

## **Submission to the Department of Communications (DOC) on the Public Service Broadcasting Discussion Document published in Government Gazette No.32420.**

Workers' World Media Productions (WWMP) is a non-profit, independent labour media production house with offices in Johannesburg and Cape Town. Our major and flagship project is the Labour-Community Radio Project that involves the setting up and development of 1-hour labour shows on over forty community radio (CR) stations in all parts of South Africa, in working class and poor communities based in urban, peri-urban and rural settings. The project was developed in partnership with the trade union movement, consisting of the three trade union federations (Cosatu, Fedusa and Nactu) and the National Community Radio Forum (NCRF). Since the LCRPs inception some seven years ago we have consistently encountered the bizarre obstacle from several community radio station managers of insisting on the payment of "air-time" money for the production and broadcasts of the labour shows. This is despite the fact that the shows are supported in various ways by WWMP, including pre-produced features and inserts on the topic for the week, weekly labour news and an HIV & AIDS insert to enhance the quality of the shows (produced in 5 languages), training for the locally based labour show hosts and research material provided for the show producers and hosts every week and sent to them by courier service. The entire project has an annual budget of nearly SAR3 million.

However, as WWMP we were also aware that community radio stations are not supported by the state and rely on self-generated income through various means. We therefore developed an ambivalent attitude to the community radio stations' management. On the one-hand we viewed the stations management's insistence on paying of air-time money as an obstacle to promoting relevant programming and the donor funded project – the Labour-Community Radio Project. On the other-hand we empathised with their situation and their quest for survival. We therefore made serious efforts to secure financial sponsorships for the air-time and have been successful on two occasions (two annual seasons over a five year period).

This submission will confine itself to responding to key questions posed by the DOC discussion paper in relation to community broadcasting and specifically based on our experience of community radio in the inter-related areas of:-

- Ownership, governance and control of CR
- Broadcast content and programming
- Funding of CR and financial sustainability

## **Background**

One of the fruits of the struggle for democracy in South Africa has been the relatively great awareness by the public of the need to ensure democratic participation in all the major facets of development – political, social and economic to at least ensure “equity” and redress of the inequalities due to the legacy of the Apartheid past. This greater awareness and democratic legacy is embodied and codified in much of the South African constitution that has been shaped to safeguard numerous democratic human rights and principles. In particular, it invokes and ensures the right to the Freedom of Expression to all South Africans and includes; “(a) freedom of the press and other media; (b) freedom to receive and impart information or ideas; (c) freedom of artistic creativity; and (d) academic freedom and freedom of scientific research...” (RSA Constitution, 1996, p.9).

However, in general, rights are informed and enjoyed in the realm of life itself which unfortunately happen to be plagued by socio-economic and political context that is characterised by poverty and various forms of inequality. Community radio was small and belatedly developed in response to the repressive nature of South African society during the late 1980’s. It was a response to the undemocratic and the propagandistic use of radio by various state and commercial interests and established as an alternative and moreover, as a conscientising tool in the struggle against Apartheid and for a democratic dispensation. Since its inception during the late 1980’s and early 1990’s in South Africa, it was viewed as a tool for popular education and the development of mass democratic participation.

Unlike the cascading approach of commercial and most state broadcasters, community radio is meant to operate in a two-way communication process that develops into a synergy between broadcaster and listener (or audience) and the distinction between the two is progressively undermined and constantly blurred.

The attainment of community radio within a democratic media legislative framework during the post-Apartheid South Africa represented an important victory and gain, especially for historically disadvantaged black working class people. However, it is our concern that this important democratic gain is being diluted and systematically eroded by the current situation.

## ***The Concept, nature and ethos of Community Radio***

Since its inception internationally, community radio has sought to foster popular education and in order to ensure this, 3 fundamental principled aspects evolved:

- Non-profit making
- Community ownership and control
- Community participation

Based on the above the experience of community radio internationally, it is meant to act as a conduit for expressing local community interests with programming locally sourced after thoroughgoing and ongoing consultation to identify the needs and interests of people served.

Community support must extend beyond a narrow network of individuals and must be genuinely rooted through local and sometimes diverse interest groups and organisations. In South Africa, because of weak political roots, a changed political context and a lack of consistent financial support, there has been an ongoing danger to the community radio ethos of handing over complete control to individuals who play a leadership role at CR stations and whose main function is securing revenue to keep the station running. Such revenue is normally secured through various commercial means such as advertising, programme sponsorship and selling of air-time. There is a profound link between the latter negative phenomenon and the vexed issue of the sources of funding that ensures financial sustainability and the threatening of the community orientation of the radio station. Studies show that there is a direct relationship between financing, ownership and democratic control of community radio to ensure loyalty to its original purpose.

Similarly the Independent Communications Authority of South Africa (ICASA) highlighted key requirements for community television in South Africa in a position paper that were to include public access, local origination, community participation and non-profit status (ICASA, 2004).

However, in this neo-liberal capitalist world that we live in, with all its commercial and ideological pressures, in all likelihood, this ideal has been under threat with resultant negative consequences to community radio's democratic and community oriented ethos. Today in South Africa, the majority of community radio stations do not play a real developmental and transformation role, despite the fact that several socio-economic facets of the Apartheid poverty legacy remain after more than fifteen years of democracy. Many appear to have become radio stations that are functionally based on a community radio "mandate" that fit in with the legislative requirements for securing and maintaining broadcast licences. In real terms their activities, operations and content seem barely to ensure that they adhere to the three principles outlined previously, let alone playing a political role of facilitating and promoting change that represents the interests of their communities.

Generous provisions were made in the RDP for community media, with a specific mention of broadcasting;

*"5.14.4. An affirmative action programme, consistent with the best experiences in the world, must be put into place to empower communities and individuals from previously disadvantaged sectors of society. This must include: mechanisms to make available resources needed to set up broadcasting and printing enterprises at a range of levels; training and upgrading, and civic education to ensure that communities and individuals recognise and exercise their media rights."* (ANC, 1994, p133).

Similarly, The Truth and Reconciliation Commission (TRC, 1998) recommended;

*"that the state should promote a multiplicity of media voices by establishing a legislative environment and state subsidies to encourage the growth of grassroots publications and local broadcasting stations."*

However the state has left the CR sector to its own devices and to survive in the capitalist media market and to compete for commercial revenue. Media writer, Horwitz (2001, p.146) further acknowledges that the IBA saddled the community radio stations that were granted licences with several handicaps, importantly amongst these being that,

*"the IBA did not pay much attention to financial viability. There was no government support for community radio. It is difficult to get much advertising in township and rural stations where there are few businesses large enough to advertise and the target audience is beset by very high unemployment."*

#### **2.4. Socio-economic Development, Community Radio and Advertising**

The situation of community radio almost mirrors that of broader political and socio-economic concerns of the country, with progressive socio-economic rights in the areas of housing, health and education embodied and "guaranteed" in Section 9 of the constitution, but undermined by the reality of the legacy of Apartheid and not adequately fulfilled by government yet.

Despite having similar, albeit smaller in scale, overhead financial costs as the bigger commercial and public broadcaster radio stations and fostered by the same progressive media and freedom of expression legislation, they receive very little material support, despite the historical legacy of poverty in most black working class communities and the partial promotion of community radio "for development". Community radio stations do not receive any regular legislated and structured state subsidies to support their existence and development and instead are encouraged to have a small business entrepreneurial "free-market" liberal capitalist approach, predominantly reliant on advertising as a source of revenue. Such advertising revenue of any significance can only be sourced from the state or big business. This directly militates against the non-profit and democratic ethos of community radio.

#### **Advertising in S.A. and the prospects for Community radio as a source of income**

For community radio stations situated within in poor black communities, with the exception of the huge townships situated on the periphery of the major cities of Johannesburg and Cape Town such as Soweto and Khayelitsha respectively, generating advertising revenue from retail business is a very limited often non-existent prospect. Even in townships where huge supermarket chains operate, their advertising spending is directed mainly towards national media such as major television channels and newspapers, rather than specifically targeting their local market. Besides, their overwhelming dominance afforded by economies of scale renders them competitively superior to smaller retailers there. They therefore do not

have a need for local advertising to play a role for them in offsetting local competition, irrespective of the radio stations popularity and large size of loyal listeners.

### *Advertising spending patterns in South Africa and Community Radio*

A compelling factor currently in directing community radio in terms of its content and organisational practice is the political economy of media advertising in capitalist societies. It works on the simple premise that affluent audiences will attract the greatest advertising income and conversely the poorest the least. This causes community radio stations in poor communities to desperately accommodate the needs of the big companies to attract advertising revenue. In a meeting with the programmes manager of a Gauteng based community radio station, we were told in no uncertain terms that whilst they like the labour show that Workers' World Media Productions (WWMP) produces, if Old Mutual came along and offered them R5000 for the same slot they would readily accede to Old Mutual's request.

Advertising spending for radio in South Africa illustrates very clearly the extreme disparities with community radio only receiving approximately 0.006% of the total radio adspend during 2007. This is despite the fact that community radio listenership makes up 21.3% of the total radio listenership in South Africa.

So whereas the Broadcasting Act as amended in 1999 defines a "community broadcasting service" as:

1. Is fully controlled by a non-profit entity and carried on for non-profitable purposes;
2. Serves a particular community;
3. Encourages members of the community served by it or persons associated with or promoting the interests of such community to participate in the selection and provision of programmes to be broadcast in the course of such broadcasting service; and
4. May be funded by donations, grants, sponsorships or advertising or membership fees, or by any combination of the aforementioned.

The reality of latter day South Africa and community radio is that whilst neo-liberal capitalism is a form of socio-economic oppression that worsens the apartheid legacy of poverty and inequality in affected black working class communities, the response of those community radio stations based there is to adapt itself and promote this very same paradigm in its operations and even programming content, contrasting to its progressive alternative roots, albeit it shallow ones that emerged during the end of the apartheid era. Class and community political consciousness is thereby undermined by survival pre-occupation and directing the role of community radio in a continuous perpetual cycle. In the process, real community ownership and control in all aspects of most community radio stations in South Africa has virtually become

non-existent and more of a mere adherence to formal requirements of the broadcast legislation and consist at best of a poorly organised “public” annual general meeting (AGM) to elect board members from the community.

Most community radio stations do not make serious attempts at promoting democratic community ownership, control and day to day content generation for broadcasts. Programme content and broadcasts are largely the prerogative of the full-time staff and volunteers who do cover issues of the community but in most cases, not generated by the community itself. Community radio in South Africa is therefore not alternative in its methods and remains in line with the top-down and cascading approach of the commercial and public broadcasters.

A chilling warning from the USA of potential consequences for CR station stations in South Africa is perhaps helpful in spurring us into action before it is too late,

*“Public and community radio in the US must contend with a commercialism which undermines its mission. The marketplace has not proven an effective protector of America’s air, its water, and its land; what it will do to the airways and community broadcasting is worthy of dread”.* (Dunaway, 1998, p.92.).

### **Where to with Community Radio in South Africa – What is to be done?**

A concerted effort needs to be made by all CR stations’ stakeholders and the communities themselves in developing and campaigning for alternatives in the areas of governance structures and arrangements to ensure full community ownership and control over the radio station’s financial income and a conscientised and enlightened community that values community radio as an essential part of its own developmental needs. However, meaningful participation by the community is the key,

*“Our experience shows that the point of departure for development communication is not the dissemination of an innovation or of a new idea that is full of promise, but the grassroots expression of its needs. Participation, by putting the emphasis on the needs and the viewpoints of the individuals and groups, becomes the key concept of development communication.”* (Bessette, 2004, p.77.).

We therefore recommend the following for consideration:

**1. A legislated financial support mechanism for Community Radio** to include the following revenue generating options:

- A municipal levy of households within which the radio station is based. This should be clear CR station annual “licence fee” ranging from R10 – R20 per annum.
- The DOC to supply capital equipment and regular technology upgrades.

- The MDDA to support programming development.

The CR stations access to this funding must be incentivised and based on clear criteria and successful implementation of new legislated guidelines for governance, ownership, control and programming content (some of which is outlined below).

## **2. A more detailed legislated guideline for community ownership control and governance.**

The provision for community AGM's to elect their CR station boards is too general and open to abuse and manipulation by interest groups. We recommend a clear structured approach with clear community sectors that are to be organisationally represented onto the board much like the CTV model for the following sectors:

- Sport
- Labour
- Community based organisations (CBOs)
- NGOs
- Education
- Arts and community media

In the Cape Town TV model, each sector nominates two people to represent them on the board. Provision should also be made for up to 3 additional persons to be elected from the general body.

Membership within the geographic community should be open to these organisations within the demarcated sectors with an annual membership fee decided upon by the general body.

The following interest groups should be excluded from membership and governance:

- Business
- Political
- Religious

These groups are not to be excluded from areas of programming.

**3. An extensive educational campaign to all South Africans** on the role and functions of Community Radio and their own role as active participants. This should be done with the participation of all stakeholders, including the National Community Radio Forum (NCRF), the National Association of Broadcasters (NAB), media NGO's and the MDDA.