

Children's programming is the most vulnerable genre of production made for the most impressionable audience members. To ensure there is a diverse range of content available in the market there needs to be support from government agencies and mandated engagement from commercial platforms.

WHAT IS THE PROBLEM?

The obligations to broadcast children's content worked well when there was a single linear channel. However, when commercial broadcasters were provided access to more spectrum and multi-channels in 2013, the broadcasters were allowed to acquit their children's content quotas across their channels. Without delay, the broadcasters shifted their children's content to a multi-channel.

As children's content became isolated on a multi-channel, and with little if any

promotion and marketing invested in by the networks, audience and advertising on these programs have declined and commercial broadcasters have begun to question their obligations. However, while the first run numbers may be in decline, children's content has a lengthy currency with strong second and third run audiences.

Commercial broadcasters currently have restrictions around the way they can advertise on children's content and point to SVOD services like Netflix and say that they aren't regulated to provide content, which they say is unfair.

ABC and SBS do not have content quotas and their budgets have been cut by the government and the ABC is reducing its expenditure on Children's content. This means while the ABC does show a lot of children's content now, this is no guarantee that it will show children's content in the future.

Subscription television broadcasters don't have children's content requirements.

It is likely that the Government will review the Standards this year as part of a broader review of Australian content regulation.

WHY HAVE CHILDREN'S CONTENT OBLIGATIONS?

At the time the *Broadcasting Services Act* was passed in 1992, the Parliament noted it intended commercial television broadcasters to broadcast Australian content which:

- reflects the multicultural nature of Australia's population;
- promotes Australians' cultural identity; and
- facilitates the development of the local production industry.

The Government also required commercial television broadcasters to broadcast children's content.

A strong regulatory environment for commercial broadcasters is seen as important because of the power of the television medium reaching nearly all Australian households for free and as a quid pro quo for access to the spectrum: a public good. There are also other regulatory protections for these businesses such as no competition from new commercial television licensees¹ and prioritised access to valuable sports rights through the Government's Anti-Siphoning List.

Australians watch a significant amount of content across all platforms: broadcast, subscription and video on demand (VOD). And while VOD services are growing, broadcast TV still dominates. Viewing hab-

its are, however, changing. For example, Screen Australia research has showed that younger audiences are most likely to watch professionally produced content through services like YouTube and to view broadcast TV through catch-up or other VOD services. The same research also showed that a majority of parents value Australian programs made especially for children (Screen Australia, *Online & On Demand*, 2017).

Across all the content providers, some of this content should be age appropriate and provided specifically for children to help their development, learning and entertainment.

WHAT IS AT RISK?

It is likely that the Government will review the Standards this year.

We hold fears that this Government will tilt the balance too far in favour of the commercial content platforms to the detriment of our children and local production.

If the current obligations are removed they cannot be re-introduced because of Australia's free trade agreement with the United States.

If there is limited involvement in children's content by commercial platforms, it will rob children of the opportunity to be educated and entertained and see children like themselves on these key services. It will dimin-

ish the diversity of content available for children and devastate the local production industry for children's content.

HOW CAN THE PROBLEM BE FIXED?

The problem is a tough one to fix so keeping the quotas for commercial broadcasters is preferable to any removal of the quotas without any careful and considered alternative reform.

Fixing the problem could be as easy as keeping the current quotas and requiring greater promotion and marketing and flexibility of children's programming across a range of a content platforms including broadcast. Obligations should also be extended to SVOD services or other digital platforms, as well as the ABC and SBS to invest in local children's content. Other options include a children's television fund, which could be set up to which all the broadcasters might contribute. There might also be an app for children's content.

We need our current regulatory environment evolved to better fit the current media landscape. Current regulations should be extended to new market entrants so that our children have access to a diversity of Australian-made children's content and a vibrant local production industry.