

News diversity & localism measurement framework

Submission to the
Australian Communications and Media Authority

Friday 31 March 2023

[Public
Interest
Journalism
Initiative]

1 Introduction

The Public Interest Journalism Initiative (PIJI) welcomes the opportunity to make this submission to the Australian Communications and Media Authority's (ACMA) consultation on 'A new framework for measuring media diversity in Australia'.

PIJI strongly supports greater measurement and assessment of news production and consumption to assist understanding of the importance of public interest journalism and impacts on society in areas where it is diminished, and to act as an evidence base to guide new policy and assess existing policies and interventions.

We commend the Government's leadership undertaken through its regulator ACMA to develop a global best-practise framework that will gather and safeguard longitudinal data – data which is vital for evidence-based policy design and assessment in support of news as a public good.

PIJI is platform-neutral and size-neutral with respect to news supply. With no commercial interests, our activities focus on optimal fiscal and regulatory measures that will support a diverse news marketplace and enable news media to innovate, grow and serve in its role as a public good for the Australian community.

From next month, we will be releasing the next stages to of PIJI's news mapping and indexing research cited in ACMA's measurement framework consultation paper. We would be pleased to brief the ACMA the new data and to provide further written submission at that point.

In preparing the following comments, PIJI has been guided by key principles that inform all our work: to act in the public interest; to ensure plurality of news production and neutrality of support; and to be independent, practical and evidence-based in consideration of any options.

Our submission is structured as follows:

- Section 1 provides an introduction to the Public Interest Journalism Initiative and the principles that guide our work;
- Section 2 provides general comments to the consultation paper;
- Section 3 provides detailed technical comment on the proposed scope;
- Section 4 provides technical comment to the proposed key measures of diversity and localism, including responses to the discussion questions raised in the consultation paper;
- Section 5 outlines the intersections between PIJI research and the proposed framework;
- Section 6 points to priority data gaps for immediate consideration;
- Section 7 comments briefly on emerging technologies;
- Section 8 suggests further processes for the development and review of the framework;
- Section 8 summarises PIJI's key recommendations;
- Section 9 provides further information about the Public Interest Journalism Initiative;
- Section 10 address the preparation of this submission.

2 General comments

Public interest journalism is vital for a functioning modern democracy. All Australians deserve access to accurate, informed reportage of local, regional and national current affairs. International literature is clear: in those areas where local journalism is removed, there is a decrease in civic engagement and an increase in impost on the people, including for example, increase in rates and local charges. The link between quality journalism and accountable Government is irrefutable.

Public interest journalism plays a critical role in ensuring that the community is well, and fairly, informed through holding powers to account and providing a public record; for example reporting on courts and parliamentary sittings, advocating for social or policy changes and providing a forum for debate and discussion. It is also an essential part of keeping communities safe and resilient as we have seen through the increased frequency of bushfires, floods and drought.

At all levels, national news, regional news and local news serve these purposes.

PIJI strongly supports a better understanding of news production and availability across all regions of Australia. Our interest lies in the health of public interest journalism in Australia and the public benefit that it generates for all.

We welcome the recent policy announcements and Government investment. We see the creation of this news measurement framework as a critical step in developing longitudinal data that can help benchmark and assess the impact of different initiatives. PIJI's contribution as a platform-neutral and size-neutral entity with respect to news media production and availability research is advantageous in this regard.

Australians deserve to be able to contribute to the national debate on important matters. They deserve to be informed, challenged, and provided with important information in times of challenge (including natural disasters).

But Australian news media is at cross-roads. PIJI, through its Australian News Mapping Project, has demonstrated the stresses and challenges facing news media outlets that has resulted in over 400 changes in three years and a net loss of 121 news outlets¹ - a sharp acceleration from previous ACCC data that showed 106 news closures over a 10-year period (2008-18).¹

The macro settings for public interest journalism in Australia remain challenging and uncertain. Industry transformation continues amid a weakening economic climate and investment horizon. Advertising revenue remains a headline risk as news media companies compete for a significantly reduced market share compared to a decade ago². Commercial deals struck with digital platforms under the introduction of the News Media Bargaining Code start coming up for renewal from 2024. Coupled with rising overheads including electricity, shipping and printing (a specific issue in Australia's limited supply chain), broad cost cutting in news businesses seems

¹ Dickson G. 2022. *Australian News Data Report: December 2022*. Melbourne: Public Interest Journalism Initiative. <<https://piji.com.au/research-and-inquiries/our-research/anmp/>>

² Australian Competition and Consumer Commission 2019. *Digital Platforms Inquiry: Final Report*. Canberra: Australian Competition and Consumer Commission. <<https://www.accc.gov.au/system/files/Digital%20platforms%20inquiry%20-%20final%20report.pdf>> p. 18.

inevitable, and is reflected in recent announcements from News Corp,³ Paramount⁴ and Australian Community Media.⁵

Governments in western democracies around the world are grappling with long term solutions to the sustainability, diversity and plurality of news media for their citizens, and yet first we must we must understand the current supply and demand of news in order to address gaps and inconsistencies.

Guiding principles

Trying to measure news production and consumption is complex, particularly as the market continues to experiment, innovate and adapt in amongst rapidly changing economic, social, technological, environmental and political settings.

There are also significant incremental and incidental costs associated with data collection and maintenance, as well as regulatory and commercial considerations that must be taken into account.

While big data is everywhere its effectiveness is directly linked to its currency, consistency and practical application.

To help address some of these concerns, PIJI advocates a principles-based approach to the news measurement framework including its governance, mechanics and use. PIJI suggests the following set of principles, which we have used to guide the development of PIJI's mapping and indexing work, may also be suitable for adoption by the measurement framework:

- i. to act in the public interest
- ii. To ensure plurality of news production and neutrality of analysis
- iii. data that is independent, and
- iv. has practical application.

We also suggest the framework commits to:

- v. a principle of 'standardisation' or consistency, wherever possible in line with other recent legislative and regulatory instruments (ideally to enable global benchmarking), and
- vi. strong governance practices, including a scheduled review every two years to ensure the measurement remains fit for purpose.

The measurement framework should also ensure the integrity in its data collection processes through a clear articulation of the three key dimensions of data to be captured⁶, namely:

- volume (the amount of data);
- velocity (the speed of data capture and processing); and,

³ Buckingham-Jones S. 2023. Up to 200 jobs likely to go at News Corp amid strategy shift. *Australian Financial Review*. 12 March. <<https://www.afr.com/companies/media-and-marketing/up-to-200-jobs-likely-to-go-at-news-corp-amid-strategy-shift-20230310-p5cr65>>

⁴ Samios Z. 2023. Ten proposes cuts to redundancy, sick leave entitlements. *Sydney Morning Herald*. 13 March. <<https://www.smh.com.au/business/companies/ten-proposes-cuts-to-redundancy-sick-leave-entitlements-20230310-p5cr0r.html>>

⁵ Lynch J., Bold S. & McManus S. 2023. Media jobs on the line as ACM announces closure of four regional WA newspapers. *ABC News*. 28 March. <<https://www.abc.net.au/news/2023-03-28/acm-announces-closure-of-four-regional-wa-mastheads/102071302>>

⁶ Office of the Australian Information Commissioner, Guide to data analytics and the Australian Privacy Principles, 2018. <<https://www.oaic.gov.au/privacy/privacy-guidance-for-organisations-and-government-agencies/more-guidance/guide-to-data-analytics-and-the-australian-privacy-principles>>

- variety (the use of different data types and sources).

There is an immediate need for data to inform existing and future media policy. A staged build and review roll out may be the most practical approach to ensure the framework is fit for purpose and provides flexibility for some areas of data capture and analysis to be set aside for future consideration and/ or implementation.

Consideration is also needed on the appropriate long-term structures of data collection, analysis and ownership. As currently scoped, the framework appears to be designed as an aggregator with the flexibility to apply different treatments to different data sets. Some data will be commercially sensitive. Some data may not sit appropriately with a regulatory authority. PIJI strongly recommends that the ACMA undertakes further industry consultation on these key questions and on a roadmap to implementation once it has resolved the framework's final scope.

Throughout, PIJI remains committed to adding to the long term, evidence based assessment into the health of public interest journalism in Australia.

3 Detailed comment on proposed framework scope

The introduction of a news measurement framework marks an important step for evidence-based policy that recognises public interest journalism as a public good.

After decades of policy and regulatory fragmentation, it is also critical that major initiatives such as a news measurement framework create some standardisation on key definitions and eligibility criteria.

While by no means perfect, much of this work began through the development of the News Media Bargaining Code and should form a key starting point for the purposes of a news measurement framework. The Code has made significant contributions through its articulation of its professional standards test (editorial standards and editorial independence), content test (examining primary purpose and core news content) and the Australian audience test, many of which have direct relevance and/or application here, which we will discuss in detail below. But we must underscore that the key issue the Code seeks to address – namely a competition imbalance between digital platforms and news media – naturally excludes important parts of the news ecosystem, notably news wholesalers and start-ups, which clearly should not be excluded from a news measurement framework.

We also note that PIJ has developed a set of eligibility criteria and definitions that we have developed and implemented for the purposes of our news mapping and indexing work over the past 4 years. To be included in PIJ’s industry data, an eligible news outlet must meet each of the following criteria:

- (i) primarily and regularly produce original public interest journalism;
- (ii) and that such content is produced:
 - a. at a local, metropolitan, state or national scale, and
 - b. for a public audience;
- (iii) adheres to identifiable professional and ethical standards.

And where it meets the following definition of ‘public interest journalism’:

original content that records, reports or investigates issues of public significance for Australians, issues relevant to engaging Australians in public debate and in informing democratic decision making, or content which relates to community and local events.

With the above context in mind, we discuss key individual elements of the ACMA framework’s proposed scope in detail below.

3.1 Professional sources of news

The framework defines a ‘professional news organisation’ as one that:

- a. Maintains independence from those it covers
- b. Demonstrates a commitment to accuracy, transparency and journalistic ethics
- c. Is devoted primarily to reporting and publishing timely, originally produced news or informed opinion about people, places, issues and events.⁷

⁷ Australian Communications and Media Authority, News in Australia: diversity and localism – News measurement framework, 2020, p. 23

PIJI supports the proposed approach of limiting the framework's scope to professional sources of news, inclusive of the requirement for strong commitments to professional standards and ethical practice by the individual news outlet.

However, the drafting of the framework does not clarify whether the proposal requires a news organisation to meet each of the three criteria to be considered a 'professional news organisation', or only a subset. We propose that all three criteria should be satisfied.

Further guidance is recommended on the definition of a 'demonstration' of a commitment to accuracy, transparency and journalistic ethics. For example, is it sufficient that an outlet be a member of self-regulatory body like the Australian Press Council or Independent Media Council, or that they are committed to an official code of ethics registered with the ACMA? Does a news outlet have to demonstrate to the regulator or alternate authority how it has included the ethical standards of its commitment into its news production process to satisfy this expectation? Could a news outlet that is not a member of an external professional organisation demonstrate equivalent commitment through its own internal policies?

PIJI also recommends that a 'professional news organisation' should be a member of a recognised standards-setting body. In the era of AI and rising misinformation and disinformation, public trust in news media must be encouraged.

Further, the use of external complaints processes serves as an important public accountability mechanism and should therefore be included in this assessment of a commitment to professionalism. Many news organisations will have access to these procedures through their membership of standards setting bodies. Other media policy instruments, such as the eligibility criteria for the News Media Bargaining Code, should also reflect this standard.

PIJI will be adding new data to our Australian News Index in coming months that will show the number of news businesses and outlets that are members of standard setting bodies such the Australian Press Council, Free TV Australia, Commercial Radio and Audio, Community Broadcasters Association of Australia, Local and Independent News Association and Country Press Australia, which may better inform this discussion.

We note this strengthened criterion may provide a loophole for organisations looking to avoid assessment under the measurement framework by deliberately not joining a recognised standards-setting body. Similarly, we recognise that being a member of a such body does not automatically guarantee that a news organisation will act according to those standards, and that an organisation not currently a member of such a body, does not adopt comparable standards.

While beyond the outlined scope of a measurement framework, careful consideration needs to be given to these points. These professional standard elements are longstanding, contested issues in Australian media regulation, and yet they directly inform assessments of news supply linked against assessments of news consumption. The presence of consistent, high professional standards also enhance public understanding and trust in news media.

Finally, the type of business registration of a news outlet, for example incorporated entities and sole traders, could be considered as an additional criterion, and which again would provide consistency with the News Media Bargaining Code's criteria.

Recommendations:

1. Professional news organisations should meet all three of the listed criteria: independence from source, commitments to professional standards and a focus on core news.

2. Provide further guidance on the definition of a ‘demonstration’ of a commitment to accuracy, transparency and journalistic ethics.
3. Consider the requirement for a ‘professional news organisation’ to be a member of a recognised standards-setting body to help encourage public trust in news media.
4. The framework criteria recognise complaints processes as a necessary feature of a professional news organisation and that this criteria be incorporated into related policy instruments including the News Media Bargaining Code’s Professional Standards Test.
5. Consider adding business registration as an additional eligibility criterion.

3.1.1 Original news production

The proposed definition of a professional news organisation includes an expectation that the outlet ‘is devoted primarily to reporting and publishing originally produced news’.⁸ This is operationalised as a metric informing the ‘Local relevance’ indicator in the framework.

PIJI supports including the consideration of content originality within the framework as a measure to better understand the Australian news ecosystem and identify which news organisations invest directly in reporting, and which do not.

Originality studies provide more nuanced understanding of how information is produced and circulated within local news markets and challenge the assumption that the presence of multiple news organisations inherently means a diverse news ecosystem..

Furthermore, the recognition and promotion of original news content can serve as a partial proxy for the promotion of quality news content, a key characteristic of public interest journalism.

The method proposed,⁹ which is to count bylines from an outlet’s reporters, would seem an efficient way to capture a story that has been syndicated from a separate market, particularly for news organisations which simultaneously operate different outlets in cities and small towns within the same region. Australian Community Media’s hub-and-spoke approach to production, for example, sees extensive content sharing between large regional city papers (such as Bathurst’s Western Advocate) and smaller surrounding titles (such as the Lithgow Mercury, Oberon Review, Blayney Chronicle). This is common at a national scale too, for example, content sharing between The Age and Sydney Morning Herald, among ABC Local newsrooms, or between News Corp’s metropolitan mastheads and its major regional titles such as the Cairns Post.

The framework will also need to address the criteria for ‘original’ production in an industry where reporting often occurs as iterations of previous work. The byline approach would not provide useful data where a news outlet has aggregated other reporting from an external source, minimally rewritten it, and published under a new byline. This would seem to give a false positive for original content.¹⁰ However, a distinction can be made between this activity

⁸ Australian Communications and Media Authority, News in Australia: diversity and localism – News measurement framework, 2020, p. 23

⁹ Australian Communications and Media Authority, News in Australia: diversity and localism – News measurement framework, 2020, p. 35

¹⁰ Australian Communications and Media Authority, News in Australia: diversity and localism – News measurement framework, 2020, p. 35

and reporting by a secondary news outlet that advances the existing story and which may be appropriately considered as original work.

Story originality is not currently captured in PIJI's content assessment project, the Australian News Sampling Project, though an assessment is made of whether a story is internally or externally syndicated, republished from a third party, or sourced from creative commons or under another licensing arrangement.

Identifying the origin of news content can be very resource intensive and may be better suited to an occasional case-study approach rather than being incorporated into ongoing content assessments.

Given the above issues, PIJI recommends that further work be undertaken to identify an appropriate methodology to assess story originality.

Recommendations:

6. Content originality should remain as key measure within the final framework.
7. Consider the most appropriate methodology to assess content originality.

3.1.2 Community and Indigenous news

PIJI's news indexing includes news sources that have a 'community' geographic scale, ie. a news scale category below 'local' but that provide some public interest. It should be noted that PIJI's work does not include a 'hyperlocal' scale, and we do not consider the 'community' scale as analogous to 'hyperlocal'.

In the print and digital sector, the community category describes news sheets, newsletters and newspapers that tend to be non-commercial and produced by volunteers, sometimes without journalistic training, and covering hyperlocal issues such as social events, profiles of individuals in the community and local history. They are often produced by a local institution such as community centre or civic organisation and can be heavily reliant on local governments for budgets, printing, distribution and/or office facilities.

Related to this sector are newsletters produced by Christine Howes¹¹ for Aboriginal Shire Councils, such as the Palm Island Voice.¹² These newsletters provide information to the community in places that are otherwise lacking commercial publishers but do so on behalf of the local government.

It is likely that most community publishers would struggle to demonstrate their adherence to the proposed professional standards or may rely too heavily on financial and other support from local civic organisations and government to be considered truly independent. Some are not incorporated entities. Though PIJI considers this sector of the market to be an important source of community news,¹³ frequently operating in places or at a scale that could not sustain a commercial publisher, we recommend that where these outlets do not meet the professional

¹¹ Newsletters produced by Christine Howes. <<http://chowes.com.au/category/newsletters/>>

¹² Palm Island Voice. <<http://chowes.com.au/category/newsletters/palm-island-voice/>>

¹³ And worthy of investigation to better understand consumption of local information.

standards criteria (inclusive of PIJJ's additional criteria recommendations), and therefore, should not be included in the framework.

In PIJJ's broadcast data, the community radio sector is also categorised at a 'community' news scale. However, to exclude community radio would exclude news content produced by a mix of subject matter experts, volunteers, trainees, student and not-for-profit newsmakers who publish under the auspices of a recognised news organisation and its editorial process. Community radio stations are subject to professional standards of behaviour under their individual license agreements and the Community Radio Broadcasting Codes of Practice. Given the existence of these regulatory obligations specific to community radio, PIJJ recommends community radio stations be included within the scope of the framework.

It is likely community television stations would be similarly categorised to community radio, but we have not identified significant news production occurring at either Channel 31 Melbourne or Channel 44 Adelaide. As such, they do not currently appear in our [Australian News Index](#). If community television stations can meet the professional standards test, we recommend that they be included in the framework.

Recommendations:

8. Community publishers should be excluded from the measurement framework where they do not satisfy the professional standards requirements.
9. Community radio stations should be included in the measurement framework as they are subject to existing standards regulation through their license agreements.
10. Community television stations should be included in the measurement framework where they satisfy the framework's full eligibility criteria as they are also subject to standards regulation through their license agreements.

3.2 Hard and soft news

The framework uses a familiar distinction between 'hard' news and 'soft' news where hard news is defined as "timely, important, and consequential, involving topics like politics, economics, international affairs or matters considered to be in the 'public interest'", and soft news is defined as stories "more closely aligned to social or cultural news; these are 'lighter' in nature and typically have lower substantive informational value, covering topics such as celebrities, entertainment, lifestyle, sports or human-interest pieces."¹⁴

The proposed scope seeks to include both hard news and soft news, particularly "in recognition of the broader role of 'lighter' news in building social cohesion and community identity" and the "significant role in supporting the viability of commercial news outlets". News sources would be included so long as their "predominant purpose is to present factual, new information, analysis or discussion on current events, but not if their predominant purpose is to entertain."¹⁵

¹⁴ Australian Communications and Media Authority, News in Australia: diversity and localism – News measurement framework, 2020, p. 22

¹⁵ Australian Communications and Media Authority, News in Australia: diversity and localism – News measurement framework, 2020, p. 22

Since the concepts paper for this measurement framework was first prepared, the concept of ‘core news’ has been developed and adopted through the legislative passing of the News Media Bargaining Code. The legislation defines ‘core news’ as:

content that reports, investigates or explains issues or events that are relevant in engaging Australians in public debate and informing democratic decision making, or current issues or events of public significance at a local, regional or national level.

The eligibility guidelines developed by the ACMA to assist news businesses seeking registration under this Code clarify that this ‘core news’ definition includes traditional hard news subjects such as “public policy and government decision making at any level of government ... reporting on law and order, health, education, science, industrial relations and business.”¹⁶ Further, core news is said to capture soft news topics such as “reporting on community issues or events that are of particular importance or significance to the community” and therefore, is sufficiently expansive in its recognition of local news.¹⁷

Consequently, PIJl recommends that ‘core news’ replace the ‘hard’ and ‘soft’ news categories identified in the initial framework to ensure standardisation across Australia’s media policy. ‘Core news’ clearly includes traditional hard news subjects, and the ACMA’s guidance that it includes coverage of issues of local importance – which PIJl submits would include community events, history and local sport – meets the stated need to ensure that the social cohesion and identity functions of news are recognised.¹⁸

We also suggest that news organisations with a single issue focus, likely to be categorised as ‘core news’ – for example, coverage of climate change, health, or the economy, and presenting to a general audience, should be eligible for inclusion in the framework.

Recommendation:

11. The framework adopts the definition of ‘core news’ in place of the terms ‘hard news’ and ‘soft news’ that are already in use under Australia’s News Media Bargaining Code, to ensure standardised definitions.
12. Single-issue news organisations focussed on ‘core news’ topics should be eligible for inclusion in the framework.

3.3 Opinion

PIJl’s goal is to improve the sustainability of public interest journalism, by which we mean the reporting function of journalism. As such, the eligibility criteria for our Australian News Index and its associated research excludes opinion-based news outlets.

PIJl proposes that opinion pieces should not be included within the scope of the news regulatory framework. In our view, a healthy news market could operate without opinion media; but no healthy news market could exclude reporting media.

¹⁶ Australian Communications and Media Authority, News Media Bargaining Code guidelines, 2021, p. 14

¹⁷ Australian Communications and Media Authority, News Media Bargaining Code guidelines, 2021, p. 14

¹⁸ Australian Communications and Media Authority, News in Australia: diversity and localism – News measurement framework, 2020, p. 22

Nonetheless, we note that the definition of ‘core news’ adopted under the News Media Bargaining Code does include some opinion pieces “where it reports, investigates or explains issues that are relevant in engaging Australians in public debate and in informing democratic decision-making; or where it reports, investigates or explains current issues or events of public significance at a local, regional or national level.”¹⁹ Of course, distinguishing between different types of opinion pieces based on these definitions is potentially resource-intensive for the purposes of a measurement framework and may pose a practical barrier in itself.

However, if opinion pieces are to be included within the framework, we recommend that there be a clear distinction between outlets which have a primary purpose of reporting news, and those which have a primary purpose of producing opinion. Clear guidance would also be needed on the minimum threshold required to satisfy a ‘primary purposes’ test.

Recommendations:

13. Exclude opinion pieces from the framework.
14. If opinion pieces are to be included, a clear distinction is embedded in the framework between news organisations with a primary purpose of reporting news and news organisations with a primary purpose of producing opinion.

3.4 International sources

The framework proposes to assess international sources of news where they have a “significant local presence”, news agencies that employ local journalists on an ongoing basis even if they aren’t publishing news directly to Australia, or “if consumer research indicates a particularly high level of popularity, consumption or reliance among Australians.”²⁰

The example provided of an international news organisation with a “significant local presence” is The Guardian Australia. PIJl agrees that an organisation operating at the scale of The Guardian or Daily Mail should be included within the framework, but clearer guidance of what constitutes a “significant local presence” may be required. For example, the New York Times and Washington Post both have much smaller Australian bureaux and write primarily for an American audience but do maintain a presence. It is not clear whether these outlets would be covered.

Though it is appropriate to assess news agencies that operate in this country, it is not clear how newswires that do not directly provide news in Australia, such as Japan’s Kyodo News or Turkey’s Anadolu Agency, fit against the indicators of the proposed framework. These organisations are not likely to provide news for significant numbers of Australians, making it unnecessary to assess their contributions to availability of sources, number of owners, range of topics, local relevance, consumption or impact. It might be the case that the availability of journalists producing local news for Australians is affected by these agencies’ presence, but it is likely to be a negligible impact overall. If this segment of the market is to be assessed, PIJl suggests that more work will need to be done to develop appropriate indicators.

¹⁹ News Media Bargaining Code guidelines

²⁰ Australian Communications and Media Authority, News in Australia: diversity and localism – News measurement framework, 2020, p. 24.

The framework also proposes to include international news organisations that do not have a presence in Australia but which are heavily consumed by Australians. We submit that this is an unnecessary focus in the initial stages of the framework’s development and may be better suited for future consideration.

Since the framework was developed, the News Media Bargaining Code has introduced the Australian audiences test to determine eligible news businesses. The test requires applicants demonstrate to the ACMA that a news source “operates predominantly in Australia for the dominant purpose of serving Australian audiences.”²¹ This standard may have crossover relevance in terms of determining the scope of the framework.

Recommendations:

15. Develop appropriate indicators to assess newswires that do not directly provide news in Australia if this segment of the market is to be included.
16. Consider the inclusion of international news organisations in the future rather than in initial stages of the framework’s development.

3.5 Social media

The framework proposes that social media be considered as a distinct platform, with examination “limited to the posts of professional news outlets”.²² We understand this to mean that where a news organisation operates an eligible news outlet, its posts to social media platforms may also be included within the assessment.

On this interpretation, the framework would appear to exclude news outlets that only exist on social media and that might otherwise meet the professionalism requirements. The Daily Aus, for example, is based on Instagram and has a commitment to editorial independence from its funders²³ and to the General Principles of the Australian Press Council on its website,²⁴ though it does not appear to be a member.²⁵ It is not clear whether it produces original journalism or repackages aggregated content.

PIJI recommends that social media-based news outlets should be assessed on their adherence to the proposed professionalism standards like any other potential news producer under the framework, rather than be pre-emptively excluded.

Recommendation:

17. Include and assess news outlets that are social media-based and that meet the proposed professionalism standards, with consideration of a minimum threshold test.

²¹ News Media Bargaining Code Guidelines, p. 8.

²² Australian Communications and Media Authority, News in Australia: diversity and localism – News measurement framework, 2020, p. 25

²³ The Daily Aus. About Us. <<https://www.thedailyaus.com.au/about-us/>>

²⁴ The Daily Aus. About Us. <<https://www.thedailyaus.com.au/about-us/>>

²⁵ Australian Press Council 2022. APC Member Publisher Mastheads (alphabetical). <https://presscouncil.org.au/wp-content/uploads/2022/09/2022_09_06_Publications-Alphabetical_formatted.pdf>

3.5.1 Participatory journalism

The framework proposes that while “independent or hyperlocal sources of journalism that meet the definition of professional journalism” could be included within the framework, “participatory or citizen-led journalism sources, such as personal blogs, community-run Facebook groups or comments on social media” would be excluded.²⁶

Excluding social media comments and Facebook groups seems consistent with the proposed professional standards, but it is not clear why personal blogs would be inherently excluded if they are producing high quality original journalism that meets the professional standards and they operate under a registered business.

Similar to community publications discussed in section 3.1.2, the scale and operations of most personal blogs is too small for any regulatory obligation or reporting that may accompany inclusion in the framework. A minimum threshold test, as discussed in section 3.1, should apply.

Recommendation:

18. Include and assess personal blogs that meet the proposed professionalism standards, operate as a registered business and with consideration of a minimum threshold test.

3.6 News aggregators

The framework proposes that news aggregators such as Google News or Apple News should be included within the framework to future proof the approach to measurement.²⁷

If included, these services would be unique within the scope of the framework, as they themselves are not news producers but rather offer a digital distribution option for producers. No argument is made for why this specific section of the news distribution ecosystem should be part of the framework where other consumer access points such as newsagents, smart TVs, digital magazine platforms or audio and visual streaming services are not.

Research into consumer access to news is already a significant portion of the highly regarded, annual Digital News Report, produced by the University of Canberra’s News Media Research Centre in collaboration with the Reuters Institute for the Study of Journalism at the University of Oxford.

If consumer access to news through aggregators is to be kept within the framework, PIJ recommends the ACMA and News Media Research Centre explore the potential for data portability or expansion of the existing Digital News Report to maintain international benchmarking and standardisation.

Recommendation:

²⁶ Australian Communications and Media Authority, News in Australia: diversity and localism – News measurement framework, 2020, p. 23-24

²⁷ Australian Communications and Media Authority, News in Australia: diversity and localism – News measurement framework, 2020, p. 25.

19. Explore the potential for data portability from or expansion of existing consumption-based research for assessment of news aggregators and access to news.

3.7 Geography

News outlets produce stories that have inherent geographies, depending on the relative localism of the issue, the event, the place, or the people involved in the story. News outlets may themselves be considered to have a particular geographic scale depending on the predominant focus of their coverage. PIJI assigns one of the following primary coverage scales to each news outlet in the [Australian News Mapping Project](#):

- Community: news outlets of the smallest scale, that tend to be produced by volunteers or non-professionals, covering extremely local issues such as profiles of individuals, local events, and community history.
- Local: news outlets primarily cover a small geographic area, from a single town or local government area up to a sub-state region.
- Metropolitan: news outlets which have a coverage area which includes an entire capital city. News outlets in this category tend to cover news over a large geographic area and for a wide audience. Unlike local news outlets their coverage of any single place tends to be irregular. Some companies have outlets in both this category and related outlets at the local scale, reflecting both the city-wide and dedicated local coverage produced by the relationship of these outlets to each other.
- State/territory: primarily cover news from across an entire state or territory. Any local news tends to be reactive or illustrative of a larger issue facing the state or territory.
- National: tend to focus on news which affects the entire country, such as federal politics or the economy.

The ACMA framework proposes to consider news outlets at the local, state and national levels. PIJI recommends that consideration be given to including a 'community' scale to represent outlets below the local level, and a 'metropolitan' scale to represent those outlets covering an area larger than a town but smaller than a state.

Separately, we note that the framework proposes to consider the Australian Bureau of Statistics Remoteness Structure as part of its news sampling selection criteria. The Remoteness Structure divides local government areas into the following categories:

- Major Cities
- Inner Regional
- Outer Regional
- Remote
- Very Remote

PIJI also uses the Remoteness Structure for this purpose.

The framework currently does not have a clear definition of what constitutes a regional news outlet as compared to a metropolitan news outlet. This will need to be resolved, as the Print media platform identifies 'regional newspapers' as a distinct media source. For consistency's sake, using the Remoteness Structure would seem ideal; however, there are some inconsistencies between the classification and a general view of which local government areas are in the cities (Major Cities) and which are regional (Inner and Outer Regional, Remote and

Very Remote). As examples, Newcastle and Wollongong are Major Cities, while Hobart and Darwin would be regional under the framework.

PIJI recommends that the ABS Remoteness Framework is an appropriate starting point but may require revision to fit with the industry and the public's view of the difference between city and regional news outlets.

Recommendations:

20. Add geographic scales for community and metropolitan news outlets.
21. Develop a classification for city and regional news outlets based on a revised Remoteness Framework.

3.8 Non-English language news

The framework does not currently consider news organisations or outlets produced in languages other than English. PIJI recognises that data gathering, particularly content sampling activities, can be very resource intensive when dealing with linguistically diverse media, requiring dedicated expertise across potentially hundreds of different languages and cultural contexts. For these reasons, non-English language media is not currently included in PIJI's [Australian News Index](#).

We submit, however, that this sector is an important provider of news to many Australians, and that the inclusion of these news outlets should be prioritised.

A practical, cost-effective approach could be to begin by assessing non-English media only for inclusion in the proposed Local News Database, with further consideration given to content sampling in future iterations of the framework.

Recommendation:

22. Include linguistically diverse media within the Local News Database.
23. Consider linguistically diverse media content sampling at a future point.

4 Proposed key measures of diversity and localism

PIJI supports the proposed structure of the framework with its three core measures (news infrastructure, news output, news engagement), each informed by indicators and accompanying metrics.

We provide further comment below specific to individual measures, indicators, framing questions and potential methodology.

4.1 News infrastructure

4.1.1 Indicator one: availability of news sources

Framing question: how many sources of news and opinion are available to Australians?

The availability of sources indicator proposes to collect data about all professional news outlets operating in Australia, inclusive of particular operating characteristics: the media platform; place of publication/broadcast; frequency of reporting; pricing strategy; and target audience by geography.

Broadly, PIJI believes these metrics are appropriate to inform this indicator. PIJI's Australian News Index, the first national register of news production, provides much of the sought data so we offer and seek clarification on some of the proposed metrics to understand the exact intent and how it relates to PIJI's data (existing and in development), noting that PIJI's research has the potential to satisfy this indicator.

4.1.1.1 Media platforms

The 'media platform' of a news outlet is analogous to a media outlet's 'primary format' in PIJI's data: whether it publishes in print or online, or broadcasts on radio or television. The framework also includes 'digital platforms' as an online media platform, meaning an outlet's presence on third-party services such as social media or news aggregators.

As a subset of media platforms, the ACMA identifies 'sources': for example, the television platform includes the sources of national public television, commercial free-to-air television, pay television and community television. This is loosely comparable to what PIJI calls 'publication formats'. We will use the ACMA's terminology throughout this section.

Most outlets exist simultaneously on at least two media platforms – a traditional platform (print, radio, television) and online. PIJI records outlets against only one platform, and our approach to this has been to allocate each outlet according to their traditional platform where relevant, and to online only if the outlet was either founded as a digital publication first and later expanded into other platforms, or if it only exists online. It may be preferable to allow a news outlet to be recorded against multiple platforms simultaneously, though noting that this approach creates more data to maintain.

Digital media platforms

The media platforms, as proposed, separate 'print (online)', meaning news websites, apps and newsletters, from 'digital platforms (online)', meaning social media and news aggregators.

It is not clear why this distinction is made. It does not follow the established logic: where TV, radio and offline print have their own communication infrastructure with different access points for consumers, this is far less true for the difference between a website and a social media feed. It also introduces definitional confusion: some news publishers do not maintain a website but upload digital editions of their publications to a service like Issuu, the magazine aggregating platform, or reproduce only some of their digital edition on their website.

Including digital platforms as a distinct media platform may introduce considerable and unnecessary duplication in assessment. It may be likely that most news content on social media will be news snippets that are intended as pathways back to the outlet's main online presence. Content on news aggregators is likely to be an exact replica of what is provided on an outlet's website, and as discussed in section 3.6, we consider aggregators to be an unnecessary inclusion in this framework.

It is, however, important to include original content produced by social media-based news outlets, as discussed in section 3.5.

PIJI suggests that the media platforms Print (online) and Digital platforms (online) should be combined as a single 'Digital (online)' platform, which would include the sources news websites, apps, blogs and social media-based news outlets that meet the relevant standards criteria for inclusion.

Recommendation:

24. Combine the two online media platforms of 'print (online)' and 'digital platforms (online)' under a single 'digital' platform.

4.1.1.2 Media sources

The list of sources that the ACMA has devised for the framework appear to comprehensively cover news distribution channels and are likely to be broadly stable over time.

Regional newspapers

The print (offline) media platform includes a source for 'regional' newspapers. As discussed in section 3.7, the framework does not currently include a consideration of a 'regional' geographic scale nor a definition of what constitutes a regional newspaper as compared to a city one.

Podcasts

Podcasts are included as a source under the radio media platform.

This placement appears to suggest that the radio media platform is not limited to its historical industry but includes a broader capture of all audio news content. However, this logic is not consistent in other media platforms, for example, YouTube is considered an online source, not a digital extension of television; print news online is not considered analogous to print news offline.

Podcasts are also produced across different media platforms. The Australian and The Age, as examples, both produce podcasts; but should never be considered as operating on the radio media platform.

Separately, we also note that podcasts are not necessarily like-for-like with the other sources provided. Some podcasts may be the main output vehicle of a media organisation ie. long running, produced weekly, and providing original news and opinion content. Others are seasonal or one-off content and therefore, a much narrower part of an outlet's overall output. This latter group presents more like radio or television programming, or a special feature series at a newspaper, and takes the framework to a micro level not replicated at other sources.

For these reasons, the podcasts source could be shifted to a consolidated Digital media platform and further guidance developed to clarify the extent to which podcasts are relevant to

the overall aims of the framework, and consideration be given to the available data to support their inclusion.

Newsletters

Email newsletters are included as a source within the print (online) media platform. Newsletters, like podcasts, can be the main news source for some outlets, such as publishers operating on a platform like Substack. It is more likely, though, that a newsletter will be an aggregation of snippets of news content published on an outlet's main website.

It is likely to be difficult to gather and retain data about newsletters, as many do not exist in archives beyond the inboxes of their subscribers. PIJI recommends that further consideration be given to the extent to which newsletters are included within the framework.

Recommendations:

25. Podcasts as a source be considered as part of a consolidated digital media platform and that further guidance be developed to clarify the inclusion of podcasts in the framework.
26. Further guidance be developed to clarify the inclusion of newsletters in the framework.

4.1.1.3 Place of publication/broadcast

The wording of this metric offers multiple interpretations:

1. the place from which a news outlet is published or broadcast, meaning the office, printing facility or transmission infrastructure;
2. the geographic area that the news outlet covers; or
3. the geographic area in which the news outlet is distributed.

As the news infrastructure key measure is concerned with news production, we assume that the intention is number two, the coverage area; however, this may overlap with the metric 'Target audience, by geography'. The methodology for generating data for this metric is likely to overlap with indicator six, 'Local relevance' (discussed in section 0), and as such this metric may better inform that indicator.

PIJI's data includes a mixture of the second and third interpretations, depending on the availability of external data and the communication intention of the visualisation:

- The 'Publishers' function of the visualisation [Local News Producers](#), which displays print and online news producers, operates according to the second interpretation. The intent of this visualisation is to show which local government areas are reported on by a news outlet.
- Despite ideally sharing the same communication intent as in the first case, the 'Broadcasters' function of PIJI's Local News Producers visualisation operates according to the third interpretation. As discussed in section 6, PIJI does not have sufficient independent access to news content archives to be able to determine the actual reporting footprints of broadcast news outlets. As such, coverage assessments cannot be made, and PIJI's visualisation instead displays radio and television outlets by transposing their broadcast license areas onto local government areas boundaries.
- The visualisation [Tracking Changes in News Production](#) also operates according to the third interpretation, as the communication intent is to show where changes in the

market are most likely to be felt. This means that though, for example, the Maroondah Leader community newspaper may be centrally produced at the Herald Sun's office in central Melbourne, the impact of that newspaper shifting online impacts an audience in the eastern suburbs, and accordingly is rendered in Ringwood.

PIJI recommends clarification on the intended meaning of this metric, and how it intersects with the metric 'Target audience, by geography'.

Recommendation:

27. Clarify the intended meaning of the metric 'Place of publication/broadcast' and its distinction from the metric 'Target audience, by geography.'

4.1.1.4 Frequency of reporting

The name of this metric suggests a focus on the activities of individual journalists within an outlet – how often they go out to report. We assume, however, that the intent is to track the frequency of publication or broadcast: how many times each daily/week/month a news outlet provides news to its audience in the form of an article, newspaper, news bulletin or other.

PIJI does not currently collect this data in a systematic way, but it could be added as PIJI's data expands. We note that some outlets have inconsistent publishing schedules – owner-operator local newspapers, for example, are particularly vulnerable to missing editions. We have also observed that changes to publication frequencies are not well communicated to market by news organisations, and that it is particularly resource intensive to audit broadcast program scheduling where past schedules are not available for comparison and/or where news bulletins are not formally included in schedules.

4.1.1.5 Pricing strategy

It is not clear whether this metric will collect the price of the news product, the revenue models, or other data. Assuming that the intention is to collect the cost to the consumer, the relevant data here may be quite complex, needing to incorporate single-issue cover prices alongside monthly subscription fees, pay-per-article models, subscriptions that cover individual outlets and outlets across a broader group, soft paywalls and donations. There is also the possibility of partial subscription models: though we are not aware of an Australian outlet implementing multiple subscription packages, the New York Times offers either separate and bundled subscriptions to its news coverage, sport coverage, product reviews, cooking and puzzles.

PIJI does not currently collect this data, and we believe it would be very resource intensive to maintain. We also note that the consultation paper says that barriers to news access would be out of scope. With that in mind, it is not clear what purpose the pricing strategy metric serves.

If the intention is to collect the cost to the user and this metric is to be retained, it may be more logically located under indicator 7: consumption.

4.1.1.6 Target audience, by geography

PIJI recommends clarification on the intent of this metric and how it intersects with the metric 'Place of publication/broadcast'.

Recommendation:

28. Clarify the intended meaning of the metric 'Target audience, by geography' and its distinction from the metric 'Place of publication/broadcast.'

4.1.2 Indicator two: availability of journalists

Framing question: how many journalists contribute to the production of local news?

Even in a digital environment where news production can be centralised from hubs remote to any particular locality, PIJI believes that the location of journalists and other media workers is a critical indicator for understanding where news production is occurring and the health of local news markets. We are aware from our own²⁸ and other research²⁹ that editors report that staff shortages, particularly in regional local news, as a critical risk to business sustainability.

Perhaps because of this, we have found the numbers and location of journalists and other media workers is treated as commercially sensitive data, and industry has been broadly unwilling to provide such information even in aggregate terms. The Australian Bureau of Statistics collects occupation-level data through the census, but the five-year census cycles are too long to show the news industry's structural changes across that same period in a timely manner.

Casualisation and existing issues around defining journalists also complicate data collection: many part-time and freelance journalists, particularly in regional areas, are engaged in another job as their primary occupation and produce news as a sideline. They may not self-identify as journalists; or may not be considered journalists under some existing legislative definitions.

Other media workers essential for news production, such as editors, photographers, camera operators, engineers and producers, do not appear to be included within the consideration of the framework.

Finally, collecting data at the micro level of persons is difficult to maintain, and has privacy implications in communities where so few journalists are present that an individual might be identifiable in the data.

PIJI recommends that ACMA prioritise developing a methodology for the collection of reliable data about where media workers, defined broadly, are located as part of its broader efforts to develop the assessment framework.

Recommendation:

²⁸ Simons M., Dickson G. & Alembakis A. 2019. *The nature of the editorial deficit*. Melbourne: Public Interest Journalism Initiative. <<https://piji.com.au/research-and-inquiries/our-research/the-nature-of-the-editorial-deficit/>>

²⁹ Attard M., Dickson G., Jehangir A. & Radford T. 2022. *Regional News Media*. Sydney: Centre for Media Transition, University of Sydney. <<https://www.uts.edu.au/node/247996/projects-and-research/rural-and-regional-news>>

29. Prioritise the development of a methodology for the collection of reliable data about where media workers, defined broadly, are located.

4.1.3 Indicator three: number of owners

Framing question: how many people exercise control over Australia's most influential sources of news?

The framework proposes two metrics to answer the framing question: a count of the number of media network owners and controllers of 'the most popular and impactful professional news outlets across platforms', and a count of the number of media network owners and controllers 'of local news outlets in sample localities'.

It is not explained what a 'controller' of a media network is, as distinct from the owner/s.

It is also not clear what a 'media network' is or how it is different from a news controller, owner, organisation or news outlet. We interpret a media network to be a collection of news outlets, potentially owned by multiple news organisations but overseen by one entity: for example, McPherson Media Group (network) publishing multiple newspapers (outlets) in north/central Victoria and southern New South Wales, many of them individually incorporated (organisations). We note that this media network standard would exclude the largest volume of news businesses, particularly across regional local news: organisations that operate a single news outlet.³⁰

These metrics are also limited in scope: rather than applying across all professional news organisations: only the most 'popular and impactful' or local news 'in sample localities' will be included.

We assume that the media network, popularity, and sample localities concepts are intended to constrain the required resourcing to meet this indicator. PIJI submits, however, constraining collection in this way will lead to incomplete data.

This data is also already available: PIJI has collected news organisation data at a base level since the beginning of its news mapping work in 2020. This data is being greatly expanded in 2023, to introduce news organisations as separate entities listed within our database. using publicly available data from the Australian Business Registry. We are also in the process of investigating the integration of data from the Australian Securities and Investments Commission, Australian Securities Exchange and Australian Charities and Not-for-profits Commission.

Recommendation:

30. Data collection about media owners should be thorough and not constrained by considerations of impact or geography.

³⁰ Using PIJI data, a 2022 Centre for Media Transition report found that 81 per cent of local print and digital news businesses operate just one publication (228 of 280). Attard M., Dickson G., Jehangir A. & Radford T. 2022. *Regional News Media*. Sydney: Centre for Media Transition, University of Sydney. <<https://www.uts.edu.au/node/247996/projects-and-research/rural-and-regional-news>>. p. 21.

4.1.4 Indicator four: range of topics

Framing question: how much variety is present in Australia's news media market?

The framework proposes to count articles produced by local media sources and code for the topics and whether the article is a hard news topic or a soft news topic. It also suggests that the relationship between source diversity (indicator one) and content diversity (indicators four and five) could be assessed through this process, as could the amount of public interest journalism produced.³¹

PIJI conducts a content assessment of this kind through our Australian News Sampling Project (ANSP). Launched in August 2022, the ANSP targets a rolling selection of local government areas each month and captures print and digital news production within an assessment framework. As of 31 March 2023, more than 4,000 news stories published across 22 local government areas have been assessed.

The ANSP includes 130 different topics, and any single news article can be allocated to up to four. These topics are divided by whether, on PIJI's assessment framework³², they constitute public interest journalism (topics relating to government, courts and crime, public services and community) or if they do not (topics relating to arts and culture, national sport, food and fashion, property and other). As news stories can be coded against multiple topics, our method allows stories at the intersection of a hard news topic and a soft news topic to be counted as both: arts and culture may not be public interest journalism, but a story about the Federal Government funding for the arts would be.

Across the first sample periods, we have observed that public interest journalism production is present at some level in every community that we have assessed. There are two main caveats to this finding:

- Different news outlets display different editorial priorities, and it is relatively common for an outlet to focus on one element of public interest journalism rather than others, such as extensive community coverage with less focus on local government. Consequently, a consumer with limited variety in their news diet may not receive all the information available to them about their local area.
- Though public interest journalism as a whole is available in all of the markets we have sampled to date, we have consistently found court and crime reporting to be far lower than other topics and has been entirely absent at some outlets. This finding needs to be checked against the availability of news-generating events such as court proceedings to determine whether there were available stories that went unreported, but at this early stage we believe there may be particular undersupply of this content.

We agree that this is a highly relevant metric for understanding the news content variety available in particular markets. As discussed in section 3.2, we recommend moving away from the hard and soft news distinction and instead adopting the newer core news definition.

4.1.5 Indicator five: range of viewpoints

Framing question: how many viewpoints are presented in Australia's news media market?

³¹ Australian Communications and Media Authority, News in Australia: diversity and localism – News measurement framework, 2020, p. 51.

³² PIJI conducts periodic reliability testing on this project's coding.

The framework proposes to collect viewpoint diversity, meaning the inclusion of differing perspectives or ideas that suggest a news outlet is contributing to a pluralistic society.

PIJI does not currently collect viewpoint diversity as part of its sampling. We are aware that the broadcast sector is already required to present a diversity of viewpoints in current affairs programming, and we defer to the ACMA on the appropriate methodology for assessing compliance with that requirement and its applicability into print and digital media platforms.

We note that, *prima facie*, viewpoint diversity assessments seem highly subjective to the coder and the topic at hand, time-consuming to investigate, and may be difficult to incorporate into a quantitative assessment framework alongside range of topic or local relevance assessments. This indicator may be more suitably addressed through targeted case studies rather than incorporation across a large part of a market.

Recommendation:

31. Consider how best to assess viewpoint diversity through case studies versus incorporation across a large part of a market, noting the subjective and time-consuming nature of investigating this indicator.

4.1.6 Indicator six: local relevance

Framing question: to what extent does local news cover matters of local significance?

The framework proposes to assess not only the range of topics in news published and broadcast by local media sources, but whether that news is relevant to the local area in question. It proposes two metrics: a count of the articles that have a direct 'connection' to the local area, and a count of original stories as a percentage of total news output.

There is no simple existing definition of local that applies across different media platforms. As the framework states, the ACMA has an existing power to create geographic structures for the purpose of licensing television and radio operators; however, these areas do not always correspond to each other. There is no reason to expect that these areas have any bearing on the coverage of a news organisation or outlet that does not hold a broadcast license, and further, they are not well understood by the community and may not correspond to what a news consumer considers their 'local' area. This is most evident for television licenses that cover remote areas across multiple states and territories, but also includes licenses that cover entire metropolitan areas, including radio.

The framework suggests that an appropriate alternative geography for news coverage is a local government area, as these are likely to be understood by news consumers and allow for greater data portability between other related data sets, for example, the framework and the Australian Bureau of Statistics.

In the Australian News Sampling Project, for the reasons identified, PIJI also uses local government areas as the organising geography. One further benefit of this approach is that it ensures that coverage of local government, which PIJI considers a key indicator of the health of a local news market, can be neatly contained within each case study.

Beginning with the Australian News Data Report: February 2023, we have commenced sampling the coverage ecosystems of broader regions, being collections of local government areas that make up a commonly understood sub-region of a state. The first to be assessed in this way is

the Eyre Peninsula, South Australia, made up of the local government areas of Ceduna, Cleve, Elliston, Franklin Harbour, Kimba, Lower Eyre Peninsula, Port Lincoln, Streaky Bay, Tumby Bay and Wudinna. This region was chosen as it shares a common set of print and digital news providers. We expect to continue to identify similar regions for study in future sampling rounds.

At the time of submission, PIJI does not include radio and television broadcast news in its sampling due to a lack of available archive; but our approach would be the same: if the broadcast license area overlaps with the local government area that is being sampled, we would include the relevant outlets in our study.

When reporting results, we identify both the scale of the story on its own terms – whether it is primarily concerning local, regional, state, national or international issues – but also the localism of the story. This is akin to the ACMA’s proposed approach: whether a local story is local to the area being studied, or local to another area. As well as assessing whether a story is local to the area being studied, we differentiate between a story that might be local to a nearby area – a neighbouring local government area, or one commonly understood to be within the same sub-region – or from further afield. With this approach we seek to recognise that people’s lives are rarely contained within a single local government area, that audiences have legitimate interests in neighbouring areas, and therefore news coverage should reflect this.

4.1.6.1 Selection criteria for sampling

The framework lists six factors that should be considered when selecting an area for sampling:

1. Population, as larger communities are likely to be able to support larger and more robust journalism.
2. Remoteness, as communities located away from large urban centres are less likely to be serviced by national or state news media, placing greater importance on local ecosystems.
3. Demographic profile, as age is a significant factor in news consumption behaviour.
4. Socio-economic profile, as communities with lower levels of education and income are associated with lower news consumption, which is likely to impact local news viability.
5. The regulatory impact of local content requirements on broadcasters in the sample LGA.
6. A mix across states/territories and between urban/non-urban localities.

The framework does not suggest that only high-population communities should be studied, but that attention should be paid to the population as a relevant determinate to news production, and that a mixture of high and low population communities should be studied. This is true across the factors, where sampling from a diverse spread is proposed.

The framework proposes to use the Australian Bureau of Statistics Remoteness Area Structure in order to inform factor 2; this is the same approach adopted by PIJI in our research.

We agree with the described factors and submit two further.

7. The presence or absence of civic institutions in a local government area, particularly courts, hospitals, and universities. We submit that this is a relevant factor as the framework is concerned with the levels of hard news coverage that is locally relevant to the community; it is therefore important to consider whether a particular local government area contains the institutions that are likely to generate news coverage opportunities.

8. The recent history of natural disasters in a local government area, as PIJI believes that the role of news media as emergency infrastructure is an important function of local news ecosystems and worth consideration.

The framework also states that localities below 10,000 people would be excluded from examination. This limit is set to make the task of measuring local government areas more manageable and in recognition of the fact that smaller areas are less likely to be able to sustain commercial news organisations. The framework states that this would exclude almost half of all local government areas.

PIJI does not support setting a population threshold and considers examination of challenging news markets as essential to understanding the state of Australia's public interest journalism.

The proposed approach will have a disproportionate impact on rural and remote areas that are likely to be the most in need of dedicated attention.

By their nature, local government areas with small populations and few (if any) news outlets are not likely to be resource-intensive to study. Though they may struggle to support commercial news producers, we suggest that volunteer, not-for-profit and/ or publicly funded news outlets may be appropriate solutions for these small markets.

It is appropriate to consider the population size insofar as it informs comparative or market analysis, but population should not be a reason to exclude a local government area entirely.

Recommendations:

32. Consider adding two further factors as selection criteria: the presence or absence of civic institutions in a Local Government Area and the recent history of natural disasters in a local government area.
33. Remove the proposed population threshold which excludes sampling localities with populations below 10,000 people.

4.1.7 Indicator seven: consumption and indicator eight: impact

Framing question, indicator 7: what are the most consumed sources of news in Australia?

Framing question, indicator 8: what are the most impactful sources of news in Australia?

The framework proposes to assess the most popular sources of news by audience size and frequency of use, and the most popular sources of news by personal importance to consumers.

PIJI does not collect consumption metrics in our data projects. We note, however, that there is extensive literature on news consumption, including audited data from industry. The most relevant study would appear to be the global Digital News Report,³³ led in Australia by the News & Media Research Centre at the University of Canberra, which contains extensive data regarding consumer news behaviours and preferences.

³³ Park S., McGuinness K., Fisher C., Lee J. Y., McCallum K. & Nolan D. 2022. Digital news report: Australia 2022. Canberra: News & Media Research Centre, University of Canberra. <<https://www.canberra.edu.au/research/faculty-research-centres/nmrc/digital-news-report-australia-2022>>

We recommend that the ACMA explore whether data portability between the Digital News Report and other existing research may be sufficient to track these indicators, or where further data is required, it may be more practicable and efficient to commission additional research on specific metrics through that study, rather than duplicate effort

Recommendation:

34. Explore whether existing research may be sufficient to track the indicators 'Consumption' and 'Impact'.

5 PIJI research and the framework

PIJI's ongoing news mapping and index research directly relates to the proposed measurement framework and makes a significant contribution towards its implementation.

Our growing data collection and analyses about the news sector occurs through three major projects:

1. The **Australian News Index (ANI)**,³⁴ a national database of the domestic news market, which contains data about news outlets and organisations, publication formats and news scale; and
2. The **Australian News Mapping Project (ANMP)**,³⁵ a series of visual maps, which show the coverage and broadcast geographies of news outlets, as well as changes in news markets.³⁶
3. The **Australian News Sampling Project (ANSP)**,³⁷ an ongoing effort to understand the quantity, diversity and localism of public interest journalism being produced in local news ecosystems.

Monthly results from these projects are published in the **Australian News Data Report**.³⁸

The following table shows PIJI's research delivery against the metrics and indicators from the proposed framework and its outputs.

| ACMA research | PIJI research | | |
|--|---------------|-----------|---------|
| News measurement framework | ANI | ANMP | ANSP |
| Indicator 1: Availability of sources | Partial | Partial | No |
| Metric 1.1: Count of outlets by media platform | Yes | No | No |
| Metric 1.2: Count of outlets by place of publication/broadcast | Yes | Yes | No |
| Metric 1.3: Count of outlets by frequency of reporting | Potential | No | No |
| Metric 1.4: Count of outlets by pricing strategy | Potential | No | No |
| Metric 1.5: Count of outlets by target audience by geography | Potential | Potential | No |
| Indicator 2: Availability of journalists | No | No | No |
| Metric 2.1: Count of journalists and editors employed by professional news outlets | No | No | No |
| Indicator 3: Number of owners | Yes | No | No |
| Metric 3.1: Count of the number of owners of the most popular sources of news | Yes | No | No |
| Metric 3.2: Count of the number of owners of local news in sample localities | Yes | Yes | Yes |
| Indicator 4: Range of topics | No | No | Yes |
| Metric 4.1: Count of articles, by category or news topic | No | No | Yes |
| Metric 4.2: Count of 'hard' articles as a % of total output | No | No | Yes |
| Indicator 5: Range of viewpoints | No | No | No |
| Metric 5.1: Average number of sources quoted or interviewed in news articles | No | No | No |
| Indicator 6: Local relevance | No | No | Partial |

³⁴Australian News Index <<https://www.newsindex.piji.com.au>>

³⁵ Australian News Mapping Project: Local news producers <<https://www.localnews.piji.com.au>>

³⁶ Australian News Mapping Project: Tracking changes <<https://anmp.piji.com.au>>

³⁷ Australian News Sampling Project <<https://piji.com.au/australian-news-data-report/#ansp>>

³⁸ Australian News Data Report <<https://piji.com.au/australian-news-data-report>>

| | | | |
|---|----|----|---------|
| Metric 6.1: Count of news articles with a direct connection to a local area | No | No | Yes |
| Metric 6.2: Count of original news stories as % of total news output | No | No | Partial |
| Indicator 7: Consumption | No | No | No |
| Metric 7.1: List of the most popular sources of news by audience and frequency of use | No | No | No |
| Indicator 8: Impact | No | No | No |
| Metric 8.1: List of the most popular sources of news by stated reliance | No | No | No |

| Research outputs | ANI | ANMP | ANSP |
|-------------------------|---------|---------|---------|
| News diversity baseline | Partial | Partial | Partial |
| Local news assessment | No | No | Partial |
| Local news database | Yes | Yes | No |
| Local news online map | No | Yes | No |

The Australian News Index provides a comprehensive database of news sources across Australia. It partially meets indicator 1: availability of sources by collecting the metrics media platform and place of publication/broadcast. It meets and exceeds indicator 3: number of owners by containing data about the ownership of every news outlet of any scale within the database, with very few exceptions.

The Australian News Mapping Project provides an online map of news sources, drawing comprehensive data from the Australian News Index and showing changes to news sources overtime.

The Australian News Sampling Project meets indicator 4: range of topics through its focus on the subjects of news stories, and partially meets indicator 6: local relevance through an assessment of news articles for their connection to the local area. Though this project does not comprehensively assess originality, it does include an assessment of syndication, including internally-syndicated content,. This may be sufficient to meet the goal of the local relevance metric ‘Count of original news stories as % of total news output’. It partially fulfills the need for data on local news availability and the content produced within communities.

The Australian News Data Report partially meets the expected output of a news diversity baseline,³⁹ containing the number of news sources in different local government areas around Australia and tracking changes to the news market since 2019.

5.1 Upcoming releases and developments

PIJI adopts continuous improvement processes to our research, for example we are introducing a structured engagement framework to work more closely and regularly with industry on data development and beta testing through their representative peak bodies.

Upcoming additions and developments to PIJI’s data projects during 2023. include:

- Australian News Mapping Project:
 - Expansion of tracked market changes
 - Addition of relevant ABS data

³⁹ Australian Communications and Media Authority, News in Australia: diversity and localism – News measurement framework, 2020, p. 42.

- Australian News Index
 - News business data
 - Peak body membership data
 - Funding programs including Government, industry and philanthropic data
 - Other support program data
- A dynamic dashboard, showing key results from across the projects

5.2 Potential pilots

As PIJI continues to expand and scale our news data and analysis, we have identified a number of pilot projects with potential to inform the development of a news measurement framework.

The Australian News Sampling Project will be assessing local news content in 40 local government areas (LGAs) across 2023. This presents an opportunity to create three supplementary pilots that have direct relevance to informing framework design and methodologies:

Pilot 1: Content analysis resampling

Undertake a second assessment of local news content in a set number of LGAs⁴⁰ sampled within the past 12 months (October 2022 – September 2023). Such an analysis will create a benchmark to inform the design of future content analyses including the appropriate frequency for sampling.

Proposed timeframe: October – November 2023 (sampling); early 2024 (reporting)

Pilot 2: Automated content sampling and analysis

This pilot project involves exploration of the potential for automated content sampling and analysis through machine learning. The project would build bespoke digital tools to enable scraping of descriptive textual data to reduce coder labour. The project would then implement machine learning tools to perform computational analysis on subjective textual data, which would be conducted alongside human coding of the same news stories to allow for reliability assessments.

Proposed timeframe: Late 2023

Pilot 3: Economic analysis of local news markets

PIJI is currently developing a research project that will assess the economic and sociodemographic characteristics of news markets to model the health of local news. This work will provide both the news diversity baseline output and the local news assessment output.

Proposed timeframe: November 2023

5.3 Future iterations

Since launching the Australian News Mapping Project in early 2022, PIJI's research has expanded extensively. We have developed significant intellectual property and subject matter expertise in

⁴⁰ For example, 10 LGAs may be an appropriate sample number but will be dependent on the complexity of the selected LGA news markets and the required research resource. Sampling would need to take place in October- November 2023 or hold over to commence from February 2024.

news indexing and mapping, which will continue to grow over 2023 as we deliver new work under funding from the Government's News Media Assistance Program.

While PIJI was initially established as a limited life initiative, we recognise the ongoing – and increasing - demand for our independent comment and research. Consequently, we are currently reviewing potential future iterations such that PIJI can continue to add value to industry, government and the community in the protection, sustainability and diversity of public interest journalism.

6 Data gaps and further measurement

There are two major data gaps that will prevent the full implementation of the proposed framework.

The first is a lack of reliable, dynamic jobs data. As noted, the Australian Bureau of Statistics is the most comprehensive source of information about jobs but only collects occupation-level data via census every five years. The long cycle between data restricts market insights as the industry continues to change rapidly.

PIJI recommends that the ACMA prioritise the collection of jobs data as an area of immediate interest and study methods and metrics for jobs data in other industries to assess their applicability for the news industry.

The second major data gap is a lack of archival material from broadcast news producers. Radio and television news is not currently included within PIJI's Australian News Sampling Project as we have not found a way to reliably access broadcast news content. Some may have extensive video or audio archives on their own websites or streaming apps; others time-limit access to news broadcasts; but most – particularly in the radio sector – do not appear to make content available for remote access beyond the initial broadcast. The assessment of audio and visual content is also more time intensive (and therefore, costly) compared to text content.

For the purposes of the proposed framework, broadcast transcript archives would be the ideal data format. This is likely to be more cost effective than storing video and audio archives. Broadcast transcripts can be easily generated through existing AI tools and more easily used as an input for emerging machine learning technologies.

PIJI recommends that ACMA engage with the broadcast sector across media platforms and outlet scales to make transcripts of news content indefinitely available for research and public use.

Recommendations:

35. Prioritise the collection of jobs data and identify suitable methodology for the news industry.
36. Engage with the broadcast sector to build public archives of news content transcripts.

6 Emerging technologies

PIJI is proposing a pilot project to test the applicability of machine learning tools to our research (refer section 5.2) to produce time and cost, particularly in the scraping, identification and entry of descriptive data for the Australian News Sampling Project.

The pilot would also test if AI tools are capable of making subjective assessments of news content with comparable consistency to a human coder, an area of active interest.

7 Development and review of framework

Ongoing engagement with the news industry will be key to the rigour and veracity of a news measurement framework.

As the industry continues to evolve its thinking around the framework purposes, mechanics and applied use, it is important to ensure further opportunity for comment and feedback.

One option is to form an industry working group to advise the ACMA in its development of the framework. PIJJ would be pleased to be part of such a group,

Another option is simply a further round of consultation, or a ‘reply comment’ period as used in some international jurisdictions and that the ACMA is considering for its spectrum consultations.⁴¹ A 30 day reply period would allow industry to comment on other party’s submissions to this framework consultation paper. As ACMA notes the key benefit of this approach is that it allows both the regulator and industry to test notionally factual assertions and opinions.

Regardless of engagement method, PIJJ recommends that further consultation be made available to industry to engage on the measurement framework given the importance it has to their future businesses. Additional consultation may also assist industry to identify more quickly common points of agreement, as PIJJ observed during the development of the News Media Bargaining Code.

PIJJ also recommends that the framework governance practises include a scheduled review every two years to ensure the measurement remains fit for purpose with its focus on news as the public good.

A regular review mechanism also enables the facility to have stage additions to the framework that can be rigour tested and implemented in a timely and efficient manner.

Recommendation:

37. Undertake further industry consultation to confirm the framework’s final scope.
38. Once complete, schedule a review of the framework every two years.

⁴¹ “The key benefit of this approach is that it allows industry to test notionally factual assertions and opinions rather than this solely being the role of the regulator” <<https://www.acma.gov.au/consultations/2023-03/draft-five-year-spectrum-outlook-2023-28>>

8 Summary of PIJJ's recommendations

1. Professional news organisations should meet all three of the listed criteria: independence from source, commitments to professional standards and a focus on core news.
2. Provide further guidance on the definition of a 'demonstration' of a commitment to accuracy, transparency and journalistic ethics.
3. Consider the requirement for a 'professional news organisation' to be a member of a recognised standards-setting body to help encourage public trust in news media.
4. The framework adopts the definition of 'core news' in place of the terms 'hard news' and 'soft news' that are already in use under Australia's News Media Bargaining Code, to ensure standardised definitions.
5. Consider adding business registration as an additional eligibility criterion.
6. Content originality should remain as key measure within the final framework.
7. Consider the most appropriate methodology to assess content originality
8. Community publishers should be excluded from the measurement framework where they do not satisfy the professional standards requirements.
9. Community radio stations should be included in the measurement framework as they are subject to existing standards regulation through their license agreements.
10. Community television stations should be included in the measurement framework where they satisfy the framework's full eligibility criteria as they are also subject to standards regulation through their license agreements.
11. Single-issue news organisations focussed on 'core news' topics should be eligible for inclusion in the framework.
12. Single-issue news organisations focussed on 'core news' topics should be eligible for inclusion in the framework
13. Exclude opinion pieces from the framework.
14. If opinion pieces are to be included, a clear distinction is embedded in the framework between news organisations with a primary purpose of reporting news and news organisations with a primary purpose of producing opinion.
15. Develop appropriate indicators to assess newswires that do not directly provide news in Australia if this segment of the market is to be included.
16. Consider the inclusion of international news organisations in the future rather than in initial stages of the framework's development.
17. Include and assess news outlets that are social media-based and that meet the proposed professionalism standards, with consideration of a minimum threshold test.
18. Include and assess personal blogs that meet the proposed professionalism standards, operate as a registered business and with consideration of a minimum threshold test.
19. Explore the potential for data portability from or expansion of existing consumption-based research for assessment of news aggregators and access to news.
20. Add geographic scales for community and metropolitan news outlets.

21. Develop a classification for city and regional news outlets based on a revised Remoteness Framework.
22. Include linguistically diverse media within the Local News Database.
23. Consider linguistically diverse media content sampling at a future point
24. Combine the two online media platforms of 'print (online)' and 'digital platforms (online)' under a single 'digital' platform.
25. Podcasts as a source be considered as part of a consolidated digital media platform and that further guidance be developed to clarify the inclusion of podcasts in the framework.
26. Further guidance be developed to clarify the inclusion of newsletters in the framework.
27. Clarify the intended meaning of the metric 'Place of publication/broadcast' and its distinction from the metric 'Target audience, by geography.'
28. Clarify the intended meaning of the metric 'Target audience, by geography' and its distinction from the metric 'Place of publication/broadcast.'
29. Prioritise the development of a methodology for the collection of reliable data about where media workers, defined broadly, are located.
30. Data collection about media owners should be thorough and not constrained by considerations of impact or geography.
31. Consider how best to assess viewpoint diversity through case studies versus incorporation across a large part of a market, noting the subjective and time-consuming nature of investigating this indicator.
32. Consider adding two further factors as selection criteria: the presence or absence of civic institutions in a Local Government Area and the recent history of natural disasters in a local government area.
33. Remove the proposed population threshold which excludes sampling localities with populations below 10,000 people.
34. Explore whether existing research may be sufficient to track the indicators 'Consumption' and 'Impact'.
35. Prioritise the collection of jobs data and identify suitable methodology for the news industry.
36. Engage with the broadcast sector to build public archives of news content transcripts.
37. Undertake further industry consultation to confirm the framework's final **scope**.
38. Once complete, schedule a review of the framework every two years.

9 Appendix D: About the Public Interest Journalism Initiative (PIJI)

The Public Interest Journalism Initiative (PIJI) is a specialist think tank advancing a sustainable future for public interest journalism in Australia.

Through our original research and advocacy work, we seek to stimulate public discussion and establish optimal market pre-conditions in investment and regulation that will sustain media diversity and plurality in the long term.

PIJI is a [registered charity](#) with tax concession charity status. It is a philanthropically funded, non-profit company limited by guarantee (ABN 69 630 740 153) governed by a Board of independent directors, advised by an Expert Research Panel and Policy Working Group and regulated by the ACNC, ATO and ASIC.

Our evidence-based approach focuses on three key research themes into public interest journalism: assessment of diversity, community value and support, and investment and financial sustainability.

9.1 Board of Directors

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Virginia Haussegger AM (Deputy Chair)
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Professor Simon Wilkie

9.2 Policy Working Group

Richard Eccles (Chair)
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9.3 Expert Research Panel

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Professor Axel Bruns, Queensland University of Technology
Professor Andrea Carson, La Trobe University
Associate Professor Andrew Dodd, University of Melbourne
Professor Kristy Hess, Deakin University
Professor Sora Park, University of Canberra
Dr Margaret Simons, University of Melbourne
Professor Glenn Withers AO, Australian National University

10. Submission preparation

In the preparation of this submission, PIJl participated in each of ACMA's measurement framework workshops as well as conducting our own industry consultation. This consultation will continue past this submission date.

We thank the following organisations for their comment to date.

Alliance for Journalists' Freedom
Australian Associated Press (AAP)
Bass Coast Post
Country Press Australia
Community Broadcasting Association of Australia
Deakin University
Free TV Australia
Independent Australia
La Trobe University
Local & Independent News Association (LINA)
Melbourne Press Club
Northern Beaches Advocate
Queensland University of Technology
Special Broadcasting Service (SBS)
Schwartz Media
Solstice Media
University of Canberra
University of Melbourne
University of Technology Sydney

[Public Interest Journalism Initiative]

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