

30 April 2018

Hon Clare Curran
Minister of Broadcasting, Communications and Digital Media
Parliament Buildings
Wellington

Dear Minister,

Recommendations of the Ministerial Advisory Group on the Allocation of New Funding for Public Broadcasting

The Ministerial Advisory Group: Allocation of Funding and Role of a Public Media Funding Commission (the Group), has been working to provide you with independent advice on the matters set out in the establishing Terms of Reference.

Attached is our report advising on the allocation of new broadcasting funding for the 2018/19 financial year. The report focuses specifically on the allocation of funding between New Zealand On Air (NZ On Air) and Radio New Zealand (RNZ). In considering this we have undertaken an evaluation of both entities. We are pleased to report that both organisations appear to be acquitting themselves well with strong support across the sector.

This is a first stage report and only considers funding allocation. We are yet to conclude our consideration of the functions, role and scope of a potential Public Media Funding Commission, alternatives to it and its establishment. We will provide a further report on this in June 2018.

We would like to record that both NZ On Air and RNZ have been helpful and constructive in their approach to our deliberations. They have supported the Group to reach viable, practical recommendations in a timely manner.

We wish to note that it became apparent in our conversations with sector participants and stakeholders that a new full-service RNZ+ public television channel is not supported. There was, however, strong support across the sector for allocation of funding to improve RNZ's radio and online content, as well as the "RNZ with pictures" style content on its existing Freeview channel.

We hope the report and its recommendations constructively contribute to your objectives as Minister of Broadcasting, Communications and Digital Media.

We thank you for the opportunity to participate in this interesting and important work.

Yours sincerely

Michael Stiassny
Chair
Ministerial Advisory Group

Allocation of Broadcasting Funding for Financial Year 2018/19

Recommendations of the Ministerial Advisory Group

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Executive Summary

Background

In February 2018, the Minister of Broadcasting, Communications and Digital Media announced the establishment of the Ministerial Advisory Group to provide independent advice on allocation of funding and the role of a Public Media Funding Commission.

The Group was established with a Terms of Reference that outlined the Minister's objectives for public media in New Zealand and set out the functions for the Group. This report provides analysis and recommendations on the allocation of funding for the 2018/19 financial year.

Context

Media organisations globally are facing unprecedented challenges as international technology giants, such as, Google, Facebook, Netflix and Amazon dominate audiences and advertising revenue. This pushes the entities into highly commercial "clickbait" and "lowest common denominator" behaviour to keep eyes on screens. New Zealand's small population sharpens these pressures. This, in turn, makes the value of government-funded public media greater than ever.

Māori media funding has a Te Reo focus and through that, contributes to the preservation of Māori culture. Māori culture is critical to our identity. As is Pacifica; New Zealand, as home to such a broad range of Pacifica people has an opportunity and an obligation to be the future keepers of Pacific culture, perspectives, history and traditions.

A New Zealand without RNZ and NZ On Air is a very bleak prospect to contemplate. The impact on national identity and the health of our democracy would be drastic. It is essential that these two public media entities are funded to a degree that keeps them functioning healthily in the current media environment.

Publicly funded media is the best way to keep our national identity. ***Once it is lost it cannot be regained.***

Analysis

The Group has focussed primarily on the potential for greater public media contribution from RNZ and NZ On Air, while taking into account the roles of Television New Zealand, Māori Television and Te Māngai Pāho and considering the context of an increasingly fragmented media environment.

In preparing the report we studied the New Zealand media environment and researched international examples of public media in countries with similar size and/or demographic profiles to New Zealand. We drew heavily from interviews and submissions received from media sector participants and stakeholders.

Informed by the sector, we have developed a view of the current public media environment here and overseas, an ideal New Zealand public media environment and the gaps that need to be addressed to move from the current to the desired position.

In our view the problems we increasingly face include:

- Our media struggles to support our national identity.
- Our media cannot serve diverse communities of interest.
- Our media fails to sufficiently support our democratic processes.
- Global trends show traditional media models are disrupted.

Recent history also shows:

- Public media funding has not kept pace.
- Our media organisations, including public media, could collaborate better.
- New Zealand's government interventions in media do not use all available tools.

New Zealand specific issues include:

- A small population with high costs of media distribution.
- A changing population with rapidly shifting demographics and ethnic composition.
- A need to revitalise Te Reo and build greater understanding of the role of tikanga in Maori culture.
- It is cheaper for media to buy in English language content than make it locally.

The Solution

The Group believes there are a number of key responses that can address these issues:

- Help RNZ extend its multi-media services to reach more people in different ways.
- Help NZ On Air to specifically improve public media content for currently under-served audiences.
- Encourage and support media organisations to collaborate and innovate with public media content.

A key part of our findings is the establishment of a new fund to encourage the creation of more public media content, bringing together RNZ, NZ On Air, the production sector and owners of various platforms.

Following discussions, RNZ and NZ On Air jointly submitted a proposal on how the two organisations can start to address the challenges within the funding and timeframe of the next financial year.

The structure proposed by RNZ and NZ On Air is that the funding be applied to RNZ+ stage 1, an increase in NZ On Air contestable funding and the establishment of a new RNZ/NZ On Air joint innovation fund. The Group agreed with the structure of the proposal but recommends a different prioritisation for the funding.

Recommendations

1. We recommend supporting each of the three components of the proposal:
 - a. We support NZ On Air's proposal to concentrate its new funding on content for children, and innovative online drama (for example directed at youth and Māori audiences).
 - b. We recommend that RNZ concentrate primarily on new and improved forms of content and multi-media programming, but that \$0.500 million be ring-fenced for the development of a fit-for-future, technology roadmap for RNZ+.
 - c. We recommend that RNZ and NZ On Air establish a contestable, joint, content innovation fund, that would commission content initially for RNZ platforms (but that can be shared with other secondary platforms), and with a focus on Pacifica and Regional audiences and other areas that are not currently well served.
2. We recommend that \$0.500 million of the available funding be used to research in depth the opportunity and capacity for collaboration across the media sector.
3. We recommend that both agencies be requested to report on the progress of the joint innovation fund in their quarterly reports.
4. We recommend the proportion of funding for each component be applied as follows:

RNZ+ stage 1	\$4.500 million
NZ On Air contestable content funding	\$4.000 million
RNZ-NZOA joint innovation fund	\$6.000 million
Research into capacity for media collaboration (Ministry for Culture and Heritage)	\$0.500 million

TOTAL: \$15.000 million

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Introduction

The Advisory Group

The Ministerial Advisory Group (the Group) was established to provide the Minister of Broadcasting, Communications and Digital Media with independent advice on allocation of funding and the role of a Public Media Funding Commission.

The Scope of the Report

This report sets out our analysis and recommendations on one of the two principal tasks of the Ministerial Advisory Group. It provides advice on the allocation of new funding for public broadcasting, through Vote Arts Culture and Heritage, from Budget 2018.

At the Minister's direction, the Advisory Group, NZ On Air and RNZ have been advised in confidence that:

- Cabinet has agreed to set aside \$15 million in 2018/19 only, for implementing the Advisory Group's recommendations;
- the Minister has been invited to report back to Cabinet on how the funding would be allocated with drawdown subject to Cabinet agreeing the business case, which would be based on the Advisory Group's recommendations; and
- the Minister has additionally been invited to develop an initiative for Budget 2019 that addresses the longer-term needs of the public media system.

The Group understands the reasoning behind this approach to Budget 2018. However, it urges Government to consider moving to a longer-term and sustainable approach to funding for public media that would provide it with sufficient certainty to plan to meet the challenges ahead.

We have structured our recommendations so that the available funding is used both to achieve immediate gains, as well as to build toward the development of a case for sustainable funding in next year's Budget.

Our recommendations are based on what we consider to be the best possible use of new funding to leverage New Zealand's public media tools.

The Advisory Group's second principal task is to provide you with advice on the functions, role, scope and initial membership of a Public Media Funding Commission. We will provide this advice in a separate paper in time to inform your mid-year report-back to Cabinet on these questions.

The Process

In preparing this report, the Advisory Group has reviewed the media environment internationally. We commissioned information from PriceWaterhouseCoopers on media arrangements and government policies in a selection of countries comparable to New Zealand in size or cultural traditions; a copy of the report is attached.

We have also studied the New Zealand media. We met with executives from RNZ and NZ On Air to discuss their funding proposals. We also met with, and considered submissions from representatives of key media organisations and other interested parties to gauge perspectives across the wider sector.

Our advice is based on analysis of proposals presented to the Group by NZ On Air and RNZ, including a joint proposal from the two agencies; and has been informed by consultation with the wider media sector.

The Group invited stakeholders meeting with, or submitting to it, to consider four topics:

- the role of public media in national identity and an informed democracy;
- arrangements to ensure sustainable, long-term funding for public media;
- how the government of the day could get independent analysis of the public media sector's health and needs;
- the role of government in supporting quality and independent investigative journalism.

A list of the stakeholders is detailed in Appendix 1.

In developing our advice we have paid particular attention to RNZ and NZ On Air, while also taking into account the roles of Television New Zealand, Māori Television and Te Māngai Pāho.

Analysis

Defining Public Media

In broad terms, public media refers to media content that a market driven by commercial considerations will not produce of its own accord.

The identification of public media on a programme or item basis is localised, as it is defined by the types of content that a specific market cannot support. This means that more populous countries find it easier to commercially support content for specific communities of interest.

Public media is not just local content. It involves continuous daily newsgathering and presentation (as distinct from individual programmes) and the provision of international content that commercial free-to-access services fail to provide (a wider window to the world). A proportion of RNZ's content, for example, is sourced from overseas public media organisations, such as the BBC or American public radio, covering topics ranging from science to social trends to music.

Importantly, public media is critical to National Identity. In the New Zealand context, this means our identity as a multi-cultural nation that pivots around our Māori history, our Māori culture today and our central place as a Pacifica Nation.

Public Media – Current State

Global trends show that traditional media models are disrupted. Advertising revenue that previously enabled commercial media providers to serve a wider audience is being diverted to global online organisations like Google, Amazon and Facebook that do not materially contribute to preservation of national identity.

New Zealand media is becoming more fragmented as well as having more and more competition from global providers. The following table shows the major media companies in New Zealand and their ownership:

Ownership of New Zealand's major media companies

Name of organisation	Ownership	Business Model
RNZ	Public (Crown entity-company)	Non-commercial
TVNZ	Public (Crown entity-company)	Commercial: advertising
Māori Television	Public (Body Corporate)	Semi-commercial: some advertising
National Pacific Radio Trust	Trust with some government appointees	Semi-commercial: some advertising
MediaWorks	Private (Oaktree Capital Management - US)	Commercial: advertising
Sky Television, Prime, Neon	Private (various shareholders)	Commercial: subscriptions and advertising
Lightbox	Private (subsidiary of Spark)	Commercial: subscriptions
Netflix	Private, US-based	Commercial: subscriptions
Stuff	Private, subsidiary of Fairfax Media, Australia	Commercial: cover price, subscription and advertising
NZ Media and Entertainment (NZME)	Private – NZ company	Commercial: cover price, subscription and advertising
Choice TV	Private – majority-owned by Blue Ant Media, Canada	Commercial: advertising

New Zealand media is adapting to changing consumer behaviour and expectations. It provides multi-platform services while competing for advertising revenue with companies that aggregate international content.

This is not a static issue – it is getting worse.

Broadcasting in New Zealand, supported by contestable funding for local content, is competing with new forms of online media offering highly regarded English-language content with every virtue, except that they do not reflect New Zealand life.

It is more cost effective for broadcasters to fill their schedules with English-language content from elsewhere. This is always likely to be less expensive than New Zealand content of the same quality in the same genres. The Internet has lowered barriers further for the entry of content into the New Zealand market, contributing to what is sometimes called the “deluge” of overseas content.

We note that, under New Zealand's model, funding agencies with public service remits are funding some of the local content on commercial broadcast media. The issues affecting both the private and public sectors are thus closely linked.

The Group believes that without significant input from the Government in the form of policy and funding, the ability of the media to play its part in sustaining a national identity and an informed democracy will be further eroded.

Public Media – Desired State

A fully comprehensive public media service represents the nation to itself, in depth and breadth, as well as providing a window on the world. It supports a sense of cultural identity. Its programming serves the whole national audience in some way at some time, by exploring issues of common interest and serving specialised interests and informational needs within the whole audience.

Approaching this ideal requires a constant effort to expand and rejuvenate the audience and keep up with changing preferences for how content is presented and accessed.

The Group's vision is of a public media system that supports innovation, exploits new technology in the interests of the audience and uses public resources to maximum effect.

We will know that we've got it right when public media is:

- fully contributing to the National Identity;
- reflecting a strong Māori and Pacifica perspective
- serving all subsets of the total audience;
- promoting national debate;
- collaborating with each other while maintaining their own identity;
- platform agnostic, with content readily re-versioned and archived to be accessed in various ways;
- providing independent, non-partisan and comprehensive news and current affairs - regional, national and international;
- placing content in a range of genres on commercial services;
- contributing to a skilled production industry;
- continuing to perform a lifeline role in emergencies.

Public Media – the Problems we face

Following our consideration of the current media environment and in establishing our view of a preferred state, we have identified a number of challenges that can be addressed by government intervention. There are a number of issues that we increasingly face:

1. Our media struggles to support our national identity

Our relatively small population is ethnically diverse with a range of interests and informational needs. Cultures unique to New Zealand, including our increasingly diverse Asia-Pacific ethnicities are not always well-represented across our media.

Māori Television and Te Māngai Pāho provide content to strategically support Te Reo Māori and the preservation of Māori culture associated with that. However, it is vital to New Zealand national identity that historical tikanga and traditions, as well as Māori cultural perspectives of today, are also well represented through everyday media.

Our unique position in the Pacific needs to be better reflected across our media. New Zealand, as home to such a broad range of Pacifica people, has an opportunity and an obligation to be the future keepers of Pacific culture, perspectives, history and traditions.

Preservation and support of our National Identity is a critical role for our public media. We cannot afford to lose this as it is something we cannot regain once lost.

2. Our media cannot serve our diverse communities of interest

Children, young people and minority audiences are under-served in the New Zealand system. There are also limitations to the services provided for specialised audiences, such as sight or hearing impaired. We believe this is likely to be a consequence of static funding and the commercial orientation of New Zealand television.

3. Our media fails to sufficiently support our democratic process

In a country the size of New Zealand, well-informed participation in our democratic system relies heavily on having a credible, well-supported public media. The ability of the population to understand and disseminate information about our elected officials and their respective positions and policies is critical to the fair and equitable implementation of the democratic political process. There has been considerable comment revealing perceptions that the overall quality of information available has declined in recent times.

4. Global trends show traditional media models are disrupted

New Zealand public media funding has remained targeted at forms of media that are no longer ubiquitously accessed by our population.

Media organisations globally are facing unprecedented challenges as international technology giants such as Google, Facebook, Netflix and Amazon dominate audiences and advertising revenue. This pushes entities into highly commercial "clickbait" and "lowest common denominator" behaviour to keep eyes on screens.

This has also reduced the impact of the funding provided for local content and public media. Public broadcasters have attempted to respond within the boundaries of their legislation and funding, but need better support to address this challenge.

Our recent history also shows that:

5. Public media funding has not kept pace

A fully-funded public media service such as RNZ is insulated from the key problem confronting commercial media: maintaining advertising revenue. However, public funding has remained static for extended periods, which limits the ability to grow and extend audience coverage.

At the same time, public media, like its commercial counterparts, has to cope with the fast pace of technological change and disruption and changing audience expectations. It faces similar cost pressures to commercial providers, but with the added responsibility of fulfilling a public remit and considering the needs of specialised as well as general audiences.

Similarly, New Zealand funding agencies have been faced with attempting to continue to support New Zealand content over an increasing number of platforms with little to no funding increases.

6. Our media organisations, including public media, could collaborate better

The value of greater collaboration between public media organisations, and the difficulty of achieving it in practice were themes that came up repeatedly in our discussions with stakeholders. These sentiments were due to concerns about brand identity, and the relative power or incompatible mandates of potential partners.

In the commercial environment, the pressures placed on business models are forcing media organisations to join forces or implement take-over tactics. Public media need to consider joining forces as much as possible to stay relevant.

The issue of cost effectiveness and efficient training and utilisation of talent has become more critical in the context of continued fragmentation and the financial pressure it puts on our public media budget.

7. New Zealand's government interventions in media do not use all available tools

There are typically three types of government intervention to achieve public media objectives:

- provision of funding;
- ownership of media entities; and
- various forms of regulation including content quotas, licence conditions, a requirement to contribute a share of profits to content production and restrictions on ownership of media assets.

New Zealand policy has focussed on the first two with little use of regulation. While it is outside the scope of our terms of reference to recommend widespread change to the Government's interventions in public media, it may well be beneficial to consider this in the coming years.

There are also some New Zealand specific issues to consider:

8. New Zealand has a small population with high costs of media distribution

The population spread throughout New Zealand means that the infrastructure costs associated with both broadcasting and online media are restrictive. To reach all New Zealanders our public media content needs to be available on every possible platform and this can only be achieved through adequate funding.

9. We have a changing population with rapidly shifting demographics and ethnic composition

Our public media organisations can only respond to changing demographics when they are able to fund the research necessary to fully understand our population and the extent of the cultures it comprises.

10. A need to revitalise Te Reo and build greater understanding of the role of tikanga in Maori culture

The revitalisation of Te Reo and understanding of the role of tikanga cannot be left entirely to our Māori media organisations. It needs to be present throughout our media, both public and commercial.

11. It is cheaper for media to purchase English language content produced internationally, than to make it locally

Without public support we are likely to see a dramatic reduction of our people and culture reflected in our media. A New Zealand without RNZ and NZ On Air would have a drastic impact on our national identity and the health of our democracy. It is essential that these two public media entities are funded to a degree that keeps them functioning healthily in the current media environment and into the future.

Addressing the Problems

The Group considers the best immediate response the Government can make to address the challenges faced by public media, is to increase funding for content targeted at under-served audiences and purposes, combined with supporting RNZ's further development as a multi-platform, audio-visual public media service.

Beyond funding, we believe there is scope for considerably more collaboration between media organisations, while preserving diversity and plurality of viewpoint and coverage – for example, in the sharing of infrastructure.

The pressures discussed in this paper may in themselves prompt more collaboration. We acknowledge the extensive partnerships for content distribution being developed by RNZ. Nevertheless, we believe that the media entities owned by the Crown can be encouraged to go further in this direction than they have to date. We think that the potential for encouraging collaboration is so important that we have identified research into this issue as an item for allocating funding in Budget 2018.

At the funding levels proposed to date, RNZ would be unable to develop a full new television service on the model of Australia's ABC or SBS, or those of the other public media entities discussed in the attached PWC report. However, the Advisory Group supports investing in RNZ's ability to present more high-quality audio-visual content, either online, or on its existing Freeview television channel, according to audience needs.

We also support increased funding for NZ On Air, to enable it to boost its reach to under-served audiences. We see the opportunity to pilot a new type of collaboration between RNZ, NZ On Air and the commercial production sector.

In summary we believe that the key focus in addressing the issues with New Zealand media need to be:

- Help RNZ extend its multi-media services to reach more people in different ways.
- Help NZ On Air to specifically improve public media content for currently under-served audiences.
- Encourage and support media organisations to collaborate and innovate with public media content.

International Comparisons

We have attached a review of comparator countries carried out by PriceWaterhouseCoopers (PWC).

We would particularly note the health of both public and private media organisations in countries of similar population size to New Zealand, where public media is funded at considerably higher levels than they are in New Zealand.

It is also important to note the common features set out in the report, including that all these countries have:

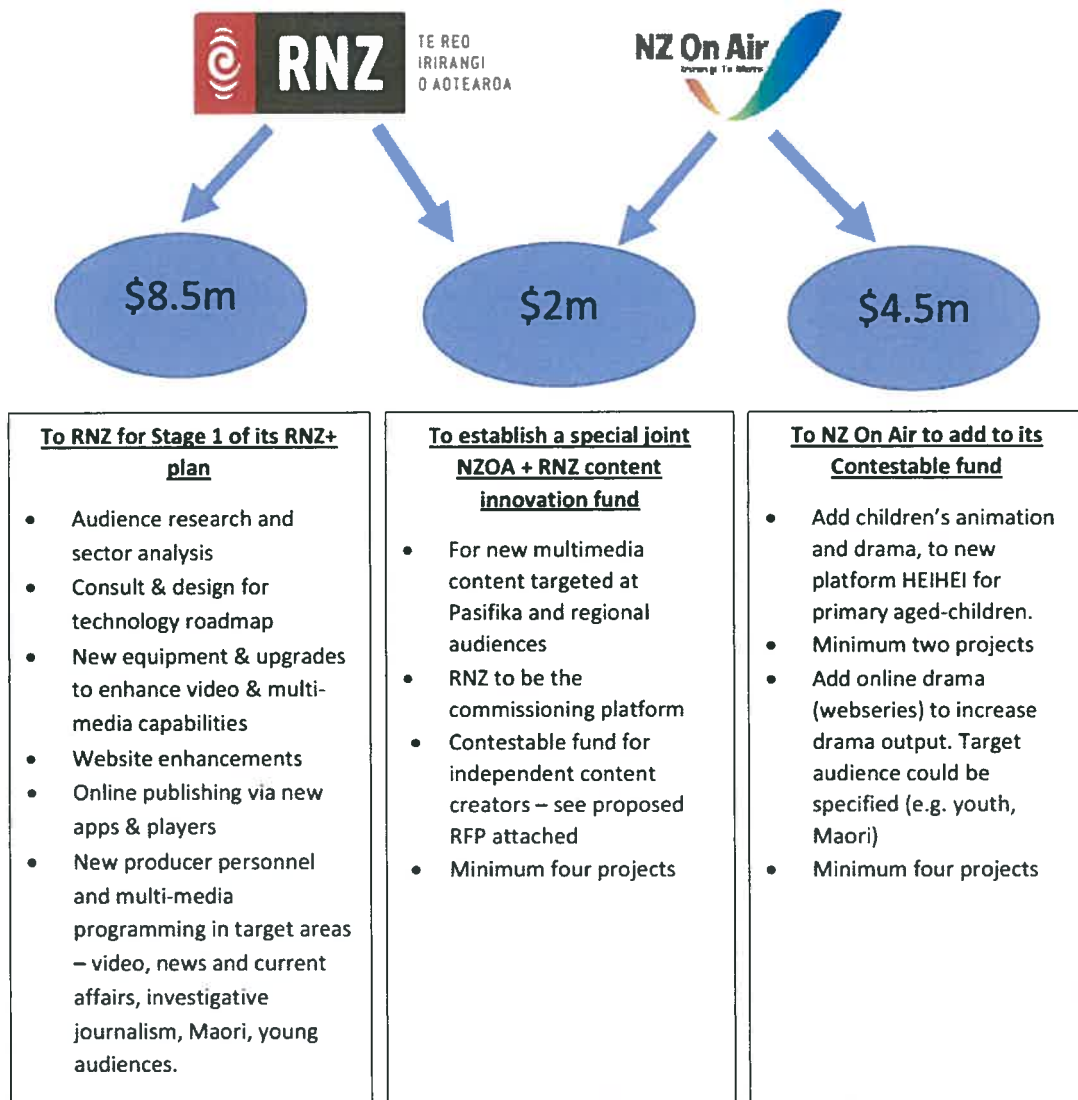
- public television channels with limited advertising or no advertising;
- restrictions on the amount of advertising on commercial media;
- nationally important events on free-to-air television channels;
- requirements to show local content;
- financial support for local production; and
- funding through a licence or a general taxation

We will be using this work to inform our future work, but feel it is important to show in the context of funding and funding allocation.

RNZ and NZ On Air Proposal

RNZ and NZ On Air have developed a combined proposal to apply funding of \$15 million in the coming financial year, including a new joint venture fund.

Under this proposal, funding would be applied for three purposes summarised in an excerpt as follows:



The Group is pleased to see the two agencies co-operating. We consider the agencies' proposal to be a well-conceived response to the Cabinet decision to make funding available for one year only at this stage. The proposal emphasises enhancements to both agencies' programmes in a way that can be built on if funding is available in future years.

This approach would allow Government to demonstrate at least the first steps of the “RNZ+” multimedia project, while also providing increased content for under-served audiences. If the “RNZ+” concept is allowed to grow, so can RNZ’s importance as a platform that fulfils a wider public service remit.

Given the challenges discussed in this paper, we think that a greater proportion of the available funding should be assigned to the proposed joint fund. We believe this will have multiple benefits. It will develop RNZ’s capacity and reputation for delivering audio-visual and multi-platform content. It will serve some neglected segments of the total audience. Most importantly, it will serve as a trial for a new kind of relationship between RNZ, NZ On Air and the production sector, in which RNZ is the willing platform for contestably funded content.

As this would leave a smaller amount for the various components of the proposal listed above as “RNZ+ stage 1”, we recommend that RNZ concentrate primarily on new and improved forms of content and multi-media programming and the development of a fit-for-future, technology roadmap. We propose ring-fencing up to \$0.500 million of the funding provided to RNZ for firming up its business case. This would include the audience research component of the proposal, as well as deeper analysis of the capital and operating budget requirements.

Recommendations

1. We recommend supporting the three components of the proposal:
 - a. We support NZ On Air’s proposal to concentrate its new funding on content for children, and innovative online drama (for example directed at youth and Māori audiences).
 - b. We recommend that RNZ concentrate primarily on new and improved forms of content and multi-media programming, but that \$0.500 million be ring-fenced for the development of a fit-for-future, technology roadmap for RNZ+.
 - c. We recommend that RNZ and NZ On Air establish a contestable, joint, content innovation fund, that would commission content initially for RNZ platforms, and with a focus on Pacifica and Regional audiences and other areas that are not currently well served.
2. We recommend that \$0.500 million of the available funding be used to research in depth the opportunity and capacity for collaboration across the media sector, with a particular focus on how the Crown-funded media agencies could use their assets more efficiently. This research would be commissioned by the Ministry for Culture and Heritage (MCH).

3. We recommend that both agencies be requested to report in some detail on the progress of the joint innovation fund in their quarterly reports to the Minister and that these reports be forwarded to the Advisory Group to inform advice on Budget 2019.
4. We recommend the proportion of funding for each component be applied as follows:

• “RNZ+ stage 1”	\$4.500 million
• NZ On Air new contestable content funding	\$4.000 million
• RNZ-NZOA joint innovation fund	\$6.000 million
• Research into capacity for media collaboration (MCH)	\$0.500 million
TOTAL:	\$15.000 million

We understand there are limits to the Government’s ability to “tag” funding for an autonomous Crown entity like NZ On Air or a Crown entity company like RNZ, but that funding can be provided for agreed additional purposes, as long as it is consistent with the agencies’ statutory functions. In this case the proposal, if not the exact allocations, has been put forward by the agencies themselves.

Public Media Funding Commission: our advice will follow

A Public Media Funding Commission has been proposed as a further means of addressing the problems and challenges discussed in this paper, and of developing measures to assess the extent to which the picture of success outlined on page 9 is being achieved.

In our consultation, we heard guarded support for the idea of a Commission from most media representatives. This was usually with the proviso that its costs should be kept low and that it develop clear indicators.

While we will give our detailed advice in due course, our initial view is that the concept has value in assessing the direction and needs of the media sector, but to gain acceptance will need to be run at a conspicuously low cost. Its likely workload, we think, would allow it to be convened periodically through the year, rather than established as a permanent office.

Our preliminary view is that a Commission would be useful for carrying out periodic assessments of the “health” of the media sector, as well as addressing particular issues, for example the impact on TVNZ as market fragmentation intensifies, or the development of television drama. It would be better focussed on giving general advice about funding levels for Crown-funded media agencies rather than assessing detailed funding bids. We think its scope should include the health of the entire media sector, including the Māori television service and Te Māngai Pāho, even though these sit within a different Ministerial portfolio.

We will provide our full advice to you on the Public Media Funding Commission concept during June 2018.

Appendix 1 - Stakeholder consultation

In consulting stakeholders, the Group met with the following organisations and individuals:

- NZME
- Stuff*
- TVNZ*
- MediaWorks*
- Māori Television
- Te Māngai Pāho
- The National Pacific Radio Trust*
- The Screen Production and Development Association (SPADA)*
- Ngā Aho Whaakari, the Māori Screen Guild
- Independent producer John Barnett

Organisations marked with an * also provided written submissions.

Women in Film and Television (WIFT), the Radio Broadcasters Association and the NZ Children Screen Trust also provided a written submission, but did not meet with the Group.

While in our discussions with stakeholders there was considerable agreement about the challenges to be faced, there was less consensus about the steps that the Government should take. Several organisations proposed more funding for content as an alternative to the television component of “RNZ+”; others favoured funding being concentrated on regional journalism.

Concern was expressed that a full television service operated by RNZ would introduce disruptive competition into a fragmented market where several channels already struggle for viewers. There were also concerns that a new public service television channel would draw away journalistic talent from the commercial sector. Many stakeholders expressed the view that it would be better to invest in online media rather than linear television as this is where the audience is going.

