From: [redacted]
To: [redacted]
Subject: FW: Summary of ABC submission in response to "Sacrifice" preliminary report [SEC=OFFICIAL]
Date: Monday, 15 June 2026 4:36:59 PM
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
BI-753 - Preliminary Investigation Report (for ABC comment).pdf

---

OFFICIAL

FYI.

OFFICIAL

From: [redacted]
Sent: Monday, 15 June 2026 4:36 PM
To: Carolyn Lidgerwood <Carolyn.Lidgerwood@acma.gov.au>
Cc: DL - Autumn Field & Assistant <DL-AutumnfieldandAssistant@acma.gov.au>; DL - Alana Fraser & Assistant <DL-AlanaFraser&Assistant@acma.gov.au>
Subject: RE: Summary of ABC submission in response to 'Sacrifice' preliminary report [SEC=OFFICIAL]

Hi Carolyn

Here is the preliminary report we sent on 20 April 2026.

We sent it with the standard email text indicating the preliminary view and asking for their submissions on the findings before a final investigation decision is made. Let me know if you would like the original email or anything else and I will send it through.

The team is currently reviewing the preliminary report and considering amending some of the wording to reflect the ABC's submission, but we don't expect it to materially change the findings. Keen to hear your thoughts after you have the chance to discuss it with Nerida.

Thanks, [redacted]

From: Carolyn Lidgerwood <Carolyn.Lidgerwood@acma.gov.au>
Sent: Monday, 15 June 2026 4:08 PM
To: [redacted]
Cc: DL - Autumn Field & Assistant <DL-AutumnfieldandAssistant@acma.gov.au>; DL - Alana Fraser & Assistant <DL-AlanaFraser&Assistant@acma.gov.au>
Subject: RE: Summary of ABC submission in response to 'Sacrifice' preliminary report [SEC=OFFICIAL]

OFFICIAL

Sorry for the delay in responding to you [redacted].

I looked at this quickly when you sent it (but then I started losing the will to live … sorry).
But now I am back into it, I am cheered by your observation at the end of your email below '… *the submissions do not change our overall findings'*.
I don't seem to have what we sent to the ABC (only a draft that I commented on) – would you mind sending that to me so that I can aim to discuss with Nerida in our scheduled meeting tomorrow morning? Thanks! Will circle back after that. C

OFFICIAL

From: [redacted]
Sent: Friday, 5 June 2026 8:52 AM
To: Nerida O'Loughlin and Assistant <NeridaOLoughlinandAssistant@acma.gov.au>; DL - Carolyn Lidgerwood and Assistant <DL-CarolynLidgerwoodandAssistant@acma.gov.au>
Cc: DL - Autumn Field & Assistant <DL-AutumnfieldandAssistant@acma.gov.au>; DL - Alana Fraser & Assistant <DL-AlanaFraser&Assistant@acma.gov.au>; [redacted]
Subject: Summary of ABC submission in response to 'Sacrifice' preliminary report [SEC=OFFICIAL]

OFFICIAL

Good morning, Nerida and Carolyn

Further to earlier discussions about the ABC submission in response to the preliminary report on *Four Corners* 'Sacrifice', the team has prepared an outline of the submission from the ABC. We have also provided some key thoughts about the submission that might be worth discussing in a meeting between the Chair and the ABC.

Summary of ABC submission

- The ABC provided a submission from ABC Editorial Director Mr Gavin Fang and a separate submission from ABC Ombudsman Ms Fiona Cameron.
- The ABC welcomed the ACMA's findings with regard to the accuracy provision of the Code. These were no breach findings.
- The ABC has challenged the ACMA's breach findings under the impartiality provision of the Code.
- Primarily, the ABC has argued that 'the draft finding also fails to take into account the factors required when assessing due impartiality. The Code says that it is to be interpreted "with due consideration of the relevant principles outlined in the Editorial Policies, and any associated guidelines"'.
- Accordingly, the ABC has provided a submission that assesses the allegations against principles of its editorial policies.
- The ABC's key concerns with the breach findings are summarised below.

Allegation that the ACMA assessed in the preliminary report	**The ABC editorial submission** 260522_ABC letter and response to ACMA RE prelim finding Four Corners Sacrifice.pdf	**ABC Ombud key considerations** 2026-05-22_Ombudsman's letter to ACMA_v1.0.pdf
Allegation 2.1: That the	The ABC stated that the	The ACMA placed undue

Program's framing of the ANAO report breached the impartiality provision of the Code	ANAO finding was clearly and prominently reported and the overall findings were accurately and fairly presented.	reliance on the ANAO's "audit snapshot", which I note ACMA both cited and extracted material from in its reasons. Regrettably, the chevrons used in the one-page snapshot do not differentiate between the overarching finding and the supporting findings when the body of the ANAO report clearly does. Having fairly presented the ANAO's overarching finding, the program was entitled to probe into these deficiencies in the public interest and thereby discharge the essential accountability function that investigative journalism serves.
Allegation 2.3: The Program's interview with Mr Anderson on the consultation process was not presented with due impartiality	The ABC stated that the ACMA has underestimated the ordinary reasonable viewer and did not take into account the reporter's accurate explanation for an issue.	ACMA seems to suggest that the voiceover should have specified that Mr Anderson was limiting his remarks to the second stage consultation process and that not doing so confused the viewers' understanding of the process. However, the program presented a fair edit of the exchange and then set out the results of each consultation stage. It was not up to the program to speculate on how Mr Anderson framed the consultation process in order to achieve impartiality.
Allegation 2.5: The ABC failed to provide opportunities for principal relevant perspectives to be expressed	The ABC submitted that expert views included that were critical of the AWM were all editorially relevant, had different expertise and different knowledge. Impartiality is not achieved by adding up interview times.	Notes that the ACMA extracted excerpts of the ABC Ombudsman's report and requests that the ACMA restore the full meaning of this report.

Allegation 2.6: The leading nature of the questioning, the nature of the interviews, the variation in the treatment of the interviewees, and the language and tone used in the Program would have likely led an ordinary reasonable viewer to conclude this was not an impartial program.	The preliminary report does not identify any leading questions to substantiate its finding or substantiate any other evidence of bias of the reporter. … All interviews were civil and fair.	To the extent that ACMA's finding at 2.3 already impugned the program's approach to dealing with Mr Anderson, this finding is also duplicative in a way that, in my view, is unfair to the program. Finally, I note with concern ACMA's frequent and highly critical references to the lead reporter, some of which appear to amount to unsubstantiated allegations that impugn his personal and professional integrity. I recommend that, as the ABC has requested in its submission, all references to the reporter be replaced with references to the program or program team.



Next steps
Please let us know once you have had the chance to consider this material, and if you would like us to set up a meeting with the ABC.

Thanks,

Manager
Content Investigations section

Australian Communications and Media Authority
[redacted]
acma.gov.au

The ACMA acknowledges First Nations peoples as the Traditional Owners and Custodians of Australia. We respect and celebrate First Nations peoples as the original storytellers and content creators of the lands on which we work and honour the enduring strength and commitment of Aboriginal and Torres Strait Islander peoples to the land, waters and their communities. We pay our respects to Elders past, present, and emerging.

OFFICIAL

OFFICIAL