



**An Coimisiún um Thodhchaí na Meán - Aighneacht TG4
mar fhreagra ar an gcomhairliúchán poiblí
The Future of Media Commission - Submission from TG4
in response to the public consultation**

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English language version available*

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1. Réamhrá

Bhunaigh an Rialtas an Coimisiún um Thodhchaí na Meán chun moltaí neamhspleácha a dhéanamh maidir leis na Meáin Seirbhíse Poiblí (PSM) chun bunús láidir a chur fúthu sa todhchaí.

Mar chéim tosaigh, tá an Coimisiún i mbun comhairliúcháin phoiblí trí chuireadh a thabhairt do thuairimí ar thrí phríomhcheist a dtabharfar aghaidh orthu ina chuid oibre.

Cuireann an aighneacht seo tuairimí TG4 i láthair ar na trí cheist a bhaineann le PSM. Is é TG4 an craoltóir náisiúnta seirbhíse poiblí Gaeilge (PSB) agus soláthróir meán.

Chuirfeadh TG4 fáilte roimh an deis bualadh leis an gCoimisiún, chun TG4 agus ár dtuairimí ar PSM in Éirinn a phlé.

2. Freagra TG4 ar Cheist 1

Ceist 1: Cén chaoi ar chóir don Rialtas an coincheap agus an ról atá ag na meáin seirbhíse poiblí a fhorbairt agus tacú leo agus cén ról a chóir a bheith aige maidir le hábhar seirbhíse poiblí sna meáin níos leithne?

Agus muid ag tabhairt faoin gceist seo, leagann TG4 amach:

- Tábhacht agus luach PSM;
- Na dúshláin is suntasaí atá roimh éiceachóras PSM na hÉireann; agus
- Cén chaoi gur féidir leis an Rialtas coincheap agus ról PSM a fhorbairt agus tacú leo agus cén ról atá aige maidir le ábhar seirbhíse poiblí sna meáin eile.

(a) *Tábhacht agus luach PSM*

Tá ról riachtanach ag PSM sa tsochaí. Chomh maith le hábhar siamsúil, faisnéiseach agus oideachasúil a sholáthar, déanann sé ionadaíocht ar chultúir náisiúin, cuireann sé a theanga(i) chun cinn agus déanann sé a thionscail chruthaitheacha a mhúnlú agus a thacú. Soláthraíonn PSM bealach chun saoránaigh a chur ar an eolas, idirphlé oscailte a chothú agus faisnéis iontaofa a sholáthar, ag cur le sochaí shláintiúil dhaonlathach.

Cuireann Aontas Craolacháin na hEorpa (EBU) síos ar PSM mar mheán atá neamhpháirteach, neamhspleách agus á reáchtáil ar mhaithe leis an tsochaí ina hiomláine. Deir sé go bhfuil PSM láidir dea-mhaoinithe mar bhunchloch den tsochaí daonlathach agus léiríonn sé go bhfuil sé ag cabhrú le leibhéal níos airde de shaoirse an phreasa, leibhéal níos ísle d'antaisceachas na heite deise agus rialú níos fearr ar éilliú¹.

Aithníonn Unesco² ceithre phríomhmharc de Chraolachán na Seirbhíse Poiblí (PSB), siad sin, Uilíocht, Éagsúlacht, Neamhspleáchas agus Sainiúlacht. Deir sé nuair a chuirtear ar bun é leis an iolrachas, éagsúlacht na gclár, neamhspleáchas eagarthóireachta, maoiniú iomchuí, cuntasacht agus trédhearcacht, gur féidir le PSB feidhmiú mar bhonn daonlathais.

Is gné lárnach de PSM an t-iolrachas. Éilíonn an Coinbhinsiún Eorpach um Chearta an Duine (Airteagal 10 ar Shaoirse Léirithe) nuair a bhunaíonn Ballstáit PSM, go gcaithfidh an dlí agus an cleachtas náisiúnta a ráthú go soláthraíonn an córas PSM seirbhís iolraíoch³.

Aithníonn Údarás Craolacháin na hÉireann (BAI) an tábhacht a bhaineann le hIolrachas agus Éagsúlacht. Is é “Éagsúlacht agus Iolrachas a chur chun cinn” an chéad cheann de chúig théama straitéiseacha i ndréacht-Straitéis 2021-2023 an BAI. Mar an gcéanna, creideann TG4 go bhfuil PSM bunaithe ar phrionsabail na hÉagsúlachta agus na hIolrachas. Caithfidh éagsúlacht agus iolrachas guthanna, tuairimí agus foinsí a bheith ar fáil i margadh na hÉireann chun go n-oibreoidh ár n-éiceachóras PSM go héifeachtach.

Tá luach PSM soiléir. Tráchtann an BBC ar an luach seo ar thrí leibhéal - an duine aonair, an sochaí agus an tionscal⁴. Léiríonn ‘luach aonair’ an caidreamh díreach atá ag PSM le daoine aonair, ag dul i dteagmháil leo ar leibhéal pearsanta. Léiríonn ‘luach sochaíoch’ cosaint ionracas daonlathach; aontacht agus comhtháthú a chothú ar fud náisiúin agus a phobail; machnamh ar chultúir, ar fhéiniúlachtaí agus ar phobail; agus, ról rithábachtach a imirt ar shaincheisteanna sochaíocha.

¹ <https://www.ebu.ch/about/public-service-media>

² Unesco.org

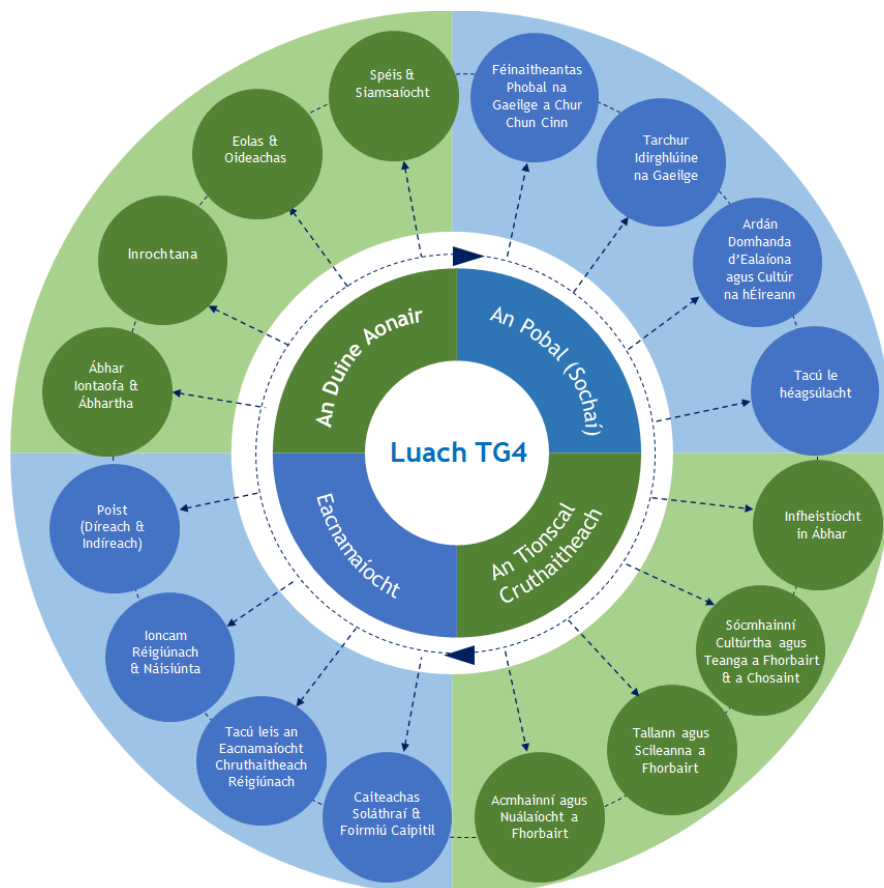
³ Cúirt Eorpach na gCearta Daonna 2009 cás Manole maidir le PSM Moldavia.

⁴ Creating and measuring dynamic public value at the BBC (December 2020).

Léiríonn ‘luach an tionscail’ cruthaitheacht agus tacaíocht an tionscail chruthaithigh trí ábhar, forbairt tallainne agus comhpháirtíochtaí straitéiseacha. Agus é seo á léiriú, deirtear i gCairt BBC 2016 “gur cheart don BBC daoine a thabhairt le chéile le haghaidh eispéiris chomhroinnte agus cuidiú le rannchuidiú le comhtháthú sóisialta agus folláine na Ríochta Aontaithe. Agus aschur á choimisiúnú agus á sheachadadh ba cheart don BBC infheistíocht a dhéanamh in eacnamaíocht chruthaitheacha gach ceann de na náisiúin agus cur lena bhforbairt ”.

Aithníonn TG4 an luach a sholáthraíonn sé, mar PSM náisiúnta Gaeilge na hÉireann, i gceithre réimse: An Duine Aonair; An Pobal (Sochaí); An Tionscal Cruthaitheach; agus an Eacnamaíocht, mar a thaispeántar i Léaráid 1.

Léaráid 1: Achoimre ar Luach TG4



An Duine Aonair

Soláthraíonn TG4 ábhar agus seirbhísí ar leith atá iontaofa agus cruthaitheach le siamsaíocht, oideachas agus faisnéis. Cuimsíonn fairsinge ár n-aschur: nuacht agus cúrsaí reatha; cláir oideachais: ealaíona & drámaíocht; Cúla4 agus ábhar leanaí eile; imeachtaí náisiúnta a bhfuil tábhacht chultúrtha leo lena n-áirítear cuimhneacháin; ócáidí spóirt náisiúnta beo saor in aisce; cláir faisnéise a bhfuil tábhacht stairiúil agus chultúrtha leo, agus go leor eile. Cuirtear ár n-aschur ar fáil ar fud ardáin líneacha agus neamhlíneach lena chinntiú go bhfuil muid inrochtana agus go bhféadfaimis ár nasc lucht féachana a dhoimhniú ar gach ardán.

An Pobal (Sochaí)

Cruthaíonn TG4 luach sochaíoch trí fhéiniúlacht agus saibhriú phobal na Gaeilge a chur chun cinn agus trí ról ar leith a imirt in éagsúlacht teanga agus i dtarchur idirghlúine na Gaeilge. I Poblacht na

hÉireann, is féidir le 1.76m duine Gaeilge a labhairt - beagnach 40% den daonra. Tá méadú 26% tagtha ar an líon seo ó seoladh TG4 i 1996, in ainneoin daonra ilnáisiúnta agus éagsúil. As an 1.76m atá in ann Gaeilge a labhairt, is í 1.33m a labhraíonn í - go laethúil san oideachas nó go laethúil, go seachtainiúil agus go minic lasmuigh den oideachas⁵.

Glactar leis go forleathan gurb é TG4 an beart is dearfaí chun an Ghaeilge a chur chun cinn. Taispeánann taighde margaidh 2019⁶ go n-aithníonn 92% den phobal TG4 go láidir mar thacadóir / thionscnóir na Gaeilge le 80% ag creidiúint go dtugann TG4 an Ghaeilge beo agus 74% ag creidiúint go gcuireann TG4 íomhá ar an nGaeilge atá níos nua-aimseartha agus níos ábhartha do gach duine. Chomh maith le tacú le tarchur na Gaeilge ó ghlúin go glúin trína sheirbhísí ábhair, soláthraíonn infheistíocht TG4 in ábhar ó earnáil léiriúcháin neamhspleách na hÉireann deiseanna d'fhostaíocht oilte, chruthaitheach agus theicniúil, ag obair i nGaeilge agus cothaíonn sí spéis i staidéar tríú leibhéal sna meáin Ghaeilge.

Is PSM poiblí saor-go-aer é TG4 agus tá sé ar fáil ar líne do Diaspóra na hÉireann ar fud an domhain. Go bunúsach, soláthraíonn TG4 ardán ar fud an domhain chun ealaíona agus cultúr na hÉireann a léiriú. Tá sé seo tábhachtach go háirithe i gcomhthéacs straitéis an Rialtais 'Global Ireland', ar cuid lárnach di ealaíona, oidhreacht agus cultúr na hÉireann a chur chun cinn do na glúine nua agus do lucht féachana ar fud an domhain. Tá cáil bainte amach ag TG4 as imeachtaí beo den scoth agus soláthraíonn sé fuinneog ar imeachtaí ceoil agus cultúrtha na hÉireann do lucht féachana ar fud an domhain, chomh maith le hÉirinn.

Cruthaíonn infheistíocht TG4 i gcraoltóireacht spóirt na hÉireann luach sochaíoch freisin, go háirithe i réigiúin na hÉireann. Gach bliain, soláthraíonn TG4 clúdach fairsing ar chluichí Gaelacha mar pheil, iománaíocht agus Peil na mBan (LGFA). Taispeánann TG4 cluichí réigiúnacha agus níos óige agus agus leathnaigh sé craoltóireacht ar chluichí Gaelacha go aoisghrúpaí agus pobail, a measadh gan dótháin tábhacht a bheith acu don teilifís bheo, ag cuidiú le pobail níos láidre a thógáil. Ag tacú leis an éagsúlacht, tá TG4 ar thús cadhnaíochta sa chraoltóireacht agus ag cuidiú le próifíl spóirt na mban a mhéadú ó bunaíodh é i 1996.

An Tionscal Cruthaitheach agus an Eacnamaíocht

Tá PSM rithábhachtach don ról atá aige in eacnamaíocht na tíre agus i bhfás na hearnála cruthaithí. Léiríonn taighde EBU⁷ go soiléir an ról atá ag PSM in earnáil chruthaitheach na hEorpa - san iomlán, tá 84% de chaiteachais cláir PSM ar ábhar bunaidh. Tá an céatadán seo i bhfad níos airde ná grúpaí meán tráchtála, ag léiriú na háite faoi leith atá ag PSM san éiceachóras ábhair. In 2019, ba iad eagraíochtaí PSM na príomhinfeisteoirí in ábhar bunaidh na hEorpa, ag tionscnamh 40.2% d'ábhar closamhairc bunaidh iomlán an AE, ag léiriú tiomantas PSM do léiriúchán Eorpach, agus mar fhórsa tiomána de chultúr na hEorpa, níor thionscain SVOD ach 1.7% de léiriúcháin an AE in 2019.

Léiríonn ráiteas misin TG4 féin an bunús cruthaitheach agus eacnamaíoch dár ról mar institiúid PSM:

“Soláthraíonn muid seirbhísí siamsúla nuálacha meán trína ndéantar ceiliúradh ar chruthaitheacht na Gaeilge agus trína ndéantar caidreamh a chothú leis an lucht féachana in Éirinn agus ar fud an domhain. Trí chomhpháirtíocht leis an earnáil chlosamhairc Ghaeilge, cumasaíonn muid cruthú ábhair den scoth agus tacaíonn muid le fás eacnamaíochta in Éirinn”.

⁵ Sonraí faoi chainteoírí Gaeilge ó Dhaonáireamh 2016 (CSO).

⁶ Ipsos MRBI, 2019 (1,000 duine fásta, aois 15+).

⁷ Funding of Public Service Media 2020. European Broadcasting Union (EBU) Nollaig 2020.

Dhírigh TG4 go háirithe ar ábhar agus seirbhísí a choimisiúnú ó chuideachtaí atá lonnaithe i gceantair réigiúnacha. Trí chaiteachas TG4 le hearnáil léiriúcháin neamhspleách na hÉireann agus trí na seirbhísí eile go léir a cheannaíonn muid ó eacnamaíocht chruthaitheach na hÉireann, tacaíonn TG4 le forbairt tallainne tionscail agus léiriúcháin, poist réigiúnacha agus ioncain. Is é TG4 an soláthróir fostaíochta aonair is mó sna tionscail chruthaitheacha agus chultúrtha i réigiúin na hÉireann lasmuigh de Bhaile Átha Cliath/Chill Mhantáin. Tugann sé seo buntáistí suntasacha eacnamaíocha do na ceantair seo.

Is féidir tionchar eacnamaíoch TG4 a thomhas trí anailís ‘multiplier’ a úsáid. Is iad na cineálacha iolraitheoirí is minice a chuirtear i bhfeidhm ná aschur (rannchuidiú le haschur náisiúnta) agus fostaíocht (tionchar ar phoist choibhéiseacha lánaimseartha). Tomhaistear na tionchair ar thrí leibhéal:

1. Tionchar díreach - fostaíocht agus aschur a ghineann TG4 go díreach.
2. Tionchar indíreach - fostaíocht agus aschur a dtacaítear leo i slabhra soláthair TG4 (e.g. comhlachtaí léiriúcháin neamhspleácha, soláthraithe eile).
3. Tionchar spreagtha - fostaíocht agus aschur le tacaíocht uathu siúd atá fostaithe go díreach nó go hindíreach i TG4 agus a sholáthraithe, ag caitheamh a n-ioncain ar earraí agus seirbhísí i ngeilleagar níos leithne na hÉireann.

Meastar gur chuir caiteachas TG4 in Éirinn in aschur le thart ar €66m in aschur náisiúnta in 2019 agus thacaigh sé le timpeall 1,023 post coibhéiseach lánaimseartha⁸ (díreach, indíreach agus spreagtha). As seo, chuir caiteachas TG4 sna réigiúin go mór le haschur réigiúnach de thart ar €54.6m agus thacaigh siad le 870 post coibhéiseach lánaimseartha⁹ (díreach, indíreach agus spreagtha).

Maidir le gach €1 a infheistíonn TG4 sna tionscail chruthaitheacha in Éirinn, is fiú €2 é do gheilleagar na hÉireann. Léiríonn sé seo leibhéal an chaiteachais ag TG4 in Éirinn agus leibhéal an chaiteachais ar chlár agus ar sheirbhísí dúchasacha seachas ar ábhar agus seirbhísí a fuarthas ó mhargáí idirnáisiúnta.

Ag aithint a thábhachtaí atá forbairt tallainne agus scileanna, tá infheistíocht mhór déanta ag TG4 in oiliúint agus i bhforbairt na hearnála léiriúcháin i gcomhar leis an BAI, Screen Ireland, Údarás na Gaeltachta, TechFéile, NUIG, Gréasán na Meán agus an earnáil léiriúcháin neamhspleách. I measc na scéimeanna tá: scéimeanna forbartha gearrscannán (Síol, Údar, Scéal 1 & 2) a chuir oiliúint agus tacaíocht ar fáil do scríbhneoireacht, stiúradh agus tallann léiriúcháin Gaeilge atá ag teacht chun cinn; Cine4, tionscnamh 4 bliana chun tacú le táirgeadh príomhscannán i nGaeilge agus chun drámaíocht Ghaeilge d’ardchaighdeán a thabhairt chuig pictiúrlanna (Roghnaíodh ‘Arracht’, ceann de na scannáin Ghaeilge Cine4 mar iontráil na hÉireann don chatagóir Fadscannán Idirnáisiúnta is Fearr do na Gradaim Acadamh ‘Oscars’ atá le teacht); agus Scéim Forbartha Oiliúna Meán nua chun tacú le cuideachtaí léiriúcháin scileanna agus tallann na foirne a fhorbairt. Tá na scéimeanna seo rithábhachtach chun tallann agus scileanna cruthaitheacha na hÉireann a fhorbairt agus teastaíonn níos mó infheistíochta i dtionscnaimh chosúla. Gach bliain, soláthraíonn TG4 deiseanna intéirneachta agus printiseachta d’iontrálaithe nua sa tionscal.

⁸ Anailís ar chaiteachas oibríochta agus caipitil TG4 i 2019 in Éirinn.

⁹ Ní áirítear tionchair chatalaíoch bhreise (spill-over) mar fhorbairt scileanna, turasóireacht srl.

(b) Na dúshláin is suntasaí atá roimh éiceachóras PSM na hÉireann

Tá go leor dúshlán suntasach roimh éiceachóras PSM na hÉireann:

1. Easpa scála maoinithe
2. Easpa Cothromaíochta in Éiceachóras PSM na h-Éireann.
3. An Domhandú agus bagairt ar mheáin dhúchasacha na h-Éireann.
4. Bearnaí móra i Seirbhísí na Meán do chainteoirí Gaeilge.
5. An gá le tosaíocht feiceálachta PSM.

1. Easpa Scála Maoinithe

Taispeánann taighde ón EBU¹⁰ nach do thairbhe PSM a chuaigh fás rachmais eacnamaíoch san Eoraip sula ndeachaigh an ghéarchéim phaindéimeach reatha i bhfeidhm go luath i 2020. Ina ionad sin, rinneadh é a imeallú go heacnamaíoch ar fud an EBU agus tá maoiniú PSM ag titim san fhadtearma.

Tharla géarchéim mhór airgeadais agus eacnamaíoch dhomhanda le 15 bliana anuas i 2008-2009, i dteannta le lagtrá mór sna margaí fógraíochta in 2009. Bhí tionchar aige seo ar chumas rialtais maoiniú cobhsaí agus inbhuanaithe a ráthú do PSM agus níor tháinig ioncaim PSM ar ais chuige féin tar éis na géarchéime seo. Ar fud an EBU, tháinig méadú beag ar mhaoiniú PSM in 2019, 1.1%. Ba í seo an chéad bhliain ó 2015 i leith go raibh méadú suntasach ar mhaoiniú. Sa tréimhse idir 2015 agus 2019, tháinig laghdú 0.1% ar mhaoiniú iomlán an PSM, áfach. Léirithe i dtéarmaí réadacha, is ionann é sin agus laghdú 5.8% thar na ceithre bliana.

I gcomparáid leis an bhfás ar Olltáirgeacht Intíre (GDP), tá maoiniú PSM ag laghdú go suntasach. Tháinig méadú 9.6% ar GDP na 49 tír a cuireadh san áireamh i dtaighde EBU idir 2015 agus 2019, i gcomparáid leis an laghdú de 0.1% ar mhaoiniú PSM. Mar sciár den GDP, ba ionann maoiniú PSM agus 0.2% den OTI in 2010 ach bhí sé tite go 0.16% faoi 2019.

Tá an cás seo le feiceáil i margadh na hÉireann, áit a bhfuil maoiniú PSM na hÉireann ag fulaingt go suntasach ó easpa scála.

Ba é an meánleibhéal maoinithe do PSM ar fud thíortha an EBU beagnach €734m in 2019, síos ó €766m in 2018. Tá an meán seo á thiomáint ag 7 dtír ina bhfuil an maoiniú níos mó ná €1 billiún¹¹. Ba é an meán-mhaoiniú do PSM ar fud 28 tír an AE ná €1.12bn in 2019. In Éirinn, bhí maoiniú PSM beagnach leath de mheánmhéid an EBU, ag €380.9m in 2019¹².

Ar bhonn per capita, tá an chuma ar chúrsaí go bhfuil Éire ag feidhmiú go maith i gcomparáid le meán an EBU agus an AE de €45 agus €49.2 faoi seach, le €76.77 in ioncam oibríochta PSM in aghaidh an duine in 2019. Mar sin féin, ní léiríonn an chomparáid seo go laghdaítear an meán seo mar gheall ar mhaoiniú PSM an-íseal per capita i dtíortha i ndeisceart agus i lár na hEorpa agus i dtíortha mar an Airméin agus an Úcráin áit a bhfuil maoiniú PSM mar shampla, faoi bhun €6 an duine. Tá maoiniú PSM per capita de níos mó ná €100 ag tíortha mar an RA, an Ghearmáin, an Iorua, an Ostair agus an Eilvéis, agus tá Éire beagnach 25% níos lú ná seo.

Tugann maoiniú PSM mar chéatadán den GDP léargas níos soiléire ar easpa scála maoinithe na hÉireann. Ar an meán, b'ionann maoiniú PSM agus 0.16% de GDP de chuid tíortha an EBU in 2019. Mar a thaispeántar i Léaráid 2, tá Éire ar cheann de thrí thír i margaí móra in iarthar na hEorpa ina bhfuil

¹⁰ Funding of Public Service Media 2020 (EBU Nollaig 2020).

¹¹ An maoiniú go léir PSM, ioncam tráchtála san áireamh.

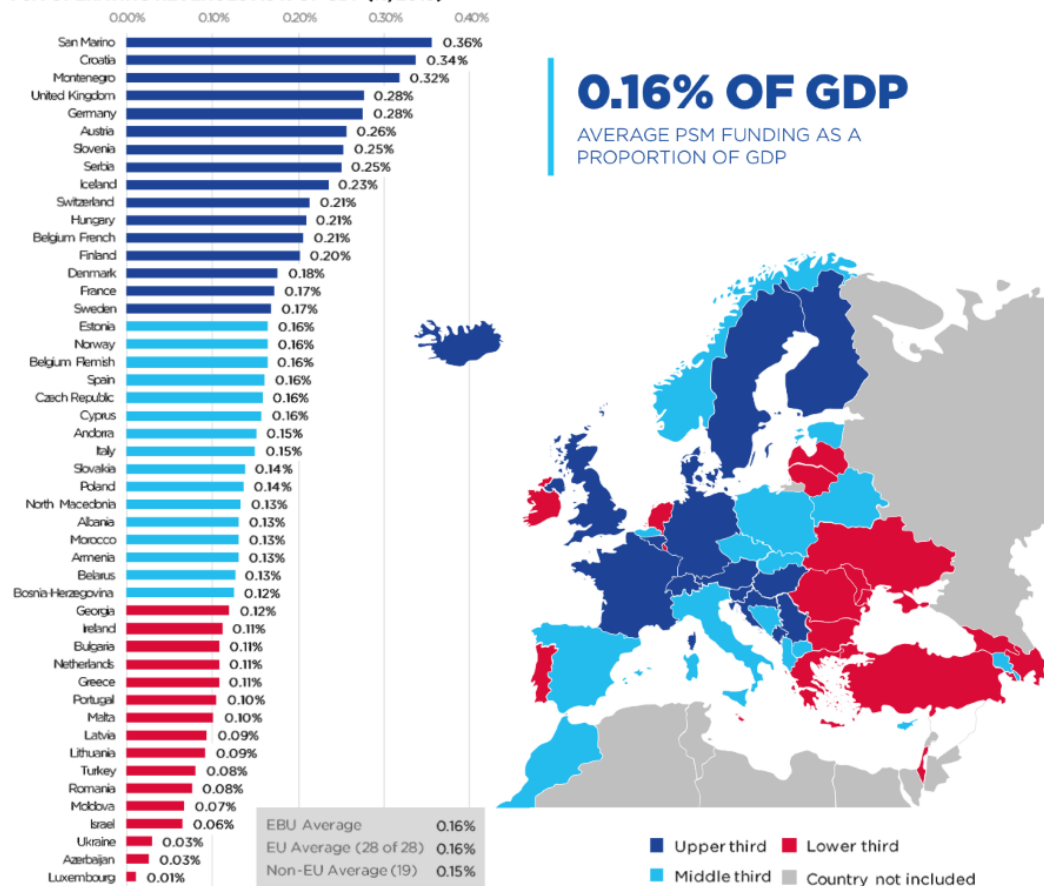
¹² Maoiniú stáit, táille cheadúnais agus ioncam tráchtála - RTÉ agus TG4.

PSM tearc-mhaoinithe i gcoibhneas lena ngeilleagair faoi seach. Tá Éire sa tríú cuid is ísle de mhargaí uile an EBU, agus maoiniú PSM cothrom le 0.11% den GDP. Tugann an EBU faoi deara gur tháinig laghdú ó 0.14% go 0.11% ar mhaoiniú PSM na hÉireann mar chion den GDP i gcúig bliana amháin, ag rá go bhfuil sé seo “particularly worrying, namely where the trend in PSM funding appears totally disconnected from a country’s economic growth”

Léaráid 2: Ioncaim Oibriochta mar % de OTI¹³

CHART 9 & MAP 2.

PSM OPERATING REVENUES AS % OF GDP (% , 2019)



Note: the Vatican has not been included owing to the lack of GDP data.
Source: EBU based on Members' data and IMF.

¹³ Funding of Public Service Media 2020 (EBU Nollaig 2020).

2. Easpa Cothromaíochta in Éiceachóras PSM na h-Éireann.

In ainneoin uailmhian an Achta, tá struchtúr closamhairc na hÉireann beagnach mar an gcéanna leis an am roimh an Acht Craolacháin 2009. Tá sé lonnaithe i mBaile Átha Cliath den chuid is mó agus craoltóir-léiritheoir amháin mar mhonailit ann.

Tá an-éagothroime idir maoiniú RTÉ agus maoiniú TG4 mar eagraíocht PSM Gaeilge na hÉireann, agus Screen Ireland agus ciste Sound & Vision an BAI mar sholáthraithe maoinithe iomaíochta d'ábhar PSM. In 2018, fuair RTÉ €189.1m i maoiniú táillí ceadúnais agus curtha leis an ioncam tráchtála de €150m, bhí maoiniú iomlán de €339.1m aige¹⁴. In 2018, fuair TG4, Sound & Vision agus Screen Ireland thart ar €68m¹⁵ idir na trí eagraíocht - gan ach 36% de mhaoiniú táille ceadúnais RTÉ nó 20% dá mhaoiniú iomlán. Ní raibh i maoiniú reatha TG4 ach 18% de mhaoiniú táille ceadúnais RTÉ in 2018.

Tá tionchair dhiúltacha suntasacha ag an éagothroime seo ar éiceachóras PSM in Éirinn. Mar a léirigh ComReg ina Athbhreithniú Margaidh ar Sheirbhísí Tarchurtha Craolacháin in Éirinn¹⁶, tá “significant market power” ag RTÉ agus “the ability and incentive to engage in exploitative and exclusionary behaviours”. Creideann TG4 go bhfuil cumhacht shuntasach margaidh ag RTÉ in Éirinn agus go spreagann an struchtúr monailiteach seo iompar monailiteach san éiceachórais closamhairc.

Tá an struchtúr seo ag dul i bhfeidhm go mór ar an earnáil léiriúcháin neamhspleách in Éirinn. Léirítear tábhacht na hearnála i bPlean Gníomhaíochta Closamhairc Creative Ireland. Tá an plean ag iarraidh fostaíocht a dhúbailt sna hearnálacha léiriúcháin scannáin, teilifíse agus beochana agus oll-bhreisluch (GVA) a mhéadú go €1.4bn faoi 2024. Aithníonn sé forbairt bhreise ar acmhainní straitéiseacha lasmuigh de Bhaile Átha Cliath/Chill Mhantáin mar thogra atá rithabhachtach chun an fhostaíocht agus spriocanna aschuir a bhaint amach. Áfach, tá an earnáil léiriúcháin neamhspleách in Éirinn in ísle brí faoi láthair agus tá an earnáil lárnaithe go mór i mBaile Átha Cliath/Chill Mhantáin. Tá inertia an lárnaithe seo anois an-fhréamhaithe go deo. Caithfidh an Rialtas seasamh a ghlacadh ar an eacnamaíocht chruthaitheach réigiúnach atá straitéiseach agus fuinniúil.

Mar Chraoltóir-Foilsitheoir, tá ról lárnach ag TG4 in eacnamaíocht chruthaitheach réigiúnach na hÉireann, ag tacú le forbairt tallainne, tionscail agus léiriúcháin, poist réigiúnacha agus ioncaim. Díríonn TG4 ar ábhar agus seirbhísí a choimisiúnú ó chomhlachtaí a oibríonn tríd an nGaeilge, a bhfuil go leor acu lonnaithe sa Ghaeltacht agus i gceantair réigiúnacha. Déantar infheistíocht i seirbhísí cruthaitheacha ar an meán, 72% de chaiteachas oibríochta TG4 agus beagnach 80% den mhaoiniú reatha gach bliain. In 2018 amháin, chaith TG4 €28m ar sheirbhísí cruthaitheacha. Bhí 82% de seo i gceantair réigiúnacha le beagnach 50% i gConnacht agus 25% i gCúige Mumhan¹⁷. Tacaíonn TG4 go díreach le poist i dtionscail chruthaitheacha réigiúnacha, ag cuidiú le eacnamaíocht chruthaitheach réigiúnach na hÉireann a chothú agus a thógáil. Le deich mbliana anuas amháin, chaith TG4 €215m ar ábhar agus ar sheirbhísí gaolmhara ó earnáil táirgeachta neamhspleách na hÉireann, a bhformhór mór sna réigiúin.

Tá TG4 den tuairim gurb í an cheist “cothromaíocht scála” agus an bonneagar closamhairc monailiteach a athchóiriú an dúshlán is mó atá roimh éiceachóras an PSM in Éirinn. Mar a luadh cheana, creideann TG4 go gcaithfidh éagsúlacht agus iolrachas guthanna, tuairimí agus foinsí a bheith ar fáil i margadh na hÉireann chun éiceachóras an PSM a chothromú agus chun oibriú go héifeachtach. Mar sin féin, is gá aghaidh a thabhairt ar struchtúr monailiteach an éiceachórais closamhairc reatha in Éirinn d'fhonn fíor-iolrachas agus éagsúlacht guthanna agus foinsí, lena n-áirítear éagsúlacht réigiúnach agus teanga, a theacht chun cinn. ***Is é an dúshlán is mó atá roimh TG4 féin sna blianta***

¹⁴ Tuairisc Bhliantúil RTÉ 2018.

¹⁵ Maoiniú reatha de €33.8m do TG4.

¹⁶ Bealtaine 2020.

¹⁷ Níl cearta ceoil agus spóirt san áireamh.

amach romhainn ná ‘scála náisiúnta den chéad scoth’ a bhaint amach chun ligean dó ról feiceálach, bríomhar a imirt in éiceachóras meán na hÉireann agus macalla láidir a chruthú i sochaí na hÉireann.

3. An Domhandú agus bagairt ar mheáin dhúchasacha na h-Éireann.

Tá margadh na meán an-dinimiciúil. Le deich mbliana anuas go háirithe, tá tírdhreach na meán athraithe as cuimse. Tá an teicneolaíocht dhigiteach, na meáin shóisialta agus gléasanna nasctha tar éis patrúin tomhaltais a athrú sa mhéid go bhfuil na réimsí ina bhfeidhmíonn craoltóirí traidisiúnta agus idirghabhálaithe ábhair dhomhanda mar Amazon, Apple agus Facebook ag teacht le chéile.

Tá iompar an lucht féachana ag athrú. Tá an t-aistriú ó theilifís líneach thraidisiúnta ag dul ar aghaidh, á thiomáint go háirithe ag lucht féachana níos óige toisc go bhfuil siad níos ceangailte, níos soghluaiste agus níos oscailte i dtreo ábhar neamhlíneach agus na meán sóisialta ó iliomad foinsí náisiúnta agus idirnáisiúnta. Cé go bhfuil an sciar is mó d’ábhar closamhairc in Éirinn fós ag teilifís líneach, tá aistriú ar bun chuig seirbhísí SVOD mar Netflix agus chuig ábhar ar líne, gearrfhoirm agus na meáin shóisialta. Leanfaidh an treocht seo de réir mar a thiocfaidh forbairt ar theicneolaíocht, gléasanna agus leathanbhanda.

Tá ceannas ag líon beag comhlachtaí domhanda ábhair agus tá ról lárnach acu i múnú roghanna ábhair lucht féachana/éisteachta. Siad na halgartaim, bunaithe ar nósanna tomhaltais, a thugann tosaíocht feiceálachta d’ábhair faoi leith agus, mar gheall air sin, éiríonn na “boilgeoga pearsanaithe” níos cúinge agus bíonn sé níos deacra briseadh amach astu. Go háirithe, nuair atá chomhtháthú ingearach i gceist¹⁸ leis na comhlachtaí ábhair agus ardáin, tá spreagadh tráchtála acu lucht féachana a chur i dtreo ábhair a oireann dá leas thráchtála féin. De réir mar a leanann margadh an ábhair ag domhandú, beidh na hathruithe seo ina mbagairt níos mó do mheáin na hÉireann.

4. Bearnaí móra i Seirbhísí na Meán do chainteoirí Gaeilge.

Is é an t-éacht aonair domhanda is mó a rinne Éirinn maidir le éagsúlacht teanga ná a cumas a teanga féin a sheachadadh ó ghlúin go glúin mar theanga bheo na dteaghlach agus na bpobal. Cé go bhfuil seasamh bunreachtúil ag an nGaeilge, feidhmíonn sí mar mhionteanga in Éirinn agus tá sí faoi bhrú mór ag leibhéal tarchuir idir-ghlúine na máthairtheanga sa Ghaeltacht agus ar fud na hÉireann. Foghlaimíonn leanaí go gasta ó thithe ina labhraítear Gaeilge go bhfuil tábhacht níos lú ag baint lena dteanga féin ná teanga fhormhór na dteaghlach Éireannacha, agus do gach glúin i ndiaidh a chéile, leanann an réasúnaíocht agus an spreagadh chun a gcuid leanaí a thógáil trí Ghaeilge ag creimeadh.

Tá ról an-tábhachtach ag meáin na Gaeilge agus na healaíona cruthaitheacha Gaeilge maidir le féiniúlacht agus saibhriú phobal na Gaeilge a chur chun cinn agus tacú le tarchur idir-ghlúine na Gaeilge. Mar sin féin, más léir do phobal na Gaeilge go bhfuil na meáin agus na healaíona Gaeilge fós, mar a thuairiscigh Breandán Ó hEithir breis agus daichead bliain ó shin, ar leibhéal “dara nó tríú rang” i gcomparáid lena gcomhghleacaithe náisiúnta sa mhórtheanga, leanfaidh tarchur idirghlúine na Gaeilge ag lagú.

Ní grúpa aonchineálach é pobal na Gaeilge. Tá an éagsúlacht agus an iolrachas céanna ann i measc phobal na Gaeilge agus atá ag an bpobal Béarla. ***Áfach, tá na bearnaí i seirbhísí closamhairc do phobal na Gaeilge i bhfad níos mó ná na bearnaí do phobal an Bhéarla, a bhfreastalaíonn na meáin phoiblí agus thráchtála air.*** Seo cuid de na bearnaí is suntasaí:

- Níl na hacmhainní céanna ag cláir nuachta Gaeilge, ar an raidió nó ar an teilifís, agus atá ag cláir mar iad i mBéarla.

¹⁸ Nuair atá na comhlachtaí ardáin freisin ag feidhmiú mar úinéirí nó soláthróirí ábhair.

- Níl aon chlúdach domhain ar chúrsaí reatha closamhairc i nGaeilge.
- Cé go bhfuil dul chun cinn déanta maidir le cláir do pháistí i nGaeilge, tá an soláthar fós lag agus níl aon chainéal faoi leith ‘Cúla4’ comhionann le ‘RTÉ Junior’.
- Teastaíonn ábhar éadrom agus ábhar drámaíochta ó lucht féachana faoi 35 agus níl mórán de seo i nGaeilge.
- Tá clúdach closamhairc náisiúnta ar chultúr agus imeachtaí Gaeilge-bhunaithe mar Oireachtas na Gaeilge fós lag i gcomparáid leis an mBreatain Bheag, mar shampla.

Cé go gcaitheann TG4 an chuid is mó dá mhaoiniú ar ábhar Gaeilge, ní leor scála a mhaoinithe chun aghaidh a thabhairt ar na bearnaí seo. Fuair TG4 maoiniú iomlán¹⁹ de €37.2m in 2020 agus bhí gá le scála níos mó, agus leithdháileadh níos cothroime, den mhaoiniú PSM. Sa Bhreatain Bheag mar shampla, tá maoiniú poiblí bliantúil de £81.5m ag S4C (teilifís na Breataine) agus chomh maith faigheann sé 515 uair an chloig de chlár in aghaidh na bliana ón BBC, le luach measta de £22m - maoiniú poiblí bliantúil iomlán de £ 103.5m. In ainneoin nach bhfuil an stádas bunreachtúil céanna ag an mBreatain agus atá ag an nGaeilge agus nach bhfuil ach 3.1m sa Bhreatain Bheag, agus meastar gur cainteoirí Breataine iad 19% díobh, ***is léir go bhfuil scála acmhainní i bhfad níos suntasaí dírithe i dtreo seirbhísí do chainteoirí Breataine seachas do chainteoirí Gaeilge in Éirinn.***

5. An gá le tosaíocht feiceálachta PSM.

Go traidisiúnta tugadh tosaíocht do RTÉ agus TG4 mar na chéad chainéil ar an EPG (Electronic Programme Guide) nuair a roghnaíonn breathnóir céard atá le féachaint ar an teilifís. Fágann sé sin go bhfuil sé furasta iad a fháil - coincheap ar a dtugtar ‘tosaíocht feiceálachta’ nó ‘prominence’ i mBéarla. Nuair atá ábhar PSM furasta a fháil, cabhraíonn sé seo lena chinntiú go mbíonn an deis ag ábhar atá maoinithe go poiblí lucht féachana na hÉireann a bhaint amach agus go bhfuil sé ar fáil go huilíoch do chách.

Leagann an EBU amach cúiseanna soiléire a dteastaíonn rialacha ‘tosaíocht feiceálachta’ ó PSM na hEorpa. Ina measc seo tá: saoirse cainte, éagsúlacht tuairimí agus an ceart chun faisnéise a chur chun cinn; agus ábhar éagsúil agus ardchaighdeán a chur chun cinn do gach lucht féachana.

Ina theannta sin, tá cúiseanna cultúrtha agus teanga ar leith ann a fhágann go bhfuil an cás ar son tosaíocht feiceálachta PSM níos práinní in Éirinn. Suíonn margadh meán na hÉireann idir an dá tháirgeoir ábhar closamhairc is cumhachtaí ar domhan - na SA agus an Ríocht Aontaithe. Suíonn Éirinn freisin laistigh ‘culture bubble’ an Bhéarla atá á thiomáint ag an dá mhór-mhargadh meán seo. Mura dtacaítear le meáin na hÉireann agus mura dtugtar feiceálacht chuí dóibh, caillfidh siad ábharthacht, go háirithe do lucht féachana óg na hÉireann atá ag fás aníos i dtimpeallacht na meán domhanda.

Tá an cás maidir le feiceálacht do na meáin Ghaeilge rithábhachtach. Cé gur teanga náisiúnta í, feidhmíonn an Ghaeilge mar mhionteanga. Bíonn an baol ann i gcónaí don phobal a labhraíonn an mhionteanga mar ghnáth-theanga go dtiocfaidh deireadh leo mar phobal. Is beag cumhacht margaidh atá ag meáin na Gaeilge agus murab ionann agus meáin Bhéarla na hÉireann, is beag tionchar a bhíonn acu ar ardáin ábhar tráchtála.

Cuireann tosaíocht feiceálachta PSM comhartha soiléir maidir le ról agus ábharthacht PSM agus go gcreideann Éire ina luach. ***Gan an tosaíocht sin, tá luach an mhaoinithe poiblí ar ábhar PSM na hÉireann i mbaol.*** Ritheann sé freisin in aghaidh an phrionsabail gur cheart go mbeadh ábhar PSM ar fáil go huilíoch do chách.

¹⁹ Maoiniú reatha agus caipitil.

Tá athrú mór tagtha ar an gcaoi a mbíonn muid ag féachaint ar ábhar agus ar an gcaoi a bhfaigheann muid nó a roghnaíonn muid céard atá le faire, thar na blianta. Sa lá atá inniu ann, tá teilifíseáin chliste, boscaí bairr, bataí sruthaithe, agus fiú na trí cinn ag go leor lucht féachana. Breathnaítear ar ábhar ar theilifíseáin agus ar ghléasanna eile cosúil le táibléad agus fóin. Féadfaidh lucht féachana a roghnú féachaint ar chainéil sceidealta (“teilifís líneach”) nó is féidir leo teacht suas níos déanaí trí sheirbhísí Player nó féachaint ar sheirbhísí SVOD.

Athraíonn an chéad scáileán, ar a dtugtar an “user interface” (UI), ag brath ar an ngléas (e.g. táibléad, teilifís nó fón) agus seirbhís. Is féidir le treoir an chláir leictreonaigh (EPG) mar shampla, a bheith ar a laghad cúpla cliceáil uait nuair a théann tú isteach sa chéad scáileán ar Sky, Virgin, Saorview, eir agus ardáin eile agus gan aon cheann cosúil leis an gceann eile. Roghnaíonn comhlachtaí domhanda teicneolaíochta agus meán céard atá le feiceáil ar an UI agus níl siad faoi cheangal ag riachtanais a bhaineann le tosaíocht feiceálachta. Bíonn tionchar ag comhlachtaí ábhair ar nós ardáin teilifíse agus ar líne agus ag dáileoirí ábhair ar an rochtain, feiceálacht agus so-aimsitheacht ábhar. Téann an scáileán baile nó na roghanna cuardaigh a thugtar duit i bhfeidhm ar do chuid cinntí agus tú ag roghnú ábhair. Íocann roinnt eagraíochtaí meán tráchtála as feiceálacht a fháil ar an UI freisin. Nuair a bhíonn sé deacair ábhar PSM a aimsiú, nó má bhíonn ort roinnt mhaith cliceáil a dhéanamh, laghdaítear an seans go bhféachfar air. Cuireann sé seo luach an airgid phoiblí PSM na hÉireann i mbaol.

Ní thacaíonn reachtaíocht reatha na hÉireann (an tAcht Craolacháin 2009) le tosaíocht feiceálachta PSM i dtírdhreach meán atá ag athrú go sciobtha agus caithfear aghaidh a thabhairt air seo, mar a phléitear tuilleadh i gCeist 3.

(c) Cén chaoi gur féidir leis an Rialtas coincheap agus ról PSM a fhorbairt agus tacú leo agus cén ról atá aige maidir le ábhar seirbhíse poiblí sna meáin eile.

Is féidir leis an rialtas coincheap agus ról PSM a fhorbairt agus tacú leo trí aghaidh a thabhairt ar na dúshláin seo. Molann TG4 trí bhealach (le buntáistí soiléire) trínar féidir leis an Rialtas é seo a bhaint amach:

1. Díriú ar scála maoinithe PSM.
2. An t-éiceachóras PSM monailiteach in Éirinn a athchóiriú - cothromaíocht a chur sa maoiniú poiblí.
3. Aghaidh a thabhairt ar thosaíocht feiceálachta PSM trí reachtaíocht.

1. Díriú ar scála maoinithe PSM.

Caithfear an maoiniú don PSM a mhéadú. Mar a dúradh, tá Éire sa tríú cuid is ísle de mhargaí uile an EBU, le maoiniú PSM de 0.11% den GDP. Caithfear maoiniú in Éirinn a ardú go leibhéil cosúil le margaí forbartha eile an AE. Mar shampla, is é 0.16% den GDP an meán-mhaoiniú PSM ar fud an EBU agus is é 0.28% den GDP an maoiniú sa RA agus sa Ghearmáin.

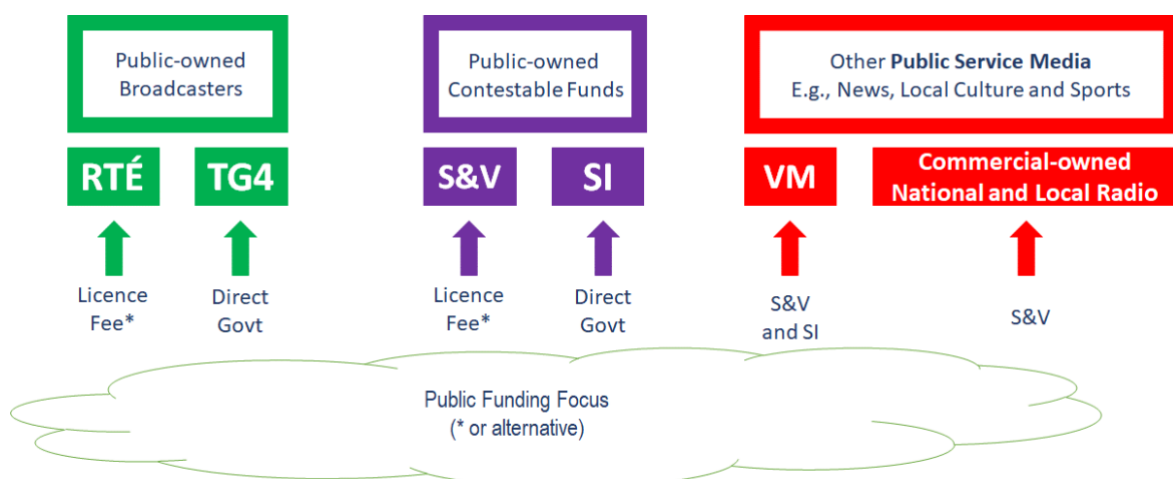
Is féidir scála méadaithe an mhaoinithe PSM a bhaint amach ar roinnt bealaí, mar a phléitear tuilleadh i gCeist 2. D'fhéadfadh meascán de mhaoiniú díreach Stáit agus táille ceadúnais, a bhailítear trí cháin aonair nó trí tháille teaghlaigh, maoiniú a mhéadú trí laghdú ar imghabháil (tá imghabháil ar na táillí ceadúnais ag c.14% in Éirinn), laghdú ar chostais bailiúcháin agus ardú ar an leibhéal ioncaim. D'fhéadfaí scála an mhaoinithe PSM a mhéadú freisin trí thobhach a chur i bhfeidhm ar sheirbhísí SVOD agus trí sheirbhísí teilifíse íocaíochta a fheidhmíonn lasmuigh de dhlínse margaidh na hÉireann.

Creideann TG4 gur gá scála an mhaoinithe phoiblí PSM a mhéadú go suntasach, agus leithdháileadh maoinithe pro rata níos cothroime a chur i bhfeidhm mar a phléitear thíos, agus ar an gcaoi sin cuidiú le héiceachóras monailiteach PSM atá i margadh na hÉireann inniu a athchóiriú.

2. An t-éiceachóras PSM monailiteach in Éirinn a athchóiriú - cothromaíocht a chur sa maoiniú poiblí.

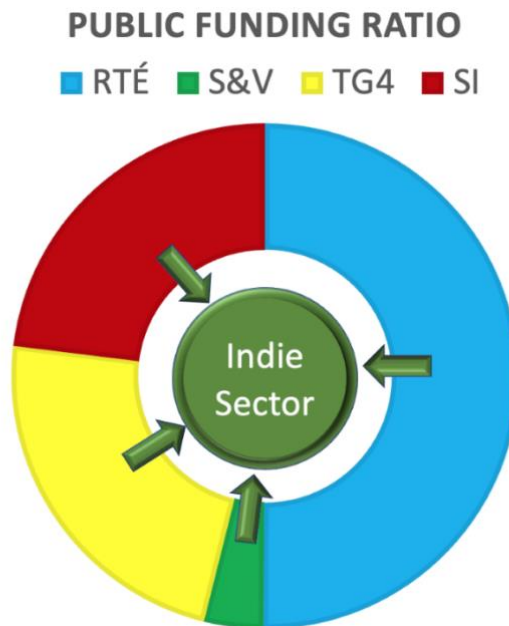
Molann Léaráid 3 cén chaoi go bhféadfaí é seo a bhaint amach trí mheascán de na craoltóirí poiblí, TG4 agus RTÉ, agus na cistí poiblí, scéimeanna éagsúla BAI Sound and Vision agus Screen Ireland, a d'fhéadfadh a chinntiú go mbeidh PSM i láthair ar ardáin craolta faoi úinéireacht tráchtála lena n-áirítear raidió.

Léaráid 3: Athchóiriú ar Eiceachóras PSM na h-Éireann



Chun é seo a bhaint amach, teastaíonn cothromaíocht idir maoiniú RTÉ agus maoiniú TG4 i dteannta le Screen Ireland agus Sound & Vision, mar sholáthraithe maoinithe iomaíochta d'ábhar PSM. Seachas cóimheas maoinithe 3:1 de réir mar atá sé faoi láthair, tá TG4 ag moladh cothromaíocht níos fearr i maoiniú poiblí na hearnála. Ba cheart go mbeadh an tsuim chéanna de mhaoiniú poiblí roinnte idir Fís Éireann, TG4 agus an Ciste BAI 'Fuaim agus Fís' agus a leithdháiltear ar RTÉ, mar a léirítear i Léaráid 4 (cóimheas maoinithe 1:1). Nuair a dhéantar cinneadh maidir le méid an mhaoinithe phoiblí do RTÉ, ba cheart go gcuirfí i bhfeidhm *cóimheas seirbhíse poiblí*²⁰ maidir le maoiniú TG4, mar an dara PSB náisiúnta.

Léaráid 4: Cóimheas Seirbhíse Poiblí



Áirítear leis na buntáistí a bhaineann le scála agus cothromaíocht mhaoinithe níos fearr:

- Tacaíocht don Ghaeilge.
 - Beidh ról rithábhachtach ag níos mó maoinithe do na meáin Ghaeilge agus d'ealaíona cruthaitheacha na Gaeilge i dtacú le tarchur na Gaeilge mar theanga phobail idir na glúine. Cuideoidh sé le dul i ngleic le bearnaí suntasacha i seirbhísí closamhairc do phobal na Gaeilge lena n-áirítear: nuacht agus cúrsaí reatha na Gaeilge; seirbhísí do lucht féachana níos óige lena n-áirítear cainéal tiomnaithe do leanaí Cúla4; agus clúdach ar imeachtaí Gaeilge.
- Éiceachóras níos fearr PSM.
 - Chuirfeadh scála maoinithe níos mó agus cothromaíocht níos fearr éagsúlacht agus iolrachas san earnáil chun cinn, cothromaíocht san éiceachóras PSM agus cothromaíocht fheabhsaithe ina leagan amach réigiúnach.
- Eacnamaíocht Chruthaitheach Réigiúnach níos fearr.
 - Taispeánann taighde an EBU²¹ go n-úsáideann PSM ar fud na hEorpa a gcuid maoinithe chun ábhair a chruthú agus chun tacú le tionscail chruthaitheacha. Bheadh tionchar díreach ag scála agus cothromaíocht maoinithe níos fearr ar níos mó infheistíochta i ngeilleagar cruthaitheach réigiúnach na hÉireann. Mar phríomh-mhaoinitheoir na hearnála closamhairc i réigiúin na hÉireann lasmuigh de Bhaile Átha Cliath/Chill

²⁰ Cóimheas sonrach cothrom idir RTÉ agus TG4 don allúntas maoinithe seirbhíse poiblí.

²¹ Funding of Public Service Media 2020 (EBU, Nollaig 2020)

Mhantáin, *chiallódh athrú mór ar scála TG4 athrú mór ar scála na hearnála closamhairc ar fad sna réigiúin*. D'fhéadfaí é seo a mhéadú trí straitéis chomhordaithe ar thaobh an tsoláthair ag gníomhaireachtaí forbartha an Stáit. Féadann sé seo a bheith ina chúis le forbairt i Straitéisí Spásúla agus Eacnamaíocha Réigiúnacha agus Plean Forbartha Náisiúnta na hÉireann, ag tógáil bonn láidir don nuálaíocht dhigiteach agus theicniúil, agus don smaointeoireacht chruthaitheach agus chliathánach. D'fhéadfadh geilleagar cruthaitheach agus cultúrtha rathúil i réigiúin na hÉireann íomhá na réigiún a athrú, dóibh siúd a chónaíonn agus a oibríonn ann agus dóibh siúd a thugann cuairt. Tá sé de chumas ag an tionscal cruthaitheach closamhairc turasóireacht, ealaíona, cultúr, spórt agus an Ghaeilge a thionchar agus a fhuinneamh, chomh maith leis na tionscail chruthaitheacha a fheabhsú trí chomhlonnú. Is féidir le saol cultúrtha faoi bhláth cur go mór le caighdeán saoil na ndaoine agus daoine a tharraing chuig na réigiúin.

- Feidhmíocht PSM a fheabhsú.
 - Tugann taighde EBU²² dá aire freisin an comhghaol soiléir idir caiteachas ábhair agus feidhmíocht lucht féachana. Taispeánann sé go mbíonn claonadh ag eagraíochtaí PSM atá maoinithe i gceart i dtéarmaí coibhneasta, feidhmíocht níos fearr a mhealladh, ag mealladh leibhéil láidre lucht féachana. Dá réir sin, is gnách go mbíonn scaireanna lucht féachana níos ísle ag PSM a bhfuil cumais airgeadais teoranta aige. Léiríonn an taighde seo taithí TG4. Ar feadh tréimhsí teoranta i rith na bliana (m.sh., Lá Fhéile Pádraig, an Nollaig), is féidir le TG4 spleáchas ar athrá a laghdú agus sceideal d'ábhar ardcháilíochta láidir a chruthú a bhfuil tarraingteacht láidir ag an lucht féachana leis. Mar sin féin, tá cumas TG4 ar feadh na bliana feidhmiú le lucht féachana teoranta ag sceideal atá ag brath ar athrá líneach.

3. Aghaidh a thabhairt ar thosaíocht feiceálachta PSM trí reachtaíocht.

Ní thacaíonn reachtaíocht reatha na hÉireann (an tAcht Craolacháin 2009) le feiceálacht PSM agus caithfear aghaidh a thabhairt ar an gceist seo. Tá deis ann é seo a leigheas tríd an mBille um Rialáil Sábháilteachta agus Meán Ar Líne²³ a thrasnóidh an Treoir um Sheirbhísí Meán Closamhairc AE (AVMSD). Cuimsíonn an AVMSD gach meán closamhairc, craoltaí teilifíse traidisiúnta agus seirbhísí ar éileamh araon, agus leagann sé amach bearta chun comhordú cur chuige níos mó ar fud an AE a thabhairt isteach, lena n-áirítear suntasacht²⁴.

Is féidir leis an mBille nua seo reachtaíocht 'feiceálachta' a thabhairt isteach, ag cinntiú go bhfuil sé éasca ábhar PSM a fháil ar an gcéad Chomhéadan Úsáideora (UI) ina roghnaíonn an lucht féachana céard atá le faire ar aon ghléas. Tiocfaidh sé in áit ghnéithe den reachtaíocht reatha atá as dáta a dhíríonn ar bhealaí craolacháin líneacha amháin.

Tá prionsabal na feiceálachta i gceist cheana féin san Acht Craolacháin 2009 agus tugann trasuí an AVMSD an deis creat reachtach agus rialála na hÉireann a nuashonrú, a neartú agus a chur in oiriúint don todhchaí agus chun tosaíocht feiceálachta PSM a chinntiú. Féach Ceist 3 le haghaidh tuilleadh faisnéise.

Mar achoimre, tá baint dhíreach ag ról an Rialtais maidir le hábhar seirbhíse poiblí sna meáin níos leithne le dul i ngleic leis na dúshláin seo. Ba chóir go ndíreodh sé ar:

- Maoiniú leordhóthanach ar scála:
 - Maoiniú díreach stáit a sholáthar d'ábhar seirbhíse poiblí agus a chinntiú go bhfuil scéim éifeachtach (nó rogha eile) um mhaoiniú táillí ceadúnais i bhfeidhm (féach Ceist 2).

²² Funding of Public Service Media 2020 (EBU, Nollaig 2020)

²³ DCCAE.ie

²⁴ Alt 7a - Members may take measures to ensure the appropriate prominence of AV media services of general interest.

- Cinntiú go bhfeidhmíonn scéimeanna maoinithe iomaíochta go héifeachtach chun tacú le hábhar seirbhíse poiblí (féach Ceist 2).
- Rialáil láidir, neamhspleách agus éifeachtach ar PSM (féach Ceist 3) chun maoiniú poiblí leordhóthanach agus leithdháileadh cothrom an mhaoinithe seo a chinntiú.
- Reachtáíocht láidir sna meáin (féach Ceist 3) chun:
 - Aghaidh a thabhairt ar thírdhreach na meán atá ag teacht (teicneolaíocht agus ardáin srl.).
 - Tosaíocht Feiceálachta an PSM a chinntiú.

3. Freagra TG4 ar Cheist 2

Ceist 2: Cén chaoi ar chóir na meáin seirbhíse poiblí a mhaoiniú ar bhealach inbhuanaithe?

Mar a thaispeántar i dTábla 1, tá go leor múnlaí éagsúla de mhaoiniú PSM ann ar fud an EBU²⁵, gach ceann acu le buntáistí agus míbhuntáistí. Is iad na príomh-mhodhanna an táille ceadúnais (múnlaí éagsúla), maoiniú díreach stáit, táillí earnála, fógraíocht agus creidmheasanna cánach. Cleachtaítear na roghanna seo go léir go pointe áirithe in Éirinn ach is gá córas táillí ceadúnais na hÉireann a athchóiriú, agus scála maoinithe PSM níos fearr agus cothromaíocht ag teastáil go práinneach. Chun PSM a mhaoiniú go hinbhuanaithe, creideann TG4 go bhfuil na prionsabail seo a leanas riachtanach:

1. Scála an mhaoinithe PSM a mhéadú (ceangailte leis an ráta boilscithe).
2. Cothromaíocht maoinithe PSM níos fearr mar a dúradh cheana, agus an méid céanna maoinithe atá leithdháilte ar RTE, le bheith roinnte idir TG4, Screen Ireland agus Sound & Vision agus cóimheas seirbhíse poiblí curtha le maoiniú TG4.
3. Ba cheart leanacht leis an dá chuid, maoiniú díreach Stáit agus táille de chineál éigin ceadúnais (a ardaítear trí cháin aonair nó trí tháille teaghlaigh) a choinneáil - tá an dá rud ríthábhachtach chun scála maoinithe leordhóthanach a bhaint amach.
4. Tá ról comhlántach tábhachtach ag scéimeanna maoinithe poiblí agus tá cuspóirí tábhachtacha ag Screen Ireland agus Sound & Vision agus ba cheart iad a choinneáil mar dhá chiste éagsúil.
5. Chun cabhrú le PSM a mhaoiniú, ba cheart tobhaigh a thabhairt isteach ar SVOD agus seirbhísí síntiúis íocaíochta Teilifíse a oibríonn lasmuigh de dhlínse margaidh na hÉireann.
6. Ardú maoinithe PSM a scaradh ó leithdháileadh maoinithe, agus an Rialtóir freagrach as an leithdháileadh. Is é an Rialtóir (Coimisiún na Meán atá beartaithe) an comhlacht is fearr chun cinneadh a dhéanamh ar an leibhéal ar cheart maoiniú poiblí a shocrú, gach bliain.
7. Níor cheart go gcinneadh ioncam maoinithe PSM (táille ceadúnais nó rogha eile) leithdháileadh maoinithe amháin. Ba cheart don Rialtóir an leibhéal iomchuí de mhaoiniú poiblí PSM a chinneadh agus sa chás go bhfuil easnamh ioncaim ann, ba cheart don Stát aon easnamh a chúiteamh tar éis an chinnidh ón Rialtóir.

Is í an táille ceadúnais príomhfhoinsé an mhaoinithe PSM ar fud thíortha an EBU²⁶, ag soláthar 60% den mheascán maoinithe ar fud limistéar an EBU. I go leor tíortha Eorpacha rinneadh é a athchóiriú, ligeadh i léig é nó tá sé á cheistiú. Is féidir leis an táille a athchóiriú ar bhealach atá cóir, in oiriúint don todhchaí agus níos éifeachtaí.

Tá dhá rogha speisiúla ann, an táille teaghlaigh agus cáin aonair ar gach ioncam. Molann TG4 go ndéanfaidh an Coimisiún iad seo a mheas (chomh maith le maoiniú díreach stáit). Chuir an Ghearmáin agus an Eilvéis an chéad cheann i bhfeidhm, atá fós ar ráta comhréidh, dícheangailte ó úinéireacht gléasanna agus mar sin neodrach ó thaobh ardáin. Chuir an Fhionlainn agus an tSualainn an dara ceann i bhfeidhm, agus tá an t-ioncam coinnithe i gciste ar leith lasmuigh de bhuiséad an Stáit. Meastar go bhfuil an dá leasú rathúil go dtí seo. Sa Ghearmáin, laghdaíodh rátaí imghabhála ó 5% in

²⁵ Suirbhé de 48 tír, na 28 tír AE san áireamh. Funding of Public Service Media 2020 (EBU, Nollaig 2020)

²⁶ Licence Fee 2020 (Media Intelligence Service, EBU, Samhain 2020).

2012 go 2% in 2019, le méadú 7% ar ioncam do PSM na Gearmáine, rud a fhágann gur féidir an muirear a laghdú. San Fhionlainn, tá ioncam PSM méadaithe os cionn 18% i 9 mbliana ó tugadh isteach an cháin nua. Tá tíortha eile ag athchóiriú na táille ceadúnais freisin. Bhog an Iorua chuig cáin seirbhíse poiblí laistigh de bhuiséad an Stáit in 2020 agus déanfaidh an Danmhairg mar an gcéanna i 2022. D'aistrigh an Iodáil a bailiú táillí ceadúnais chuig soláthraithe leictreachais, ag laghdú imghabháil ó 31% in 2015 go 7% in 2018.

Tábla 1: PSM Funding Models in the EBU ²⁷				
PSM Funding Model	Description	Countries Using	Pros	Cons
State Budget	PSM funding through transfers from the State budget.	Used in 31 EBU countries. E.g., Spain and Belgium.	- Save on collection / related costs. - Can promote increased flexibility and more frequent financial adjustments than licence fee mechanisms. - Distancing PSM funding from citizens may help minimise any hostility towards publicly funded bodies.	- May result in increased political interference. - Risks to independence are the key risk. - Funding may be assessed relative to other uses without regard for macroeconomic conditions. - Reliance on state funding also raises concerns over the stability and predictability of funding. - More vulnerable to Government austerity measures. Can address these risks by basing funding on external indicators such as % of GDP or the State budget etc.
Funds Outside State Budget	PSM funding stems entirely or partly from funding ringfenced outside the State budget for that purpose.	Used in 2 EBU countries. Finland and Sweden ²⁸ .	- Safeguard against political interference. - Safeguards against economic constraints faced by the State. - Paid on individual rather than household basis which might be considered fairer with taxes proportional to individuals' financial resources. - Can address licence fee evasion - collected directly through taxation agencies. - Preserves the direct link between public service media organisation / broadcasters and citizens, thus increasing PSM accountability to audiences. - A direct taxation link to PSM can limit resistance to it.	- PSM funding is more "noticeable" potentially making it more vulnerable to competitor envy. - Makes PSM funding more comparable with other public services. - Largely considered pro-cyclical. State does not provide a counter-cyclical buffer to PSM. - May impact State flexibility in allocating expenditure.
Licence Fee (Conventional and Household Charge)	Charge allocated on the basis of owning a TV / receiving device. A household charge is considered to be a more modern / future-proof version of a licence fee.	Used as the main funding model in 21 EBU countries. E.g.: Ireland, UK, Italy, Poland. 2 of the 21 have upgraded their licence fee to a household charge - Germany and Switzerland.	- Generally considered to guarantee a stable level of PSM funding and safeguard against political interference. - PSM accountability - direct link between PSM & citizens. - Licence fee is generally quite adaptable (reform is easier than changing PSM funding models. E.g., changing the scope, price, collection method etc.). - Upgrading the licence fee to a household charge can boost revenues and address evasion. Revenues are disconnected from device ownership. A household charge circumvents legal conflicts over the definition of qualifying reception devices. - Reinforces PSM accountability and links to citizens. - Additional mechanisms for household charge: - German PSMs cannot spend surplus revenues generated (i.e.: revenues exceeding an amount set by the independent industry commission which recommends the amount charged). Extra revenues must be set aside in a reserve fund	- Can be strictly defined in law preventing reform. - A household charge requires an administrative organisation. - A household charge requires a strong societal consensus as households not previously covered by the licence fee will have to start paying for PSM.

²⁷ Foinse: TG4 ag úsáid eolas ó: Funding of Public Service Media 2020 (EBU, Nollaig 2020).

²⁸ Tá samplaí eile de cháin ag maoiniú PSM (cánacha aonair san Íoslainn agus san Iorua agus cáin ar oibreoirí tráchtála sa Spáinn) ach cuirtear an t-ioncam isteach i mbuiséid an Stáit agus déantar é a mheas mar mhaoiniú ó Bhuiséid Stáit.

			which can be used to lower the charge in subsequent years. ○ In Switzerland, additional revenues over the capped level are shared with commercial broadcasters.	
Contestable Funding for Public Service Content	Public money is allocated to a fund for the production of public service content. Funds are allocated in a bidding process.	Suggested in several European countries. Ireland, Denmark and UK etc. have implemented these funds.	• Complements, rather than replaces, the main source of PSM funding. • A new source of revenue for PSMs and commercial broadcasters. • Increases scale of funding available for public service content for all broadcasters.	• Some of the funds previously allocated wholly to PSMs are used to fund such schemes (e.g., “top-slicing” the licence fee revenues) - potential diversion of funding previously allocated to PSMs. • If implemented fully, would lead to the separation of public funding for broadcasting from the PSM organisation. • Could undermine the concept of PSM, decontextualising it and denying the role that a continuous schedule, driven by a public service remit, can play in making this type of content readily available to citizens.

Maidir le maoiniú inbhuanaithe, creideann TG4 gur cheart go bhfaigheadh RTÉ an méid maoinithe poiblí a theastaíonn uaidh chun a dhualgais seirbhíse poiblí a chomhlíonadh agus ba cheart go gcoinneodh sé an cumas maoiniú tráchtála a chruinniú ó fhógraíocht agus ó urraíocht. Is craoltóir-léiritheoir é RTÉ agus faigheann sé go leor dá láidreachtaí ón múnla inmheánach sin a bhfuil a mhaoin intleachtúil féin aige. Tá cuóta ag RTÉ maidir le táirgeadh neamhspleách agus ba cheart go leanfadh sé seo ar aghaidh.

Úsaideann TG4, mar chraoltóir-foilsitheoir, a mhaoiniú coimisiúnaithe mar chiste iomaíochta, ag roghnú na smaointe is oiriúnaí ó tháirgeoirí neamhspleácha ar fud na hÉireann, a choinníonn a gcuid maoine intleachtúla féin.

Ba cheart go gcoinneodh TG4 an cumas maoiniú tráchtála a chruinniú ó fhógraíocht agus ó urraíocht. Tá go leor buntáistí ag baint leis seo lena n-áirítear: cuidiú le fócas a choinneáil ar lucht féachana náisiúnta; ioncam a sholáthar don sceideal tacaíochta de scannáin agus ceannacháin eile; roinnt fógróirí a spreagadh chun fógraíocht a dhéanamh i nGaeilge agus, a chinntiú go soláthraíonn an Stát leaganacha Gaeilge d'fhaisnéis seirbhíse poiblí ar shláinte srl., atá thar a bheith tábhachtach le linn na paindéime Covid-19 mar shampla.

Creideann TG4 gurb é an múnla de 'ciste iomaíochta' an t-idirghabháil phoiblí is éifeachtaí chun a chinntiú go gcruthóidh comhlachtaí meán faoi úinéireacht tráchtála ábhar seirbhíse poiblí. Tá an múnla seo ar fáil trí TG4, Sound and Vision agus Screen Ireland.

In Éirinn, áfach, léiríonn na struchtúir atá ann faoi láthair do chistí iomaíochta easpa scála. Ba léir é seo leis an éileamh ollmhór ar choimisiúin ó bhabhta 'Fuaim agus Fís' i Mí na Nollag 2020, rud a d'fhág go raibh frustrachas san earnáil neamhspleách. Dá mbeadh an maoiniú poiblí ag TG4, Sound and Vision agus Screen Ireland ag an leibhéal céanna le maoiniú phoiblí RTÉ mar a dúradh cheana, thabharfadh sé sin an spreagadh a theastaíonn chun bonn láidir a chruthú do mhaoin intleachtúil dhúchasach agus idirnáisiúnú ar eacnamaíocht chruthaitheach neamhspleách na hÉireann.

An tábhacht leis an dá chiste iomaíochta éagsúil

Tá difríocht fócais idir na cistí iomaíochta atá bainistithe ag Sound and Vision agus Screen Ireland. Tá sé an-tábhachtach agus i bhfad níos luachmhaire dhá chiste iomaíochta a bheith againn sna meáin phoiblí. Baineann Sound and Vision le cultúr na hÉireann, tá ról aige i maoiniú ábhar raidió agus, dar le TG4, d'fhéadfaí cead a thabhairt dó cló agus ar líne a mhaoiniú. Mar Bhord Scannán na hÉireann, bhí sainchúram pictiúrlainne ag Screen Ireland agus tá sainchúram scáileáin níos leithne curtha leis anois. Baineann fócas Screen Ireland ní amháin le cultúr na hÉireann ach le tallann na hÉireann, mar a léirítear trína infheistíocht i dtionscadail mar 'Room', bunaithe ar obair an údair Éireannaigh, Emma Donoghue.

Tugann Sound and Vision tacaíocht do 25% ar a laghad de thionscadail Ghaeilge nó dátheangacha. Go stairiúil, is beag spéis a léirigh Screen Ireland i dtionscadail Ghaeilge. Tá sé seo ag feabhsú trí chomhoibrithe ar fhadscannáin Cine4 mar 'Arracht' agus ar roinnt forbairt drámaíochta don lucht féachana óg ach mothaíonn TG4 go láidir go gcaithfidh straitéis agus cuótaí Gaeilge a bheith ag Screen Ireland a léiríonn go hiomlán an cur chuige Sound and Vision.

4. Freagra TG4 ar Cheist 3

Ceist 3: Cén chaoi ar cheart na meáin a rialú agus a rialáil?

Cuirfidh trasuí na Treorach AVMS i reachtaíocht na hÉireann an t-athrú is mó ar thimpeallacht rialála na meán ó tháinig an BAI chun bheith ina údarás rialála uileghabhálach ar sheirbhísí craolacháin closamhairc in Éirinn, lena n-áirítear RTÉ, a mbíodh a Údarás féin aige. Bhí an BAI eiseamláireach ina chur chuige maidir le rialáil chothrom agus tá cultúr barr feabhais aige a fhreastalóidh go maith air agus é ag dul ar aghaidh chun raon níos leithne seirbhísí closamhairc a rialáil.

Mar sin féin, cé go bhfuil fíis don éagsúlacht agus don iolrachas mar bhonn agus taca le hAcht Craolacháin 2009, tá laghdú tagtha ar an dá cheann le deich mbliana anuas de réir mar a tháinig laghdú ar bhuiséid oibríochta sna meáin phoiblí agus tráchtála. Is beag rud a bhaineann fíis na héagsúlachta atá taobh thiar den Acht a baineadh amach agus is léir go bhfuil struchtúr monailiteach na ré roimh an Acht fós slán. Cé gur oibrigh Sound and Vision go maith, níl scála ann agus tá an iomarca éilimh air.

Is féidir le rialú agus rialáil na meán aghaidh a thabhairt ar na saincheistanna seo agus creideann TG4 go bhfuil na rudaí seo a leanas rithábachtach: Rialtóir láidir neamhspleách; agus, reachtaíocht chomhréireach ar féidir léi céim a choinneáil leis an teicneolaíocht agus aghaidh a thabhairt ar fheiceálacht PSM (mar atá mínithe i gCeist 1).

Rialtóir láidir neamhspleách.

An Príomhról don Rialtóir sna deich mbliana amach romhainn ná a chinntiú go mbainfear amach dhá cheann de na príomhmharcanna a ndíríonn Unesco orthu (Neamhspleáchas agus Uilíocht). Go stairiúil choinnigh meáin na hÉireann a gcuid neamhspleáchais ó chur isteach polaitiúil, cinnte i gcomparáid le roinnt náisiúin eile san AE. Ó bunaíodh an BAI, áfach, rinne rialtais neamhaird seasta ar mholtaí BAI maidir le maoiniú poiblí do straitéisí reachtúla cúig bliana RTÉ agus TG4. Mar seo bhí na craoltóirí PSB mar “chliant dhíreacha” na Roinne Cumarsáide. Tá tionchar tráchtála ag méadú freisin ar mheáin uile na hÉireann, agus tá réimsí neamhthráchtála mar chraoltóireacht do leanaí, ag dul i léig.

Mar chuid den Bhille nua um Rialáil Sábháilteachta agus Meán Ar Líne, bunófar Coimisiún Meán nua agus tiocfaidh sé in áit an BAI. Caithfear cumhacht a thabhairt don Choimisiún Meán seo a bheith ina Rialtóir láidir neamhspleách, ar an mbealach céanna a bhfuil sé de chumhacht ag an gCoimisiún um Rialáil Fónais (CRU) fónais inbhuanaithe a chinntiú ar chostas réasúnta. Caithfidh na “fiacra” agus na cumais a bheith aige chun déileáil le cuideachtaí móra ábhar domhanda mar Facebook, Google agus Amazon srl.

Caithfidh an Rialtóir a bheith freagrach as leithdháileadh maoinithe PSM agus ba cheart go mbeadh sé in ann an Rialtas a threorú ina leith seo. Beidh an scaradh idir bailiú maoinithe agus leithdháileadh maoinithe ina phrionsabal tábhachtach chun tacú le maoiniú PSM agus níor cheart go mbeadh aon idirghabháil ag an Rialtas maidir le cinntí maoinithe PSM.

Reachtaíocht

Is réimse í an uilíocht atá faoi bhagairt go soiléir sna deich mbliana amach romhainn agus beidh coincheap na feiceálachta PSB agus PSM lárnach má tá uilíocht le coinneáil. Mar a leagtar amach i gCeist 1, mura dtacaítear le PSM na hÉireann agus mura dtugtar tosaíocht feiceálachta chuí dó, caillfidh sé ábharthacht, go háirithe do lucht féachana óg na hÉireann atá ag fás aníos i dtimpeallacht na meán domhanda. Cuireann feiceálacht PSM comhartha soiléir amach maidir le ról agus ábharthacht

PSM agus go gcreideann Éire ina luach. Gan tosaíocht feiceálachta, tá luach poiblí ar airgead PSM na hÉireann i mbaol agus tá sé ag dul in aghaidh na bprionsabal gur cheart go mbeadh ábhar PSM ar fáil go huilíoch do chách.

Caithfidh an Rialtas reachtaíocht a thabhairt isteach maidir le tosaíocht feiceálachta tríd an mBille nua um Rialáil Sábháilteachta agus Meán Ar Líne. Ba cheart go leagfadh an Bille ról amach don Choimisiún Meán nua chun feiceálacht a rialáil. Ba cheart go mbeadh ar Choimisiún na Meán cóid feiceálachta infheidhmithe a fhorbairt. I bhfianaise luas an athraithe ar dháileadh ábhair, ba cheart go mbeadh cumhachtaí aige gach cód suntasachta a athbhreithniú agus a nuashonrú. Rud atá tábhachtach, ba cheart go ndúnfadh an Bille nua na bearnaí dlínse atá ann cheana ionas gur féidir le Coimisiún na Meán tosaíocht feiceálachta a rialáil agus a chur i bhfeidhm go hiomlán ina measc siúd a dháileann ábhar agus seirbhísí in Éirinn.



**An Coimisiún um Thodhchaí na Meán - Aighneacht TG4
mar fhreagra ar an gcomhairliúchán poiblí
The Future of Media Commission - Submission from TG4
in response to the public consultation**

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English language version
Leagan Gaeilge ar fáil

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1. Introduction

The independent Future of Media Commission has been established by the Government to make recommendations on Public Service Media (PSM) in order to provide a strong future foundation.

As an initial step, the Commission is conducting a public consultation by inviting views on three key questions to be addressed in its work.

This submission presents TG4's views on the three questions relating to PSM. TG4 is the national Irish language public service broadcaster (PSB) and media provider.

We would welcome the opportunity to meet with the Commission, to discuss TG4 and our views on PSM in Ireland.

2. TG4 Response to Question 1

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

In addressing this question, TG4 sets out:

- a. The importance and value of PSM;
- b. The most significant challenges facing Ireland's PSM ecosystem; and
- c. How Government can develop and support PSM and its role in relation to public service content.

(a) *The Importance and Value of PSM*

PSM plays an essential role in society. In addition to providing entertaining, informative and educational content, it represents a nation's cultures, promotes its language(s) and both shapes and supports its creative industries. PSM provides a means to inform citizens, to foster open dialogue and to provide trusted information, contributing to a healthy democratic society.

The European Broadcasting Union (EBU) describes PSM as being non-partisan, independent and run for the benefit of society as a whole. It states that well-funded and strong PSM is a cornerstone of democratic societies and has been shown to correlate with higher degrees of press freedom, lower levels of right-wing extremism and better control of corruption¹.

Unesco² identifies four key markers of Public Service Broadcasting (PSB), namely, *Universality*, *Diversity*, *Independence* and *Distinctiveness*. It states that when guaranteed with pluralism, programming diversity, editorial independence, appropriate funding, accountability and transparency, PSB can serve as a basis of democracy.

Plurality is a central aspect of PSM. The European Human Rights Convention (Article 10 on Freedom of Expression) requires that when Member States establish PSM, the national law and practice must guarantee that the PSM system provides a pluralistic service³.

The Broadcasting Authority of Ireland (BAI) recognises the importance of *Plurality* and *Diversity*. "Promoting Diversity and Plurality" is the first of five strategic themes in the BAI's draft Strategy 2021-2023. Likewise, TG4 believes in PSM being founded on the principles of *Diversity* and *Plurality*. A diversity and plurality of **voices**, **views** and **sources** must be available in the Irish market for our PSM ecosystem to work effectively.

The value of PSM is clear. The BBC attributes this value at three levels - individual, societal and industry⁴. Individual value reflects the direct relationship PSM has with individuals, engaging with them on a personal level. Societal value reflects: protection of democratic integrity; fostering of unity and cohesion across a nation and its communities; reflection of cultures, identities and communities; and, playing a critical role on societal issues. Industry value reflects the creation and support of the creative industry through content, talent development and strategic partnerships. Reflecting this, the 2016 BBC Charter states that "the BBC should bring people together for shared experiences and help contribute to the social cohesion and wellbeing of the United Kingdom. In

¹ <https://www.ebu.ch/about/public-service-media>

² Unesco.org

³ European Court of Human Rights 2009 Manole case concerning Moldovan Public Service Media.

⁴ Creating and measuring dynamic public value at the BBC (December 2020).

commissioning and delivering output the BBC should invest in the creative economies of each of the nations and contribute to their development”.

TG4 identifies the value it delivers, as Ireland’s national Irish language PSM, in four areas: Individual; Public (society); Creative Industry; and the Economy, as shown in Figure 1.

Figure 1: Summary of TG4 Value



Individual

TG4 provides trusted, creative and unique content and services to entertain, educate and inform. The breadth of our output includes: news and current affairs; educational programming: arts & drama; *Cúla4* and other children’s content; national events of cultural significance including commemorations; live national sporting occasions free-to-air; documentaries of historical and cultural importance, and so much more. Our output is provided across linear and non-linear platforms ensuring we are accessible and can deepen our audience connection on all devices of choice.

Public (Society)

TG4 creates societal value by promoting the self-identity and enrichment of Irish language communities and by playing a unique role in linguistic diversity and intergenerational Irish language transmission. In the Republic of Ireland, 1.76m people can speak Irish - almost 40% of the population.

This number has increased 26% since TG4 was launched in 1996, despite an increasingly multinational and diverse population. Of the 1.76m who can speak Irish, 1.33m actually do speak it - either daily in education or daily, weekly and less often outside education⁵.

It is widely accepted that TG4 has been the most positive measure to promote the Irish language and give it prominence. 2019 market research⁶ shows that 92% of the public strongly identify TG4 as a supporter / promoter of the Irish language with 80% believing that TG4 brings the Irish language to life and 74% believing that TG4 makes the Irish language seem more modern and relevant for everyone. In addition to supporting intergenerational Irish language transmission through its content services, TG4's investment in content from the Irish independent production sector also provides opportunities for skilled, creative and technical employment, working in the Irish language and fosters an interest in third level Irish language media studies.

TG4 is a free-to-air public PSM and is available online to the Irish Diaspora around the world. In essence, TG4 provides a worldwide platform to portray Irish arts and culture. This is particularly important in the context of the Government strategy *Global Ireland - Ireland's Global Footprint to 2025*, a key component of which is to promote Irish arts, heritage and culture to new generations and to audiences across the world. TG4 has built a reputation for outstanding live events and provides a window on Irish music and cultural events for audiences worldwide, as well as in Ireland.

TG4's investment in Irish sports broadcasting also creates societal value, particularly in Ireland's regions. Every year, TG4 provides extensive coverage of Gaelic games such as football, hurling and Ladies Gaelic Football Association (LGFA) fixtures. TG4 showcases younger and more regional games and has expanded Gaelic games broadcasting across age groups and communities, generally considered too niche for live television, helping to build stronger communities. Supporting diversity, TG4 has been pioneering the broadcast, and helping to increase the profile, of women's sport since its establishment in 1996.

Creative Industry and Economy

PSM is vital for the role it plays in a nation's economy and in the growth of the creative sector. EBU research⁷ clearly demonstrates the role PSM plays in the European creative sector - in total, 84% of PSM programming expenditures are on original content. This percentage is far higher than commercial media groups, illustrating the unique place of PSM in the content ecosystem. In 2019, PSM organisations were the leading investors in European original content, originating 40.2% of total EU original audio-visual content, demonstrating the commitment of PSM to European production, and as a driving force of European culture (subscription video on demand (SVOD) only originated 1.7% of EU productions in 2019).

TG4's own mission statement reflects the creative and economic basis for our role as a PSM institution:

"We deliver entertaining and innovative media services that celebrate Irish language creativity and connect with audiences at home and worldwide. Through partnership with the Irish language audio-visual sector, we enable the creation of world-class content and support economic growth in Ireland".

TG4 has particularly focused on sourcing content and services from companies in regional areas. Through TG4's expenditure with the Irish independent production sector and all of the other services

⁵ Irish language speaker data is from the 2016 Census (CSO).

⁶ Ipsos MRBI, 2019 (1,000 adults aged 15+ years).

⁷ Funding of Public Service Media 2020 (EBU December 2020).

we buy from Ireland's creative economy, TG4 supports the development of industry and production talent, regional jobs and incomes. TG4 is the single biggest provider of employment in the creative and cultural industries in the Irish regions outside Dublin/Wicklow. This brings significant economic benefits to these areas.

TG4's economic impact can be measured using multiplier analysis. The most commonly applied form of multipliers are output (contribution to national output) and employment (impact on full-time equivalent jobs). The impacts are measured at three levels:

1. Direct impact - employment and output generated directly by TG4.
2. Indirect impact - employment and output supported in TG4's supply chain (e.g., independent production companies, other suppliers).
3. Induced impact - employment and output supported by those directly or indirectly employed in TG4 and its suppliers, spending their income on goods and services in the wider Irish economy.

It is estimated that in 2019, TG4's expenditures in Ireland made a contribution to national output of approximately €66m and supported approximately 1,023 full-time equivalent jobs⁸ (direct, indirect and induced). Of this, TG4's expenditures in the regions made a contribution to regional output of approximately €54.6m and supported 870 full-time equivalent jobs⁹ (direct, indirect and induced).

For every €1 invested by TG4 in the creative industries in Ireland, it is worth €2 to the Irish economy. This indicates the level of expenditure by TG4 in Ireland and the level of expenditure on indigenous programming and services rather than on acquired content and services from international markets.

Recognising the importance of talent and skills development, TG4 has also invested extensively in production sector training and development in conjunction with the BAI, Screen Ireland, Údarás na Gaeltachta, TechFéile, NUIG, Greásán na Meán and the independent production sector. Schemes include: short film development schemes (Síol, Údar, Scéal 1 & 2) which provided training and support for emerging Irish language writing, directing and other production talent; *Cine4*, a 4-year initiative to support production of feature films in the Irish language and to bring high-quality, Irish language drama to cinemas (*Arracht*, one of the *Cine4* Irish-language films, has been selected as Ireland's entry for the Oscars' Best International Feature Film category for the upcoming Academy Awards); and a new Media Training Development Scheme to support production companies to develop the skills and talent of staff. These schemes are vital for developing Irish creative talent and skills and more investment in similar initiatives is required. Every year, TG4 also provides internship and apprenticeship opportunities for new entrants to the industry.

⁸ Analysis of TG4's 2019 operating & capital spend & funding in Ireland.

⁹ Excludes additional catalytic impacts (spill-overs) such as skills development, tourism etc.

(b) *The Most Significant Challenges facing Ireland's PSM Ecosystem*

Ireland's PSM ecosystem faces many significant challenges:

1. Lack of sufficient funding scale.
2. Lack of balance in Ireland's PSM ecosystem.
3. Globalisation and the threat to Ireland's media output.
4. Significant gaps in media services for Irish language speakers.
5. The need for PSM prominence and findability.

1. Lack of Sufficient Funding Scale

Research from the EBU¹⁰ shows that PSM has not benefited from economic wealth creation in Europe before the current pandemic crisis impacted in early 2020. Rather, it has been economically marginalised across the EBU and PSM funding is falling in the long-term.

The last 15 years have seen a major global financial and economic crisis in 2008-2009, in conjunction with a major slump in advertising markets in 2009. This impacted the ability of governments to guarantee stable and sustainable funding for PSM and revenues did not recover sufficiently after this crisis. Across the EBU, PSM funding increased marginally in 2019, by 1.1%. This was the first year since 2015 that there has been a notable funding increase. In the period between 2015 and 2019, total PSM funding declined by 0.1% however. Expressed in real terms, this represents a decline of 5.8% over the four years.

When compared to growth in Gross Domestic Product (GDP), PSM funding is declining significantly. The GDP of the 49 countries included in the EBU research, increased by 9.6% between 2015 and 2019, compared with the decline in PSM funding of 0.1%. As a share of GDP, PSM funding represented on average, 0.2% of GDP in 2010 but had fallen to 0.16% by 2019.

This situation is mirrored in the Irish market, where Ireland's PSM funding suffers from a lack of sufficient scale.

The average level of funding for PSM across EBU countries was almost €734m in 2019, down from €766m in 2018. This average is driven by 7 countries where funding is greater than €1 billion¹¹. The average funding for PSM across the 28 EU countries was €1.12bn in 2019. In Ireland, PSM funding was almost half of the average EBU amount, at €380.9m in 2019¹².

On a per capita basis, Ireland would appear to perform well compared to the EBU and EU averages of €45 and €49.2 respectively, with €76.77 in PSM operating revenues per capita in 2019. However, this comparison does not reflect the fact that the average is reduced by exceptionally low per capita PSM funding in countries in southern and central Europe and in Caucasian countries such as Armenia and Ukraine where PSM funding for example, is below €6 per capita. Countries such as the UK, Germany, Norway, Austria and Switzerland have PSM per capita funding of greater than €100, with Ireland almost 25% less than this.

PSM funding as a percentage of GDP provides a clearer picture of Ireland's lack of funding scale. On average, PSM funding represented 0.16% of EBU countries' GDP in 2019. As shown in Figure 2, Ireland is one of three countries in larger western European markets in which PSM is underfunded relative to

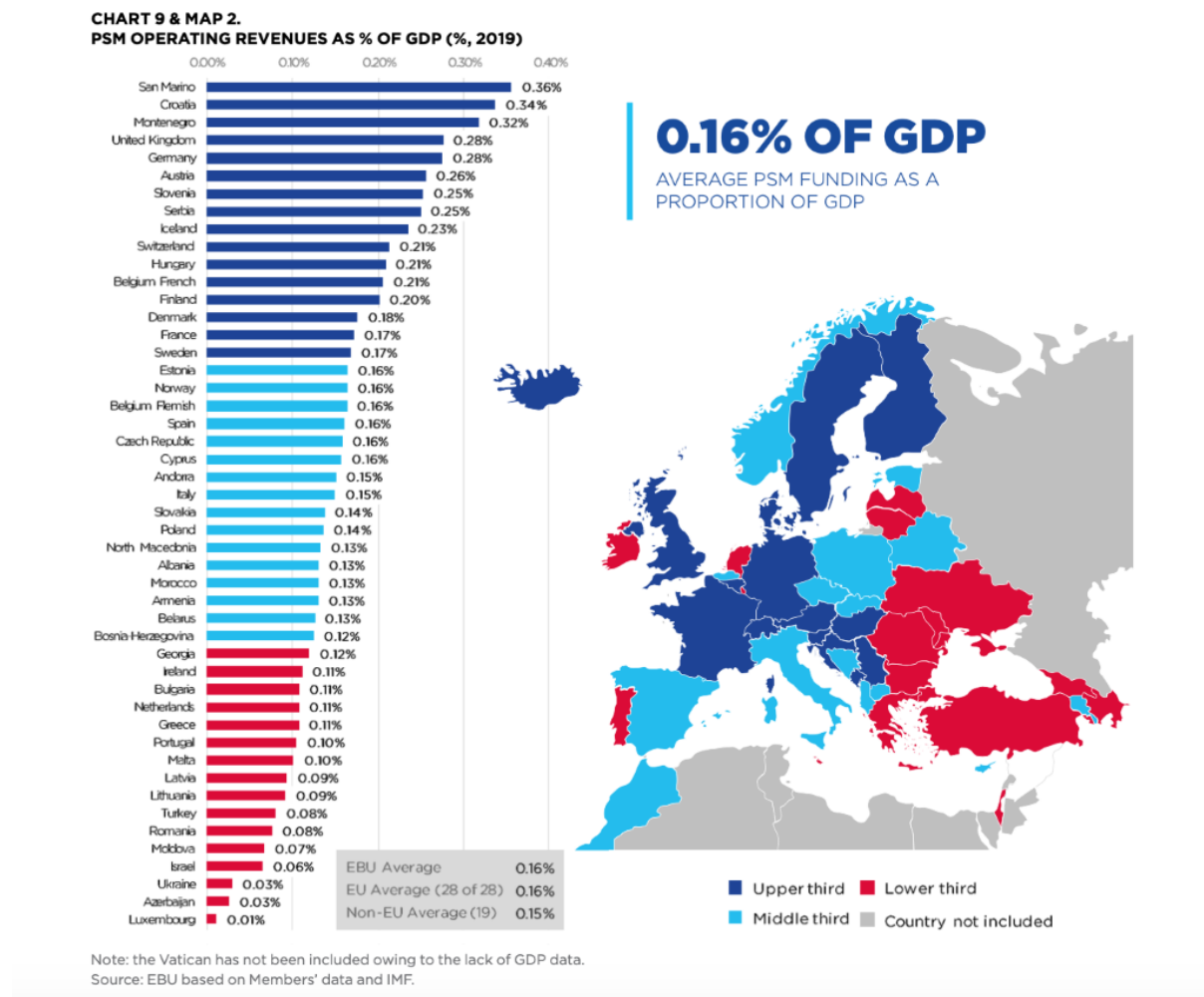
¹⁰ Funding of Public Service Media 2020 (EBU December 2020).

¹¹ Funding is all funding for PSM, including commercial income.

¹² Public, licence fee and commercial income - RTÉ and TG4.

their respective economies. Ireland ranks in the bottom third of all EBU markets, with PSM funding amounting to 0.11% of GDP. The EBU notes that Ireland's PSM funding as a proportion of GDP, declined from 0.14% to 0.11% in just five years, commenting that this is *"particularly worrying, namely where the trend in PSM funding appears totally disconnected from a country's economic growth"*

Figure 2: PSM Operating Revenues as a % of GDP¹³



¹³ Funding of Public Service Media 2020 (EBU 2020).

2. Lack of Balance in Ireland's PSM Ecosystem.

Despite the clear ambitions of the 2009 Broadcasting Act, the Irish audio-visual structure remains much the same as before 2009, largely based in Dublin and with the monolithic presence of a single broadcaster-producer.

The imbalance between RTÉ's funding and that of TG4 as Ireland's Irish language PSM organisation, and Screen Ireland and the BAI *Sound & Vision* fund as providers of contestable funding for PSM content, is stark. In 2018, RTÉ received €189.1m in licence fee funding and including commercial income of €150m, had total funding of €339.1m¹⁴. In 2018, TG4, *Sound & Vision* and Screen Ireland received approximately €68m¹⁵ between the three organisations - only 36% of RTÉ's licence fee funding or 20% of its total funding. TG4's current funding was only 18% of RTÉ's licence fee funding in 2018.

This imbalance has significant negative impacts on the PSM ecosystem in Ireland. As ComReg demonstrated in its Market Review of Broadcasting Transmission Services in Ireland¹⁶, RTÉ has "significant market power" and "the ability and incentive to engage in exploitative and exclusionary behaviours". TG4 believes that RTÉ has significant market power in Ireland and that the monolithic structure of the audio-visual ecosystem here encourages monolithic behaviour.

One of the biggest impacts has been on the independent production sector in Ireland. The importance of the sector is reflected in Creative Ireland's Audio-visual Action Plan. The plan is seeking to double employment in the film, television and animation production sectors and to increase gross value add (GVA) to €1.4bn by 2024. It identifies further development of strategic capacity outside Dublin/Wicklow as critical to achieving the employment and output growth targets. However, the production sector is currently in a difficult situation and the sector is highly centralised on Dublin / Wicklow, with the inertia of this centralisation now quite entrenched. Government needs to adopt a position on the regional creative economy which is both strategic and energetic.

As a Publisher Broadcaster, TG4 plays a key role in Ireland's regional creative economy, supporting the development of industry and production talent, regional jobs and incomes. TG4 focuses on sourcing content and services from companies which operate through the Irish language, many of which are located in Gaeltacht and regional areas. Investment in creative services is on average, 72% of TG4's operating expenditure and almost 80% of current funding every year. In 2018 alone, TG4 spent €28m on creative services. 82% of this was in regional areas with almost 50% in Connacht and 25% in Munster¹⁷. TG4 directly supports jobs in regional creative industries, helping to sustain and build Ireland's regional creative economy. Over the past decade alone, TG4 has spent €215m on content and related services from the Irish independent production sector, the vast majority in the regions.

TG4 is of the opinion that the issue of "balance of scale" and reforming the monolithic audio-visual infrastructure is the biggest challenge facing the PSM ecosystem in Ireland. As noted earlier, TG4 believes that a diversity and plurality of voices, views and sources must be available in the Irish market for the PSM ecosystem to be balanced and to work effectively. However, the monolithic structure of the present audio-visual ecosystem in Ireland needs to be addressed in order for true plurality and diversity of voices and sources, including regional and linguistic diversity, to emerge. *The biggest challenge facing TG4 itself in the coming years is achieve 'first-class*

¹⁴ RTÉ Annual Report 2018.

¹⁵ Current funding - €33.8m for TG4.

¹⁶ May 2020.

¹⁷ Excluding sports and music rights.

national scale’ to allow it play a role of meaningful prominence in Ireland’s media ecosystem and create meaningful resonance in Irish society.

3. Globalisation and the threat to Ireland’s media output.

The media market is highly dynamic. Over the past decade in particular, the media landscape has changed beyond recognition. Digital technology, social media and connected devices have transformed consumption patterns to the extent that the lines between traditional broadcasters and global content intermediaries such as Amazon, Apple and Facebook are converging.

Audience behaviour is evolving. The move from traditional linear television is ongoing, driven particularly by younger audiences as they are more connected, mobile and disposed towards non-linear content and social media from multiple national and international sources. While linear TV still holds the majority share of audio-visual content in Ireland, there is a move to SVOD services such as Netflix and to online, short-form and social media content. This trend will continue as technology, devices and broadband develop further.

The dominance of a small number of major, global content intermediaries and their role in shaping audiences’ content choices is critical. As more content discovery is determined by algorithms based on consumption habits, “personalisation bubbles” become narrower and more difficult to penetrate. In particular, where global content intermediaries are vertically integrated¹⁸, they have a clear incentive to draw audiences to content that suits their commercial interests. As the content market continues to globalise, these changes will increasingly pose a threat to Ireland’s media output.

4. Significant Gaps in Media Services for Irish Language Speakers.

Ireland’s biggest single contribution to global linguistic diversity has been its ability to pass its own language from generation to generation as the living language of homes and communities. Although Irish has constitutional standing, it behaves like a minority language in Ireland and is under considerable pressure at the level of intergenerational transmission of the mother tongue in the Gaeltacht and throughout Ireland. Children from Irish-speaking homes learn very quickly that their home language matters less than the language of the majority of Irish homes, and for each successive generation, the rationale and motivation for raising their children through Irish continues to erode.

Irish language media and the Irish language creative arts have a very important role to play in promoting the self-identity and enrichment of the Irish language community and in supporting the intergenerational transmission of the Irish language. However, if it is clear to the Irish language community that the Irish language media and arts are still, as Breandán Ó hEithir described over forty years ago, at a “second-class or third-class” level compared to their national counterparts in the majority language, the intergenerational transmission of the Irish language will continue to be weakened.

The Irish-speaking community is not a homogeneous group. The same diversity and plurality exists within the Irish-speaking community as in the English-speaking community. *However, the gaps in audio-visual services for the Irish-speaking community are far greater than those for the English-speaking community, which is served by both public and commercial media.* Some of the most significant gaps include:

- Irish language news programmes, on radio or television, do not have the same resources as equivalent programmes in English.
- There is no in-depth audio-visual current affairs coverage in Irish.

¹⁸ Where platform operators are also content owners and/or providers.

- Although progress has been made with children's programming in Irish, provision remains weak and there is no dedicated *Cúla4* channel equivalent to *RTÉ Junior*.
- Audiences under 35 need light content and drama content and there is little of this in Irish.
- National audio-visual coverage of Irish language-based culture and events such as Oireachtas na Gaeilge remains weak compared to Wales, for example.

While TG4 spends the majority of its funding on Irish language content, the scale of its funding is insufficient to address these gaps. TG4 received total¹⁹ funding of €37.2m in 2020 with a greater scale, and more equitable allocation, of PSM funding required. In Wales for example, S4C (Welsh language television) has annual public funding of £81.5m and receives 515 hours of programming per annum from the BBC, with an estimated value of £22m - a total annual public funding of £103.5m. Despite the fact that Welsh does not have the same constitutional status as Irish and that Wales has a population of only 3.1m, of which it is estimated that 19% are Welsh speakers, *it is clear that a much more significant scale of resources is directed towards services for speakers of Welsh than for speakers of the Irish language in Ireland (almost 40% of the population)*.

5. The need for PSM prominence and findability.

RTÉ and TG4 have traditionally been afforded prominence by appearing as the first channels when a viewer selects what to watch on television. This makes them easy to find - a concept known as prominence, often referred to as 'findability'. When PSM content is easy to find, this helps to ensure that publicly-funded content has the opportunity to reach Irish audiences and that it is universally available and accessible to all.

The EBU sets-out clear reasons why European PSM needs prominence rules. These include, among others: promoting freedom of expression, diversity of opinions and the right to information; and promoting varied and quality content for all audiences.

There are in addition, specific cultural and linguistic reasons which make the case for PSM prominence even more persuasive in Ireland. The Irish media market sits between the two most powerful producers of audio-visual content in the world - the US and UK. It also sits within the English language 'cultural bubble' which is driven by these two major media markets. Unless Irish media is supported and given due prominence, it will lose relevance, particularly for younger Irish audiences who are growing up in a global media environment.

The case for prominence for Irish language media is crucial. Although a national language, Irish functions as a minority language. Its habitual-speaking community continually face the danger of language shift and diminution. Irish language media has very little market power and, unlike Ireland's English language media, exerts very little influence on commercial content platforms.

PSM prominence sends a clear signal regarding the role and relevance of PSM and that Ireland believes in its value. *Without prominence, the public value-for-money of Irish PSM is at risk*. It also runs contrary to the principle that PSM content should be universally available and accessible to all.

How we watch content and how we find or choose what to watch, have changed significantly over the years. Today, many viewers have smart TVs, set-top-boxes, streaming sticks, and even all three. Content is viewed on televisions and other devices such as tablets and phones. Viewers can choose to watch scheduled channels ("linear television") or can catch-up later via Player services or watch SVOD services.

¹⁹ Current and capital funding.

The first screen, known as the “user-interface” (UI) varies, depending on device (e.g., tablet, TV or phone) and service. The electronic programme guide (EPG) for example, can be a few clicks away when a viewer enters the first UI on Sky and the experience varies on Virgin, Saorview, eir and other platforms. Global technology and media companies choose what appears on the UI and are not bound by prominence requirements. Content intermediaries such as television and online platforms and content distributors affect the access, visibility and findability of content by determining the positioning of home screens or search and recommendation options. Some commercial media organisations also pay for prominence on UIs. When PSM content is difficult to find, or is several clicks away, the chances of it being watched are reduced which puts value-for-money of Irish PSM at risk.

Ireland’s current legislation (the Broadcasting Act 2009) does not support PSM prominence in the evolving media landscape and must be addressed, as discussed further in Question 3.

(c) *How Government can Develop and Support PSM and its Role in relation to Public Service Content*

The government can develop and support the concept and role of PSM by addressing these challenges. TG4 proposes *three* means (with clear benefits) by which Government can achieve this:

1. Address PSM Funding Scale.
2. Reform the Monolithic PSM Ecosystem in Ireland - Address Funding Balance.
3. Address PSM Prominence through Legislation.

1. Address PSM Funding Scale

Funding for PSM must be increased. As stated, Ireland ranks in the bottom third of all EBU markets, with PSM funding of 0.11% of GDP. Funding in Ireland must be raised to similar levels to other developed EU markets. For example, average PSM funding across the EBU is 0.16% of GDP and funding in the UK and Germany is 0.28% of GDP.

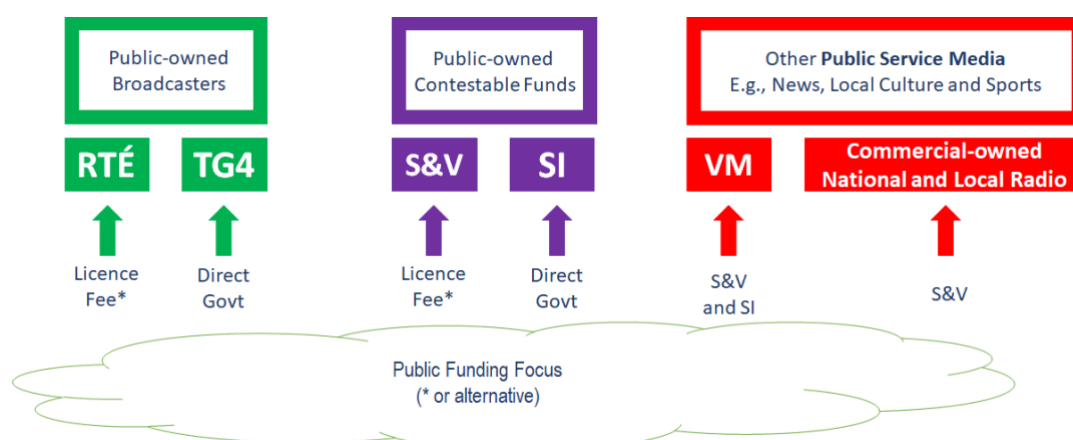
Increased scale of PSM funding can be achieved through a number of means, as discussed further in Question 2. A combination of direct State and licence fee funding, which is either raised through an individual tax or through a household charge, could increase funding through a combination of reduced evasion levels (licence fee evasion is c. 14% in Ireland), reduced collection charges and higher revenue levels. The scale of PSM funding could also be increased through application of a levy on SVOD services and on subscription Pay TV services which operate outside Irish market jurisdiction but supply content into the Irish market.

TG4 believes that the scale of PSM public funding needs to be significantly increased, with a more equitable pro rata allocation of public funding to be put in place as discussed below, thereby helping to reform the monolithic PSM ecosystem which exists in the Irish market today.

2. Reform the Monolithic PSM Ecosystem in Ireland - Address Funding Balance.

Figure 3 suggests how this might be achieved through a mix of the public broadcasters, TG4 and RTÉ, and the public contestable funds, BAI *Sound and Vision* and Screen Ireland's various schemes, which could ensure the presence of PSM on commercially-owned broadcast platforms including radio.

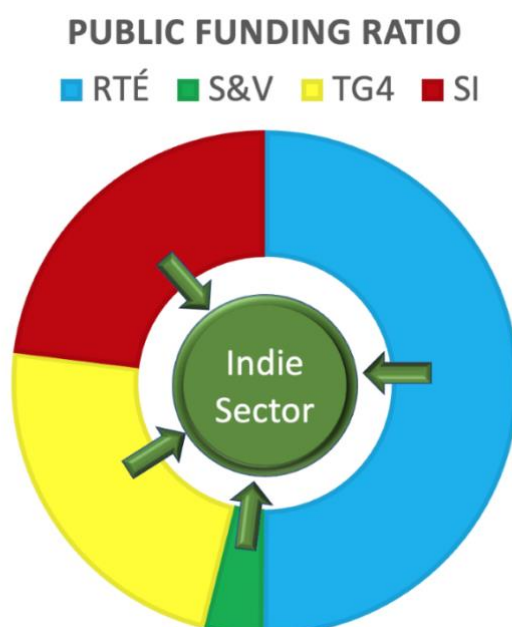
Figure 3: PSM Ecosystem in Ireland



To achieve this, a balance between RTÉ's funding and that of TG4 along with Screen Ireland and *Sound & Vision*, as providers of contestable funding for PSM content, is required. Rather than an

almost 3:1 public funding ratio as per the current situation, TG4 is proposing a better balance in the public funding of the sector. The equivalent amount of public funding allocated to RTÉ should be shared between TG4, Screen Ireland and *Sound & Vision*, as illustrated in Figure 4 (1:1 ratio). When a decision is made on the size of public funding for RTÉ, a *public service ratio*²⁰ should apply to TG4's funding, as the second national PSB.

Figure 4: Public Funding Ratio



The benefits of greater funding scale and balance include:

- Support for the Irish language.
 - More funding for Irish language media and the Irish language creative arts will play a critical role in supporting the intergenerational transmission of the Irish language. It will help address significant gaps in audio-visual services for the Irish-speaking community including: Irish language news and current affairs; services for younger audiences including a dedicated *Cúla4* children's channel; and coverage of Irish language events.
- Improved PSM Ecosystem.
 - Greater funding scale and better balance would promote diversity and plurality in the sector, balance in the PSM ecosystem and improved balance in its regional configuration.
- Enhanced Regional Creative Economy.
 - EBU research²¹ shows that PSMs throughout Europe use their funding for content creation and to support creative industries. A direct impact of better funding scale and balance would be more investment in Ireland's regional creative economy. As the principal funder of the audio-visual sector in Ireland's regions outside of Dublin/Wicklow, *a step change in TG4's scale would mean a step change in the scale of the audio-visual sector in the regions*. This could be amplified by a co-ordinated supply-side strategy by the State's development agencies. This can be a driver of development in Ireland's Regional Spatial & Economic Strategies and National Development Plan, building a strong basis for

²⁰ A defined, equitable pro rata allocation of public service funding between RTÉ and TG4.

²¹ Funding of Public Service Media 2020 (EBU, December 2020)

digital and technical innovation, and creative and lateral thinking. A thriving creative and cultural economy in Ireland's regions could transform the image of the regions, for those who live and work there and for those who visit. The creative audio-visual industry can impact and energise tourism, arts, culture, sport and the Irish language, as well as enhancing the creative industries through clustering and co-location. A flourishing cultural scene can become a major *quality of life* enticement to industries in other sectors, to invest and innovate in the regions.

- Enhanced PSM Performance.
 - EBU research²² notes the clear correlation between content spend and audience performance. It shows that properly-funded PSM organisations in relative terms, tend to perform better, attracting strong audience levels. Correspondingly, PSM with limited financial capacities tend to have lower audience shares. This research reflects TG4's experience. For limited periods throughout the year (e.g., St Patrick's Day, Christmas), TG4 can reduce a reliance on repeats and create a schedule of compelling, high-quality content which clearly has strong audience appeal. However, TG4's year-round ability to perform with audiences is limited by a schedule relying on linear repeats.

3. Address PSM Prominence through Legislation.

Ireland's current legislation (Broadcasting Act 2009) does not support PSM prominence and must be addressed. There is an opportunity to remedy this via the Online Safety and Media Regulation Bill²³ which will transpose the EU Audio-visual Media Services Directive (AVMSD). The AVMSD includes all audio-visual media, both traditional TV and on-demand services, and sets-out measures to introduce greater EU-wide coordination of approach, including on prominence²⁴.

This new Bill can legislate for prominence, ensuring that PSM content is easy to find on the first User Interface where viewers choose what to watch on any device. It will over-write aspects of the current, outdated legislation which focuses only on linear broadcast.

The principle of prominence is already enshrined in the Broadcasting Act 2009 and the transposition of the AVMSD provides the opportunity to update, strengthen and future-proof the Irish legislative and regulatory framework to support this principle and secure PSM prominence. Refer to Question 3 for further information.

Overall, Government's role in relation to public service content in the wider media is directly related to addressing these challenges. It should focus on ensuring:

- Adequate funding of scale:
 - Provision of direct state funding for public service content and ensuring an effective, sustainable licence fee funding scheme (or alternative) is in place (see Question 2).
 - Ensuring contestable funding schemes operate effectively to support public service content (see Question 2).
- Strong, independent and effective regulation of PSM (see Question 3) to regulate the sector and ensure sufficient public funding and its equitable allocation.
- Robust media legislation (see Question 3) to:
 - Address the evolving media landscape (technology and platforms etc.).
 - Ensure PSM prominence.

²² Funding of Public Service Media 2020. (EBU, December 2020)

²³ www.dccae.ie.

²⁴ Article 7a - Members may take measures to ensure the appropriate prominence of AV media services of general interest.

3. TG4 Response to Question 2

Question 2: How should PSM be financed sustainably?

As shown in Table 1, many different models of PSM funding co-exist across the EBU²⁵, each with pros and cons. The principal methods are the licence fee (variety of models), direct state funding, sectoral levies, advertising and tax credits. All of these options are practised to a certain extent in Ireland but the Irish licence fee system needs reform, with better PSM funding scale and balance urgently required. To sustainably finance PSM, TG4 believes the following principles are necessary:

1. Increase scale of PSM funding (with inflationary adjustments).
2. Better PSM funding balance as stated earlier, with the equivalent amount of public funding allocated to RTE, shared between TG4, Screen Ireland and *Sound & Vision* and a public service ratio applying to TG4's funding.
3. The combination of direct State funding and some form of licence fee (which is either raised through an individual tax or through a household charge) should be retained - both are critical for achieving sufficient funding scale.
4. Contestable funding schemes play an important **complementary role** and should be retained separately, with Screen Ireland and *Sound & Vision* having important purposes and objectives.
5. To help fund PSM, levies should be introduced on SVOD and subscription Pay TV services operating outside Irish market jurisdiction but providing services in the Irish market.
6. Separation of PSM finance-raising from funding allocation, with the latter being the responsibility of the Regulator. The Regulator (envisaged Media Commission) is the best-placed body to decide the level at which public funding should be set, annually.
7. PSM funding revenues (licence fee / alternative) should not determine funding allocation alone. The Regulator should decide the appropriate level of PSM public funding and in scenarios of a revenue shortfall, the State should make up any shortfall, following Regulatory decision.

The licence fee remains the main source of PSM funding across EBU countries, providing 60% of funding mix across the EBU area²⁶. It has been reformed, dropped or is being questioned in many European countries. The fee can be reformed to be fair, future-proof and more efficient.

Two interesting options are a household charge and an individual tax on all income. TG4 proposes that these be considered by the Commission (in addition to direct State funding). Germany and Switzerland have implemented the former, which remains flat-rate, dissociated from device ownership and therefore platform neutral. Finland and Sweden have implemented the latter, with the revenue ringfenced in a specific fund outside the State budget. Both reforms are considered successful to date. In Germany, evasion rates have been reduced from 5% in 2012 to 2% in 2019, with a 7% increase in revenues for German PSM, allowing the charge to be reduced. In Finland, PSM income has increased by over 18% in 9 years since the introduction of the new tax. Other countries are also reforming the licence fee. Norway moved to a public service tax within the State budget in 2020 and Denmark will do likewise in 2022. Italy transferred its licence fee collection to electricity suppliers, reducing evasion from 31% in 2015 to 7% in 2018.

²⁵ Survey of 48 countries including 28 EU countries. Funding of Public Service Media 2020 (EBU December 2020).

²⁶ Licence Fee 2020 (Media Intelligence Service, EBU, November 2020).

Table 1: PSM Funding Models in the EBU²⁷

PSM Funding Model	Description	Countries Using	Pros	Cons
State Budget	PSM funding through transfers from the State budget.	Used in 31 EBU countries. E.g., Spain and Belgium.	- Save on collection / related costs. - Can promote increased flexibility and more frequent financial adjustments than licence fee mechanisms. - Distancing PSM funding from citizens may help minimise any hostility towards publicly funded bodies.	- May result in increased political interference. - Risks to independence are the key risk. - Funding may be assessed relative to other uses without regard for macroeconomic conditions. - Reliance on state funding also raises concerns over the stability and predictability of funding. - More vulnerable to Government austerity measures. Can address these risks by basing funding on external indicators such as % of GDP or the State budget etc.
Funds Outside State Budget	PSM funding stems entirely or partly from funding ringfenced outside the State budget for that purpose.	Used in 2 EBU countries. Finland and Sweden ²⁸ .	- Safeguard against political interference. - Safeguards against economic constraints faced by the State. - Paid on individual rather than household basis which might be considered fairer with taxes proportional to individuals' financial resources. - Can address licence fee evasion - collected directly through taxation agencies. - Preserves the direct link between public service media organisation / broadcasters and citizens, thus increasing PSM accountability to audiences. - A direct taxation link to PSM can limit resistance to it.	- PSM funding is more "noticeable" potentially making it more vulnerable to competitor envy. - Makes PSM funding more comparable with other public services. - Largely considered pro-cyclical. State does not provide a counter-cyclical buffer to PSM. - May impact State flexibility in allocating expenditure.
Licence Fee (Conventional and Household Charge)	Charge allocated on the basis of owning a TV / receiving device. A household charge is considered to be a more modern / future-proof version of a licence fee.	Used as the main funding model in 21 EBU countries. E.g.: Ireland, UK, Italy, Poland. 2 of the 21 have upgraded their licence fee to a household charge - Germany and Switzerland.	- Generally considered to guarantee a stable level of PSM funding and safeguard against political interference. - PSM accountability - direct link between PSM & citizens. - Licence fee is generally quite adaptable (reform is easier than changing PSM funding models. E.g., changing the scope, price, collection method etc.). - Upgrading the licence fee to a household charge can boost revenues and address evasion. Revenues are disconnected from device ownership. A household charge circumvents legal conflicts over the definition of qualifying reception devices. - Reinforces PSM accountability and links to citizens. - Additional mechanisms for household charge: - German PSMs cannot spend surplus revenues generated (i.e.: revenues exceeding an amount set by the independent industry commission which recommends the amount charged). Extra revenues must be set aside in a reserve fund	- Can be strictly defined in law preventing reform. - A household charge requires an administrative organisation. - A household charge requires a strong societal consensus as households not previously covered by the licence fee will have to start paying for PSM.

²⁷ Source: TG4 using information from Funding of Public Service Media 2020 (EBU, December 2020).

²⁸ There are other examples of taxes to fund PSM (individual taxes in Iceland and Norway and tax on commercial operators in Spain) but the income is reinjected into State budgets and considered under funding from State Budgets.

			which can be used to lower the charge in subsequent years. ○ In Switzerland, additional revenues over the capped level are shared with commercial broadcasters.	
Contestable Funding for Public Service Content	Public money is allocated to a fund for the production of public service content. Funds are allocated in a bidding process.	Suggested in several European countries. Ireland, Denmark and UK etc. have implemented these funds.	• Complements, rather than replaces, the main source of PSM funding. • A new source of revenue for PSMs and commercial broadcasters. • Increases scale of funding available for public service content for all broadcasters.	• Some of the funds previously allocated wholly to PSMs are used to fund such schemes (e.g., “top-slicing” the licence fee revenues) - potential diversion of funding previously allocated to PSMs. • If implemented fully, would lead to the separation of public funding for broadcasting from the PSM organisation. • Could undermine the concept of PSM, decontextualising it and denying the role that a continuous schedule, driven by a public service remit, can play in making this type of content readily available to citizens.

For sustainable financing, TG4 believes that RTÉ should receive the amount of public funding it needs to discharge its public service duties and should retain the ability to raise commercial funding from advertising and sponsorship. RTÉ is a **producer-broadcaster** and derives many of its strengths from that in-house model which owns its own intellectual property. RTÉ has a quota for independent production and this should continue.

TG4, as a **publisher-broadcaster**, uses its commissioning funding in the manner of a contestable fund, choosing the most suitable ideas from independent producers throughout Ireland, who retain their own intellectual property.

TG4 should retain the ability to raise commercial funding from advertising and sponsorship. This has many benefits including: helping to retain a focus on national audiences; providing income for TG4's supporting schedule of films and other acquisitions; encouraging advertisers to advertise in Irish; and, ensuring the State provides Irish language versions of public service information on health etc., particularly important during the Covid-19 pandemic for example.

TG4 believes that a contestable funding model is the most effective public intervention for ensuring the creation of public service content by commercially-owned media companies which might otherwise not produce this type of content. The contestable funding model exists through TG4, *Sound and Vision* and Screen Ireland.

In Ireland, the present structures for contestable funds demonstrate a lack of scale. This was manifest by the huge oversubscription to the December 2020 *Sound and Vision* round, leading to frustration in the independent sector. Publicly funding the combination of TG4, *Sound and Vision* and Screen Ireland to the level of RTÉ public funding as stated earlier, would provide the impetus needed to create a solid base for indigenous intellectual property and the internationalisation of Ireland's independent creative economy.

The Importance of Separate Contestable Funds in Ireland

The difference in focus between the funds managed by *Sound and Vision* and Screen Ireland is nuanced. Having two contestable "eyes" on the future of publicly-financed media is very important and much more valuable than the creation of a single contestable fund. *Sound and Vision* relates to Ireland's culture, has a role in funding radio content and, in TG4's opinion, could also be allowed to fund print and online. Through its existence as the Irish Film Board, Screen Ireland had a cinema remit and has now added a broader screen remit. Screen Ireland's focus is less about Ireland's culture than Irish talent, as demonstrated by its investment in projects such as *Room*, based on the work of Irish author, Emma Donoghue.

Sound and Vision gives support to a minimum of 25% Irish language or bilingual projects - this minimum of 25% should be retained (ideally increased). Historically, Screen Ireland has shown little interest in Irish language projects. This is beginning to be corrected by collaborations on *Cine4* feature films such as *Arracht* and on some young audience drama development but TG4 feels very strongly that Screen Ireland must have an Irish language strategy and quotas which fully reflect the *Sound and Vision* approach - a minimum of 25% to Irish language / bilingual projects.

4. TG4 Response to Question 3

Question 3: How should media be governed and regulated?

The transposition of the AVMS Directive into Irish legislation will herald the greatest change to the media regulatory environment since the BAI became the overarching regulatory authority of audio-visual broadcast services in Ireland, including RTÉ. The BAI has been exemplary in its approach to even-handed regulation and has a culture of excellence which will serve it well as it moves forward to regulate a wider range of audio-visual services.

However, while a vision for diversity and plurality underpins the 2009 Broadcasting Act, both have declined in the last decade as operational budgets stagnated or declined in public and commercial media. Little of the vision of diversity behind the Act has been achieved and the monolithic structure of the era before the Act is clearly still intact. While *Sound and Vision* has worked well, it lacks scale and is becoming more and more oversubscribed.

Media governance and regulation can address these issues and TG4 believes the following are critical: a strong, independent Regulator; and, proportionate legislation which can keep step with technology and address PSM prominence (as outlined in Question 1).

Strong Independent Regulator

A key role for the Regulator in the next decade will be to ensure two of the key markers which Unesco points to (Independence and Universality), are achieved. Ireland's media have historically kept their independence from political interference, certainly when compared to some other EU nations and the USA. However, since the foundation of the BAI, governments have steadfastly ignored BAI recommendations on public funding for the statutory five-year strategies of RTÉ and TG4. This has effectively established the PSBs as "direct clients" of the Communications Department in terms of funding allocation. There has also been a growing commercial influence on all of Ireland's media, and emergence of loss-making areas such as children's broadcasting, which have suffered badly.

As part of the new Online Safety and Media Regulation Bill, a new multi-person Media Commission will be established and will replace the BAI. This Media Commission must be empowered to be a strong and independent Regulator, in the same manner that the Commission for Regulation of Utilities (CRU) is empowered to ensure sustainable utilities at reasonable cost. It must have both the "teeth" and capabilities to deal with major global content companies such as Facebook, Google and Amazon etc.

PSM funding allocation must be the sole responsibility of the Regulator and it should be able to direct Government in this regard. Separation of finance-raising from funding allocation will be an important principle to underpin PSM funding and there should be no intervention by Government on PSM funding decisions.

Legislation

Universality is an area which is clearly under threat in the next decade and the concept of PSB and PSM prominence will be central if meaningful universality is to be retained. As outlined in Question 1, unless Irish PSM is supported and given due prominence, it will lose relevance, particularly for younger Irish audiences who are growing up in a global media environment. PSM prominence sends a clear signal regarding the role and relevance of PSM and that Ireland believes in its value. Without

prominence, the public value-for-money of Irish PSM is at risk and it runs contrary to the principle that PSM content should be universally available and accessible to all.

The Government must legislate for prominence via the new Online Safety and Media Regulation Bill. The Bill should set-out a role for the new Media Commission to regulate prominence. It should require the Media Commission to develop enforceable prominence codes. Given the pace of change in content distribution, it should have powers to review and update all prominence codes. Importantly, the new Bill should close out on existing jurisdictional anomalies so that the Media Commission fully regulate and enforce prominence requirements among those distributing content and services within Ireland.