

SUBMISSION BY  
FREE TV AUSTRALIA

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# Towards a new National Cultural Policy

Submission to the  
Office of the Arts



AUSTRALIA

# Table of Contents

- Table of Contents ..... 2**
- 1. Executive Summary ..... 3**
- 2. Introduction ..... 4**
- 3. Free TV is National Cultural Infrastructure ..... 5**
  - 3.1 *The Broadcasting Services Act 1992 recognises free TV as cultural infrastructure..... 6*
  - 3.2 *The United Kingdom model: a template for joining the dots ..... 7*
- 4. Free TV and the Five Pillars of the National Cultural Policy..... 9**
- 5. Getting the policy settings right on AI ..... 11**
  - 5.1 *Permission and payment must be a baseline for AI training ..... 11*
  - 5.3 *The Policy should deal specifically with AI..... 12*
- 6. Conclusion..... 12**
- 7. Attachment A ..... 13**
  - About Free TV ..... 13*
- 8. Attachment B ..... 14**
  - Analysis of the PacificAus TV Approach to Pacific Broadcasting ..... 14*

# 1. Executive Summary

- Free television makes a significant and important contribution to Australia’s cultural life. While it is of course important to recognise the role of galleries, libraries, museums and performing arts institutions, the role of free, universal commercial television services in shaping our national identity should similarly be recognised in the National Cultural Policy (the **Policy**).
- Free commercial television services are a public good in both the economic and social sense – universally accessible, free of charge, locally relevant, and delivering important public policy outcomes particularly by operating under rigorous regulatory obligations including content quotas, impartiality requirements and enforceable codes of practice.
- The renewal of the Policy presents a clear opportunity to strengthen the connection between cultural policy and communications and media policy, as well as copyright policy, providing a principled foundation for the support measures the sector needs.
- Free TV Australia (**Free TV**) supports the five pillars as the organising structure for the new Policy. Commercial television makes direct, substantial contributions to each – from broadcasting 390 trusted local news bulletins weekly, to \$1.625 billion in annual Australian content investment, to delivering live and free sport that brings our nation together, to extending Australia’s cultural presence in the Pacific through the PacificAus TV initiative.
- Recognising free commercial television as cultural infrastructure would strengthen delivery of each pillar and ensure the Policy’s benefits reach all Australians, regardless of location or income.
- The rise of AI, if not properly managed, risks undermining each of the five pillars of the Policy.
- Free TV welcomed the Government’s confirmation that it will not introduce a text and data mining exception to copyright and supports inclusion in the Policy of a clear statement that strong copyright protection and AI innovation are not mutually exclusive.
- Licensing frameworks, rather than copyright exceptions, would create sustainable commercial relationships between AI companies and content creators, benefiting both parties while ensuring AI systems have access to high-quality, verified, locally produced Australian creative and news content.

## Recommendations

- The Policy should recognise free commercial television as a critical element of Australia’s cultural infrastructure.
- The Policy should complement and be connected to communications, media and copyright policy settings in support of the long-term sustainability of free commercial television and the cultural benefits it delivers.
- The Policy should include a clear statement in support of a strong copyright framework that works in concert with other legal and policy mechanisms to ensure reasonable and equitable use of copyright material by AI.

## 2. Introduction

Free TV welcomes the opportunity to submit in response to the Office of the Arts' *Towards a new National Cultural Policy* consultation paper (the **Consultation Paper**). Free TV is the peak industry body for Australia's commercial television broadcasters. Information about Free TV and its members is at **Attachment A**.

Free TV was an active participant in consultations on the development of the *Revive: A place for every story, a story for every place* policy (**Revive**) released in 2023. Among Free TV's priorities at the time were:

- policy and regulatory settings to ensure prominent display of free TV services and content, including Australian television content, on connected devices; and
- debate about the economic impact of proposed subscription video on demand (**SVOD**) expenditure obligations on the cost of producing Australian content for free TV.

Discoverability of Australian content on connected devices – whether that be news, entertainment or live sport – remains central to the health of Australian culture and democracy. If you can't find Australian screen content, it can't reflect your Australian way of life back to you. If you can't find trustworthy local news, the quality of civic and democratic participation will suffer. And if you can't come together as a community around big national moments like iconic sporting matches, available free regardless of your postcode or income, then social cohesion will suffer.

It was therefore very important that Parliament acted to mandate prominence of local television services on connected TVs in 2024, in legislation that also made some amendments to the anti-siphoning scheme governing access to rights to televise sport free for all Australians. While these reforms were welcomed, there remain significant opportunities to improve each of these frameworks to ensure they deliver the cultural benefits they promised.<sup>1</sup> Both frameworks will be subject to legislative reviews in the coming two years and Free TV will engage actively.<sup>2</sup>

So too will it remain important to monitor the impact of the SVOD expenditure obligations, now legislated following the Revive policy, on production costs and capacity. Free TV's members spend \$1.625 billion on Australian content each year and are subject to significant content quotas. Their investment in Australian content underpins the broader screen production sector, including many independent producers. SVOD expenditure obligations have added a new, structured source of demand into an already constrained market. The government should continue to actively monitor whether this is driving cost and infrastructure pressure and consider what this means for industry sustainability.

More broadly, this submission notes it is now time to formally recognise the value and place of universally available Australian, trusted and free commercial television in the Policy, alongside other very important components of Australia's cultural infrastructure. As Australian creators and cultural businesses and institutions face new threats, such as from the rise of generative AI – which takes Australian culture generally without payment to, or permission from the creators – it will be essential that Australia is clear on what elements of its cultural landscape it is seeking to protect and support.

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<sup>1</sup> For example, prominence legislation was passed in 2024 only applies to television sets manufactured after January 2026 and will take 5–10 years to have any real impact in a fast-moving sector. The anti-siphoning legislation still contains a digital loophole that could see broadcasters cut out of free streaming rights (required for services like 7plus, 9Now and 10 Streaming, Network 10's free streaming service).

<sup>2</sup> To this end Free TV welcomes recognition in the Consultation Paper that expectations around access, discoverability and participation continue to evolve – Consultation Paper, page 4.

This submission is structured in the following way:

- **Section 3** makes the case for recognising free commercial television as essential national cultural infrastructure and includes a comparison to what is happening in the UK where local public service broadcasting is seen to be at an inflection point.
- **Section 4** links the role of free commercial television to the five pillars of the Policy.
- **Section 5** deals with the importance of getting policy settings right to support free commercial television’s ongoing cultural contribution to Australia.

### 3. Free TV is National Cultural Infrastructure

#### Recommendations

- The Policy should recognise free commercial television as a critical element of Australia’s cultural infrastructure.
- The Policy should complement and be connected to communications, media and copyright policy settings in support of the long-term sustainability of free commercial television and the cultural benefits it delivers.

As Minister Burke noted in his foreword to the Consultation Paper, ‘[c]ultural policy isn’t just a set of announcements about the arts...[i]t’s about making sure we consider the place of culture in Australia’.<sup>3</sup>

Free TV agrees that the Policy is about putting culture at the centre of our national life, given the links between a healthy cultural sector and the economy, and the links between access to Australian stories and Australians’ wellbeing and sense of belonging.<sup>4</sup>

Free commercial television makes a significant contribution to Australia’s cultural life and national identity. It plays an indispensable role in contributing to Australia’s diverse news landscape, serving as a cornerstone of informed democracy and community connection across the nation. It also provides shared cultural moments that bring Australians together in a way no other platform can, like watching live sport together, which is part of being Australian. In a fragmented world, these shared moments create common experiences and strengthen social cohesion.

Free commercial television is also a public good in both the economic and social sense. It is non-excludable – available free of charge to every Australian, from the inner suburbs of capital cities to the most remote communities in the country. It is non-rivalrous – everyone can access it simultaneously without diminishing anyone else’s access. It requires no subscription, and in the case of terrestrially-delivered television, no broadband connection. No credit card is required. In an era of escalating cost-of-living pressures those features matter.

The Albanese Government has recognised this. In a speech at the Free TV Parliamentary Showcase in September 2025, the Prime Minister noted that the role of commercial free TV broadcasters:

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<sup>3</sup> Consultation Paper, page 2.

<sup>4</sup> Consultation Paper, page 2.

*is absolutely essential in our democracy because the nature of the product that you produce is democratic. Anyone can turn on their TV. They don't have to pay for it.*<sup>5</sup>

For these reasons free commercial television is critical to Australia's cultural life like galleries, libraries, museums and performing arts institutions and should be recognised as such.

While Revive did note the role of commercial broadcasting – including in relation to promoting social inclusion by broadcasting local news, telling local stories, and providing a platform for emerging and established local artists<sup>6</sup> – there is an opportunity to uplift the nature of this recognition in the Policy.

The Prime Minister's characterisation, that free TV is democratic because it is universal, is precisely the basis on which it should be recognised in the Policy as national cultural infrastructure.

### 3.1 The Broadcasting Services Act 1992 recognises free TV as cultural infrastructure

There is an opportunity in the Policy to strengthen the clear connection between cultural policy and communications and media policy. Furthermore, as set out below in Section 5, there is also an important opportunity to link the Policy to the work of the Attorney-General's Department in protecting Australia's copyright framework in the face of threats from AI.

Free TV's members are heavily regulated under the *Broadcasting Services Act 1992* (the **BSA**),<sup>7</sup> but the objects of the BSA are also relevant to understanding how the public service values that Australian commercial broadcasters have been required to uphold for more than 30 years are expressed. The BSA's objects include to promote:

- the availability to audiences throughout Australia of a diverse range television services offering entertainment, education and information;
- the role of broadcasting services in developing and reflecting a sense of Australian identity, character and cultural diversity;
- the availability to audiences throughout Australia of television programs about matters of local significance;
- the free availability to audiences throughout Australia of television coverage of events of national importance and cultural significance; and
- the provision of high quality and innovative programming by providers of broadcasting services.<sup>8</sup>

These objects remain as important now as when the BSA was passed – arguably more so, in an era of pervasive algorithmic misinformation, the fragmentation of news consumption, and the growing dominance of video sharing platforms that attract audiences and consume Australian advertising revenue but do not carry the same policy and regulatory burden as commercial broadcasters.

In substance, Australian commercial free TV broadcasters already perform the functions that warrant recognition of the sector as key cultural infrastructure: they produce and broadcast universally

<sup>5</sup> Speech by the Prime Minister of Australia, the Hon Anthony Albanese MP, at the Free TV Australia 'Shaping a Nation' Parliamentary Showcase, 2 September 2025.

<sup>6</sup> *National Cultural Policy – Revive*, 2023, page 87 – available at <https://www.arts.gov.au/publications/revive-place-every-story-story-every-place>.

<sup>7</sup> For example, in relation to transmission of Australian content, restrictions on ownership and control, and content requirements and limitations.

<sup>8</sup> *Broadcasting Services Act 1992*, section 3.

accessible, locally relevant content; they operate under rigorous regulatory obligations including Australian content quotas, impartiality requirements and other community safeguards set out in enforceable codes of practice; and, they are accountable to the regulator, the Australian Communications and Media Authority (**ACMA**), and to their audiences.

What is missing is formal recognition in Policy that reflects this reality.

## 3.2 The United Kingdom model: a template for joining the dots

### 3.2.1 Valuing the role of public service broadcasting

The United Kingdom has for decades recognised that licensed commercial broadcasters are Public Service Broadcasters (**PSBs**). Channel 3 (ITV), Channel 4 and Channel 5 sit alongside the BBC in the UK PSB framework. By virtue of fulfilling their obligations under their licences, they are understood to provide inherent social and cultural value to the nation.

Like Australia’s commercial television broadcasters, UK PSBs deliver impartial and trustworthy news, and commission and broadcast original UK content that reflects the lives of people across the country. They also carry their services universally, on digital terrestrial television, to every household.

In July 2025, the UK regulator, Ofcom, published *Transmission Critical – The future of Public Service Media (Transmission Critical)*.<sup>9</sup> In overview, it noted that:

- The next few years will be critical in determining the future of UK broadcasting.
- Without PSBs there would be significantly less UK content and there is a risk that society becomes ever more fragmented and polarised.
- PSBs support democracy and culture and are a cornerstone of the UK’s production sector.

Ofcom described the pressure PSBs are under in *Transmission Critical*. It found:

*The UK media landscape is undergoing rapid transformation. Traditional broadcasters are in a fierce battle for audience attention, while global tech giants flood the market with an ever growing range of content. These pressures are not unique to the UK.*

*Services like Netflix and YouTube offer hyper-personalised experiences that are hugely popular with viewers and advertisers. Algorithms, tailored recommendations and instant accessibility are reshaping how a growing number of audiences discover and consume media. Emerging technologies, such as generative artificial intelligence (“GenAI”), are revolutionising how content is created, distributed and consumed. These seismic shifts are well underway and the next few years will be critical in determining the future of UK broadcasting.*<sup>10</sup>

<sup>9</sup> Ofcom, *Transmission Critical – The future of Public Service Media (Transmission Critical)*, July 2025 – available at <https://www.ofcom.org.uk/siteassets/resources/documents/public-service-broadcasting/public-service-media-review/transmission-critical-the-future-of-public-service-media.pdf?v=400631>.

<sup>10</sup> *Transmission Critical*, page 3.

Urgent action is required, according to Ofcom:

*This review calls for urgent action, both now and in the coming years to strengthen and maintain public service media (“PSM”) content which provides trusted and accurate news, tells UK stories and represents the diversity of the nations and regions of the UK.<sup>11</sup>*

These conditions closely mirror the pressures facing Australian commercial television broadcasters, and there is a clear opportunity to connect a range of policy areas in support of their long-term sustainability. Doing so will ensure that, as the Consultation Paper notes, the Policy remains relevant, effective and forward-looking.<sup>12</sup>

### The UK’s policy focus on sustaining public service media

Transmission Critical called out a range of policy areas where action is required:

- **Prominence** – PSB content risks being buried on third-party platforms like YouTube, and legislation may be needed to ensure it is prominently discoverable alongside existing connected TV prominence rules.<sup>13</sup>
- **Clarity on how TV will be distributed in the future** – digital terrestrial television is becoming a cost burden rather than an asset, and Government needs to make a decision on the future of TV distribution soon.<sup>14</sup>
- **Streamlined regulation** – the current regulatory framework was built for a linear world and needs fundamental reform.<sup>15</sup>
- **Stable and adequate funding** – any new funding mechanisms should prioritise commercially less viable but socially valuable genres such as news, including potential reform of tax credits.<sup>16</sup>
- **Anti-siphoning** – the listed events regime has been modernised but may need to extend protection to on-demand digital rights, given that video-on-demand’s share of sports viewing is growing.<sup>17</sup>
- **AI** – news providers are concerned that audiences may increasingly rely on AI-generated summaries rather than original journalism, and argue, among other things, for licensing requirements.<sup>18</sup>

### 3.2.2 The contribution of free television services to social cohesion

The UK has also recognised the contribution of PSBs to supporting social cohesion as it examines the future of the broadcast television platform in the coming decade. The ensuing public debate has focussed greater attention on the shortcomings of online television as a substitute for broadcast television, either now or in the foreseeable future.

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<sup>11</sup> Transmission Critical, page 3.

<sup>12</sup> Consultation Paper, page 4.

<sup>13</sup> Transmission Critical, see commentary at page 5.

<sup>14</sup> Transmission Critical, see commentary at page 6.

<sup>15</sup> Transmission Critical, see commentary at page 7.

<sup>16</sup> Transmission Critical, see commentary at page 6.

<sup>17</sup> Transmission Critical, see commentary at page 39.

<sup>18</sup> Transmission Critical, see commentary at page 58.

The populations most dependent on free terrestrially-delivered television – older, lower-income, regionally located, and less digitally included viewers – are among those vulnerable to disruptions in social cohesion, including caused by misinformation distributed online.

In this context, and drawing on extensive community research, a 2025 UK report from the Digital Poverty Alliance<sup>19</sup> found that:

- Terrestrial TV is uniquely positioned to provide universally accessible, reliable, and trustworthy content.
- The digital divide, exacerbated by digital poverty, makes terrestrial television a critical safety net for millions of UK households.
- Terrestrial television fosters and builds community bonds through a simple, universal method in a way that cannot be replicated by online platforms.
- Without intervention, the loss of terrestrial television would lead to increased social isolation, loneliness, and a diminished sense of belonging.
- Cost-effective television is vital for communities – which terrestrial television provides.

Australia will be soon commencing its own review of the future of television,<sup>20</sup> providing an opportunity to similarly consider the contribution of free commercial television broadcasting to social cohesion in Australia.

## 4. Free TV and the Five Pillars of the National Cultural Policy

The Consultation Paper confirms that the Policy will continue to be organised around the five enduring pillars first set out in Revive. Free TV supports the five pillars as the organising structure for the Policy. This section sets out the ways in which free TV contributes to each pillar.

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<sup>19</sup> Digital Poverty Alliance, *Safeguarding Britain's Social Resilience: The Critical Role of Terrestrial Television*, 2025, page 12 – available at [digitalpovertyalliance.org/wp-content/uploads/2025/03/Safeguarding-Britains-Social-Resilience-The-Critical-Role-of-Terrestrial-Television.pdf](https://digitalpovertyalliance.org/wp-content/uploads/2025/03/Safeguarding-Britains-Social-Resilience-The-Critical-Role-of-Terrestrial-Television.pdf).

<sup>20</sup> First announced by the Hon Michelle Rowland MP, Former Minister for Communications, ‘Supporting Australian TV and radio’, press release, 19 February 2025 – available at <https://minister.infrastructure.gov.au/rowland/media-release/supporting-australian-tv-and-radio>. Commencement of this review was flagged more recently by government in the context of May 2026 Budget measures related to the Commercial Broadcasting Tax.

Pillar	Free TV’s contribution
<b>Pillar 1: First Nations First</b>	<ul style="list-style-type: none"> <li>• Pillar 1 recognises the central place of First Nations stories in Australian culture.</li> <li>• Reconciliation Action Plans reflect shared commitments to cultural learning, representation, community engagement and amplifying First Nations voices through TV platforms.</li> <li>• Free TV member Imparja Television is Australia’s First Nations-owned commercial broadcaster. It delivers free television across approximately 3.6 million km<sup>2</sup>, including to remote and very remote First Nations communities in Central and Eastern Australia.</li> </ul>
<b>Pillar 2: A Place for Every Story</b>	<ul style="list-style-type: none"> <li>• Pillar 2 recognises the breadth of Australian stories and Australians as cultural creators locally and through place-based practice.</li> <li>• Free TV members broadcast 390 local news bulletins weekly across metropolitan, regional and remote Australia – significant place-based cultural production.</li> <li>• Beyond news, Free TV members invest in Australian lifestyle programming, documentaries and entertainment reflecting the diversity of Australian life.</li> <li>• In FY24, commercial networks spent \$1.625 billion on Australian content, with 88% directed to local programming, sustaining independent producers.</li> <li>• Through the PacificAus TV initiative, Free TV also delivers over 2,000 hours of Australian content annually to 18 broadcasters across 11 Pacific nations and Timor-Leste – contributing to Australia’s diplomacy and cultural presence in the region.<sup>21</sup></li> </ul>
<b>Pillar 3: Centrality of the Artist</b>	<ul style="list-style-type: none"> <li>• Pillar 3 is described as supporting the artist as worker and celebrating artists as creators.</li> <li>• Free TV members’ annual content investment flows directly to independent producers and thousands of other creative workers.</li> <li>• As set out in Section 5, getting the policy settings right on AI will be essential to supporting artists and creators and the local businesses that employ them.</li> </ul>
<b>Pillar 4: Strong Cultural Infrastructure</b>	<ul style="list-style-type: none"> <li>• Pillar 4 addresses the institutions and systems that sustain Australia’s arts, culture and heritage, focussing on resilience, adaptability and long-term sustainability.</li> <li>• As set out in Section 3, free TV is an essential part of Australia’s cultural infrastructure and should be recognised as such in the Policy.</li> </ul>
<b>Pillar 5: Engaging the Audience</b>	<ul style="list-style-type: none"> <li>• Pillar 5 is about making sure Australian stories connect with people at home and abroad, including responding to changing audience behaviours, discovery pathways and modes of engagement.</li> <li>• Free TV broadcasters know Australian audiences and produce content that appeals to and reflects them.</li> <li>• However, as set out in Section 2, the prominence and discoverability of Australian content will be at risk if Australia’s regulated prominence regime does not keep pace with technological change.</li> </ul>

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<sup>21</sup> The PacificAus TV initiative, administered by Free TV under a grant from the Australian Government is an essential pillar of the Indo-Pacific Broadcasting Strategy. It delivers over 2,000 hours of Australian commercial television content annually to 18 broadcasters across 11 Pacific nations and Timor-Leste, and eight time zones, including Papua New Guinea, Fiji, Vanuatu, the Solomon Islands, Kiribati, Tuvalu, Nauru, Tonga, the Cook Islands, Niue, Samoa and Timor-Leste. As the Policy itself notes, the Indo-Pacific Broadcasting Strategy ‘boosts Australian content and voices in the region, creating more audiences across, and supporting media capacity-building in, the Pacific region’. More information is at <https://www.pacificaustrv.com/>. See a summary of recent academic analysis of the initiative at **Attachment B**.

## 5. Getting the policy settings right on AI

### Recommendation

- The Policy should include a clear statement in support of a strong copyright framework that works in concert with other legal and policy mechanisms to ensure reasonable and equitable use of copyright material by AI.

This submission has dealt with a number of important policy issues relevant to sustaining the role of free commercial television broadcasting in the Australian cultural ecosystem, including ensuring prominence and anti-siphoning policies are fit-for-purpose. There are a number of other key policy issues that are currently on foot, including:

- implementation of the News Media Bargaining Incentive – aimed at ensuring large digital platforms contribute to the sustainability of news and journalism in Australia;
- the development of an ex ante digital competition framework – to enact service-specific regulation to address anti-competitive behaviour in the supply of certain digital platform services such as advertising technology services and app stores (both areas of concern to Free TV members); and
- the review of the future of television, mentioned above, including arrangements for its terrestrial delivery into the 2030s.

Each of these are very important to mapping out the sustainable future of free commercial television broadcasting.<sup>22</sup> However, the remainder of this submission deals with the issue of the rise of AI which, if not properly managed, could undermine each of the pillars of the Policy.

### 5.1 Permission and payment must be a baseline for AI training

A significant threat to Australia’s cultural sector is the systematic and unlicensed use of creative and news content by AI operators. AI companies are ingesting the work of Australian journalists, storytellers, producers and artists without permission, without payment and without attribution. They are using this content to build and operate commercial AI products that, in many cases, directly compete with the organisations whose work trained them.<sup>23</sup>

Copyright forms the underpinning of the creative and news media industries. The value of intellectual property is depleted when it is used without authorisation, threatening the business models that fund quality journalism, entertainment and other creative endeavours.

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<sup>22</sup> For more information see Free TV’s 2026–27 Pre-Budget Submission available at <https://www.freetv.com.au/wp-content/uploads/2026/03/Free-TV-Pre-Budget-Submission-2026-27.pdf>.

<sup>23</sup> For example, as reported in the *Australian Financial Review* in August 2025, AI firms are crawling the news sites of Nine Entertainment, owner of Free TV member the Nine Network, 10 times a second. See Sam Buckingham-Jones, ‘AI firms crawling Nine Entertainment’s news sites 10 times a second’, *Australian Financial Review*, 6 August 2025 – available at <https://www.afr.com/companies/media-and-marketing/ai-firms-crawling-nine-entertainment-s-news-sites-10-times-a-second-20250806-p5mkop>.

### 5.3 The Policy should deal specifically with AI

The Government has provided certainty to Australian creators by confirming that it is not considering a text and data mining (**TDM**) exception to copyright law.

A TDM exception would have legalised unauthorised content use by AI providers – in effect, allowing global technology companies to extract value from Australian creative and journalistic work without contributing anything to the sector that produced it. The decision not to proceed with a TDM exception is sound policy, and Free TV strongly supports it. However, ruling out a TDM exception is a floor, not a ceiling.

Free TV is pleased to note that in April 2026 the *Australian Government response to the Senate Select Committee on Adopting Artificial Intelligence (AI) report: Final Report and Interim Report (Government AI Response)* affirmed this position.<sup>24</sup> Noting that the Australian Government is invested in the success of Australia’s creative and media industries, it said that:

- It is important that the development and adoption of AI technologies is done in a way that builds trust and confidence in their use.
- Having provided certainty to Australian creators by announcing that the Government is not considering a TDM exception in Australian copyright law, the Government is working with stakeholders to find solutions to encourage innovation while protecting and supporting Australian creators (including through the Attorney-General’s Department Copyright and AI Reference Group).

Most importantly, the Government AI Response noted that:

*The Government commits, in its National Cultural Policy – Revive: a place for every story, a story for every place, to maintaining a strong copyright framework that works in concert with other legal and policy mechanisms to ensure reasonable and equitable use of copyright material.*<sup>25</sup>

Free TV welcomes this commitment and fully endorses inclusion in the Policy of a clear statement that strong copyright protection and AI innovation are not mutually exclusive.

Such a statement would underpin the use of licensing frameworks which Free TV supports – frameworks that enable sustainable commercial relationships between AI companies and the content creators on whose work they depend. Licences benefit both parties, including by providing the AI industry with access to high-quality, verified, locally produced Australian content.

## 6. Conclusion

Commercial free television is one of Australia’s most important cultural platforms, its most universal storytelling medium and a cornerstone of its democracy. The Policy has an opportunity to formally recognise it as national cultural infrastructure and to put in place the policy settings that ensure it remains sustainable, discoverable and protected from the threats that the digital environment poses.

<sup>24</sup> *Australian Government response: Senate Select Committee on Adopting Artificial Intelligence (AI) report (Government AI Response)*, April 2026 available at <https://www.industry.gov.au/publications/australian-government-response-senate-select-committee-adopting-artificial-intelligence-ai-report>.

<sup>25</sup> Government AI Response, page 14.

## 7. Attachment A

### About Free TV

Free TV Australia is the peak industry body for Australia's commercial television broadcasters. We advance the interests of our members in national policy debates, position the industry for the future in technology and innovation and highlight the important contribution commercial FTA television makes to Australia's culture and economy. We proudly represent all of Australia's commercial free television broadcasters in metropolitan, regional and remote licence areas.



Free TV brings Australians together, supporting Australian culture and democracy. The commercial television industry creates these benefits by delivering content across a wide range of genres, including news and current affairs, sport, entertainment, lifestyle and Australian drama. At no cost to the public, our members provide a wide array of channels across a range of genres, as well as rich online and mobile offerings.

#### Commercial television networks:

- Reach 19.3 million Australians every week, including 11.4 million who watch trusted news every week, and 9.5 million who watch live and free sport each week
- Provide 25,285 hours of Australian content a year
- Spend more than \$1.625 billion on Australian content every year, dedicating over 88% of their content expenditure to local programming
- Spend more than \$400 million a year on trusted news, including on 390 local news bulletins every week across the country (plus updates and community service announcements)

A report released in September 2022 by Deloitte Access Economics, *Everybody Gets It: Revaluating the economic and social benefits of commercial television in Australia*, highlighted that in 2021, the commercial TV industry supported over 16,000 full-time equivalent jobs and contributed a total of \$2.5 billion into the local economy. Further, advertising on commercial TV contributed \$161 billion in brand value.

The commercial television industry creates these benefits by delivering content across a wide range of genres, including news and current affairs, sport, entertainment, lifestyle and Australian drama. At no cost to the public, our members provide a wide array of channels across a range of genres, as well as rich online and mobile offerings.

A strong commercial broadcasting industry delivers important public policy outcomes for all Australians and is key to a healthy local production ecosystem. This in turn sustains Australian storytelling and local voices and is critical to maintaining and developing our national identity.

## 8. Attachment B

### Analysis of the PacificAus TV Approach to Pacific Broadcasting

In late-2025, the Centre for AI, Trust, and Governance at the University of Sydney completed an analysis of the PacificAus TV initiative, publishing a report titled *Free Content, Local Choice – The PacificAus TV Approach to Pacific Broadcasting* (the **Report**).<sup>26</sup>

The Report examines PacificAus TV in the context of Australian broadcasting policy frameworks and findings from the November 2023 Indo-Pacific Broadcasting Review. It also looks at how PacificAus TV operates in practice and considers lessons applicable to similar initiatives by other nations.

Among other things, the Report notes that:

- The initiative supplies Australian commercial television content to existing Pacific broadcasters, who retain complete editorial independence in selecting which programs to air and when to schedule them.
- Free TV consults regularly with Pacific partner broadcasters identifying programming preferences, assesses audience reception, and responds to emerging broadcaster needs.
- Programming selection balances broadcaster preferences, available content, rights clearance feasibility, and cultural appropriateness considerations.
- The fact that much PacificAus TV content appears in primetime schedules across Pacific broadcasters reflects professional judgments that programming attracts audiences and performs competitively.
- This model respects Pacific broadcaster autonomy, positioning partner organisations as active decision makers rather than passive content recipients.

The Report concludes that:

*PacificAus TV demonstrates that programming provision models can effectively complement traditional international broadcasting whilst respecting Pacific broadcaster autonomy. The initiative's expansion from 1,188 to 2,950 hours annually, geographic extension across twelve nations, and positive 2023 review assessment validate governmental investment in commercial content distribution. For organisations seeking Pacific broadcasting engagement, the program illustrates the importance of consultation, flexibility, respect for local agency, and sustained commitment. Success ultimately rests on alignment between policy objectives, broadcaster operational needs, and audience preferences. This is achieved through partnership approaches respecting Pacific priorities rather than imposing predetermined content or technologies.*<sup>27</sup>

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<sup>26</sup> The Centre for AI, Trust, and Governance, *Free Content, Local Choice – The PacificAus TV Approach to Pacific Broadcasting*, December 2025 (the **Report**) – available at <https://ses.library.usyd.edu.au/handle/2123/35330>.

<sup>27</sup> The Report, pages 6–7.