

**Submission to**

**The Future of Media Commission**

**from**

**The Public Relations Institute of Ireland (PRII)**

**and**

**The Public Relations Consultants Association (Ireland) (PRCA)**



Submitted on behalf of the PRII and the PRCA

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## Background to this Submission

Public relations and communication professionals disseminate verifiable news on social, cultural, political, and economic developments to inform, educate and entertain the public. The diverse scope of this content ranges from life-saving public health information campaigns; to the availability of new products and services; and to sports and cultural events.

Going back to the rural electrification project in the early days of the Free State in 1920s Ireland, it is difficult to think of an active organisation of any kind in the public, commercial or voluntary sector which does not need to communicate to its stakeholders on a regular basis.

Broadcast, print and digital media at national, regional and community levels are important conduits for this information.

The public relations and communication practitioner identifies the relevant audience for specific information and news and then identifies the specific media channels that are consumed by, or reach, that stakeholder group.

As they represent diverse organisations with diverse stakeholders, access to, and the existence of, diverse, reputable media is of critical importance to the sustainability of these organisations and interests.

The media provide a vital service for society. The public relations and communication sector provide vital information content to the media.

The reach, relevance, and credibility of all media is therefore of great interest to public relations and communication professionals and the organisations for which they work.

Taking into consideration contributions from members of the Public Relations Institute of Ireland (PRII) and the Public Relations Consultants Association of Ireland (PRCA) over the past month, this submission represents the views of those charged with communicating social, cultural, political, and economic developments to the Irish population at home and abroad, in all its diversity and complexity.

It represents the views of those who provide verifiable information for consideration, and on occasion challenge, by editorial teams.

We believe this Commission's work presents an opportunity for public sector media to (re)assert its relevance to the Irish people by becoming the authoritative source of the information necessary to live a fully participative life in Ireland.

Both bodies would be keen to meet with the Commission to further discuss our views and to assist the work of the Commission on an ongoing basis in any way the Commission sees fit.

### [The Public Relations Institute of Ireland](#)

Established in 1953, the Public Relations Institute of Ireland (PRII) is dedicated to promoting the highest professional practice of public relations and communication in Ireland.

The Institute works towards:

- wider recognition of the role of public relations in the Irish society and economy; and
- higher standards of professionalism among public relations and communications practitioners.

Membership of the Institute is voluntary and there are currently just under 900 PRII members, excluding student members.

They comprise of public relations and communication professionals drawn from consultancies, industry, Government, semi-state, voluntary and business organisations.

Independent research in 2019 calculates the contribution of the sector to the Irish economy is in the region of €1.3 billion.

All members subscribe to Codes of Practice and Ethics that promote professional integrity in the implementation of public relations programmes. Compliance is backed up by a rigorous Standards Management Procedure which includes independent external input.

## The Public Relations Consultants Association Ireland (PRCA)

The PRCA is the representative body promoting the interests of public relations consultancy firms or agencies in Ireland. Founded in 1989, there are thirty member firms in the PRCA employing over 500 people.

PRCA member firms provide public relations and media relations services to their clients across a range of sectors including industry, academia, Government, public sector, voluntary / charity sector, and professional services. Services include strategic communications planning, public information campaigns, internal communications, media relations, event management, stakeholder engagement programmes and public affairs.

Members of the PRCA must attain the internationally recognised Consultancy Management Standard.

All members of the PRCA subscribe to international statements of ethics and codes of conduct. Compliance is backed up by a formal complaints' procedure which includes independent external oversight.

## Introduction

Many in society may take contemporary mass media for granted. For centuries<sup>1</sup> they have existed as part of the lived experience of the average citizen; omnipresent, all knowing and unquestioned.

The potential of media as a means of informing and influencing public thinking is well charted historically. Influence in the media has been coveted in politics, in business and in the fields of art and culture as highlighted in the recurrent ambition over time for ownership of media organisations by commercial and political interests.

In democratic societies the role of media has traditionally been to ‘speak truth to power’ and to offer an opportunity for an articulation of pluralism across society, if not on the part of each individual medium or media organisation, then through the cumulative ‘balancing’ effect of competing media interests in a given jurisdiction.

That collective effort serves to frame and contextualise civil discourse, enabling people to stay informed and establishing a point of reference for what is accepted in society.

At the heart of that effort is good journalism – the skill built over time to identify what is new or unrevealed, understand it and explain it in words or pictures to others.

Those skills had always existed, but the evolution of radio in the 1920s, television from the 1950s and the rapid expansion of transport infrastructure that enabled trans-continental and the global distribution of printed media, brought about a golden age of media from the 1960s to the end of the 20<sup>th</sup> century where journalists became figures of public attention and media organisations reached the height of their power with primary control over both the creation of content and its distribution.

Strong independent journalism has always been a hallmark of the Irish media, both print and broadcast. Unlike many other countries, Ireland has prided itself on the freedom of its media to offer relatively independent commentary and opinion without fear of retribution, something that is still not the case in many parts of the world, and increasingly so, in some European countries.

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<sup>1</sup> The first newspaper, as we understand the term, was published in 1609 in Strasbourg.

The role of public relations in the media would be seen by many as functional – engaging with journalists to present and transfer information from their clients or employers to their stakeholders. Much of the early study of public relations centres around that presumption. While it might have done in the past, the public relations industry no longer thinks like that. We now see our role in a broader context, not defined solely by engagement with the media. Our role is now defined in the first instance by the contribution that we make to the objectives of our employers or clients, interpreting how they are positioned and seen by the world at large and by their key stakeholders, and advising and assisting them in managing those reputations.

Our work also involves undertaking ongoing stakeholder engagement, creating and managing community fora, running public consultation programmes to inform public policies and vital infrastructure projects and managing corporate social responsibility projects. It includes the development and management of sponsorship programmes that are vital to the sustainability of our sporting and cultural life, managing public participation programmes that support public health and education and charity fundraising.

Over the last year, effective public relations and communication has been central to the management of COVID-19 both in society and within individual organisations where, among other messages, internal communication on the necessary shift to remote working was critical. While it is not all of what we do, the media does play a strong role in the two-way processes of communication around all these tasks. It is in our interest that the media are sustainably equipped to continue that role.

This submission is predicated on supporting the capacity of the media to contribute to how the stakeholders of any organisation understand the world – including the articulation and acceptance of the validity of informed, dissenting views. The work of public relations seeks to provide opportunities for organisations to become known and to explain themselves, on a proactive or reactive basis as circumstances demand. It is the mediation via editorial input and challenge that distinguishes public relations from advertising.

The PRII and PRCA are making this submission to underpin the importance and value of the media to the effective function of an informed society and an informed marketplace, both of which are of value to those that we work with and represent.

## Communicating with the public in the 21st century

In addressing that role for information in society it is critical to understand the specific function that media play as it is very different today to that was traditionally understood.

The evolution of digital technology has created multiple new means of distribution and redefined how, where, and in what form, content can be presented to the public or any subset of the public. Whereas the media in the late 20<sup>th</sup> century served as the channel for institutions and organisations to communicate with and disseminate information to the public, today, they are just one channel.

Now, using digital media, an organisation of any size, in any location, that wishes to send out or share content can do so directly, targeting specific audiences in specific locations and at specific times. It can monitor the efficacy of the messages it sends in real time and adjust or edit them instantly as required.

In addition to that direct reach, it can mobilise individual consumers or citizens to either create or share further content and, again, can then move that content around and vary its targeting in an instant.

The traditional mass media cannot compete with that flexibility. Nor should they try to. They have a quite different role to play because, while any organisation can provide the public with any information needed, directly or indirectly, at any time and to any point, they cannot 'vouch' for, or endorse, themselves. That is where the media, its selectivity over content and its obligation to editorial oversight, has a critical and irreplaceable value to society.

The telling of an organisation's story which has been independently and objectively identified, researched, interrogated and verified by the skills of professional journalists and editors is of a distinct value as a point of reference to stakeholders and to society at large that cannot be replaced by technology, whether that be the means of distribution or the means of creation.

Digital media channels have also found themselves challenged to moderate the scourges of disinformation, misinformation, and malformation.



The unfiltered ability of social media to enable a citizen with a mobile device to be a “reporter” or commentator underpins the value and importance of professional, regulated, and accountable media. A major priority for the future of the media should be maintain and uphold the scope for freedom and independence on the part of ‘traditional’ news.

Those that wish to engage with the public, from individuals to the largest companies and Governments in the world, require a sustainable, functioning media, in all its forms, and with competing voices that reflect the natural and evolving diversity of societies.

For diverse organisations to communicate to their stakeholders in a timely fashion they need diverse, independent, ethical, media outlets staffed by well-trained, responsible journalists and producers.

By diverse media we understand media which are available, accessible, affordable, reliable, and attractive to a population diverse in terms of interests, viewpoints, location, age, gender, sexuality, social class, disposable income, language, ethnicity, religion, education, literacy, (dis)abilities and access to infrastructure (e.g. broadband).

It is essential also that we continue to have a wide range of both public and commercial media outlets, with strong competition, to ensure diversity of viewpoints and a counterpoint to group-think and suppression of information.

Many of those with whom the public relations community works are conscious of the importance of maintaining their ‘social licence to operate’<sup>2</sup> – the idea that society will recognise the merits and support the presence of any organisation that shows its willingness to engage appropriately with its stakeholders and society and to act within the realm of social norms. The media is an important arbiter of that social context.

The media is also of vital relevance to those in the public relations community dealing with the meta challenges of society – public health, gender equality, climate response and freedom of speech – all topics that are subject to sustained campaigns of misinformation.

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<sup>2</sup> Hurst et al (2020) Engaging for a social licence to operate, Public Relations Review

In their work, public relations professionals are employed to, or contracted with, disseminating information on social, cultural, economic, and political matters of public interest. These professionals are therefore accountable, identifiable sources of reliable transparent information. Their names and contact details are (literally) attached to everything they do on behalf of clients and employing bodies. This is in direct contrast to those individuals/organisations disseminating fake news and mis/disinformation.

If we do not have a strong and supported community of media with whom we can deal confidently on behalf of those that contract us, there is a limit to the voices that can be heard, the voices that can be verified and the range of views available.

This will impact on every aspect of society, limit its development and limit people's choices as citizens, political actors, and consumers. In effect, it will impact democracy.

## Interpreting the Commission's Terms of Reference

We have taken some time to review and consider the terms as set out by the Commission in its public statements and on its website.

These set out that the Commission is examining the challenges faced by public service broadcasters, commercial broadcasters, print and online media platforms including:

- Sustainable funding sources
- Changes in audience behaviour
- Changes in technology

In our response we are focusing primarily on future provisions for the print and broadcast media where there is a critical need for society as set out earlier and which are undeniably threatened.

While the opening comments made by the Commission are inclusive of “the challenges faced by public service broadcasters, commercial broadcasters, print and online media platforms”, the directions for the consultation process present it as being quite specifically around the concepts of public service media and public service content,

In our view this is too narrow a focus. While recognising absolutely the legitimate desire and need to identify a sustainable basis on which to make aspects of society that are culturally and historically significant publicly accessible through some form of media, we have found these terms and the suggested template for response to be limiting.

The concept of ‘public service media’ is not sustainable on a stand-alone basis. We believe that the Commission cannot look at the media that might serve a public service need or deliver public service content in isolation from the wider media industry and the media community.

A healthy functioning media industry must be viewed and developed as an eco-system and one which can compete both for ‘share of voice’ and market share.

Public service media are one part of such a media ecosystem and the Government needs to recognise and address the overall needs of that ecosystem in the first instance.

Within that ecosystem, distinct structures and arrangements can be put in place to support the public service need and which are permeable and facilitate fluidity in the movement of resources to allow for innovation and evolution.

Part of the challenge is the scale of the Irish market and its capacity to sustain a media industry of scale, a challenge that is complicated (if not compromised) economically by the overspill of comparable international media content into Ireland.

To focus in isolation on the public sector element however is to build a silo that has no natural context for growth or development. It risks being left behind by future market-led technological, creative and editorial progressions in which context it would atrophy and need constant replenishment and resuscitation, not to mention financial subvention, just to function. This in effect, would bring us back to this process, or one like it on a recurring basis, in the future.

The consultation document posed the question ‘what we can learn from other jurisdictions?’ We would suggest that the answers in this analysis may better come from other realms and media contexts including what is being done by new and emerging digital and social media platforms and diversification and innovation on the part of new media companies. Given the scale of presence in the Irish market of many of the world’s top media and technology companies, we would urge an engagement in that direction as part of future planning.

## Shaping the Future of Media in Ireland

We believe that the most secure and sustainable context in which to deliver public service media output is as part of a diverse, well-trained, professionally governed, regulated, and sustainably funded media industry that serves all the information needs of its citizens.

In that context we have considered the challenges for the future more broadly within which we will likely cover many of the questions set out in the suggested consultation framework.

In doing so, we are taking the following principles as given: -

- That the future shape and structure of media in Ireland should be framed around a vision of the outcomes it is seeking to support in that future, and the outputs required to do so, rather than by any structures or norms that are in existence now or in the past.
- That the task of preserving engagement with Ireland's languages, cultures, history, traditions, and sports must be assessed and progressed, while not presuming the omnipresence of traditional media.
- That the approach to creating a sustainable space for media generally, and public service output in particular, will not be predicated on a regime that seeks to block, ban or diminish the place of others in the market.
- That the need for further and ongoing investment is inescapable with the focus on funding activity and supporting the development of quality inputs and output – and the capability of delivering both consistently – rather than on sustaining entities or their administration.
- Many audiences – and not just those under 25 – consume little or no formal News and Current Affairs coverage and thus risk not being exposed to essential public service messaging which prompts for a broader definition of public value in media output.<sup>3</sup>

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<sup>3</sup> While the events of 2020 will have captured some of that 'lost' audience, there is still a substantial challenge to harness public attention for the longer term.

- The appetite for the preservation of culture and tradition is ultimately set from ‘the ground up’ and any effort to stimulate engagement in that regard must be respectful of, and provide platforms for, all beliefs and cultures in our increasingly multi-cultural society.
- The media are a dynamic, responsive and evolving force which is of most value and relevance when it reflects the society that it seeks to serve.

### The remit of media organisations

The landscape for media organisations in Ireland, can be broken down between print and broadcast, each of which has seen, broadly two eras, in similar timeframes.

#### The print media

Having been distributed across a wide range of, mainly, individual family-owned businesses up to the 1990s, ownership of the print media in Ireland is now primarily consolidated into seven groupings with mixed interests in national and regional titles.

These are all in private ownership with a number controlled from outside the State. There is no public ownership interest in the print media.

From the perspective of consumer demand, the market at national level is well served with seven papers published in Ireland daily and five on Sunday.

Regionally there is at least one local paper in every county and two or more in most.

From a commercial point of view however digital media have significantly impacted both on the attractiveness of newspapers as a medium for content delivery, and as a vehicle for advertising. These commercial challenges have been exacerbated considerably by Covid-19 with advertising revenue losses estimated to be as much as 70 per cent in some instances. Some regional newspapers have already folded, and others may not survive without radical change.

There is no market-led failing at this point that would justify the State taking an ownership or investment interest in print media, but this paper will look at actions outside the realm of ownership that would support the needs of the print media in terms of cost-management and opportunity to earn.

We would point out that there is one issue of ownership in the print media market that is political rather than market based and which the Commission may wish to consider as to whether it is of significance to the needs of Irish society. At this point, only one publisher of daily print news and one publisher of Sunday print news – two different organisations – in the Irish market are Irish owned and controlled.

There is no evidence that we know of that this is in any way an issue at this point, but it may be that the Commission would wish to consider options for the future that would protect the capacity of editorial decision makers to maintain full local discretion in their work.

#### Broadcast media

Broadcasting is very different to print not least due to the presence and scale of state involvement in ownership which has shaped and dominated the market.

The State was the only licenced broadcaster in Ireland up to 1989 and has only had sustained competition since the mid-1990s when the now VirginMedia Television was established as TV3 and Today FM was established as a national radio licence.

There are now a further 60 licenced ‘independent’ radio stations – 2 national, 32 commercial and 26 community or special interest but the reach and influence of the national broadcaster is still significant.

There is a clear imbalance in the resources available to the broadcasting sector where RTE receives most of a public licence fee for television set ownership (86% - €189m for 2018, the latest year for which figures have been published)<sup>4</sup> as well as having full access to the broadcast advertising market in which it was the sole operator up to the mid-1990s.

We are very clear that a State broadcasting organisation is a necessary part of the national media infrastructure in the public’s interest.

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<sup>4</sup> Laura Slattery, Irish Times, 16 Dec 2020

We believe however that if one were to set out today to create an organisation that would produce all of what would be described as ‘serving the public’ one would not create the organisation that is RTE today which was shaped in a very different and less competitive era.

At present the organisation has too many competing internal and evolving priorities, all creating resource demands that are not serving the need for quality public service content.

Accordingly, it has struggled to respond to mainstream market competition as it is trying to sustain too wide a range of positions – some arguably no longer necessary or that could be hosted elsewhere. Competitors with narrower priorities can take quicker decisions with no conflicting or distracting interests.

The longer-term planning for RTE must centre on the core competencies of broadcast content production and, to the extent that the technology involved is not generic, delivery.

In keeping with the principle of being led by the outcome that is needed to serve the public interest, we believe that Government should commit to a complete reappraisal of the corporate structure required to deliver that outcome.

There needs to be more than an organisational re-jig or even a business model change. It is about framing a plan to be delivered over a five-to-ten-year window that would fundamentally reshape and renew the profile, footprint and resourcing of the national broadcaster.

There is no other way for an organisation, formed when it was the only organisation of its type, to respond to being in a hyper competitive market with varying competitive forces, some of significantly greater scale.

That work would have to take a market-led approach to understanding the needs of the public, and the public good generally, for a healthy media environment, within which media organisations or investments that support the public need can then survive.

- That output would have an independent news service at its core. It would continue to present a mixed slate of popular programming, recognising that the public interest will demand a mix of programming, or else will take its eyes, ears, and minds elsewhere.
- It would however be reconstituted to run as a lean organisation optimising its use of technical facilities, equipment and talent in the market on competitive terms.



- The renewed State broadcaster would adopt a different approach to staffing, talent, and financial management, that are at present out of synch with meaningful comparators.
- The emphasis in employment – particularly in research, editorial, production and presentation – should reflect insofar as possible, the full diversity of the Irish population in order to be – and be seen to be – relevant to today’s and tomorrow’s population.
- The RTE 1 radio and television channels should aspire to be, and identify as, the Irish ‘Broadcaster of Record’. Relatedly, public sector media should be funded to create and manage curated archives of content for current (and future) generations of researchers in Irish life from academia to students, civic bodies and the wider public.
- In establishing that position, the State broadcaster must focus on the characteristics that distinguish it from any other provider or possible provider. What about its work and how it is delivered is of value, rare, non-inimitable and difficult for others to substitute or organise?
- A substantive focus must be given to better understanding the specific consumption patterns of different audiences, recognising that varied formats and modes of delivery may better exploit the overall reserve of content that has been created with State investment.
- The RTE Player, which is not currently fit for purpose, should be funded to be a technically reliable and sufficiently expansive source of programme content – live or on ‘catch up’ – and as a useful resource for those researching topics of Irish social, cultural, economic, or political interest. An exemplar would be the BBC online presence.

Ultimately that process must bring focus to the work of the State broadcaster calibrated against clearly defined outcomes in the public interest.

## Public service content in a wider media context

We have noted above the commercial challenges faced by media generally and by local media – print and radio – in particular.

The reality for these media and their scale is that to maintain a commitment to editorially robust and independent news gathering and reporting, they need either to establish other sources of revenue or to reduce the costs of providing those services.

We are asking the Commission to look at the scope for collaboration by the media with third parties to develop schemes that could help in that regard.

- Building on existing relationships, some forged during the national response to COVID-19, we believe there is scope to engage with the educational sector to provide support resources for both the creation of new content and the re-purposing of existing resources in support of education through all levels of the system.
- Establish competitive structures at national and local government level that would facilitate media organisations in opportunities in respect of public information programming needs – for example in relation to employment, healthcare, energy and climate management and access to public services.
- We would ask the Commission to explore the scope for the establishment of a ‘local media resource programme’ to fund applications from local media, made jointly with community and possibly commercial partners, where media resources can be applied to solving local public interest challenges, for example in respect of public health, workforce activation, the environment, civic engagement or protection of the public realm.
- We would ask also for a reconstitution and extension of the programming or content production budget that is currently on offer through the *Sound and Vision* fund for ‘public service content’. In addition to increasing the scale of the fund, we would ask that it create scope for programming to merit support where a media organisation can present matching funding, be that from a community or a corporate supporter.

## Exploring sustainable funding methods

The Commission's guidance on consultation poses several relatively detailed questions around funding sources and methods.

Others are better positioned than we are to comment in detail on the mechanics of funding media, but we can make a few general observations.

Firstly, we accept the assessment presented by Mr Vincent Crowley, Chairman of NewsBrands Ireland to the Oireachtas Joint Committee on Media, Tourism, Arts, Culture, Sport and the Gaeltacht in December 2020 when he said that "*the economic model which once sustained newspapers is broken.*"<sup>5</sup>

From working at close quarters with media outlets of different scales and profile, all over the country, we can see the evidence of this. There are a range of challenges contributing to those circumstances; market forces (the loss in advertising to digital platforms followed by the impacts of COVID-19 are well documented), competitive challenges, varying business models with mixed operational focuses and historical debt structures.

We do not see a one-size-fits-all solution but equally there is limited scope for most to even 'stumble on'. Therefore, within the work of the Commission we would advise that a separate track be established with commercially experienced support that forensically examines the core issues on funding with a view to identifying a suite of sector specific and progressive actions that would be supported financially by Government to enable and support media organisations that meet certain thresholds of viability and of recurring output. That process would include input from NewsBrands, Local Ireland, the Independent Broadcasters of Ireland and the National Union of Journalists as key stakeholders.

As a general principle we would advocate that the focus in funding should be linked to output, production and editorial activity and the elements that deliver in that respect. There cannot ever be any link between funding and editorial insight – the focus must be on funding the working of the media eco-system and its benefit to society.

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<sup>5</sup> Statement to the Oireachtas Joint Committee on Media, Tourism, Arts, Culture, Sport and the Gaeltacht, Newsbrands.ie 16 Dec 2020

## Wider public supports for media activity.

In considering the challenges faced by the media, we have noted a number of possible options for proactive support that fall outside the headings noted by the Commission in the direction on consultation. These are actions that could be supported or sponsored by the State and have the potential to offset the resource requirements of the media.

- We would ask that the continuous training and upskilling of media personnel in specialist areas including investigative and data journalism and technology skills be given Government support to enable each medium to retain its talent and the market opportunity that goes with that.
- Much of what the media does involves sourcing documentation submitted to public bodies. We would ask that protocols be agreed and resourced to enable accessibility for media to public documents and public information to reduce the cost and friction in their roles, while respecting issues of necessary legal and competitive confidentiality and with undertakings on behaviour, supported by training in their use.
- Give the media a funded role and responsibility in the delivery of media literacy to be integrated into second and third level curricula and to lead public information campaigns directed at those outside formal education institutions. This 'public good' could become part of the public service remit of RTE.

We have noted the impact of digital and, in particular, social media platforms on traditional media business models. There are however challenges in the market also for these organisations as they manage their growth and societal concerns regarding their dominance. Google's investment in its Google News Lab, the establishment by Facebook of its Global Journalism Project and the decision by Amazon owner Jeff Bezos to buy the Washington Post highlight their recognition of the connections that exist between the media, and its journalism, and the public at large.

Notwithstanding, or perhaps because of, their size these young organisations are growing faster than they can perhaps control and with considerable challenges to address in how that growth is balanced with making a sustainable contribution to the societies around them.

Given the significant presence in Ireland of all the major digital communications and media brands who are equally seeking to plot a path forward that is sustainable from both a commercial and a regulatory point of view, we would propose an effort to synchronise the energies of traditional and new media around the challenge of the future of media by setting up a media innovation lab with inputs and resources supported by a full buy-in from Government to collaboratively explore and chart the next generation of media.

This would see the Irish media market being used as a 'sandbox' for testing new products and ideas including the development of new media products, new payment systems, and the study and education of media users while benefitting from financial aid programmes to balance the economic cost of that product development.

There could also be a requirement for a financial contribution from the digital media companies to support that work and promote both the development of journalist education and the continued development of media.

## Summary Conclusion

The media is an industry like none other. A strong media sector underpins democracy, the rule of law, consumer freedom of choice and the scope for open competitive activity.

As professionals working with the media, for whom its contribution has a key value for the organisations that we serve - public, commercial and non-profit alike - we believe strongly in the need to support the media ecosystem in its entirety.

Within that media capacity the existence of a capable, well-resourced, and assured Public Service Media is essential.

The role of Public Service Media should be distinguished and supported by reference to that which is singular to it and not easily or naturally substitutable by the work of others.

Although Government has many priorities to attend to, we regard the case for the support of media to be something that marks it out as an exception and one strategically in need of Government backing, financially and through supporting organisational structures and public sector behaviours.

That support should focus on enabling the capability of media generally to deliver quality research-led work that supports openness and transparency in society.

This support would not be a 'free pass' for media organisations but a recognition that the ability of media to maintain quality and independence in editorial discretion is of paramount importance to society.

We thank the Commission for the opportunity to share our thoughts and would be happy to review these further and to support the work of the Commission in any way it sees fit.