Media Reform proposal: Submission summary

March 2025

The following is a high level summary of the key points made by NZ On Air in our submission to Manatū Taonga | Ministry for Culture and Heritage on the Media Reform package.

Our submission was in two parts – dealing first with Draft Proposals 1-4 and then in more detail addressing Draft Proposal 5. NZ On Air welcomed the opportunity to engage in a discussion of the need for Media Reform.

Part 1

Draft proposal 1: Ensuring accessibility of local media platforms

NZ On Air submitted in favour of the intent of this proposal, and asked if it could potentially be extended to include online radio prominence also.

Draft proposal 2: Increasing investment into and discoverability of local content

NZ On Air submitted in support of the intent of the proposal, but questioned how the proposal can be implemented, and whether it would make a material difference for audiences or the media ecosystem. These concerns may be alleviated with more clarity about the detail, such as how a levy would be quantified and administered; and about how discoverability would be addressed on the global platforms. We submitted that any initiative that seeks to bring the streaming platforms to the table and lean into local content obligations would be welcome.

Draft proposal 3: Increasing captioning and audio description (CAD)

As the current funder of Able, that delivers CAD on local platforms, we agree there is a need for more CAD to increase accessibility and agree that it would need to be a phased approach. As a priority, platforms must be tech-enabled in order to carry these services. But we would be concerned if all of the cost was placed at the feet of the broadcast platforms, which could compound significant financial issues and potentially reduce their investment in local content. We also noted Able would need time to increase its resourcing, that AI will have an impact on cost in the future but is not yet the answer, and that in the short-term the safest approach would be to increase ring-fenced funding to Able, but to ensure broadcast platforms are investing in being tech-enabled for CAD, as a minimum.

Draft proposal 4: Modernising professional media regulation

We agree the standards regime is out of date and that the proposal addresses a wider range of content in a more consistent way, but noted the proposal's gaps. Social media is increasingly used to share professional content, yet is excluded. It is unclear who the complaints body would be for the likes of broadcasters and streamers if the BSA is to be the regulator rather than handle complaints. It is not clear how the layering of a self-regulatory body between the media and regulator would simplify or strengthen the system. However, we submitted that the strongest option is the option that can be done now, with the flexibility to increase the range and types of media later.

Part 2

Draft proposal 5: Streamlining Crown content funders

We suggested that the case for change should be viewed through the lens of the main problem facing the media sector right now (being the significant decline in ad revenue destabilising the sector), noting the need for the problem definition in the Media Reform proposals and the offered solutions to match.

We examined the case for a merger of NZ On Air and the NZ Film Commission from two perspectives – 'for the merger' and 'for further consideration'.

The case for the merger:

- Merging New Zealand's screen agencies could create a unified, future-focused agency for funding all screen content, streamlining support for producers and platforms. This would enable more coherent conversations around applications, audiences, and formats.
- Countries like Australia and Ireland have successfully merged screen bodies, enhancing both film and TV outputs without sacrificing quality. These examples show that a combined agency can better support diverse content, provided mandates remain clear.
- A merger offers a strategic opportunity for New Zealand to grow domestic IP and expand its global cultural and economic footprint through unified marketing, distribution, and co-production strategies.
- An integrated entity could also pioneer cross-discipline funding, supporting creators working across games, music, film, and TV. It would enable stronger talent pathways and better leverage connections between creative sectors.
- A unified agency could coordinate sector development more comprehensively, aligning with how funding is already evolving.
- Modest administrative savings from merging operations could be redirected to content creation.

The case for further consideration:

- **Broader remit:** NZ On Air funds not only screen content, but also music, podcasts, journalism, and media platforms and services, as well as administering the Game Development Sector Rebate. These roles must not be sidelined or lost in a screen-centric model. Their preservation is essential to a healthy public media ecosystem.
- **Editorial independence:** NZ On Air is bound by legislation that protects content creators from editorial interference, crucial for journalism and current affairs. The NZFC has a more involved developmental role. A merged entity would need to maintain editorial protections if it is assumed that funding current affairs and journalism remains in scope, but this might present challenges in other areas.
- **Platform funding:** NZ On Air also supports platforms like RNZ, Pacific Media Network, and community radio. The merger proposal does not clearly outline how this funding or oversight would be managed. Until an alternative is detailed, maintaining platform funding within a merged entity is the most practical option.
- **Implementation risks:** Merging two distinct agencies presents complex challenges—staffing, technology systems, policy alignment, and contract management must be handled carefully to avoid sector disruption during a vulnerable period.
- **Purpose alignment:** NZ On Air and NZFC serve different goals—public service media vs. economic and cultural export. Any new structure must integrate these effectively.
- A single agency could have value—provided it adopts a broader “media content” mandate.

Rather than viewing structural change primarily as a response to problems, we argued that there is an opportunity to create a world-leading approach to creative industry development. A thoughtfully designed entity could:

- Develop integrated pathways for talent across all formats and platforms
- Create more flexible funding models that prioritise storytelling excellence and audience impact, enabling creators to develop content that flows naturally across platforms - established and emerging.
- Build stronger international partnerships and export strategies
- Leverage New Zealand's compact creative ecosystem to create and fund unique cross-pollination – i.e. games and music and TV series
- Provide more coherent funding support throughout the content lifecycle from early stage development through to marketing and distribution

In considering a merger, the focus should be on designing an entity that enhances rather than diminishes the strengths of both organisations.