

Submission to the Commission on the Future of Media in Ireland

• THE IMPORTANCE OF RTÉ

RTÉ is the target for a lot of criticism in Ireland. We accept that as a fact of life, but the truth is that the standard of programming on the State channel(s) is – for the most part at least – relatively high and is often exceptional. It is important to sustain that commitment to quality in the State-funded broadcaster, while also giving other media a fair chance to have access to badly-needed funding support; and also as far as possible to counter-balance or reform aspects of the media environment that are inherently anti-competitive.

In relation to television, where local is less immediately relevant than with radio, Ireland happens to be positioned beside the UK, with whom we share the dominant use of the English language. Since before RTÉ opened, people – in Dublin at least – had been able to watch programmes on BBC and ITV. Now we have an entire cable full of English-language competitors to RTÉ.

In many ways, the BBC set the standards for everyone else and continues to – in terms of production capabilities, it is a great broadcaster. As a result, we became accustomed to exceptional editorial and production standards. Judged against these, RTÉ may sometimes struggle. But, objectively, this is a very unfair yardstick.

While there is currently a review underway, BBC has always been fully funded by UK taxpayers. They are operating in a market of over 65 million people. The population of Ireland, on which RTÉ can draw for funding of one kind or another, is currently 4.9 million (up from 3.78 million when RTÉ television was established). The effect, inevitably, is that budgets are much smaller in Ireland.

• THE WIDER NEGATIVE IMPACT OF PROXIMITY TO THE UK

There is a key lesson here, in relation to media in general, for which the differences in resources in BBC and RTÉ offer a simple, clear and immediately understandable, reference point. It is that our proximity to the UK; the access that UK media products enjoy in Ireland; the shared language; and the inevitable comparisons between media there and here represent an ongoing threat, as well as a stimulus, to media in Ireland.

A huge number of the newspapers and magazines on sale in Ireland are UK-owned and benefit enormously from the economies of scale that can be achieved in that far bigger market. The same is true of websites. They also, for example, attract interviews with major stars or leading world figures, on the basis of the far bigger audience they can deliver, when the UK and Irish markets are combined.

This particular competitive advantage, and the associated hazards, underline the importance of a properly thought-through, fair and essentially supportive regime that would help to strengthen indigenous Irish media – and media that has Ireland as its primary focus and not just as an add-on for the local market.

This proximity to the UK is not just geographical, it is also cultural, and it is therefore an issue that affects every aspect of media in Ireland. All of this needs to be strongly factored into any consideration of the future of media here.

• CHANGES IN UK BROADCASTING

To return to broadcasting, in a rapidly changing world, as UK broadcast media mutates, the impact and influence of developments there will seep into Ireland and potentially have an impact on ideas, interests, standards and beliefs here.

For example, we are about to see the launch of the first two openly partisan news broadcasters in the UK, with the heavily funded GB News to the fore. In the US, it is widely accepted that this kind of partisan broadcasting was hugely instrumental in creating the conditions in which the outrageous deceptions, lies and propaganda of the Donald Trump era were spread and given wings. We don't know yet if the same kind of latitude will be given to GB News, or other new stations, in the UK, to deliver propaganda masquerading as news, but there will certainly be a far more presenter and agenda-driven form of broadcasting.

By extension, the launch of these two new stations in the UK will likely represent a significant challenge for media in Ireland, and indeed for Ireland itself. Will either of the new stations set about promoting an extension of the Brexit agenda which is important to the current UK government?

Will the new agenda-driven broadcasting be used to drive anti-EU feeling among people in Ireland? Where will the stations stand on the issue of the status of Northern Ireland, and the Belfast Agreement? To what extent will stations in this mould support far right political forces, and conspiracy theories, in the way that similar stations have in the US?

There is an argument that this is something we just have to live with, in the same way that we had to live with the toxic influence of Donald Trump on Twitter for the four years he was President of the United States. It is certainly not something that Ireland is in a position to directly control.

What it does underline, however, is that our exposure to media from the UK is a powerful factor in the shaping of expectations, and often prejudices, within Ireland. To a considerable extent, in relation to standards, that influence was a powerfully positive one, especially in the context of broadcasting, where the UK's support for an independent, fully-funded State broadcaster delivered one of the best examples in the world for broadcasters, editors, journalists and media companies here, to test ourselves against.

But as the BBC's position is gradually eroded, as seems likely, and to a greater extent than ever before the UK follows the lead of the US, as also seems likely, there really is an urgent need to provide the finance and the support at the level required to strengthen our locally-based Irish media sufficiently to battle against much better-funded external and potentially hostile media interests; and to enable the Irish media to flourish and to produce the kind of great content that will make it harder for a potentially invasive neighbouring media to exert undue influence.

• FUNDING RTÉ

There is an argument that, like the BBC, RTÉ should be funded entirely out of the public purse. This is worth considering, even if the outcome were that RTÉ would soak up the bulk of whatever additional resources might be made available by the State for media, over the coming decade.

The effect would be to free up a huge amount of advertising spend, which should, in part at least, be redirected to independent media companies, who do not currently receive any direct subvention from the State.

This would not be as big a win now as it might have been in the past, in that the freed-up advertising spend might migrate to global platforms (the most obvious being tech giants like Facebook and Google) rather than to TV stations, independent radio, newspapers, magazines and so on. But, in our view, the increasing market dominance of those big tech companies must in any event be addressed effectively in the report of the Future of Media Commission, and in any legislation that is destined to flow from it.

• UNFAIR COMPETITION

This touches on one of the key issues, which is that the dual funding of RTÉ inherently creates unfair competition within the media marketplace. This is just a statement of fact. In Hot Press, we are for a strong State or semi-State broadcaster. RTÉ has a hugely important role to play in shaping the national conversation. But there is an extent now to which the pressure to bring in revenue from whatever source means that all

media operating in Ireland are chasing the same advertising and sponsorship budgets. And the fact that RTÉ has a huge subvention means that it has an unfair advantage over all other media in doing advertising and sponsorship deals.

Looking at it from an independent media operator's perspective, the Future of Media Commission has to be brave enough to decide how to address this imbalance, without jeopardising RTÉ and its public service elements. It also needs to consider the fact that even the BBC soaks up advertising revenue from Ireland through locally targeted advertising on its website.

The dual-funding model also means that RTÉ has to chase audiences in a fiercely competitive way, rather than taking on a more focussed, non-profit public service function. The effect of this had historically been felt to the greatest extent by independent broadcasters – whether radio or television. However, it now hits all media directly.

To take the most obvious example, the RTÉ website is packed with material which is created by a huge staff that is supported to a very large extent by the proceeds of the licence fee (€189 million in 2018). And yet, every other website operating here is required to compete with RTÉ, for audiences and for revenue, as if it is on equal terms.

This is a huge issue for all media, and increasingly so. The consensus is that video is more important than ever to website audiences. RTÉ is producing video material all day, every day. It has a huge competitive advantage against all other websites and publishers – and, again, this advantage is underpinned by the licence fee. It will never be possible to fully counter-balance this competitive advantage. However, a mechanism is required that would level the playing field to a noticeable extent.

Magazines Ireland have made a submission to the Future of Media Commission which highlights that the imbalances created by different forms of State involvement in the broadcasting landscape are not entirely confined to the impact of RTÉ. That submission points out that independent radio stations have a separate, legitimate claim that they should receive support for the public service elements of their work as broadcasters, and in *Hot Press*, we would fully support the enhancement of mechanisms which achieve that end.

The greater the extent to which public service broadcasting can be encouraged and supported in independent Irish radio and television stations, the better. However, it must be recognised that all FM broadcasters in Ireland are in effect also afforded an indirect subvention by being given a licence to broadcast in what is, in each instance, effectively a closed marketplace.

To take this at its simplest, online, all broadcasters are enabled to compete in the 'text and pictures' market, which historically was the domain of print newspapers and magazines. On the flip side, newspapers or magazines cannot start FM radio stations. As a result, licensed broadcasters enjoy a competitive advantage, like RTÉ (though nothing like on the same scale), in relation to the production of video and sound/podcast material. They also – in most cases – enjoy the privilege of being protected against direct competition in their specific licence areas.

There is no obvious way that this imbalance can be addressed except via some form of direct subvention for media that are currently not supported, as is the case with magazines and newspapers, and their online platforms.

• **MAGAZINES: THE CANADIAN MODEL**

Canada has an established reputation for being very alert and effective in supporting local cultural activities and enterprises against the otherwise inevitable domination of the Canadian cultural space, by US producers. This applies to film, where the National Film Board of Canada set extraordinary standards, but also to music and media, where local content quotas and State support combine to create a vibrant media and cultural sector, with a strong public service remit, and a genuine richness in Canadian-focussed content.

In its submission, Magazines Ireland has referred to the Canada Periodical Fund (Canada Periodical Fund Aid to Publishers) as the best model for support for the sector.

This fund starts with a recognition of the special role that magazines have played in Canadian society and life. It reflects the fact that there is a big neighbour next door, whose products occupy magazine racks in Canada – in much the same way that UK magazines do in Ireland. It also reflects the fact that the editorial and production budgets available to magazines and publishers in the larger market are a multiple of what is available in the smaller, local one.

I don't think we need to hype the importance of what Hot Press has achieved over the past 40+ years, or the extent to which it has been a hugely positive catalyst for change, and for cultural development, in Ireland. Almost everything the magazine has done, and continues to do, whether in print, or online via hotpress.com, can be defined as having a public service remit. Hot Press has been a platform for thoughtful, high quality journalism. It has documented aspects of Irish culture in a way, and to an extent, that no other medium has. It has broken new ground journalistically. It has been immensely important in the support it has always given to Irish music, film, literature and other forms of popular and artistic culture. And in particular, it has been recognised as a key driver in the development of an international-quality music scene in Ireland.

Historically, this was done without any form of direct Government support.

However, the changes that have taken place in media generally mean that it is much more difficult than ever now, to fund the kind of public service function that Hot Press has performed. In the digital era, there is pressure to keep a website ticking over 12 hours a day or more. Social media has to be fed in a similarly intensive way. In effect, a magazine like Hot Press has been pushed by wider market forces into a hugely increased output. Maintaining standards has become increasingly difficult.

(It is worth noting that this is true in the wider world of newspaper journalism too, with many national newspaper journalists suffering from exhaustion and burn-out).

Scale is absolutely critical. Since web advertising is essentially paid for per click the disadvantages of being in a small market (from which advertising revenue can be attracted) of 4.9 million people are magnified enormously. A similar title, producing an equal amount of content in the UK should generate a multiple of 10 to 13 times the income Hot Press can generate online, in the Irish market. The negative logic of it, from an Irish perspective, is brutal.

In one respect, it comes down to a simple question: do we want our magazine racks, our news-stands, our browsers, and our social media feeds, to be completely dominated by UK material? If the answer is 'no' – as it should be – then it follows that it is vital to provide the necessary financial support to enable quality Irish magazines, and in particular those with a strong cultural and public service ethos, to sustain in print form but, also, to grow and to diversify successfully into the online space. We will leave it to NNI to fight the corner for newspapers in relation to this, as they surely will.

It is also necessary to counter-balance the competitive advantages given to other players in the media space in Ireland. The best way to do this effectively is as part of the wider redrawing of the landscape in relation to funding, advertising and other related issues that is the remit of the Future of Media Commission.

• SOCIAL MEDIA

The biggest threat to media in general in Ireland comes from the way in which the tech giants have been allowed to operate outside any proper or meaningful legal or regulatory framework here and elsewhere.

It is now widely recognised that the extent to which this was allowed to happen represents a failure on the part of democratic Governments – who are only now waking-up to the scale and extent of the abuses which have been facilitated by the special status afforded, originally in the US under Section 230 of the Communications Decency Act, to these companies, including Facebook, Twitter, Google and so on.

For a long time, critics of the new status quo have been saying that companies like Twitter, Facebook and others are no different to publishers or broadcasters. They are media companies, which are competing with other media (including what have been called 'traditional media'): (a) for audiences; and (b) for advertising revenue.

Among the core differences between Twitter, to take one example, and, say, The Irish Times is that Twitter gets all of its content free from millions of contributors all over the world, whereas the Irish Times has to pay for most of its content.

In terms of what Twitter publishes, the simple analogy is with the Letters Page in the Irish Times, or with the Classified Ads section in any newspaper or magazine.

This is in effect free content for newspapers, submitted by members of the public. But, with a national newspaper – or a magazine – that content has to be vetted in relation to source, and checked for inaccuracies, misleading statements, possible libel and so on. There is a significant cost associated with that in itself. But if someone is libelled through the publication of a letter in the Irish Times or Hot Press, then the Irish Times or Hot Press can be held accountable and potentially sued for damages.

From the point of view of the person who has been libelled, this is as it should be.

But, in contrast, Twitter has been given almost complete immunity from the legal consequences of the material it publishes – and from which it directly earns advertising revenue. The same is true of Facebook and other forms of social media.

The effect is that they have been afforded two huge competitive advantages over other media: they get millions of contributions free (incidentally, driving down the value of the written word and what journalists can be paid); and they are not burdened by anything like the editorial and legal responsibilities, and demands, which are a pressing daily fact of life for other media.

For a long time, the tech giants played a very effective game of pretending that they are not publishers, but that they are 'public utilities'. However, latterly, as US politics became much more complicated, the fact that they perform editorial functions when it suits them, became absolutely impossible to deny. Nor does their claim to be public utilities stand up. They are private enterprises, whose essential goal is profit.

And yet, they have been enabled in a way that has allowed them to suck between 40% and 50% of the total advertising spend out of the market in Ireland, without being burdened with any of the overheads – professional journalism, production costs, fact-checking, legal-ing and so on – in which other media have to invest heavily on an ongoing basis. It is the ultimate competitive advantage.

While its origins are explicable, objectively there is no logical basis for retaining this totally privileged position, above the law, which they have been afforded. Ending that unjustifiable privilege and the other forms of market dominance, which they exert at the expense of competitors for advertising spend, should be a core objective of the Future of Media Commission

• **AMASSING OF DATA**

There are other competitive advantages, in securing advertising, which have been established by stealth by the big tech companies. It is not new to say that their business model is best described as Surveillance Capitalism. But it is important to put this reality – and the question as to how it might be addressed – at the heart of any consideration of the future of media in Ireland.

To take Facebook as an example, they have established intimate pen pictures of the vast majority of those who use Facebook and its off-shoots or companion platforms. These include gaining access to every morsel of information that can be gleaned from anything and everything else that an individual does while they are online.

Most people had no idea that, by joining Facebook or by using Google, they were enabling the creation of an intimate profile of themselves as individuals, the mapping of their activities, friendships and movements, and the monetisation of this via targeted advertising. This process was knowingly advanced by stealth.

There are many reasons why this needs to be addressed urgently, most critically with the objective of protecting the democratic process and democracy itself – given in particular that this micro-targeting has been used in all sorts of devious ways in political advertising and in attempts to derail the democratic process by ‘bad actors’, often external to a given jurisdiction.

However, for many publishing companies, and other media, the damage has been done. A huge volume of advertising revenue has migrated to social media platforms, as a result of what is another form of anti-competitive, and also in many ways unethical, behaviour.

Of course, this is a global failure rather than an Irish one – but it is also true that there has been a failure on the part of the authorities here to recognise what was happening and to act independently, as a nation, in relation to it.

As a result, there is a strong argument that others in the media space should be compensated for the extent to which their businesses have been disadvantaged and damaged because regulators and lawmakers were slow to recognise the deeply problematic reality of what was being done by the Big Tech companies.

• CHANGING THE ALGORITHMS

It is worth repeating: the way in which data has been accumulated, and the extent to which people, and their data, are turned into the commodity that’s being sold, as a function of the business model adopted by social media companies and Big Tech is unethical. But this applies also to their modus operandi in various other ways.

The most obvious is that they can, and do, change the algorithms that control and drive traffic and engagement without any reference to anything other than their own commercial advantage as media platforms that sell advertising.

There is absolutely no scrutiny of the algorithms. There is no third party that has the right of oversight or approval. And they have only one motive for how they change things when they do: increased profit. Here is one, simple illustration, in relation to Facebook:

- They induced businesses to create a Facebook presence
- They made it attractive enough that some businesses thought they didn’t need a website
- Those businesses became highly dependent on Facebook
- Once they achieved critical mass in terms of sign-ups, Facebook started to tighten the rules
- They limited the number of ‘followers’ to whom messages would be shown
- How could you reach the rest? By advertising, of course
- They changed the algorithm so that it discriminates against posts where other businesses’ Facebook pages are tagged
- Is it possible to get around that? By advertising of course.

At every turn they are finding new ways of extracting money from businesses that have a Facebook presence and there is no regulatory oversight to prevent it.

• FREEDOM OF SPEECH

As anyone who has observed the recent political machinations in the US, and the decisions taken by Facebook and Twitter in that context to shut down accounts or take individuals offline, we are faced ultimately with the question: is it right that mega-rich, monopolistic corporations whose core motive is profit should be the ones

making momentous decisions about freedom of speech – without being properly accountable to a higher, State-led authority of any kind.

For sure, this issue is bigger than Ireland – and it is true that a Europe-wide move to limit and control these corporations, and if necessary to break up what are effectively monopolies, may be the best solution. But to fulfil its remit fully, the Future of Media Commission should make the kind of recommendations that would be necessary to address the issue in Irish terms, so that Irish public policy can respond.

• DIGITAL LEVY

- In France, the Autorité de la Concurrence rules that Google's practices have caused a clear and immediate harm to the press sector. They have applied a 3% levy on revenue from digital services earned in France by companies with revenue of more than €25million in France and €750million worldwide.
- In the UK, they have introduced a digital levy of 2% on the revenues of search engines, social media services and online marketplaces which derive value from UK users.
- In Australia they have promised a tax on the revenue being generated from advertising by Big Tech companies.

In general, there is an increasing realisation of the toxic impact of the global monopolies which have been established by the big tech companies, and the way in which they feed off news and other media. Clearly, from an Irish perspective, a European decision to tax them would be the best solution; and from Europe's perspective a global agreement would be preferable. But it seems that a tax on revenue is one potentially legitimate means of generating the additional resources required to fund media, and especially the public service element of it. Recommendations in relation to this should be considered by the Future of Media Commission.

• MEDIA EDUCATION

There is general agreement among experienced practitioners that there are serious issues with the way in which media education in Ireland is working right now. Our historical experience in Hot Press is that, rather than coming through the educational system, many of the best journalists and writers are what might be described as 'naturals'. Some of the very best ended their studies at Leaving Cert level.

There is an extent to which this apparent anomaly might be addressed by (a) a revision of the CAO process and the requirements to get into journalism or media courses, with a far greater emphasis being placed on straightforward writing ability; and/or (b) changes in the way the courses are shaped and what they teach. However, the reality is that until people get into a working environment, it is hard to tell in what aspect of media they might excel.

An underlying factor is that there is nothing that can really prepare a young journalist for the pressure cooker atmosphere of doing it for real. Many students have observed that what they learn during work experience – frequently required by colleges as part of B.A. or M.A. courses – is far more valuable to them than the three or four years spent in college. What they get during these work experience placements is a crucial form of applied learning. There is a problem, however, that the time involved currently is too short for the full benefits to be delivered to the students, with many students requesting to stay on after the initial four-to-eight week internship period has been completed.

A longer requirement in terms of unpaid work experience is not the answer. No one is comfortable with a situation where young journalists are expected to work for nothing, which can easily become, or certainly feel like, a form of exploitation. But it is worth noting that in various European countries – Germany, Belgium and Italy, for example – additional media training is paid for substantially by the State, with contributions being made also to the cost of accommodation and expenses, depending on the jurisdiction. Irish media students or recent graduates deserve the same level of support as their European counterparts.

Magazines Ireland has proposed a scheme that would involve the cost of taking on media workers straight from college being shared between employers and the State. Depending on entry qualifications, or other factors, the scheme could cover one or two years, after which the students would be fully qualified and in the position of having accumulated 12 months / 24 months experience.

The cost to the exchequer of this scheme would be relatively small. And the dividend, in the long run, would be hugely positive. It would improve media education in Ireland significantly, with the potential for a wider, ongoing uplift in editorial standards. And it would likely ensure that more media graduates would end up actually working in media.

There is no doubt that the requirement for quality content creation – for every form of media – is likely to increase over the coming decades. But the important emphasis here has to be on ‘quality’. Ireland should aim to have the media professionals capable of meeting that demand. If it doesn’t, content will inevitably be acquired from international sources far more often. And hopes for a distinctive, locally-driven culture of public service media will be damaged.

It is important to be clear that the establishment of a targeted media employment support scheme of this kind would not be remotely enough on its own to address the issues and the challenges facing independent and public service media in Ireland. But it will certainly help, by ensuring that our incoming media professionals would be far better prepared for the very difficult challenges that inevitably lie ahead.

• IRISH CONTENT QUOTAS

While very few broadcasters like quotas, there is general acceptance that they work. If no public service broadcasting requirement had been placed on local radio stations when licences were originally issued in 1989, the likelihood is that they would have developed as pop or country music stations. In the same spirit, while the process of agreeing a quota of Irish Music on Irish radio is still being debated, the fact that a decision to introduce a 30% Irish Music quota was made by the IRTC in the 1990s created a context in which a significantly increased amount of Irish Music was – and still is – played than had been the case beforehand.

Across the board, the same is true: the higher the requirement on broadcasters to include local or Irish output, the more local content creation flourishes. So it is in the national interest to do as much as possible, within reason, to ensure that local creative content is given space, airtime and exposure.

In the past, that aspiration created a potential conflict with our European obligations. In fact, the IRTC were able to negotiate an agreement with the EU, in relation to an Irish Music content quota, by emphasising (a) the unique nature of Irish Music, not just in its musical language, but also in the story-telling of Irish songwriters across all genres; and (b) the threat to that musical culture represented by the dominance of US and UK pop and rock music. In the event, largely because of timing issues, the solution negotiated at the time was not fully implemented, and so a question mark remained over what was possible.

However, we have just entered what is potentially a completely new era in relation to content quotas. The legal obstacle to quotas came from the requirement within the EU not to engage in anti-competitive practices, which might discriminate against any member country or which might be seen as a form of State subsidy to local businesses.

On the other hand, there is no problem whatsoever in stipulating that a specific percentage of any broadcaster's output – radio or television – must originate in the EU. Specific criteria can be set out in relation to what qualifies as EU-produced, including, for example, nationality of the artist/ nationality of the songwriter / where the music was recorded / location of the record label releasing the track etc.

In that context, it would be possible to legislate that (notionally) a specified percentage of all of, say, RTÉ's music output must originate in an EU country. This, of course, would be equitable only if the same rule were applied to all licensed FM stations.

Whereas, historically, a decision of that kind would have likely meant a shift to more music of UK, as against US, origin, following the exit of the UK from the EU, the effect would likely be completely different. Because of the importance of language in broadcasting, the likelihood is that stations would play a far greater proportion of Irish music, sung or performed in the English language.

It is worth remembering that local quotas have been applied within the EU. These are typically based on preservation of the language of a particular country (as with local music quotas in France and Portugal). But there are other examples. Our understanding is that, even while a member of the EU, the UK required film producers who were availing of their film incentive schemes to use music that originates in the UK for film soundtracks. A similar provision could be applied in Ireland.

This is not to advocate the immediate application of a slate of content quotas. All sorts of factors have to be taken into account in any discussion of the issue, including the increasing prevalence of global streaming platforms, the likely greater difficulty in securing the Irish broadcast rights to recent films and so on. But there is a strong argument that the whole issue of quotas should be looked at afresh, in the light of Brexit, in a way that would enable Irish editorial, content and creative producers as well as artists, songwriters and performers to thrive.

• INDEPENDENT CONTENT CREATORS

There was a moment when the control exerted by RTÉ on the audio visual market in Ireland was recognised as a major stumbling block to the emergence of an independent television production sector. As a result, while it was resisted at the time by RTÉ, requirements were put in place for a proportion of television budgets to be spent by RTÉ on independent productions.

This, combined with other incentives in the film and audio visual sector, and the establishment of TV3 (now Virgin Media Television) had the desired effect of building the Irish independent TV production sector into a viable business arena. While no one would claim that this is now operating at the optimum level, there is no doubt that the measures that were put in place (a) were entirely necessary; and (b) had, at least in part, the desired effect.

What may be missed is that this can be viewed as an indirect subvention of independent TV and film production companies in Ireland, in that licence fee money is used to fund the programmes commissioned and made; and TV production companies are thereby placed at an advantageous position in relation to attracting sponsorship and commercial support from limited budgets.

In contrast, nothing has ever been done to similarly support or encourage independent magazine publishers. In fact it is probably fair to say that magazines and newspapers – including their online platforms – are the least supported sector in the Irish media landscape. This reflects an unintended but nonetheless real form of cultural discrimination that has had serious economic consequences for publishers.

The Future of Media Commission has the opportunity to redress this historic, and current, imbalance. Magazines have frequently acted as a breeding ground for new journalistic, writing, photographic and creative talent, coming into the media space. Right across the media spectrum, in RTÉ, Virgin Media Television, national newspapers, and international media alike, you will find journalists and writers who began their careers with Hot Press. This is a track record of which any media organisation would be proud.

We believe it is important now to ensure that there is continuity in the kind of properly directed, responsible editorial experience given to these young creatives and media workers and that the magazine sector should be supported, in order to give entry level journalists, writers and photographers the kind of grounding in the important editorial and related disciplines that can make all the difference to their careers and their professional development.

This is more urgent than ever in a social media-driven world, where shouting megaphone opinions is too often seen as the role of good journalists and of 'real' journalism.

• WHO SHOULD QUALIFY FOR SUPPORT?

What criteria would or should be applied in relation to support or subvention by a State appointed media commission, or authority? And what forms of journalism or content creation should be supported?

1. Where magazines or periodicals are concerned, as per the Canadian model, there should be forms of support which are not dependent on one-off applications or on providing editorial or content elements that are heavily prescribed or set out by the authority.

2. (a) There are good reasons to support the view that investigative journalism should be supported: it takes time, is costly and it requires upfront investment that may never see a return.

(b) While acknowledging the importance of investigative journalism, it would be vital for any new media regulatory and support regime in Ireland not to downgrade the importance of ongoing, straightforward public service journalism, particularly in the cultural sphere: introducing new artists, writers and thinkers; supporting them and their work; providing a platform which enables them to reach and build an audience – and so on.

(c) Equally, positive awareness and consciousness-raising work – for example in relation to the environment, science, best practice in other jurisdictions and so on – which can also be time-and-resource-consuming, and costly, should be considered for support.

(d) It would be valuable to make specific provision for the support of greater diversity and inclusiveness in Irish media, including the introduction of new voices, new writers and different stories, especially from disadvantaged, marginalised or migrant communities.

(f) Finally, given the extent to which 'fake news' has been an issue in recent years and specifically in the context of the unregulated status of social media, there is a strong argument in favour of support for the steady, and often slow, meticulous, fact-checking, information-gathering aspect of journalism and content-creation.

3. It is vital that processes for accessing funding should not be overly complicated or long-drawn out. Public support measures (and the organisations that administer them) have a tendency to require levels of bureaucracy, form-filling, specific timing, and so on which are inimical to the pace at which media operates, and has to operate, and which work against independent businesses which have to fight on an ongoing, often daily basis to make things happen. It is, of course, vital that support money should be well spent or directed, and that the funding authority (and those who receive funding) be accountable. But the barriers to entry should not be at a level which means that media businesses simply cannot afford the time or resources required to apply.

4. It is also vital that there is not, in either the design or implementation of a supportive regime, any preference for organisations that are already being supported by the State or given other forms of State subsidy. In the wider media space, for example, some of the best educational initiatives – locally and internationally – are taken by media owners. However, those initiatives are frequently undercut by similar educational classes being offered by already State-supported organisations, who access further subsidies to create competing courses, in a way that is clearly anti-competitive.

There is a legitimate concern that State-supported organisations tend to receive further State supports. In as much as the Future of Media Commission can affect this, it should ideally be in the direction of ensuring fairness and a level playing field. The objective should be to support commitment, track record, creativity, fresh ideas, quality output, independence, excellence and achievement. It should also be to support media businesses that employ people and that have the potential to develop an international dimension.

Overall, in Ireland, in the long term, we have to aim to have global reach in what we do in the media space. There is great potential in that ambition, which has perhaps been accelerated by Brexit. The case will have been made eloquently by others that Ireland can become a gateway into Europe for US content creators, TV companies, film producers and so on. Hot Press supports this as an ambition: policies should be framed which

encourage media companies to look outwards and to reap the full dividend of competing successfully in the international market for media and cultural products.

The reputation that Ireland has already built in terms of creative talent of every kind has the potential to be translated into a huge increase in employment in media, the arts and entertainment in Ireland over the coming decade, if it is facilitated in the right way, and with the appropriate framework of grants, supports and incentives.

However, making that policy work is likely to be a marathon rather than a sprint. In the meantime, the existential threats to Irish media remain imminent and – for media businesses, editors and staff alike – daunting.

We believe that Ireland will best achieve global reach by first ensuring that what we do in media locally, and for Irish audiences – in relation to Ireland, Irish society, Irish culture, and the lives and experiences of Irish citizens, or those who aspire to Irish citizenship – is strong, well-funded and committed to the highest standards and best quality possible.

Hopefully, that can be the primary, immediate outcome of the deliberations of the Future of Media Commission. We look forward to reading its report and hope that the key issues raised in this submission can be addressed.