and to publish a well rounded product.

There needs to be a measure of this spread of news - possibly a count of annual news stories published by community area/town/city not just LGA as this will be dominated by the largest towns/cities in this LGA and this would not measure diversity and localism. This is an opportunity CPA has already spoken with the PIJI about how our two organisations can work together.

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

A more definitive measurement of sustainability is needed to reflect the length of time a media entity has been operating and actively producing news content.

The ability to track where any new entity will be in 3-6 months, the opening and closing of news outlets and the ability to track news content over time would be of benefit.

If the ACMA was to produce this refined draft framework and release it for a further round of consultation, we would recommend ACMA also take the time to close the loop on any outdated pre-pandemic data it might otherwise look to use.

This would also give established media organisations such as the CPA and PIJI more time to create a more accurate picture of at least the print media industry as we see it.

**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?**

It needs to be acknowledged Meta has indicated it wants to move away from news within two years. The framework currently fails to recognise that a majority of news posted to social media and other digital platforms originates from established media - and especially print media.

If diversity is measured by the number of voices in a market, the increasing presence of social media companies does nothing to support any improvement to diversity, unless there is increased government support for traditional media.

CPA notes comments from ACMA that it does not intend to implement the framework as it stands, and that further consultation and a review of the methodology would be required.

CPA welcomes any opportunity to be part of that consultation process for and on behalf of our members.

The issue of diversity, while important, is also problematic. Are we seeking diversity in each local news market, or across the broader industry? It's almost impossible for any single entity, and especially smaller regional and rural entities to deliver on the goal of diversity due to their size, resources and the cost impediments.

**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?**

It's vitally important to the successful development of an effective news measurement framework that more data and research is considered.

[The Australian Research Council funded Deakin University report into the future of country Australia's civic press](#), for example.

Launched on March 23, this landmark report calls for better definitions of news, the need for greater industry collaboration and more support and investment from government.

Country Press Australia has a role to play as a focal point for collaboration between its broad membership base and organisations such as the ACMA and the PIJI.

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An industry-led response is an integral part of any response to the development of a news measurement framework.

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

Yes, but only if those third parties follow a set of established guidelines, and if the data can be verified as accurate.

Much of the third party data cited by ACMA pre-dates the pandemic, underlining the need for a review and further work in this area.

The ACMA needs to consider other external data sources in its deliberations, as by its own admissions, the ACMA's current regulatory remit focuses on broadcast media only.

Given the past three years have included a global pandemic that brought unprecedented changes to the media industry, it would also be timely to update much of that pre-existing data to reflect more recent developments in the industry.

As stated elsewhere, CPA has concerns about the integrity of some existing data cited as part of the rationale for measuring the news market.

That data states 81 per cent of adult Australians accessed news content online in a seven-day period during June 2022, compared to 67 per cent for TV, 39 per cent for radio and just 23 per cent for print. This statistic fails to identify the source of that online news content, and it's likely a substantial amount of it was produced by print journalists, given ACMA states elsewhere that 10 of the top 20 news websites in Australia are newspaper sites.

These are subtle points we make, but they have the potential to mislead, and to have a real and long-lasting impact on the media industry if they are not properly acknowledged.

**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?**

CPA is aware of ACCC data that could be relevant, but it's our understanding the ACCC is restricted from sharing this information.

We believe any concerns about the commercial sensitivity of data from CPA members could be abated by the data being presented in an aggregated format.

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

The current state of data fragmentation is actively undermining the effort needed to firstly establish clarity on the true state of the media landscape across all sectors, and then set a course of priority actions to chart the media industry's future sustainability.

CPA has concerns about the integrity of some existing data, the methodology employed to gather this data and therefore any decisions that could subsequently be enacted.

For example, in 2019 and as part of the *State of the Regions Report: Availability of Local News and Information*, the PIJI initiated a survey of local media outlets, but not one media outlet was interviewed. Rather, it was a survey of council media managers and their views.

Whilst this might have been done for reasons of efficiency and expediency, it is CPA's belief that this approach is fundamentally flawed.

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Given the importance of this project and its future implications, CPA believes this approach must be re-visited before any final framework is implemented.

More importantly, CPA stands ready, willing and able to assist with any future surveys or research that could better inform key policy makers and bodies and help garner an accurate view of the newspaper industry.

Our organisation has already moved to meet separately with the PIJI to look at ways our respective organisations can work more closely together to share data and enhance any existing data regarding our membership mastheads. This new era of cooperation and a willingness to work together for the common good of our industry is a major positive step in the right direction.

CPA's 200 plus newspaper members could be surveyed on their views and this data would be invaluable. Public interest journalism and the resulting advertising and subscription revenue is the key driver for commercial sustainability. CPA's independent publishers are at the coalface and need to make their businesses work for their own future so could provide a range of views.

**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?**

CPA stands willing and able to work with any pilot projects or research teams, such as the Australian Research Council funded Deakin University project....

CPA has a membership of more than 200 mastheads, (the biggest of any media organisation in Australia?) and the ability to play a key role in consultation and collaboration with a significant portion of the print media industry, bearing in mind that many of our members are also significant contributors to the digital media space in their respective markets.

As stated above, CPA has already commenced new talks with the PIJI about how we can work together, and if there's a way we can both be supported in this endeavour, it's CPA's belief it will be of great benefit to both parties, and to ACMA's intentions as well.

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

As above. CPA has an established track record in working with Deakin University, and we have signalled our willingness to work with the PIJI on establishing the accuracy and currency of data from the print media industry.

CPA would also welcome, and indeed, recommend the establishment of a stakeholder reference group to help guide the ACMA's best endeavours to develop an appropriate news measurement framework, of which CPA would request to be involved in.

**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?**

CPA has spoken with the PIJI and signalled its willingness to participate in a sample of audits in regional areas around content, story count etc.