

Submission of The Agricultural Trust to the Future of Media Commission (FOMC)

Section 1 - The Agricultural Trust

The Agricultural Trust are publishers of the following titles (in print and on-line):

- The Irish Farmers Journal (weekly)
- The Irish Field (weekly)
- Irish Country Magazine (seven issue per year)

The mandate of our core title – the *Irish Farmers Journal* - is to serve Irish farmers and Irish rural communities. It is the largest selling agricultural publication on the island of Ireland with 295,900 weekly print readers. Our strong reach ensures that farmers and rural communities across Ireland continue to have a strong voice. Every week the *Irish Farmers Journal* produces high quality unique content that is trusted and valued by our print and digital readers. From the latest farming news and rural life features to weekly updates from our various livestock programmes, our specialist team provide expert commentary, analysis and technical advice for farmers across Ireland.

Our by-line for many years was “Fearlessly on the farmer’s side”. Our current by-line is “The voice of Ireland’s farming industry”, while the spirit of the original by-line has not been lost. Our corporate structure is one of Company Limited by Guarantee, which underlines our commitment to serve Ireland’s farming communities and rural Ireland. Company profits are re-invested back into the business (there are no shareholders or dividends and directors are not paid directors fees) to ensure the high calibre of our agricultural specialists and the best service to our readers. The *Irish Farmers Journal* has a long tradition of supporting worthwhile projects (big and small) in the agricultural world. It has often funded agricultural research into best practice, often carried out in the universities and state agencies (e.g. Teagasc). It has supported college scholarships and travel bursaries for students of agricultural science. In recent times, it has supported Professorship of Agricultural Economics in UCD and the Senior Lectureship in Grassland Management in UCC. We have also made investments in farm enterprises and technical farm programmes (detailed below). Our structure, as a Company Limited by Guarantee, also ensures our editorial independence in reporting on agricultural/farming news and in challenging government to robustly support farming. It allows us to challenge the large agricultural corporations without fear or favour.

As an organisation we go to great lengths to making sure we deliver professional, independent and unique content to farmers and rural communities. Our employees drive change to make rural households more sustainable. The three pillars to achieve this are the

1. Irish Farmers Journal Farm Investment Policy,
2. Irish Farmers Journal Technical Program Schedule, and
3. Irish Farmers Journal Annual Industry Event Schedule.

All three require significant investment resources and bring significant financial risk to the business. However, very importantly, they bring our team of specialists face to face with the reality underpinning our connection with what matters in parishes and communities all around Ireland.

Irish Farmers Journal - Farm investments

In the last ten years, the Irish Farmers Journal has made medium-term and long-term multi-million euro investments in owning and leasing a dairy farm, a suckler-sheep farm and a dairy-beef farm. The intention and objective of all three farms is to show leadership and vision to sectors undergoing fundamental policy change with unbiased and independent content creation.

At a business level, the primary objective for investing in the farms is to allow the creation of unique content in a controlled and measured farm setting. The control and involvement brings unparalleled transparency on all levels (production, financial, etc.) to allow farmers read and watch content created on the farms and also to walk the farms to bring the theory and content on the pages into life.

Regular public open days, which attract in excess of 5,000 farmers attending on any day, show the extent of the reach and interest from farmers looking to hear and see a vision for the various sectors. All three sectors have been challenged and some are still challenged with significant changes in EU policy. By the farms adopting best practice they were providing a future policy direction for the sector and individual farms.

The financial transparency of the farms allows those engaging with the content to see clear financial comparison and provide clear economic guidance on production systems. These are not research farms, but real commercial demonstration farms implementing best scientific practice to improve the wellbeing of family farms all around Ireland.

The investment made are undoubtedly delivered unique and quality content. However, the expertise to allow this to happen (i.e. manage farm leasing and operation) would not be possible without highly-skilled people involved in the running and content creation on the farms. This in-depth knowledge and understanding aligned with the ability of the Agricultural Trust to handle the investment risk is a huge strength and source of knowledge for Irish farmers.

The value of independent reporting, information and results highlighting the real successes and failures facilitates real and truthful guidance for Irish farmers in order to allow them make much better informed decisions.

Irish Farmers Journal Technical programmes

Aligned to our ownership, and investment in individual farms is our involvement with industry-partners working on technical programs on commercial farms across all the main agricultural sectors on the Island of Ireland.

Over the last ten years, we have worked side by side with over 40 industry partners and over 220 individual family farms to bring new science and thinking into local communities.

Working alongside industry professionals, our technical team of specialists lead changes at farm level to drive improved profitability and sustainability in dairy, sheep, suckler and tillage farms.

These technical programs include the following:

- Better Beef – improving margins on suckler farms
- Thrive – measuring efficiency in dairy calf to beef farms
- Greenfield – new thinking for new entrants and expanding dairy farms

- Dairylink – a cross border initiative to share knowledge on high input and output dairy farms and
- Northern Ireland Sheep Program managing sustainability on lowland and hill sheep systems.

They all demonstrate the depth and extent to which we are involved in rural Ireland with a clear objective to make the livelihoods of those farmers better.

Running alongside these Technical Programmes are a suite of tools and calculators that allow individual farmers make better decisions. Martbids is an example of a valuable industry tool that allowed livestock marts continue to do ‘virtual’ business in 2020 during the various Covid19 lockdowns.

This on-line sales platform allows farmers view cattle for sale at a mart, provide details on stock quality and a real-time bidding tool to allow the farmer purchase animals. Now installed in marts from Kerry to Donegal it has allowed the industry continue to trade in 2020. It would not have been possible without the knowledge, understanding and capacity to react to market demands. This type of innovation is only possible with trusted partners who have an understanding and a willingness to engage for the betterment and continuation of a sector dealing in exceptional circumstances.

Irish Farmers Journal - Annual Technical Events

Every year, our special annual technical events attempt to answer key questions that farmers have about issues pertaining to their individual sectors. We invite industry experts and professionals from all over the world to come to Ireland to take part in our events. All are asked for their experience and practical solutions to challenges inside and outside the farm gate.

These focused technical events bring new thinking, new challenges and new engagement on sensitive topics, and a real opportunity for farmers in all sectors to come together. Events such as

- Dairy Day;
- Beef & Sheep Open Day;
- Dairy Beef Open Day;
- Machinery Day; and
- Crops and Cultivation Day;

help highlight the challenges and opportunities at sector and industry level. The investments both in physical infrastructure to host and in human resources to run and manage these events are hugely significant.

Irish Farmers Journal - Employees

Investing in our people is absolutely essential to enable us to engage, organise, lead and manage this level of on- farm engagement (farm investments, farm programs, technical event days). As a business, we need the best trained, the most in- touch, the best communicators so that our editorial specialists are leaders in the field. This investment is necessary to deliver on our exceptional editorial quality standard but places a huge investment and management cost on the business.

All employees have at least one higher level degree while a number of employees qualified to Level 10 doctoral degree level in their specialist area. Many have held important senior management positions within the industry prior to joining the team.

This level of investment in staff resources is aligned to the company objectives to provide independent, high-quality and unique content to make farmers more sustainable. No other media

organisation could go to this cost and then be forced to compete on an unfair pitch with global media organisations who don't have to incur any of these costs or investments in rural Ireland and beyond.

The Irish Field

The Irish Field supports the Irish Equine industry (horse-racing, breeding and other equestrian sports).

The Irish Field celebrated its 150th anniversary in 2020. This weekly publication serves the €1 billion per annum equine industry and is regarded as “the trade paper”.

It is the only publication which reports on each race at every Irish race-meeting and every race at every point-to-point. Key industry bodies rely on *The Irish Field's* reach to get information to stakeholders.

Horse Racing Ireland, the Irish Horseracing Regulatory Board, Horse Sport Ireland, the Irish Thoroughbred Breeders' Association and the Association of Irish Racehorse Owners are just some of the key stakeholders who take advantage of *The Irish Field's* reach when they need to circulate important information to the industry.

During the Covid-19 pandemic, *The Irish Field* has been to the front in keeping stakeholders informed on new protocols and changes regarding racing fixtures and bloodstock sales. *The Irish Field* was the only paper of its type to continue to publish in the early months of Covid-19. This was greatly appreciated by our industry stakeholders and readers.

The Irish Field also attends industry seminars/webinars and publishes reports on these events. Prominent veterinary surgeons, farriers, breeders, etc. are invited to write articles aimed at demonstrating 'best practice' for horse owners, and making them aware of new developments.

Moving horses between Ireland and Britain has become a much more complicated process since January 1st, 2021, and *The Irish Field* is constantly providing the industry with updates on the new requirements.

An example of what stakeholders say about The Irish Field: “The Irish Field is the best industry newspaper and our first point of contact when we need information circulated to a wider audience.”
– Regina Byrne, Manager, Association of Irish Racehorse Owners.

Irish Country Magazine

Irish Country Magazine is women's lifestyle magazine with a difference. Speaking to women from all walks of life, all over Ireland, it appeals to the modern Irish woman with its mix of thought-provoking and informative content.

It is a huge supporter of the arts, travel, fashion, food, and beauty and retail industries across Ireland, and this support is reflected through its originally-produced content working with a vast roster of talented creatives and collaborators. The magazine regularly covers wellbeing, family and women's health topics, often tackling taboo subjects alongside expert advice and first-hand personal stories that empower readers and make lasting connections long after they have finished reading. It

features authors, business owners, food producers, crafters, investors, designers and farmers, as well as Olympians, Hollywood stars and boundary-breaking women of all backgrounds.

Irish Made is a sub-brand of *Irish Country Magazine*. Originating as a little green stamp that is placed on all products featured throughout the magazine that are made in Ireland, it has won numerous accolades including Innovation of the Year at the Irish Magazine Awards, as well as Event of the Year for the Irish Made Summit – an event that catered to supporting SMEs in their road to launching and developing their unique Irish brands. The biggest success of the *Irish Made* brand is the annual *Irish Made Awards*, in which companies across the country and Northern Ireland compete for a coveted prize. 2020 was the fourth year of this awards and saw over 54,000 votes and 340 companies enter into awards. This generated huge support from the general public for these Irish brands across food, fashion, homewares, etc..

Irish Country Magazine readership (76,000 TGI 2019) is primarily in the Republic of Ireland. However, we also have a significant presence in Northern Ireland, as well as a digital e-magazine and postal subscription service (1,800+ readers). We also reach readers via irishcountrymagazine.ie and multiple social channels (circa 95k digital followers).

We have become known as the go-to magazine for the intelligent Irish woman looking for advice, insight and the latest must-haves. Throughout the pandemic we increased our circulation by 15% and subscriptions by 50% as readers looked to us for escape and entertainment as well as ideas on what to buy as special gifts, moments of relaxation and crucial me-time away from the negative news cycle and mindless scrolling.

We are available to members of the National Council for the Blind Ireland in Braille and audio and are passionate about hiring contributors and creatives from all walks of life to write for and contribute to the pages.

The circulation of our titles is primarily in the Republic of Ireland. However, we also have a significant presence in Northern Ireland.

Section 2 – Issues & Challenges

A vibrant National Irish Media

It is in Ireland's interest and therefore the Government's interest that Ireland maintains an independent, free, vibrant national Irish media.

As in most countries, some of Ireland's media is publicly-owned and publically funded and conforms to the working definition of "Public Service Media (PSM)" on your web-site. PSM, under its statutory remit, has far-ranging responsibilities to provide "widely-accessible content" for the "public benefit".

Privately owned media organisations do not have a statutory remit or statutory responsibilities. However, they provide vital services of a public-service nature. Your website refers to these non-publicly-owned media organisations as "Public Service Content Providers PSCP".

In many cases, the "Public Service Content (PSC) and services provided by PSCPs is very developed and is a vital part of the Public Service Content disseminated to the public.

In the case of the Agricultural Trust, while we are not publically funded with a public service remit, we operate under the same public service responsibilities as state organisations such as RTE. We are held accountable by our readers (who effectively are our shareholders) and they expect the highest standards from our publications to ultimately meet the end goal of enhancing the competitiveness of Irish farming and those involved in it.

Role of Government

All media (whether publicly-owned or privately-owned) has an important role in actively and responsibly holding power to account. This includes holding the organs of the state including the Government to account. In Ireland, we have a healthy tradition of both public-owned and privately-owned media fulfilling this role. This hasn't been without its tensions and controversies (Section 31 of the Broadcasting Act (1960) being a case in point).

It is clearly not the role of the government (as organ of the state) to monopolise media ownership or to monopolise the funding of the media. This would lead to a dysfunctional media and likely facilitate corruption in Irish public life.

The government does, however, have a responsibility to support the media as a public good. In particular, it has a responsibility to support media that are producing public-service-content.

The government has a responsibility to ensure that there are no unnecessary obstacles, of whatever type, to the operation of an independent and free media, so that it can properly fulfil its function.

The government has a particular responsibility to ensure that privately-owned/privately-funded media are not in any way, directly or indirectly, unfairly treated or discriminated against in favour of publicly-owned/publicly-funded media organisations.

This is obviously in the national interest and is a constitutional imperative.

These principles apply at a national, regional and sectoral level.

Challenges

Because of its role, the media is always in the limelight and plays a prominent role in public life.

The so-called “traditional media” worldwide are experiencing many challenges. These challenges include the following:

- The rapid development and dissemination of digital media resulting in a radical change in the consumption of media. This has been a major disruption event. Some traditional media have adapted well to this particular challenge and have themselves become major digital-players and have adapted their business-models to the digital world, while at the same time still fulfilling their fundamental media mandate.
- The dominance of global digital companies such as Google and Facebook. They have come to dominate on-line advertising. Advertising formerly available to traditional media is now being hoovered up by the on-line advertising algorithms of these global companies.
- The route to market is being more challenged in recent years. Newspapers are having to compete for retail space in ways that they have never had to do so before. Rural shops are closing, unable to compete with the larger supermarkets. Other shops are discontinuing newspapers or reducing the shelf space afforded to this category due to declining volumes and increasing service charges by the distribution companies.
- Often, newspapers are simply being treated as one more commercial product. The unique contribution of newspapers and their public service role can get lost in this scramble for shelf-space.

As circumstances change, government policy also needs to change to take account of new circumstances.

Key Proposals

1. Revision of Defamation Legislation

The 2009 *Defamation Act* (“the 2009 Act”) provided welcome changes to defamation law in Ireland.

However, more than ten years since its introduction it is clear that the 2009 Act has not fully addressed a considerable number of limitations on journalists and publishers when seeking to provide a fair and balanced approach to the right of the individual to their good name and reputation and the right of a newspaper/journalist to publish articles on that person.

The 2009 Act did have a limited dampening effect in reducing the potential for the excessive and extreme awards previously awarded by juries.

However, the reality is that the sum set by juries in the High Court filter down and have an impact upon the level of damages that are sought in cases where liability is not at issue and the publisher seeks to resolve and settle the matter swiftly without the need for incurring substantial legal costs.

The fact is that awards in defamation cases are disproportionately large when taking into account the impact and effect that a defamatory article or publication has on an individual when compared with similar levels of damages awarded in personal injury claims. Individuals have to suffer serious and often life-threatening injuries before they are in a position to recover a level of damages anywhere remotely near a standard level of damages sought in defamation cases.

There is a serious disconnect between the level of awards in defamation cases and the impact, upset and distress that a defamatory article has on an individual.

In the same way that considerable effort is now being put into seeking to reduce the level of damages in personal injury claims, the same process needs to be applied to apply a reasonable and proportionate level of damages in defamation claims.

Offer of Amends

The introduction of the offer of amends in section 23 of the 2009 Act was welcomed.

However, the Supreme Court decision in *Higgins v IAA* and *White v Sunday Newspapers Ltd* has effectively neutered the benefit of a publisher making an offer of amends under section 23 of the Act.

The threat now that an offer of amends has to be run before a jury rather than a judge sitting alone, seriously negates the benefit and impact of an offer of amends.

Consideration needs to be given to amending the 2009 Act to explicitly state that offers of amends are to be dealt by a Judge sitting alone.

This will help re-balance, in some limited way, the rights as between a publisher and a plaintiff.

Jurisdictional Limits

Given the cost and the time that arise from High Court defamation claims, there is merit in the jurisdictional level of the Circuit Court being raised to accommodate the majority of defamation claims.

This will have the benefit of ensuring that these trials are dealt with by a Judge only. The costs will be substantially reduced. There is a likelihood that the plaintiff will get quicker access to a hearing rather than waiting for a jury trial in the High Court. To this end, the jurisdictional limit should be raised to a minimum of €75,000.

Defence of fair and reasonable publication

The defence of fair and reasonable publication as provide from in section 26 of the 2009 Act was, in principle, a welcome introduction. However, the fact is that it is overly complicated and requires an excessive number of criteria to be met before the defence will succeed. This renders this particular plea meaningless. As part of a review of the 2009 Act, this section needs to be reviewed and considerably simplified.

Mediation

Given the current push toward greater involvement of the parties in mediation at an earlier stage, consideration should be given to amending the 2009 Act or the Rules of the Court to direct the parties to avail of mediation.

There is already provision for an informal process of resolution through the Press Ombudsman. In line with the current trend to push toward options to resolve matters without the expense of legal process, the Courts, as part of case management, should be allowed to direct the parties to attend mediation and face consequences if they do not engage meaningfully.

Section 28 Declaratory Orders

Section 28 of the 2009 Act allowing a person to apply to the Circuit Court seeking a declaratory order that the statement made was false and defamatory clearly shows the intention of the 2009 Act to make provision to protect the person's good name in a cost-effective way.

However, the reality (notwithstanding the many assertions that individuals are not looking for money but only seeking to defend their good name), is that section 28 is very seldom availed of.

Whilst acknowledging that persons are entitled to be compensated for damage to their good name, consideration should be given to place greater prominence on section 28 and whether or not as part of individual plaintiffs be formally advised of the section 28 process and encouraged to avail of same.

Companies and Damages

Companies should be required to show that they have suffered actual loss based on the alleged defamatory article.

It should not be sufficient for a company just to show that a defamatory statement was made about it. As is the case in the UK, the plaintiff company must show that it has suffered actual damage and actual loss as a result of the alleged defamatory statement.

To equate a defamatory statement against an individual's personal feelings with that of a corporate entity shows a serious disconnect.

The ability of a company to seek damages for a defamatory statement without having to prove loss, very clearly has a detrimental impact and "cold hand" on the journalist or reporter seeking to report on that company's activities.

Again, legislative change could easily remedy this imbalance.

2. Reduction of VAT to zero

One way in which other countries support media organisations is that media organisations in these countries do not have to charge VAT on their content (print/ digital/ video).

This is a clear recognition of the important service that these companies provide in informing, educating and entertaining the public. It is a recognition of their public-service remit.

There is no VAT on print or digital news-media in the UK. We strongly recommend to the government that VAT on print/ digital news-media be reduced to zero in Ireland.

3. Removal of unfair barriers between publicly-owned/publicly-funded media organisations and privately-owned/privately-funded media.

RTE is the Irish statutory body with a public-service remit. It receives significant public funding via the licence fee (TV Licence Fee). The majority of the TV Licence Fee goes to RTE.

One could argue that RTE has always been in competition with other non-publicly funded media organisations. However, up to relatively recently, the nature of competition was likely quite limited. Now, because of the digital revolution, RTE's digital offering is in direct competition with the digital offerings of the private media companies. As RTE's digital offering is effectively funded and that of the private media companies is not, this has given rise to a lopsided competition environment which is loaded towards supporting RTE to the detriment of the others. This practice is not a sustainable.

One way to deal with this would be for all news-media who are performing a public-service remit to receive a portion of the TV Licence Fee. It is imperative that this would be done in a fair and objective way with no strings attached. Independently audited circulation figures could be an objective basis on which funds could be allocated to media organisations that are fulfilling a public service remit.

4. Help remove structural issues in the route to market for print media

It is inevitable that some commercial realities in running a business change over time. It is the same in all media businesses. One of the big changes in recent years has been the closure of small local shops all over Ireland. Many of these small shops would traditionally have sold newspapers (national, local and regional). These shops are being replaced by bigger shops owned by the multiples/ garage outlets etc. where the competition for retail space is intense and newspapers are finding it difficult to maintain their selling-space.

One of the effects of the digital revolution is that fewer newspapers are being printed and sold. It is true that news and media output is now being consumed in new and different ways. The pace of life has also changed and many people don't have as much time to read newspapers as in former times. However, we have found that there is still a great loyalty to the printed version of our newspapers.

With that in mind and the potential future narrowing of the route to market for printed newspapers, we think that the government could assist with specific policy initiatives.

While Ireland has a good postal system for first-class post, with 99% of letters being delivered the following day, the record for lower levels of the postal service (which are discounted) is not so good. It can take several days for newspapers and magazines to be delivered.

Therefore, the following policy initiatives supported by Government would be of great benefit:

- Keeping postal costs at a minimum economic level
- A guarantee of next-day delivery

Government could cover the full postal charges of public-service publications as a way to ensure a sustainable route to market for public service publications.

These provisions could be underwritten in an agreement with An Post.

Support for Retail Shops

If government are serious about facilitating public-service media, there may be other ways in which government policy could incentivise retail shops to sell newspapers. Some kind of commercial rates rebate for retailers whose newspaper sales reach a certain level might be one way of doing this.

5. Hold the global power-players to account (e.g. Googles/ Facebook).

It is important that the government is able to differentiate the important role that some of these global companies play in the Irish economy as employers and corporate tax-payers from their disruptive and dominating role in other areas of public life.

As global commercial companies, they have no loyalty *per se* to countries where they operate, such as Ireland. They don't see themselves as providing public-service content or serving the public in the manner discussed above.

The manner in which they have come to dominate advertising revenues cannot simply go unchecked and treated as an inevitable market development. The government must consider the common good. If these companies continue to dominate, there is a danger that they will effectively displace other media in a way that could be detrimental to maintaining a vibrant and free media who are actively and responsibly providing Public Service Content to the general public.

It is well documented that the large tech companies have come to dominate media advertising to the detriment of traditional public service media.

- The Competitions and Markets Authority (CAMA) in the UK recently completed a market study into the online platforms and the digital advertising market in the UK. Its final report (July 2020) concluded that competition is not working well in these markets, leading to substantial harm for consumers and to society as a whole. It recommended that the UK government should pass legislation to establish a new pro-competition regulatory regime.
- In 2019, the European Commission fined Google €1.49 billion for breaching EU antitrust rules. Google had abused its market dominance by imposing a number of restrictive clauses in contracts with third-party websites which prevented Google's rivals from placing their search adverts on these websites.
- Australia has recently passed legislation to force Google and Facebook to pay media outlets for news content as a way of protecting independent journalism.
- According to an article in the Financial Times (December 8th 2020):
“The EU is about to launch a new push against the largest US tech companies — one that will have global implications. Startled by the growing economic power of the tech sector, EU regulators are rushing to act against the so-called “gatekeepers” — the businesses such as Google, Apple and Amazon that run online marketplaces other companies must use and compete against to trade.
Within the next fortnight, EU regulators are expected to come up with two major proposals.

The digital services act will look to clarify the responsibilities that internet companies have for taking down illegal content or counterfeit goods, with the large players facing more onerous requirements. It will also set out clear rules on ad transparency and disinformation. At the moment, the big platforms can remove non-compliant products or content on a voluntary basis, with little legal downside if they refuse to do so or fail to act in a timely manner.

The second, called the digital markets act, will seek to place new restraints on the gatekeeper platforms.

Regulators believe these companies are using the control they have of marketplaces where they also sell their own products and services to potentially disadvantage

smaller competitors. It will set out a list of rules for platforms so it is clear which activities are illegal without regulators having to launch lengthy antitrust investigations to prove damage to consumers. It will also seek the power to launch market investigations in different sectors of the economy where new gatekeeper platforms could potentially emerge”.

It is important the government is aware of all of these developments and that it is cognisant of the harm that the dominance of these companies does to public service media in Ireland. Together with the other members of the EU, it needs to actively play its part in holding these companies to account for their actions and forcing them to make the required changes for the good of public-service media, consumers and society as a whole.

6. Government can directly support particular initiatives that are universally accepted to be in the common good.

Providing direct supports to individual media organisations is fraught with difficulty. The process is potentially open to political interference and the government of the day favouring and supporting media organisations that report on the government in a favourable light. This would do tremendous damage to public life in Ireland and should be avoided at all costs.

The manner in which any support would be given would need to be completely removed from any potential political interference. This would likely mean the setting up of an independent statutory body with responsibility for disseminating funding.

There would need to be complete clarity on the criteria under which potential funding would be given.

It would be important that funding is not decided on the basis of the latest fashions or on the dominant political correctness of the day.

The following initiatives would be worthy of support:

- Education of young working journalists
- Literacy initiatives
- Investigative journalism
- Educational initiatives in the area of professional ethics
- Initiatives of media organisations promoting the use of the Irish language
- Initiatives promoting Irish culture, identity and sport
- Initiatives that connect with the Irish diaspora
- Initiatives educating in Irish history/ the commemoration of particular events in Irish history
- Local and regional news organisations
- Initiatives enhancing life in rural Ireland

Other ways in which support could be given

- Annual awards for specific initiatives

Funding provided should meet clear criteria. Recipients must be carrying out their public-service responsibilities serving a distinct Irish audience and be able to produce auditable figures that support their application.

7. **Copyright**

Media organisations are content creators. Much of their resources goes on paying people to generate content to fulfil their public-service mandate.

It is imperative that copyright is protected. This has become more difficult in the digital era. Digital-only publications/web-sites have become very adept at lifting content from traditional media.

Some large global players also do this in more subtle ways. Enough content is grabbed to give the basics of a news story, meaning that the reader doesn't have to follow links back to the original content.

The signing into law of the Copyright and Other Intellectual Property law Provisions Act 2019 is welcome.

It is important that the legal protection of copyright is kept under review and that the work of content creators is robustly protected.

ENDS