



Zoe Daniel MP

Independent Federal Member for Goldstein

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To whom it may concern,

Submission to ACMA consultation

‘A new framework for measuring media diversity in Australia’

Thank you for the opportunity to make a submission to the consultation on ‘A new framework for measuring media diversity in Australia’.

Parliament House has a newspaper reading room. Prominent at the end is a wall full of pigeonholes which once were full of dozens of regional and suburban newspapers. Today it is virtually empty and currently the reading room is closed for renovation. Such is the parlous state of the media in rural, regional and suburban Australia, that there is now no need for space for local news outlets.

In the space of a couple of decades, they have become an endangered species, reducing local voices and the access of communities across the country to a plurality of voices and sources.

In short, in danger of extinction and rendering our democracy even more fragile.

We are suffering from a media drought.

Information is power. Disinformation, unfortunately, even more so.

The contraction of media means that sources of conversations around the country are fewer and less diverse; there is less scrutiny, especially at the local level, with consequences for the quality of governance.

- In some parts of the country, there are no local print outlets at all. In others there are several outlets, but they are all run by the same company.
- According to the Public Interest Journalism Initiative’s Newsroom Mapping Project, 31 LGAs have no local print or digital outlet at all.
- The electorate of Goldstein in suburban Melbourne is one of them; the only definitively local media outlet is a community radio station, Southern FM.
- In recent months, for example, Australian Community Media (ACM) closed the print editions of the Campbelltown Macarthur Advertiser, Camden Narellan Advertiser, Fairfield City Champion, Liverpool Champion and Wollondilly Advertiser, leaving residents of much of western Sydney and its southern outskirts less well informed.



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- In the United States, a study by PEN America found that as local newspapers closed local government corruption, costs and inefficiency rose while spending and environmental checks went down.

In a recent New York Times article, columnist Jamelle Bouie remarks that “much of the conversation about journalism and democracy concerns the problems of misinformation, disinformation and partisan silos.”

True.

However, Bouie adds that while these things have always existed in some form, even pre-internet: “one of the most striking aspects of the modern information environment, as many people have observed, is the almost total collapse of local and even regional news outlets.”

“I think that this decline has played an important role in undermining America’s democratic institutions, as well as the public’s faith in democracy. It is not just that the collapse of local news has made it harder to hold any number of public officials accountable — contributing to general cynicism about the ability of government to do anything constructive — but that Americans increasingly lack the information they need to participate in the political process in their communities,” the writer comments.

As the Brookings Institution notes, as Americans have shifted away from local news, turnout in state and local elections has fallen and communities that have lost reporters have seen fewer candidates run for local office.

These are factors that should concern proponents of a vibrant democracy in Australia.

The stated purpose of the proposed *News Measurement Framework* is to contribute to ‘a robust evidence-base about the news media industry’ that will assist the Australian Government ‘to support policy interventions and inform longer-term considerations on media reform’.

The Consultation Paper notes that ‘Media diversity is a critical and longstanding objective of the Australian regulatory framework. The existing legislative scheme seeks to encourage the production and distribution of a wide range of information and viewpoints across the media market, while preventing any single media voice from exerting undue or unacceptable levels of influence over public discourse.’



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If that is the case, it has failed. There may be more noise online, but Australian media is more concentrated than ever.

While this submission identifies significant issues within the proposed Framework that need to be addressed, it nonetheless endorses the stated purpose of the Framework and the overall objective of ensuring Australians have access to a diversity of information and viewpoints from the broad range of Australian experiences, and of preventing any single news media outlet or owner from overly dominating the media landscape.

In addition to the mainstream voices of business, government and large NGOs, a diverse media is inclusive of the voices of, for example, First Nations peoples, people living with disabilities, people from lower socioeconomic groups, young people, senior Australians, LGBTQI Australians, and Australians from minority cultural and ethnic groups, and utilises these groups as sources and not just as the subjects of news stories.

Often, government avoids intervention in the media environment for fear of the political consequences of doing so, and the obvious potential accusations of interfering in free speech. However, ensuring a functioning, vibrant media environment is critical to democracy, and indeed recent legislative intervention in the form of changed media ownership rules, together with market forces, has reduced diversity rather than the other way around.

Changes to the Broadcasting Services Act in 2017 have accelerated the trend to concentration and closure.

The “two out of three” cross-media control rule was abolished as well as the “75 percent audience reach” rule.

There is no doubt that media ownership in Australia is highly and increasingly concentrated – just two owners are responsible for more than 80 percent (86%) of the circulation of all daily newspapers – an oligopoly, if not a monopoly.

From my own observations, having reported extensively in the US, the lack of local media means that political debate is had at the national level, without reference to local community impact, cost or benefit.

This is highly destructive, disconnects people from their government, and in some cases the void created sends people down the rabbit hole of conspiracy theories and makes them vulnerable to disinformation. The storming of the US Capitol in January 2021 was one example of this.



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Diversity is an essential underpinning element of a functioning democracy. It is therefore a core responsibility of the Australian Government to proactively intervene whenever and wherever regulatory reform is required in support of democracy.

It is this responsibility that justified the creation of the ABC and underpins current calls to restore and increase funding of the ABC. Given the decline in the number of professional journalists and local news outlets in Australia, and the growth of misinformation and disinformation online, the role of the ABC has never been more critical. The role of the Australian newsagency, AAP, is also critical to fact-based reporting in Australia and the region. News agencies are routinely partly or fully funded by governments around the world to provide a benchmarked newsgathering and factchecking service. The AAP falls into this category.

A proactive rather than reactive Government strategy is necessary, given the serious consequences of failure for our Australian democracy. This is particularly the case when instability and erosion of trust in leadership are likely to be compounded by forthcoming climate change impact in Southeast Asia, Australia and the Pacific.

These issues are intersecting and must be considered as such. Just as Australia seeks to be a regional leader in a geopolitical context, a strong, diverse and rigorous media can contribute to that leadership.

For this reason, investment in tools, such as a News Measurement Framework, which will allow ongoing tracking of performance and alert the Government to trends and changes, are required. In addition to enabling well-targeted media reform in a timely manner, such tools will provide the Australian people with an impartial, well-validated source of information about the news media.

This submission addresses the first six questions posed by ACMA:

1. Do you consider the framework, as outlined in the paper, would be an effective tool in measuring and tracking levels of media diversity in Australia?

There are significant problems with the proposed Framework which centre on a series of unusual and overly narrow definitions and measures applied within the Framework. As it stands, the Framework would be of limited efficacy as a tool for measuring and tracking media diversity. These problems include:

1.1. The word 'source' is used in the Framework in a way that is likely to create confusion. Within established journalistic practice, a source is a person, organisation,



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or record of some kind (e.g. informant, document, photograph, online post), that provides the information used by journalists in creating news stories.

This definition of the term is also an established usage within existing legislation, including in the recently passed *National Anti-Corruption Commission Bill 2022*, which refers to ‘the public interest in protecting the confidentiality of the identity of the journalist’s source’.

In contrast, in Appendix A of the consultation paper, the ACMA measurement of source diversity is a ‘count of all professional news outlets operating in Australia’. That is, rather than the sources used by news outlets, it is the news outlets themselves that are deemed to be ‘sources’. Indeed, the symbol used in Figure One to denote a ‘source’ appears to be a factory. If ACMA were to adopt this definition of ‘source’ then there is potential for the creation of confusion and a misunderstanding of ACMA reports, especially by the public who are likely to be most exposed to the headline findings without the detail.

1.2. The term ‘viewpoint’ is adopted by the Framework as an indicator of ‘content diversity’ and ‘civic journalism’. However, the proposed measure would be of the ‘number of sources quoted or interviewed in news articles’.

The first problem with this measure is that this is a different definition of ‘source’ to that described above, which creates a confusing inconsistency within the framework itself.

The second problem is that sources and viewpoints are not the same thing. The number of sources does not necessarily indicate the number of viewpoints. If the sources quoted are consistently drawn from the same narrow range of organizations and individuals, then the same or similar viewpoints are replicated and there is little diversity.

The comments section of Appendix A, related to ‘Range of viewpoints’, states that counting viewpoints is ‘an achievable and appropriate proxy for viewpoint diversity’. It may be an achievable measure but decades of content analysis of news stories does not support the argument that, on its own, it is a valid proxy. Research has found that the media tend to rely on a very narrow range of sources, to return the same sources repeatedly, and to systematically exclude certain types of sources while favouring others.



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1.3. Overall, the concept of ‘diversity’ itself has also been used in a way that diverges from common usages. For example, the basic Oxford definition of diversity is ‘a range of many people or things that are very different from each other’. In the Framework, the second half of this definition is absent, and ‘diversity’ has been narrowly redefined as meaning ‘many things’. As a result, the Framework measures only the quantity of news media outlets and the quantity of viewpoints, which are volume measures, not range measures.

Given that the Framework rests on the stated Government objective of ensuring ‘a wide range of information and viewpoints’ across media, it is essential that the Framework enables policy makers to assess whether such a range exists. It is also essential that the Framework identifies which voices are marginalised or excluded, which groups are spoken about rather than able to speak for themselves, and which perspectives on issues are absent from debates. On its own, a metric of the ‘average number of sources quoted or interviewed in news stories’ will not provide this information.

1.4. The Framework includes as a key focus, ‘civic journalism’, which it defines as ‘news of public significance’. The Framework does not, however, include any measures of civic journalism. It is listed under ‘range of viewpoints’, ‘consumption’ and ‘impact’ as an indicator but none of the associated metrics will measure whether news stories are of ‘public significance’. This absence will need to be addressed by the addition of an additional measure if the Framework is to provide any information about the level of civic journalism in Australia.

2. Do you consider the framework, as outlined in the paper, would be an effective tool in measuring and tracking the health of local news in Australia?

With the issues raised above in mind, the proposed measures of local content are less problematic. However, they will need to be reframed once these issues are addressed. One critical element included in the Framework is the ‘availability of journalists’. The rapid decline in the number of professional journalists employed by Australian news organizations speaks directly to the capacity of news media to cover stories of national as well as local significance. In the absence of journalists there is little capacity for news platforms to do more than simply amplify a story by a single journalist or replicate media releases.

A secondary issue is the definition of local content and the re-publication of content across multiple outlets in a single or multiple markets. This is an efficient use of resources for news



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companies, but it leads to homogenised content across print, online, radio and television outlets, often all owned by the same company unbeknownst to the consumer.

Would the average reader, viewer or listener in Melbourne, for example, know that 3AW, The Age and Channel Nine are the same company and understand, therefore, that the coverage they are consuming is via a single lens?

Equally, would those reading the online Southeast Leader, realise that it is owned by News Corporation, and is in effect rebranded content from the Herald Sun?

3. As detailed in our December 2020 paper, we proposed restricting the scope of our examination of the news market to 'professional' sources of news that can show a level of connection to Australia. This would include digital news sites, podcasts, and the social media presence of media outlets, but exclude sources of participatory journalism like personal blogs and community-run forums, as well as news from organisations without sufficient editorial independence, like advocacy groups. We also proposed excluding certain categories that, while important components of a diverse news environment (like standpoint diversity and having low barriers to news access), are not easily able to be measured and could constitute scope creep.

Do you agree with the proposed scope of the news market?

Given the fast-moving nature of changes in the news market in the digital age, the proposed scope of the news market should be seen as a starting point with ongoing reviews to ascertain what changes are necessary. Consideration should be given to the actual sources of news that are accessed by Australians as well as the development of new digital methodologies, particularly those that can be applied to qualitative content analysis. ACMA should remain open to developing or adopting such new methodologies.

One further point which relates to the preamble to this question. Reference is made to the exclusion of news from 'organisations without sufficient editorial independence' with advocacy groups given as the example. Exclusion from scope of the news feed of any organisation – be it a government agency, private company, NGO, or advocacy group – that is intended to promote only the viewpoint of that organization is unproblematic as such sites do not constitute news media. However, raising the issue of editorial independence leads directly to the question of how this is to be assessed and where the line is to be drawn. With the advent of syndicated sites such as the Breitbart News Network in the US, which purport to be news media but are highly partisan and have been responsible for



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actively spreading conspiracy theories and misinformation, thought will have to be given to how such sites are to be treated.

Further thought and consideration should therefore also be given to the definition of a journalist, as this goes to the effectiveness of legislation in protecting journalists interacting with whistleblowers or in receipt of national security information.

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

A number of significant issues with the diversity measures are discussed above and these issues will need to be addressed for the measures to be measures of diversity. As it stands, they do not measure diversity. As also mentioned above, localism also requires careful definition as news is increasingly homogenised and distributed on several platforms by the same company or companies.

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

The Framework requires the following changes:

- I. The adoption of standard and consistent nomenclature within the Framework.
- II. The word 'source' to be used only to denote the sources of information used by journalists in creating news stories.
- III. The word 'source' not to be used to denote news outlets. An alternative term, such as 'news outlet' should be used.
- IV. A qualitative measure of source diversity, which will inform us of the range of sources included and provide insights into which sources are absent or underrepresented.
- V. A qualitative measure of viewpoint diversity, which will inform us of the range of viewpoints included and provide insights into which viewpoints are absent or under-represented.
- VI. A qualitative measure of 'civic journalism', which will inform us of the extent to which news outlets cover 'news of public significance'.
- VII. A clear definition of what is meant by 'organisations without sufficient editorial independence'.
- VIII. A clear definition of 'localism'.
- IX. A definition of 'journalist'.



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

The relevance and efficacy of the Framework rests upon the methods that are deployed. Given that some of the flawed measures included in the Framework may have been selected because they are resource efficient, ACMA should remain open to developing or adopting new methodologies, particularly those that enable large scale qualitative analysis and/or are suited to the analysis of digital media.

More broadly it is clear that Australia's existing system of media regulation and oversight is neither fit for purpose nor serving the community.

Too few media organisations dominate the market. Convergence means that media organisations are no longer newspapers, radio, television or online.

They are news factories.

It is the government's responsibility to adapt the various frameworks to the evolving media environment to ensure diversity and rigour and to therefore support a robust democracy, and trust in it.

I will be available to answer any questions arising from this submission. My contact details are listed below. Thank you.

Sincerely,

A handwritten signature in cursive script that reads 'Zoe Daniel'.

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