Pre-Budget Submission
2024/2025 Budget

Submission by Croakey Health Media
to the Department of Treasury
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1. Overview

Croakey Health Media appreciates the opportunity to contribute a pre-budget submission to inform the Government’s decision-making for the 2024-2025 budget. We appreciate the deadline extension, in recognition of our constrained financial situation (as outlined further below).

We make this submission in a dual capacity: as an independent media organisation with a direct and urgent financial interest in various budget outcomes; and as a public health news organisation that advocates for and reports on public interest journalism as an upstream determinant of the health of individuals, communities, Country and societies.

This submission is relevant for:

• The Department of Treasury
• The Department of Finance
• The Department of Infrastructure, Transport, Regional Development and Communications
• The Department of Health and Aged Care

Urgency

Croakey Health Media plays an important and unique role in the Australian media ecosystem and also has global reach and influence (see more details of our impact here: https://www.croakey.org/impact-and-readership/). We are told by a variety of influential sources that our work is useful in informing policy, education, practice, research and communities about critical health matters. However, our financial sustainability is precarious.

On 8 February, 2023, we wrote to the Minister for Communications, the Hon Michelle Rowland MP, advising that we were in a perilous financial situation and that our operations were at risk. We put forward a range of recommendations that would have been useful for CHM and other independent media organisations that are struggling. During 2023, we approached relevant government departments to request consideration for a small proportion of government advertising. To date, we have not had a helpful response from government. We have been operating on a month-by-month basis since February 2023. We know from discussions with other publishers that others are also facing significant challenges, with the threat of closure of titles.

We are sharing the details of our precarious financial situation in order to underscore the urgency of the need for support to sustain existing public interest journalism publishers. Croakey Health Media and many other independent news organisations did not benefit from the News Media Bargaining Code. Further we note that the Code has probably undermined media diversity in this country and had a number of other unintended consequences, including through reducing public access to news on Meta platforms, due to their subsequent de-incentivisaton of news-sharing. For more information, please see our 2 April, 2024 submission to the ACCC consultation on the Code, which calls for an urgent, independent review of the Code to be undertaken that centres its impact upon media diversity, and the supply of public interest journalism, especially to under-served communities and populations, and in relation to the spread of misinformation and disinformation. “If the Code is indeed
discouraging digital platforms from sharing news, this is a problem for media sustainability, democracy, and for tackling the spread of misinformation and disinformation,” our submission to the ACCC states.

The urgency of the matters at stake relates not only to the sustainability of organisations like ours. As democracies and societies around the world are undermined by coordinated and polarising disinformation campaigns, it is increasingly urgent that governments play their part in supporting a diverse and thriving news and media ecosystem. We note that a similar point was made in LINA’s submission to the News MAP consultation, which stated: “The COVID-19 pandemic and the referendum on an Aboriginal and Torres Strait Islander Voice to Parliament provide recent examples of matters impacted by coordinated mis-and disinformation campaigns which have affected the health and social cohesion of Australian society.”

While Croakey Health Media is advocating very strongly for assistance for independent media, as an organisation whose strategic plan recognises the importance of public interest journalism for the health and wellbeing of communities (https://shorturl.at/ekHV4), we encourage the Government and relevant departments to recognise the right of all Australians to have access to public interest journalism – as both contributors to news and consumers of news. It is also important to recognise that people do not have to be involved in the news process, as either contributors or consumers, to derive benefits, for example, through greater accountability of corporations, governments, and other power-holders.

When news and media organisations close, a wealth of accumulated human capital and knowledge is lost and cannot be quickly or easily rebuilt. We urge the Government to ensure funding in the forthcoming May Federal Budget to sustain independent media that is commensurate with the scale of the crisis facing public interest journalism, at a time when misinformation and disinformation are recognised as some of the most significant global threats (https://www.croakey.org/new-reports-identify-big-picture-challenges-for-health-locally-nationally-and-globally/).
2. Three key recommendations

We have three specific requests that will improve the sustainability of Croakey Health Media, in the short, medium and longer term, and also benefit other independent media publishers, as well as communities who are currently under-served by public interest journalism.

1. Immediate assistance through government advertising commitments

We appreciate the Government’s work in developing the News Media Assistance Program (News MAP); however, this is unlikely to provide funding in time for many media organisations that are struggling, and emergency, interim arrangements are required to support the sustainability of public interest media organisations that are struggling. By directing a proportion of government advertising to independent media organisations, the Government could make an immediate impact upon media sustainability and diversity.

At CHM, our preference for immediate support would be in the form of a two-year advertising arrangement with relevant government departments, such as health and aged care. This arrangement would make a real difference to our sustainability in the short term.


2. Expedite approval of a standalone DGR category for public interest journalism organisations

We support recommendations from the Productivity Commission’s ‘The Future Foundations for Giving Draft Report’ to create a DGR category for public interest journalism, and have urged that this be a standalone category. We join with our colleagues at the Local and Independent News Association (LINA) in urging the Government to act on that recommendation quickly.

Implementation of a DGR category for public interest journalism in 2024-2025 would make a real difference to our sustainability in the medium term, and bring wider benefits for communities now underserved by public interest journalism.


3. Develop a policy framework to support and grow NFP public interest journalism sector

We reiterate the recommendations outlined in our 2023/2024 budget submission for development of a policy framework to support and grow the not-for-profit public interest journalism sector in Australia, with a particular focus on meeting the needs of under-served communities and topics.
Developing this framework would make a real difference to our sustainability in the longer term, encourage media innovation, and bring wider benefits for communities now underserved by public interest journalism.

The framework could include:

- A clear, transparent, equitable pathway for appropriate entities to set up as a NFP public interest journalism organisation with DGR status, meeting criteria for editorial independence and ethical professional practice. It would be important to have a rigorous review process to ensure that applicants are not serving commercial, partisan or other sectional interests.

- Support for a peak body to represent and support growth and sustainability of this under-developed sector, including support for the many small outlets that now exist that might opt for NFP structure if it was more accessible and affordable. Initially, this could be done through an existing entity, such as the Local and Independent News Association (LINA).

- Government to identify a percentage of funds from Government advertising and other campaigns to be allocated to NFP public interest journalism organisations. It is suggested that the percentage of funds allocated commence at 0.5% and rise to 2% over the budget forward estimates.

- Initiatives to encourage philanthropists and other potential funders to consider supporting NFP public interest journalism models, and to encourage public awareness of the benefits of NFP models.

- The Government’s planned framework on media diversity should include data on the NFP sector, with diversity of business models being considered as one of the measures of diversity.

- The NFP sector should be eligible for all support programs for journalism and media organisations, with a specific funding pool established for the NFP sector.
3. About Croakey Health Media

Croakey Health Media is widely recognised as an innovator and leader in the emerging not-for-profit public interest journalism sector in Australia (Public Interest Journalism Initiative, 2021). We are innovative in our organisational structure, blended funding model and development of the practice of social journalism (Sweet et al, 2017). We focus on health equity, and the social, cultural and environmental determinants of health, including climate change. The voices and expertise of Aboriginal and Torres Strait Islander people are foregrounded through our work, including through our governance. Our board is chaired by leading Aboriginal scholars, Professor Bronwyn Fredericks (University of Queensland), and James Blackwell (ANU). Croakey Health Media Limited was registered on 24 August 2018 as a member-based company limited by guarantee, after evolving since 2007 as an independent journalism project. The ABN is 59 628 369 335 and the company is registered for GST.

Due to the lack of a clear pathway for public interest journalism organisations to establish as not-for-profit entities, Croakey Health Media is registered with the Australian Charities and Not-for-profits Commission (ACNC) as a charity under the subtypes of Advancing Health and Advancing Public Debate. We have not been able to obtain DGR status, reflecting the lack of a transparent, equitable pathway for NFP public interest journalism organisations to do this. We have made a number of unsuccessful applications for DGR status, and have recently lodged another application. Not having DGR status has been an obstacle to our capacity to raise funds and to our efforts to become more sustainable.

Croakey Health Media’s public interest journalism activities are supported by a blended funding model, including sponsorship, donations, subscriptions, the provision of professional services, advertising, and paid journalism activities, including the Croakey Conference News Service. Our funders and supporters include leading health organisations. We have firm policies on editorial independence and these are communicated to funders.

As an organisation, one of our five strategic priorities is to create a sustainable environment for public interest journalism, acknowledging the vision outlined in our strategic plan, that “a vigorous and sustainable public interest journalism sector contributes to the health and wellbeing of people, families, communities, policies, societies and the environment”.

We advocate for policy reform to support a sustainable public interest journalism sector, through making submissions, and through journal and book publications, research, and presentations to conferences. We are also proactive in engaging with other public interest journalism publishers and organisations to help build momentum for better policy to support public interest journalism. Croakey Health Media is a member of the Local and Independent News Association (LINA). Our members belong to various professional organisations, including the Media, Entertainment and Arts Alliance.

We work to increase public awareness of the challenges facing public interest journalism and its important role for the health of communities, policies and democracy. Journalistically, we cover public interest journalism as a critical determinant of health. See our archives on public interest journalism as a determinant of health.

See Croakey Health Media’s previous submissions to inquiries on media policy and related (2017-2024).