

A joint submission to

The Future of Media Commission

From

Community Radio Ireland: CRAOL
and
Community Television Association: CTA

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Introduction

This joint submission from CRAOL and the CTA responds to the questions put by the Future of Media Commission (FoMC). Community media broadcasters are highly successful, with impressive track records across many areas, media literacy, diversity, Irish language and participation, and have a strong profile where they operate. A preface is needed, however, to describe the main features of the community media sector and the unique benefits it generates, but also to account for its relatively low profile in certain quarters. Outside of communities served and the sector itself, there is limited awareness among officials, elected representatives and even media researchers about community media, of the range of benefits generated and of the vital role they play.

It may well be that FoMC members too are unaware of the ethos and work of community media, so the preface begins by highlighting the value of community media. It continues with an exploration of the reasons for the sector's low profile among officials and the media industry, and in the course of doing so presents key features that distinguish the sector from public service and commercial media, and that justify its position as a "distinct strand"¹ or "third pillar"² of media in Ireland

Preface: Defining Features of Community media

Summary:

Community media comprise 21 licenced radio and 2 television stations. They reach a large proportion of the population, command the loyalty and participation of numerous people and communities across the country, and generate a diverse and unique range of benefits for their communities.

Yet as a sector we recognise that it has not gained the profile it merits among some decision-makers. Why is this? The lack of a reliable source of income – unlike other media sectors, community media rely mainly on volunteers - to enable us to engage in local and national promotion and awareness, and the fact that many areas in Ireland have yet to open a community channel, can only partly account for this. A deeper examination suggests another explanation, and at the same time reveals the core defining features of community media. Community media do generate major "public service content", but they also do a lot more: they offer media training and media/digital literacy to local communities; provide hundreds of volunteers an opportunity to actively engage at all levels in a media organisation that is owned and managed by themselves; and support numerous local organisations in their development actions. The problem is that if community media are analysed *solely as a media subsector*, with its emphasis on audience numbers, *these achievements can be overlooked* – under the radar of media watchers - and the sector's contribution is greatly undervalued.

To address this issue, CRAOL and CTA, working with the BAI, have developed the concept of "social benefit", along with a methodology to measure it. This encompasses "public service content" but also expands to the use of media as a tool for community empowerment and development. This is now being widely applied in the sector, is contained in legislation and regulation, and being actively implemented by media entities.

More recently completed research, also commissioned by the BAI and in consultation with the sector, explores community media within the wider evolving media context such as platform neutrality and AVMSD. This has

¹ The sector was recognised first by the Broadcasting Commissions of Ireland as the third pillar, and this continues with the BAI. "The Commission defines Community Broadcasters as a distinct strand in Irish Broadcasting, the other two strands being Independent Commercial Broadcasting and Public Sector Broadcasting" *BCI Policy on Community Radio Broadcasting*.

² *Report of the Joint Committee on the Future Funding of Public Service Broadcasting*, 2017 (page 44).

produced a future-proof joint community media policy and is expected to be considered very soon by the BAI. It is highly relevant to the FoMC, and we will be seeking an opportunity to present it.

What do Community Media mean to communities in Ireland?

Community media, as they first emerged in communities and are practiced around the world today, are deeply rooted in democratic, participative and empowering traditions³. Building on Article 19 of the Universal Declaration of Human Rights, we as community media aspire to the *right to communicate*. This goes beyond freedom of *expression* to embrace everyone's right to *equitable access* to the means of expression, to create and disseminate their own media, and to communicate freely with others. The internet has gone some way towards expanding access to the media content creation and dissemination. But communication rights also, and crucially, are based on the idea of *democratising media structures* as a key way to reinforce media content's contribution to social justice and to generating and disseminating knowledge essential to global sustainability.

Community media in Ireland currently comprise 21 licenced radio stations broadcasting since 1995, and two television channels since 2005 (see Annex 2)⁴. Radio channels reach about 55% of the nation's population; and TV stations in Cork and Dublin are distributed by cable⁵ to a large proportion of the cities' populations. Some achieve high audience figures comparable to local commercial stations, such as Dublin City FM with over 120,000; and community stations in Kilkenny, Athlone, Youghal and Connemara. Others are niche stations, serving small communities and specific groups, such as ROS FM Roscommon town and Radió Coirca Baiscinn FM in West Clare.

Both Red C Research (2012) and IPSOS/MRBI (2015) have completed in-depth research into the community radio sector.⁶ The Red C research, based on over 500 on-to-one interviews, found that **two thirds of people** in community radio catchment areas were **aware of their station**; that **22% had listened to it "yesterday"**; and that almost **80% of these** understood that it was specifically a **community station**.

Key reasons for listening were (in descending order): the station features "local voices/local people"; it helps them "feel more connected to their community"; "I hear something I don't hear anywhere else"; "specialist music" and "diversity in programing".

When asked what was especially important at a personal level, it became apparent that community radio is not just an individual listening experience, but involves **a much wider sense of being part of a community**. They responded as follows (maximum score is 10):

- "giving space to tell our stories" (7.87)
- "Giving a voice to the rarely heard" (7.80)

³ There is a large literature on community media: to mention but a few:

Lewis, Peter (2008) *Promoting Social Cohesion, the role of Community Media*, Council of Europe <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=0900001680483b32> *Fissures in the mediascape: An international study of citizens' media*. Hampton Press (NJ). Howley, K. (2005) *Community Media: People, Places, and Communication Technologies*, Cambridge University Press. The Journal of Alternative & Community media is published regularly: <https://www.intellectbooks.com/journal-of-alternative-community-media>

⁴ They are licensed under Section 64 and Section 72, respectively, of the Broadcasting Act 2009.

⁵ Cork Community Television is also live-streaming 24 hours a day. See <http://corkcommunitytv.ie/>

⁶ Both reports can be access at: <https://craol.ie/about/research/>

- “Sharing knowledge and experience” (7.80)
- “reinforces our sense of community”(7.70)
- “Reduces isolation” (7.64)
- “Acts as a vital source of information” (7.61)

Thus, when about the level of **impact on their community**, **60% gave it a score of 8 or higher** on a scale of ten. This aspect is confirmed by more recent IPSOS/MRBI research, which used focus group research to examine in more depth this specific community impact. Among the results were that community radio:

- is **more inclusive** by promoting opinions and voices such as immigrants and women;
- is best positioned to be **more active in support of marginalised groups**, including older people and social action groups;
- provides access, ranging from **physical access**, to a **welcoming environment**, to offering **training and mentoring** to enable people to broadcast their concerns and aspirations;
- gives **airtime to less-popular topics** such as minority sports, arts and music;
- provides **a space for the expression of social, political and cultural ideas**;
- supports **community development actions**, facilitates advocacy, and promotes diverse dialogue, including in the Irish language.

Overall this research points to a clear conclusion. Much of what community media broadcasts is certainly *public service content*, as the term is used by the FoMC. But community media also mean a lot more to people, and generate benefits beyond the content produced. In short, in comparison to mainstream media, **community media are much less about “media”, and much more about “community”**. (This point is explored in more depth below.)

A couple of further points are worth adding.

A considerable proportion of the audience for community media, both radio and television, is to be found among the **Irish diaspora**. While research is required to determine levels of streaming, video and blogs downloaded (most stations support streaming and on-demand blogs and video) - and it should be noted that these fall outside the activities for which a license is required - almost all stations, radio and television, confirm that they are being accessed by the diaspora and many receive a considerable amount of feedback. Community radio were in fact that first broadcasters in Ireland to engage in podcasting.

Finally, community media are to be found everywhere in Europe, and their value, role and distinct nature have long been recognised by both the **Council of Europe** and the **European Union**. For instance, the Council of Europe’s Committee of Ministers declaration⁷ in 2009 included that community media “by their very nature are close to their audiences, serve many societal needs and perform functions that neither commercial nor public service media can meet or undertake fully and adequately”. They recognise the “contribution of community media in fostering public debate, political pluralism and awareness of diverse opinions”. The European Parliament, in a resolution in 2008, noted that “community media are an important means of empowering citizens and encouraging them to become actively involved in civic society; ... they enrich social debate,

⁷ See https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805d1bd1

representing a means of internal pluralism of ideas; and ...concentration of ownership presents a threat to in-depth media coverage of issues of local interest for all groups within the community”⁸

Why such a low profile

The above evidence begs a question: Despite the considerable reach of community media, the loyalty of so many communities and the unique benefits generated, **why have we as a sector not achieved the public profile one would expect?** Indeed, the absence of specific mention of community media in the FoMC documents is perhaps testimony to this. Why is this? Why, despite decades of tangible and ongoing contributions to communities, does the sector not have a more prominent national profile, and a clear identity that differentiates it from the mainstream and commercial (including local commercial) media?

There are a few potential reasons. The sector’s resource base draws almost entirely on the voluntary time and commitment of community members, and hence (unlike, in different ways, the other two sectors) it lacks a reliable and substantial stream of income to enable stations locally and us – CRAOL and CTA – nationally to engage in advocacy and build a profile.⁹ Furthermore, community media presence is still far short of national. In community radio, for instance, outside of Dublin there are only two other stations in Leinster; only a special interest license in Cork; and none in Waterford, Sligo, or Kerry.

Yet these offer only a partial explanation since the benefits generated should, to a degree at least, speak for themselves.

A deeper exploration of this question leads to the heart of what community media are about, the **key characteristics that sets them apart from other media and defines the unique nature of the public service they provide.**

What sets Community Media apart

Community media do produce and disseminate public service content as defined by FoMC. However the benefits to society generated by community media go beyond those of public service and commercial media in a couple of important ways. These flow from the fact that community media are part not just of the media sector but also of the *community development sector*; and they depend on community media’s unique *cooperative, community-based ownership model*, which is the basis of the deep trust and loyalty shown by the local community.

- Community media provide **training and mentoring in media production**, including in digital media; and offer multiple opportunities to **actively engage in a media enterprise** at all levels.

To be underlined here is the contribution to media literacy, including digital literacy, both broadly and narrowly defined. The active engagement in media production and in running a media organisation have instilled a capacity in hundreds of community members to critically analyse media (as well as enabling some to develop a career in both mainstream and community media). At a formal level, CRAOL members in 2016 designed and gained approval from QQI for a level 5 Media Analysis training course. It includes extensive modules in media analysis, critique,

⁸ See <https://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P6-TA-2008-0456+0+DOC+XML+V0//EN>

⁹ This FoMC response, for instance, is written entirely by volunteers from CRAOL and CTA.

dynamics and ownership, ethics and audience behaviour. It is open to all suitable qualified stations to deliver and NEAR FM community radio in Dublin, amongst others, is collaborating with a local education institution to implement the course.

- Community media provide a no-cost **media platform** to a range of **local NGOs and CBOs** active in supporting their community, especially in rural areas. In many cases this platform is an essential and integral part of these organisations' service provision and economic sustainability.¹⁰

These key contributions to community skills and development dynamics, when combined with the public service content media, generate a bond that ultimately contributes to a sense of identity, "localness", that is ever more important in navigating a globalised world.

Yet – and this returns to the question in hand - *if community media are viewed solely as a media subsector with its emphasis on audience size and on broadcast content*, these parts of its core mission **fall completely under the radar**. A recent study suggests¹¹ that to the communities themselves, this contribution to the community development dynamic can be as important as the actual content broadcast. But **when viewed from the outside**, by policy makers, researchers, and the wider public (i.e. those lacking, or unaware of, their own community media) and indeed as portrayed by other media, the value and place of community media tend to be **measured solely by the standards of a commercial media sector** such as audience size, and their **contribution to community development is not factored in**. They thus do not gain the full recognition they deserve.

In conclusion, the fact that many benefits generated by community media are not those conventionally associated with media goes a long way towards explaining its low profile and lack of a distinct identity, especially among elected officials and media stakeholders.¹²

The concept of "social benefit" of community media

As organisations representing the sector, we recognised some time ago the need for a clear identity and were supported in this by the BAI.

Following a suggestion from the community media sector, the concept of '**social benefit**' was included in the 2009 Broadcasting Act as a condition of receiving a license, granting legislative recognition to the sector's unique contribution.¹³ Since then the BAI has worked actively with us to

¹⁰ A recent report, commissioned by the BAI and CRAOL, detailed 29 'stories' (case studies) of community media in Ireland following a systematic methodology. They present numerous examples of these benefits. For the published selection, see *Community Radio: Delivering Social Benefit*, BAI, CRAOL, NEXUS, CFI, 2020 https://www.bai.ie/en/media/sites/2/dlm_uploads/2020/06/Community-Radio-Delivering-Social-Benefit-.pdf For the full report *Introducing a Social Benefits approach to Community Radio: A Compendium of Stories*. see: www.bai.ie/en/download/134916/

¹¹ The study is not conclusive as it is based on two pilot studies in the 2020 BAI/CRAOL study *Assessing the Social Benefit of Community Media: A Toolkit for Community Radio*. A survey completed as part of it indicates the highest level of agreement with a statement that the community station "helps voluntary and community-based organisations to achieve their goals". (page 23-4) See https://www.bai.ie/en/?attachment_id=134923 for the full report and methodology.

¹² The experience of several Community Station managers, informally reported to CRAOL, suggests a compounding factor. i.e. elected officials often confuse community media with local media, and this lack of a distinct recognition can result in lending their support to local – but not community – broadcasting.

¹³ Section 64 (b)(i) for community radio; Section 72 (2)(b)(i) for community television.

implement this legislative provision. Most recently, a joint *Community Media Working Group*, established in early 2018 and bringing together CRAOL, the CTA and the BAI, recommended commissioning a substantial piece of hands-on research to put flesh on the concept of social benefit. Funded by the BAI, this was completed and launched in 2020¹⁴, and the idea of social benefit is being promoted by CRAOL, the CTA and the BAI across the community media sector and is being introduced into regulation¹⁵. Community media themselves are beginning to apply the associated methodology to generate the empirical evidence they can use both to make their case and to enhance their service to the community. The *Community Media Social Benefit Framework* is contained in Annex 1 of this submission.

Developing and concept and clarifying the content of the social benefit created by community media underlines the complimentary nature of community media in relation to other media, as well as its unique contribution.

It is **complementary, but different, to public service media** in that it actively pursues a fine-grained diversity of broadcasting at local level. A key principle of community media is that marginalised and seldom-heard groups are given a voice, and minority activities and interests in sports and culture are broadcast. This ‘fills in the local gaps’ that RTE cannot reach since it necessarily maintains a national perspective on diversity.

It is **complementary, but different, to commercial local radio** in that a core mission is not to maximise audience size, but to build further the concept of ‘hyper-localness’ and of a diverse but cohesive community. This is done through, again, ensuring that the broadcasting of minority voices, activities and interests, and by providing a no-cost platform to all those organisations involved in community development across a range of social, economic and cultural domains.

But most of all it **pushes the boundaries of both “public service content” and “public service media”**: It opens out the production, management and resources of the station to the entire community; and thus reimagines a media organisation – owned and managed by the community itself - as a tool for enhancing media learning and literacy locally, formally and informally; and as an integral part of the development dynamic of the community.

A recent report commissioned by the BAI demonstrates this in practice through 29 ‘stories’ or case studies of community media in action. (See footnote 9 above to access the report.)

Looking to the future

Having established the concept of social benefit in media legislation and regulation, and within the practices of the community media sector, our goal now is to extend that understanding to the wider public, to community support institutions, and to the body politic; and thus both to gain the profile the sector merits and to access wider sources of funding support.

¹⁴ See the above mentioned report: see *Community Radio: Delivering Social Benefit* https://www.bai.ie/en/media/sites/2/dlm_uploads/2020/06/Community-Radio-Delivering-Social-Benefit-.pdf
Also *Assessing the Social Benefit of Community Media: A Toolkit for Community Radio*: https://www.bai.ie/en/?attachment_id=134923.

¹⁵ The Sound & Visions recent round for community radio explicitly included the concept as a condition for funds being granted.

The BAI commissioned a further piece of research in mid-2020 to situate the concept of community media in current and future media trends such as platform neutrality and the AVMS Directive and, in consultation with the sector, to **redefine a community media policy for the future**. This research has been completed and will be published shortly, and the new community media policy is expected to be considered by the BAI's Board. The explanatory report accompanying the draft community media policy includes an analysis of the means by which community media generate social benefits (see Box 1.)

Box 1: How Community Media generate Social Benefits

The concept of "Social benefit" encompasses "public service content" as employed by the FoMC, but extends into other areas. The full range of benefits are presented below as outcomes of community media activities, drawing on the cumulative research, the Community media Social Benefit Framework and the (soon to be published) report on a community media policy. References in square brackets are drawn directly from the Framework, and its six types of social benefit (see Annex 1).

The **public service content** produced or 'curated' by community media ensures that community members:

1. are provided with information from within, and relevant to, their lives that they can use to improve their well-being in small or large ways; [SB 3]
2. have access to diverse viewpoints and better information that enables them to respond more effectively as active citizens to issues from local to global level; [SB4]
3. have access to content that reinforces and celebrates their identity as a community, reflecting a sense of commonality and shared values within a wider spirit of humanistic and democratic principles. [SB6]

Community media practices, enabled by the community media organisation, means that community members can:

4. grow in confidence and creativity and reinforce a sense of belonging; [SB1]
5. gain media and digital literacy skills that enhance vocational prospects and the capacity for critical media analysis; [SB2]
6. reinforce the ability of community organisations to achieve their development goals. [SB5]

Among the concepts being developed, all building on what is already being realised for instance in a community radio channel in Dublin and a community television in Cork, is the idea of a **community media hub**. Community media hubs are designed to serve several communities working hand in hand with other local organisations and institutions. They would offer:

- A **physical centre** for a community to engage with, learn about and create media and content; that doubles as a virtual centre that reaches out to the peripheries;
- A **training and capacity** provider, physically and virtually, across all media tools and platform with a key focus on media and digital literacy;
- A **production centre** for radio, podcast/vodcast, television, social media blogging, Websites etc.
- A **broadcast and dissemination centre** for all media, and that enables dissemination from the peripheries.

A special function of the hub might be, under the guidance of the regulator, to issue short term, on-demand, licenses for **micro-community radio**, covering no more than a few streets or a small village, or a community of interest. These could be run by local youth clubs, education institutions, and other organisations with development goals, which also provide the training and support needed.

All of this is highly relevant to the wider remit of the FoMC's and we intend to keep the Commission apprised of these developments after the consultation period is over, and to seek a meeting with the Commission at the appropriate time.

CRAOL and CTA Response to the Questions

Question 1: How should Government develop and support the concept and role of public service media and what should its role in relation to public service content in the wider media be?

Public service media in Ireland is, legislatively, restricted to RTE, and its contribution to the public interest is recognised and supported through legislation and regulation, including financially through begin in receipt of the vast majority of the current License fee. The concept of **public service content**, on the other hand, is far less developed.¹⁶ The Sound & Vision Scheme partially recognises the concept in practice (excluding a news and current affairs component), and it is open to all **broadcasters**. The legislation and regulation of commercial media also implicitly steer commercial broadcasters towards the production of public service content in line with a perception of the general public interest. In return, commercial media are given a license to broadcast and the prospects of generating significant income from advertising (albeit reduced in recent years) and other sources.

A key strand in debates on public service media is driven by the self-interest of each side. RTÉ as a major institution seeks to retain (expansion is currently not an option) its level of income, both commercial and through the license fee; and expand its range of other activities. Commercial media argue that RTÉ should retain only its narrow public service elements, news and current affairs and perhaps some cultural contributions. They would thus eagerly welcome a shift in financial resources from public service media (i.e. RTÉ) towards the idea of public service content - to the extent that such content would be produced by commercial media and funded by the public.

It is important that the community media sector clarify its position in relation to this important debate, before presenting its own case.

The backbone of public service content at the national level must be retained by the public service broadcaster. It has, under legislation, a core mission to produce public service content, but it also has the experience, culture and the trust of the public that are essential to achieve this. Fully maintaining the resources, and expanding them as required, that are needed to enable RTE to carry out this mission, and to continue as the national producer of public service content – in all its key news, current affairs and cultural and social aspects - at the national level is critical to the future of the media in Ireland.

Furthermore, we believe that public funding must be adequate to enable RTE to function in its public service capacity without the need to rely significantly on advertising revenues. Advertising revenues can distort the content of media, and the share received by the broadcast media sector is anyhow falling dramatically.

Conversely, if there are areas of RTE activities that currently receive public funding that fall outside its remit of producing public services content, then that funding would be better redirected towards the production of public service content by other stands of the media – always assuming that

¹⁶ In Denmark, for instance, the regulator issues public service content licenses, enabling producers and broadcasters to access medium-term funding in specific themes. For an example see: <https://www.dr.dk/om-dr/licens/licens-english/public-service>

withdrawing such funds from RTE would not diminish its capacity to undertake its public service content functions.

The situation of community media is more complex.

A core mission of community media, as noted in the Preface, is to support democratic, participative and empowering activities within their communities. From that perspective, and based on the content they produce, we see ourselves as providing an important public service and producing public service content. Yet, because of their more intimate and extensive relationship with their communities, as audiences but also as active citizens and owners and managers of their own media cooperatives, the services they provide are wider than that captured by the either public service media or public service content. **These are, in effect, media enterprises that support the empowerment of their communities.** Hence with the support of the BAI, we developed the concept of 'social benefit'.

The concept of social benefit incorporates **public service content in the “last mile”** i.e. right down to the level of the community¹⁷. In practice this reinforces and deepens the reach of public service media through a network of community media organisations. The FoMC call for submission notes four components to public service content (page 2). Each of the four can be interpreted in a community context. Community media:

- “informs, educates and entertains” not the Irish public as a whole, but at the level of the local community, including especially in culture, sport (covering sports¹⁸ others do not), and language (including Irish¹⁹ but also programmes for new Irish communities from Brazil²⁰ and Poland).
- provide access to impartial reporting with a focus on the community level, through numerous discussion and roundtable programmes and by inviting local organisations to present their own positions on topical issues;
- play a key role in bringing the community together, and some also reach significant diaspora audiences;
- give a platform to many local musicians²¹, arts²² and drama²³, including to diaspora audiences.

We believe that community media, as compared for instance to local commercial media, are better placed to deliver these. Their mission dedicates them to this goal; their cooperative structure means they welcome in all sides of the community and some stations act as a community centre; and they build strong relationships of trust across the community and their organisations.

¹⁷ Examples of all of the following can be found in the Community Media Stories compendium here: www.bai.ie/en/download/134916/

¹⁸ For instance see Tip Mid-Wes FM's <https://www.facebook.com/tippmidwestradiosport/> and Dublin Community Television's series in Hurling: <http://www.dctv.ie/category/sport/>

¹⁹ Raidió na Life broadcasts entirely through Irish.

²⁰ For examples see Dublin City FM's *Brazilian Coffee Time*. <https://www.dublincityfm.ie/shows/the-brazilian-coffee-time/>

²¹ For instance see Dublin Community Television's series *Copper & Brass*: <http://www.dctv.ie/category/music/>

²² For instance Connemara FM's coverage of *Clifden Arts Festival*: <https://www.connemarafm.com/arts-on-air/>

²³ NEAR FM won the Celtic media award for Radio Drama 2020, against competitor from the BBC and others. See <http://nearfm.ie/near-fm-wins-celtic-media-festival-award/>

But the concept and practice of “social benefit” also encapsulates something more: **the role of media as a tool for community empowerment**, as part of the community development infrastructure and dynamics. This is a form of ‘public service’ that no other media can deliver. Such a role is increasingly important with the convergence of all media, in terms of building community media literacy; and even more important as the consolidation of media continues globally and media grow more distant from the real lives of people.

Summary response to Question 1: We believe that the government should give further recognition to these special forms of “public service content” generated by the community media sector - encapsulated in the concept of “community media social benefit” - in both bringing content to the “last mile” and in enabling media to become a tool for community empowerment. This has implications for sectoral funding mechanisms and regulation, and the recognition of its positioning within the wider media sector.

- *What systems may be required to support and sustain public service content, e.g. high quality, independent journalism, in an increasingly competitive and consolidated market?*

It follows from the above we believe that the delivery of public service content, in the enriched sense outlined above, can best be supported at the local level by extending the existing networks of community media, radio and television, to cover the entire country, and by strengthening their capacity to support young journalists and in media literacy through support for Community media hubs. Such Hubs bring people to a welcoming environment, to learn about and practice media of all kinds, from television to radio, blogging, podcast and vlogs, using technologies from smartphone to sophisticated studios. They deliver in a participatory manner, where people, especially young people, create media with expert support in a communal setting. Young people learn about media through making media.

- *How might public service media be more effective in promoting the Irish language, sport and culture?*

Irish language, minority sports and the arts are often seen as not commercially viable, and areas such as visual arts and poetry rarely appear on local commercial media. RTÉ usually has space on its programming only for established artists, and indeed cannot be expected to act in a hyper-local way. This where community media really excels. Examples are in the footnotes on the previous page.

Community media, both radio and television, produce numerous programmes in support of Irish culture. They are the exclusive broadcasters of many events and festivals, give the only coverage of some sports including the only live coverage of cricket on NEAR FM²⁴, and champion Irish music, including traditional music, in many programmes. Almost all these programmes are produced and presented by local volunteer enthusiasts, trained to produce to the highest quality

²⁴ This is supported by Sound & Vision. A testimony from Philip Smith, General Manager, Cricket Leinster: “Near FM provides critical media support to the ongoing growth and development of cricket”.

standards²⁵. Most important, because of the high level of trust and support within the local community, they encourage a strong sense of communal identity through these cultural activities.

- *What can we learn from other jurisdictions?*

All European countries support community media, often in different ways and to different extents. Dr Ken Murphy and Dr Gavan Titley were funded by the BAI, under the Media Research funding Scheme, to carry out a 'Cross national comparative analysis of Community Radio funding schemes'.²⁶ This research is available from the BAI and shows that there is much to be learned from Austria, Denmark and New Zealand. Among other matters it presents various forms of dedicated support schemes to enhance sustainability of the sector:

- The availability of operational funding (France)
- Operational funding for determined programme hours as opposed to 'specific projects' (Denmark)
- Funding for generic programme strands as opposed to defined 'stock' programming (Austria)
- Ring fenced 'radio' funding (Austria, Canada and France)
- Funding based on successful retention of a service license in conjunction with project proposals (Austria, Denmark, France, New Zealand).

Question 2: How should public service media be financed sustainably?

- *What is the best model for future funding of public service media in Ireland? What approach best supports independent editorial oversight while achieving value for money and delivering on public service aims?*

There is now wide agreement that the TV license fee is no longer fit for purpose. The Community media sector offers several proposals in Annex ? that may assist the Commission in its deliberations. We believe that whatever funding model is selected, a portion of that should be allocated to the sustainability of community media, as a sector that meets the public service criteria of the Commission.

- *How might content commissioning, including by RTÉ, TG4 and the BAI Sound and Vision scheme, be adjusted/improved/reformed to better achieve public service aims?*

In terms of Sound & Vision, community media believe that our sector should be afforded separate ring-fenced rounds each year, to include both community radio and community TV. The annual sum allocated should be flexible enough to meet the developmental needs of community media as per legislation (2009 Act). It should extend its eligibility criteria to include the categories of 'social affairs' and 'community news', opening up support for community-level journalism.

The current ban on supporting news and current affairs in the Sound & Vision scheme is partly based on the fact that both RTÉ and commercial broadcasters have a regulatory obligation to

²⁵ The high quality is attested to by Raidió na Life's award of Station of the Year at the annual Bronze Torc Awards for Excellence at the Celtic Media Festival. It was up against BBC Radio Cymru, BBC Radio nan Gàidheal, BBC Radio Wales, Isles fm 103, Radyo an Gernewegva and RTÉ Raidió na Gaeltachta. See <https://radiotoday.ie/2013/04/raidio-na-life-wins-station-of-the-year/>

²⁶ See <https://arrow.tudublin.ie/cgi/viewcontent.cgi?article=1030&context=aaschadpoth>

produce news programmes, and hence the Scheme need not and should not support this. Community media have no such obligation, and logically, therefore should be permitted to apply for funding for news-based programmes at community level. It also makes sense in terms of training and supporting a new generation of journalists.

Furthermore, we believe that the criteria, management and selection process of the scheme should be restructured so that often hard-pressed community organisations that seek support to produce programmes do not end up competing against each other. This has been found in the past to have a damaging effect on their motivation to engage with media in future.

The Social Benefit Framework as developed by the BAI and the sector (see Annex 1) should be the benchmark for such funds allocation. The most recent Round of Sound & Vision in 2020 moved in this direction for community radio, and also offered a dedicated amount of funding to the sector (in previous rounds, community media had to compete with commercial and public service media). This is very welcome but should be extended to community television.

As the sector with best experience of the ethos and approach of community media, members of both CRAOL and CTA should be on an adjudication committee for such a revised Sound & Scheme. This already happens with the BAI Community Broadcasting Support Scheme, and this has worked effectively.

- *How should public funding or tax reliefs be apportioned to Public Service Content providers?*

We believe that the community media sector **merits a significant proportion of public funding** directed towards public service content providers. The justification is provided above i.e. community media are best positioned to **complete the 'last mile'** when it comes to bringing public service content of direct relevance to communities to them.

At the same time, they can be seen as the **'first mile' of public service content** in that they have the capacity to play a significant role in educating and supporting young journalists. Numerous volunteer journalists are active in contributing to different programme formats, a role that could be greatly expanded through the idea of Community Media Hubs. The sector has already won support from the Mary Raftery Journalism Fund²⁷.

Such Hubs²⁸ can be developed further to provide mentoring or a 'support desk' for community media in dealing with issues such as 'false news', misleading report and so forth, and to build the capacity of the sector generally towards community level journalism.

Community Stations are already providing work placements to third level media students. Many of these students cannot secure placements with commercial stations and hence community media have been hugely beneficial. For example, *Tralee IT* students come to Athlone Community Radio, and they also take students from *Moate Business College* media studies course and *Galway and Roscommon Education and Training Board*.

Community media are thus highly relevant to current discussions about dedicated public financial support to journalistic skills and practices, including investigative journalism. One effect of the fall-off in advertising revenue in media, and this applies worldwide, is a reduction in the

²⁷ See <http://maryrafteryfund.ie/>

²⁸ The report outlining the Hubs in more depth will be forwarded to the FoMC when it is published by the BAI.

level of investment in news and current affairs journalism, which in turn means that fewer young people are attracted to the professions. A key activity for a Community media Hub would be to families and support young people in this direction, for all forms of media. .

An important point must be made about the **nature of mechanisms** that might support community media.

Public funding support for the community media sector, to further leverage the huge volunteer input and to supplement station funding raising and income from a variety of sources. These reflect community media's position of being both a media and a community development organisation. They receive support from the Sound and Visions Scheme, and the BAIs Community Broadcasting Support Scheme. Many community radio stations also take advantage of Pobal's Community Support Programme scheme to cover some basic staff though the emphasis on generating matching funding through trading is unsuited to the community media model and indeed can divert the stations from their main goal. A small number of stations also receive a Community Employment grant from the Department of Social Protection, though it is restricted in terms what it can support. Other sources of income have also been secured by both radio and television, for instance from Local Authorities who value their work, but on a sporadic basis and seldom to cover any core costs.

A more efficient and cost effective means to support the sector would be through the creation of a consolidated **Community Media Support Fund**. This would combine resources from several sources, the BAI, government Departments and possibly the on-demand fee. It would be coordinated by a single lead entity, and work closely with CRAOL and CTA, the community media sector organisations. Different components should, taking into account the varied needs of different types of community media, administer support for core funding, community training and support, content production support, and so forth. It would seem reasonable that the new Community media Hubs would be supported with funds gathered by the on-demand license holders.

A potential further source of funding could derive from a levy the government is entitled to collect from on-demand media service providers in Ireland, under the EU's **Audiovisual Media Services Directive** (Article 13 Directive 2018/1808). The Directive specifies that there must be "at least a 30% share of European works in their on-demand catalogues of and ensure the prominence of these works"; but they may also require that such service providers to make financial contributions that are "proportionate and non-discriminatory"²⁹. The AVMSD provides for mandatory exemptions for low-turnover or low-audience media entities, which would include community media.

A strong rationale exists for directing part of the proceeds of such a levy towards Community Media Hubs. Such Hubs are working directly in a multi-platform, multi-media environment, and will be generating content for communities to download on demand. Indeed, these hubs might

²⁹ For a detailed discussion see: *Communication from the Commission: Guidelines pursuant to Article 13(7) of the Audiovisual Media Services Directive on the calculation of the share of European works in on-demand catalogues and on the definition of low audience and low turnover* (2020/C 223/03). [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020XC0707\(03\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020XC0707(03))

themselves be included in the list of on demand media service providers (which must be drawn up by each EU country), reinforcing their case for benefiting from such a levy.

Another area of support from the perspective of regulatory relates to ensuring the **prominence and 'findability'** of community media content, in an increasingly cluttered media environment with visibility often heightened by big promotion and advertising budgets.

Finally, it is worth mentioning

- *What role is there for alternative funding models for Public Service Content providers – voluntary, cooperative, crowdsourcing, subscription?*

Community media already generate significant resource via volunteers. This is expected to be continued in future, and incentives for people to participate would be very valuable in that regard.

Question 3: How should media be governed and regulated?

- *What regulatory changes at EU or global level might impact on the governance of public service media in the period ahead?*

The *Audiovisual Media Services Directive* (AVMSD) is hugely significant in that it is the first concerted attempt by the European Union to bring the new wave of internet drive, on-demand media into a regulatory framework. Without bringing media enterprises, most of them controlled by huge global corporations, under a regulatory umbrella the prospects for public service media and public service content would be far bleaker.

- *What challenges are posed to a vibrant, independent public service media by increasing consolidation / declining plurality of ownership in the Irish market?*

The European Union funded *Media Pluralism Monitor* Project tracks the progress of European Union and Candidate Countries along four key parameters of *Basic Protection, Social Inclusiveness, Political Independence* and *Market Plurality*. Its latest report of 2020 gives cause for concern in a couple of areas.³⁰

Especially concerning is **Market Plurality**. The report concludes (p10):

“Though considered a “medium risk” the 65% score for Market Plurality approaches the high risk threshold and is the highest overall risk category associated with Ireland. [This] confirms previously identified risks related to the news media ownership concentration and highlights alarming risks in the viability of news media”

Most worryingly, however,

“News media concentration remains a very high risk (87%). This is due to the absence of defined legal limits on media-ownership, for both horizontal and cross media concentration” (p11)

³⁰ European Union Institute(2020) *Monitoring Media Pluralism in the Digital Era: Application of the Media Pluralism Monitor in the European Union, Albania and Turkey in the years 2018-2019 Country report: Ireland* https://cadmus.eui.eu/bitstream/handle/1814/67806/ireland_results_mpm_2020_cmpf.pdf

Of relevance to community media is that this concern applies to the high concentration of ownership in the local radio sector, as well as cross ownership with print media. It is extremely concerning that just one media owner, Denis O'Brien, has extensive media interests across many platforms and is known to aggressively pursue his commercial interests, and to be extremely litigious in countering criticism and commentary.

A second area of concern relates to **Social Inclusiveness**. While overall, Social Inclusiveness is assessed as a "medium risk", *Access to media for minorities* comes in at 88%, well into the "high risk". This complicated by the legal environment: "legally-speaking, Ireland does not recognise the existence of any minorities". This means that there is:

"... no specific obligation on private or PSM [public service media] broadcasters to provide such content and in practice there is virtually no dedicated programmes addressing ethnic minority audiences."

The report continues:

*"The **one exception to this is the community broadcasting sector** which, though somewhat precariously-funded, offers consistent minority-audience programming strands across the 20 stations operating under such licences."*

Further recognition of this comes from the fact that the key criterion for being eligible for funding from Pobal under the CSP scheme is the extent of diversity in the broadcast content. Pobal employed a methodology to measure this, and a station has yet to fail to qualify on this criterion.

All the above demonstrates clearly **that the community media sector contributes far more to diversity on the airwaves than the other two sectors combined.**

On a more positive note, the report states:

"Access to media for local/regional communities and for community media scores a low risk (25%) because provision for the existence of such media and their access to broadcast distribution platforms is made in the 2009 Broadcasting Act."

But the report went on: **"The one major question mark over community media relates to its limited and somewhat precarious funding."**(page 13: emphasises added.)

A final point is worth making. True media plurality is not just about ensuring a sufficient *number of media owners*; it is also about a **plurality of ownership structures** or *types of ownership*. This is because each type of media ownership brings with it certain tendencies and dynamics. Thus commercial media – irrespective of the number or media organisations present– will always (and indeed are legally obliged to under company law) have a strong tendency to maximise profits. This will in turn unavoidably influence the extent to which they broadcast public service content, as well as the quality and nature of that content. Community media, on the other hand, exist solely to serve their community: generating content and taking actions to serve the public interest flows naturally from this remit.

Building a strong community media sector, alongside a strong public service media, is thus the strongest safeguard possible against the growing consolidation of, and declining plurality of, media ownership.

Annex 1: Community media Social Benefit Framework.

The following framework was developed by the BAI and the community radio sector. It is designed to be equally relevant to the community television sector, and both CRAOL and CTA has endorsed it. The full framework and a selection of community media case studies can be downloaded here: https://www.bai.ie/en/media/sites/2/dlm_uploads/2020/06/Community-Radio-Delivering-Social-Benefit-.pdf

The Social Benefit Framework summarises the types of benefits that a community media can offer its community.

At the top is a definition of what 'social benefits' are from the perspective of community media.

Down the left column are **six types of social benefit**. These have been drawn from the literature and refined with the CRAOL and BAI Steering Committee that oversaw this research, and with Stations themselves at the Féile in October 2019 and individually with others.

The second column suggests concrete activities that contribute to each type of benefit. Hence they can also be seen **as indicators that these benefits are being achieved**.

Table 1: Framework for Assessing the Social Benefit of Community media:

Definition of Social Benefit from Community Media:	
"Benefits to individuals or collective actors in the community that enhance their lives socially, culturally or economically, or in terms of development, empowerment and/or well-being, that otherwise would not have come about."	
Social Benefits	Indicators of Social Benefits of each Type
1. Individuals, especially minorities and those marginalised, are <u>growing in confidence and creativity and/ or reinforcing a sense of belonging</u> , directly from engaging with the Station	SB1 is being achieved through... 1.1. placements from community organisation working with marginalised/ disadvantaged people 1.2. station volunteers making programmes and in administration and support 1.3. training of marginalised/ disadvantages individuals; and taking in interns from external entities 1.4. isolated or marginalised individuals listening to radio programmes addressing their interests

<p>2. Individuals are <u>enhancing their employment prospects</u>, through gaining skills and confidence reinforcing community identify</p>	<p>SB 2 is being achieved through...</p> <p>2.1. media training that enhances vocational prospects.</p> <p>2.2. volunteer opportunities that enhance employment prospects through personal development and skills acquisition</p> <p>2.3. staff experience and training that enhance their vocational prospects.</p>
<p>3. Community members are <u>informed and aware</u> of what is happening around their community</p>	<p>SB3 is achieved through the use by community members of information broadcast by the Station, in the form of...</p> <p>3.1. regular bulletins of everyday information such as traffic, weather events etc.</p> <p>3.2. specific social bulletins such as death notices, social events, etc.</p> <p>3.3. transactional information services such as Job Search or Marketplace delivered free or at low-cost</p>
<p>4. <u>Community members are responding more effectively</u> to issues–local to global– because they have access to diverse viewpoints and to more and better information</p>	<p>SB 4 is achieved through the station:</p> <p>4.1. producing/broadcasting content and format that addresses local to global, with diverse views presented in a balanced and constructive format, in studio and outside broadcasting</p> <p>4.2. providing facilities and resources for volunteers to do the same, covering issues of local interest and concern</p> <p>4.3. referencing local advocacy groups when reporting on news items</p> <p>4.4. actively engaging in the community through projects, advocacy and interactions on issues or local interest and concern</p>

Annex 2: Community Media Stations in Ireland

<u>Station</u>	<u>County</u>	<u>Licence type</u>
<i>Television</i>		
Dublin Community Television	Dublin	TV Community Content
Cork Community Television	Cork	TV Community Content
<i>Radio</i>		
RosFm	Roscommon	Community Sound Broadcasting
Claremorris	Mayo	Community Sound Broadcasting
Castlebar	Mayo	Community Sound Broadcasting
Connemara	Galway	Community Sound Broadcasting
Athlone	Westmeath	Community Sound Broadcasting
Dundalk	Louth	Community Sound Broadcasting
Kilkenny	Kilkenny	Community Sound Broadcasting
Dublin City	Dublin	Special interest
Dublin South	Dublin	Community Sound Broadcasting
Flirt FM	Galway	Community of interest: Student
Liffey Sound	Dublin	Community Sound Broadcasting
Near FM	Dublin	Community Sound Broadcasting
Phoenix FM	Dublin	Community Sound Broadcasting
Radio na Life	Dublin	Community of interest: Irish language
Radio Corca		
Baiscinn	Clare	Community Sound Broadcasting
Youghal	Cork	Community Sound Broadcasting
UCC	Cork	Community of interest: Student
Life FM	Cork	Community of interest: Christian
Tipp Mid West	Tipperary	Community Sound Broadcasting
West Limerick	Limerick	Community Sound Broadcasting
Wired	Limerick	Community of interest: Student

Annex 3: Proposals for media Sector Levies

A Media Public Service Obligation Levy

The Commission should consider the use of the existing Public Service Obligation (PSO) levy, already added to every electricity bill, to replace the TV license fee. This approach might offer a swift, low profile solution to charging for Irish media.

This levy could be collected through the Commission for Regulation of Utilities (CRU), Ireland's independent energy regulator, and transferred to the relevant Media Commissioner for distribution. The policy associated with the PSO is already mandated by Government in legislation and approved by the European Commission. Both Greece and Italy have adopted this approach and it has resulted in a significant decrease in the cost to households of the TV levy. Indeed, Greece uses this method to collect other local taxes, which are then remitted to local authorities.

The current Social Welfare exemptions under the existing TV license system could be retained and here, the subsidy per recipient, would also be commensurately reduced for that Department.

Taxing online advertising revenues.

A major shift of advertising revenue from print and terrestrial media towards online, digital has been evident for some time. Google and Facebook alone now control about two thirds of global advertising revenue. While regulation can partly address this then, the Commission should also consider proposing taxation measures.

A challenge currently facing legislators is that online advertising is 'placeless' and thus eludes national tax legislation. Transnational media operators assert that advertising sales do not take place in a specific country, but via an auction algorithm that is operated by other algorithms whose physical location is not clearly defined. For example, Google's European invoices are drawn up in Ireland, and there is an exchange between Google in Ireland and the European advertising clients. Who pays, where and why?

How then, to tax online companies who claim that they are stateless?

Applying the first principle of community media - that only people can create content - offers a possible solution to the taxation dilemma. Policy measures for taxing transnational corporations, including digital companies, need to be based not just on the question where and how much value is produced, but also on the question: who actually produces such value?

Only human beings communicate productively and produce communicatively, creating the practical and economic value of the Internet. Put simply, only people can create economic value; the facilitating Google and Facebook technologies cannot. The Commission should apply this criterion to the content of online activity, and this is where taxation policy could be located. A taxation policy could usefully declare that online companies should pay for advertisements sold online in the country where these advertisements are targeted and consumed i.e. where the value is realised.

If Google and Facebook's value creation takes place where the users are i.e. those who create the value of online advertising, then taxes must be paid in the country where the users are when they consume the advertisements. It is technically possible to determine what percentage of viewed and clicked-upon adverts occur in which country. Such personalised and targeted advertising is thus not placeless, and a taxation policy could be drawn up by the Commission for Government action here in Ireland. This model could be replicated across the European Union.