

Ofcom Advisory Committee for Wales - Measuring Plurality

- Ofcom has been requested by the Secretary of State for Culture, Media and Sport to provide advice on media plurality. Members of the Ofcom Advisory Committee for Wales (ACW) welcome the opportunity to provide advice to Ofcom.
- Today, the needs of a diverse UK audience are served by an extensive range of services provided by multiple voices - on television, on radio, in print and online. However, this is clearly not the case in the context of Wales, where ensuring the continued range of media viewpoints remains vitally important especially in the provision of public service broadcasting. Members of the ACW are very concerned to ensure, as a primary objective, that sufficient plurality of media provision is maintained in Wales.
- Whilst the internet has enabled the creation of communities of interest; as a global network of largely user-generated content, it will not be a substitute for professional, impartial and authoritative sources of news provided by television and print media and it does not yet reflect the cultural diversity of geographically identifiable communities such as Wales.
- At present, Wales is still heavily reliant on the BBC for programming and online content specifically for audiences in Wales. Whilst we believe BBC Wales should remain the cornerstone of public service content in Wales, it would not be desirable for media provision in Wales to be left entirely to the BBC. Plurality of supply is crucial in informing civil society; scrutinising the democratic process; and to ensure that Welsh audiences have access to high quality original news and non-news programming, relevant to their lives and the area in which they live.
- Indeed, with BBC Wales in the process of reducing its programming by up to 20%; the possible reduction in the plurality of programme supply and viewpoint if ITV's commitment to Wales is allowed to diminish in the next licence period; and a weak indigenous press; the media deficit in Wales has become a cause for alarm. The Welsh Government has previously described this lack of plurality as a "real obstacle" to the development of civil society in a devolved Wales, which has only recently gained primary legislative powers. Post-devolution, it is essential that the public service broadcasters and print media provide news and current affairs services covering the whole of Wales which can hold democratic government in Wales to account.
- None of the London-based newspaper titles publishes a Welsh edition and there is almost a total absence of Welsh content in UK-wide newspapers. Indeed, the Institute of Welsh Affairs estimates that almost 90% of daily newspaper readers in Wales read papers with no Welsh content. The two indigenous newspapers in Wales have suffered from a significant decline in their circulation in recent years as their business models have been threatened by technological advances and a decline in advertising revenues. Some have suggested that the Western Mail, the only daily paper of its type which reports and scrutinises developments in the National Assembly, may become a weekly title, further threatening media plurality in Wales.
- Within this context, the risks posed by a lack of plurality in Wales are of pressing importance and ought to be considerations in measuring media plurality, in addition to competition and media ownership issues which dominate the current debate. As Geraint Talfan Davies, the Chairman of the Institute of Welsh Affairs, has said "*plurality of ownership is an imperfect proxy for plurality of viewpoint*". The ACW believes that plurality should not solely be viewed

in a UK context, but that a more sophisticated geographic assessment of plurality should be made at a UK, national, regional and community level so that any measurement of plurality accurately reflects the specific circumstances of Wales.

- For example, if one treats the London media market in isolation, several organisations may be judged to have a disproportionate share of the cross-media market, resulting in forced divestment. However, if one replicated this means of measuring plurality in Wales, Trinity Mirror, for example, which occupies a near monopolistic position in the Welsh newspaper market, would be forced to reduce its already relatively weak output, with little prospect of other providers filling the gap. This would be to the detriment of the Welsh media market. The Advisory Committee for Wales has suggested that Ofcom considers a “floor” as well as a “ceiling” - i.e. plurality rules on the maximum share of the market is only applicable if the total number of providers is above a minimum threshold.
- Whereas there is a consensus emerging that cross-media ownership rules ought to be tightened in a vibrant London-based media market, the opposite is the case in Wales. The lack of media outlets means that cross-media ownership rules ought to be relaxed to stimulate cross-platform collaboration, as was suggested in the IFNC model, to allow newspapers and radio stations to survive.
- In conclusion, it is clear that one set of measures of plurality may not be appropriate for all parts of the UK. The ACW advises that Ofcom ought to consider local circumstances in its deliberations.