

Proposal to Amend the Broadcasting Act – Public Consultation

November 2021

1. Introduction

A request was made to the Council of Ministers to consider making changes to legislation that currently prevents a newspaper from holding more than 20% interest in a licensed broadcaster.

As part of their considerations the Council of Ministers sought the views from the public and relevant stakeholders as to impact any such change in legislation may bring.

The legislation in question is the Broadcasting Act 1993, namely Schedule 1 of the Act. Under the same Schedule, provisions may be made to amend the percentage interest:

Amendment of percentage interest

6. (1) The Council of Ministers may by order amend paragraph 1(i) or (k), 2(1)(e), 4(1) or (2) or 5(1) or (2) by substituting a different percentage for the percentage for the time being specified there.

(2) An order under sub-paragraph (1) shall not have effect unless it is approved by Tynwald.

2. The Consultation – “We Asked”

The consultation ran from the 10th August 2021 and ran for six weeks until the 21st September 2021.

There were a total of 39 responses to the consultation. The table below shows the breakdown between individuals and those responding on behalf of an organisation:

Option	Total	Percent
Organisation	8	20.51%
Individual	31	79.49%

3. The Responses – “You Said”

Questions 1 to 4 requested name, email, organisation and whether their response could be published.

Question 5 asked “Do you agree that the legislation should be amended to allow for newspapers to hold a 100% interest in a local broadcaster and for local broadcasters to hold a 100% interest in newspapers?”

16 out of 39 responses (41%) responded that yes the legislation should be changed with 23 out of the 39 responses (59%) stating no.

Question 6 asked if respondents had any comments to support their answer to Question 5 and a selection are provided below:

Keith Uren Publishing:

We are a small island and a newspaper owning a radio station seems unlikely to compromise the integrity of what we read or hear. From a commercial point of view, it perhaps narrows the field for organisations wishing to advertise. There is also the danger that advertising rates will increase as a result of reduced competition. If the proposal was creating the possibility of a monopoly I would not agree, however this doesn't appear to be the case here.

Anonymous:

Care needs to be taken to ensure that any such proposed consolidation doesn't create a monopoly by default in the media sector. The acquisition of a commercial radio station by a print media business is, in my opinion, primarily about commercial revenue generation from both organisations existing primary sources of income; the sale of advertising.

3FM:

The UK amended their legislation to allow newspapers to hold 100% interest in local radio in the 1990's. The proposed change in the Isle of Man bring the legislation in line with the UK.

Question 7 asked respondents if there were any other stakeholders that had not already been considered in the consultation report and if so, to state who.

Respondents gave the following suggestions:

Carerra Media Group Limited (trading as Billboards.im)

Social Media Channels: Facebook/Twitter/Instagram/You Tube

Isle of Man Television (on You Tube) – Paul Moulton Television

Video content providers such as Greenlight Television and Studio One

Question 8 asked respondents if they felt there were any harm or benefits that they could identify that may come from a change in the legislation. 32 out of the 39 respondents answered this question and a selection of responses are provided below:

Anonymous:

Loss of jobs and opportunities as they use automated technology over real people

Anonymous:

I do not consider that there are any harmful consequences of such gravity as to require the ownership restrictions to be continued - the market on Island is limited and so far as local news reporting is concerned, there is no culture of investigative reporting by Island broadcasters.

Question 9 asked for any further comments on the proposal and a selection of responses are provided below:

Anonymous:

Positive that you are consulting openly about this proposal

Anonymous:

I support the proposed changes

Dave Martin:

Please see earlier comment on possible need for a review of regulation and possibly a unified regulator across all types of media.

4. Next Steps – “We Did”

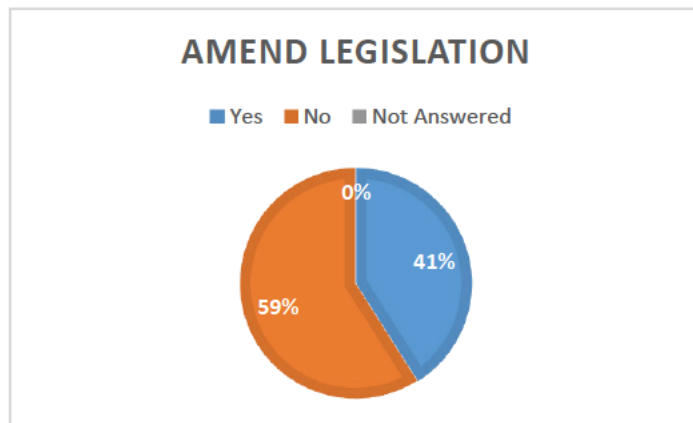
Following consideration, the Council of Ministers has opted to not progress with any changes to the Broadcasting Act.

A full summary of responses from those who indicated their response could be published in full, or anonymously, is provided in the Appendix document on page 4.

APPENDIX Summary of Responses

The following document contains all responses from the Broadcasting Act survey from those who indicated that they were content to have their responses published. Individuals have been identified where they gave permission to do so:

Question 5: Do you agree that the legislation should be amended to allow for newspapers to hold a 100% interest in a local broadcaster and for local broadcasters to hold a 100% interest in newspapers?



Question 6: Do you have any comments in addition to your response to Question 5?

Anon:

There is only one reason behind this consultation and that is to allow an off island company to buy a Manx one, the law should not be changed for the sake of two businesses in such a manner. It also risks destabilising the already delicate advertising revenue for other media brands and in turn will lead to a decrease in viable businesses and quality output.

Anon:

Can't see a conflict. Likely to preserve local media jobs

Keith Uren Publishing:

We live in a multi-media world where, unfortunately, social media can often mislead and distort the truth. This can, of course, be the case with large media organisations. One doesn't always agree with the way some news is presented on television, for example, where political bias is sometimes evident. However, we are a small island and a newspaper owning a radio station seems unlikely to compromise the integrity of what we read or hear. From a commercial point of view, it perhaps narrows the field for organisations wishing to advertise. There is also the danger that advertising rates will increase as a result of reduced competition. If the proposal was creating the possibility of a monopoly I would not agree, however this doesn't appear to be the case here.

Anon:

We are not the UK where the circulations/digital reach of papers and broadcast media can have a significant effect. I'm sure that we can legislate for editorial independence. And given that the IOM Govt effectively pays for Manx Radio it levels the playing field somewhat.

Anon:

I support the amended change for the reasons detailed in the summary.

Anon:

The Island needs greater diversity of journalistic reportage. The purchase of a radio station by a newspaper, or vice versa, would reduce this.

Anon:

This is not "consolidation to ensure the future sustainability of the sector" this is consolidation to have the monopoly in media on the Island. Consolidation will provide a one sided presentation of public affairs whilst providing them with the power to influence and persuade public opinion. This is NOT in public interest. In addition this will create economies of scale for the two businesses and possible redundancies. Consolidation will lead to a concentrated market, creating unfair competition and potentially leading to higher prices for small businesses wishing to advertise. Individually they already command more marketing spend from IOM Government than any other body. It is clear how consolidation will benefit both parties but how will it benefit our community? The lack of transparency is also worrying, neither 3fm or IOM Newspapers have mentioned this legislation amendment publicly (at the time of writing) clearly hoping it can be swept under the carpet without objection. This is "breaking news" and should therefore be reported upon by the two largest media providers on the Island. IOM Newspapers is owned by a UK company, who have recently closed down outlets as print declines, how financially secure are they? Does the Island really want a UK business to control media coverage on the Isle of Man??

Anon:

I believe in the UK this would be acceptable similar to Global owning OOH and Radio Advertising, but on the Isle of Man I believe it would create a bias towards one standpoint/opinion if the two were merged/linked.

Anon:

Care needs to be taken to ensure that any such proposed consolidation doesn't create a monopoly by default in the media sector. The acquisition of a commercial radio station by a print media business is, in my opinion, primarily about commercial revenue generation from both organisations existing primary sources of income ; the sale of advertising.

An acquisition of a commercial radio station by a Newspaper Group will lead to an increase in commercial revenue for the Group. It will also create more competition for commercial advertising revenue within the existing market due to consolidation of the advertising options to the consumer across the Groups platforms. This could lead to a reduction in the revenues of competitor advertising business, to include Manx Radio & Energy FM and have the effect of driving down revenue as competitiveness increases. It could also lead to job losses in the media economy as revenues fall. Of course the consumer 'wins'; but also the consolidated Group Co 'wins' (generating greater revenues across platforms) but the competition doesn't.

3FM:

The UK amended their legislation to allow newspapers to hold 100% interest in local radio in the 1990's. The proposed change in the Isle of Man bring the legislation in line with the UK.

In today's media landscape the idea that the legislation protects plurality is out of date. The public consume their local and national news from such a wide variety of sources especially through the Internet and social media. Social media can perpetuate fake news so it is an advantage to have a trusted news source. Newspapers and radio are trusted news sources.

Anon:

In a small community like the Isle of Man this would provide far too much control of the local media to one company. As the Isle of Man Newspapers are owned by Tindle Group (who also own radio stations in the Channel Islands) this acquisition could also lead to job losses locally as roles are outsourced or pooled in other offices causing damage to the local economy and the local output produced by the newspapers and the radio station in question. Changing the legislation could also have knock-on affects in the future if the Tindle Group were ever purchased by a larger media conglomerate further damaging the 'local' coverage and employment opportunities in media on the Island.

There is also only a finite amount of advertising revenue to go around an already bloated media landscape on the island. If the Newspapers were to own a radio station this would give them an unfair advantage allowing them to cross-sell the platforms and treat one as a loss leader giving them an uncompetitive advantage over other media providers who rely on advertising revenue to function.

As the newspapers is effectively subsidised by the Government via the advertising of Government notices the Isle of Man Government may find themselves in a situation where they are in effectively subsidising two radio stations.

A clearly funded and defined public service broadcaster is essential to a functioning democracy. A Government essentially funding a radio station by the back door without that station having a clear remit or programme code on broadcasting and reporting duties is exactly the opposite of a democracy.

Ed Rowe:

I believe the newspaper industry should only hold an interest in their own sector.

Isle of Man Newspapers is owned by the Tindle Group which also owns radio stations on other Islands in the British Isles.

Those radio station under ownership of Tindle have seen job cuts and losses of local programming with the use of networked programmes instead.

Anon:

Media monopolies should be discouraged to encourage unbiased and factual reporting.

Anon:

It is the only way the media will survive with so many people not buying newspapers and listening to sound bites on the radio.

Anon:

Legislation should not be changed as this would create a monopoly.

Also there is not a greater call for the change, just a single agenda. I dare say a radio station is trying to sell and has a potential buyer it can't sell to under current legislation.

Anon:

On paper and in a hindsight situation I don't have a problem with it at all. It's business. Companies should be allowed to merge, buy and sell.

In this situation though the desire to change the legislation has come about because Tindle want to purchase 100% of 3FM.

If this happens local jobs will be lost.

Just a small amount of research into how Tindle run their operations will show you that on air talent and office admin jobs will go. Tindle will operate these from a central location off island and swallow up the work within their radio network.

Also there is talk of Bauer Media being interested in a take over of Tindle and if that was to happen they would be turned into Greatest Hits Radio which is a great brand and a great station but would mean that remaining local jobs would be further threatened as

they bring ALL of their output from one base with exception of breakfast presenter which may remain local.

Anon:

The points raised by IOM Newspapers are wholly incorrect for the reasons set out below: I also have further comment to make.

The legislation is NOT out of date as the very same provisions regarding the %'s are also set out in the 'brand new' Communications Act.

This Act has only just received Royal Assent and has been widely consulted upon recently and has received heavy scrutiny. It is far from 'out of date'.

All media was actively involved in the consultation of the new Communications Act including [REDACTED] of 3FM. [REDACTED] was fully aware at the time and attended meetings at the Communications Commission regarding this Act.

It should be noted that a change in the Broadcasting Act now, would also be required to the Communications Act as when the provisions relating to Broadcasting come in to force, (noting that these parts of the Act are not yet in force) then the ownership would become illegal as the new Communications Act states 20%. It is 20% for good reason.

The Newspapers are incorrect to say the change will ensure the 'sustainability of the sector' - a change is almost certainly to result in an overly dominant position by the newspapers in media, reduce plurality and cause an 'unsustainable' and chaotic position.

This change is likely to seriously impact not just the other two radio services, but all other media such as the local glossy magazines and digital media. The IOM Newspapers would control print, radio and digital by cross-promoting only their outlets on their platforms. This is dangerous in a small jurisdiction where we need plurality.

Legislation should not be changed at the request of a single commercial entity. This is an entirely wrong way to deal with primary legislation and a major change such as this should only be considered if it has had wide industry support.

Legislation should also not be changed to facilitate someone wanting to sell off their company to fill their own pockets. They knew the rules and should either sell the company to someone who is not prohibited or restricted by the legislation, or surrender the licence back to the CURA and wind up the company. There will be other 'non prohibited' operators who may wish to take up the licence for additional services.

IOM Newspapers is owned by Tindle Group and there is no protection should Tindle be sold to the likes of (For example: Bauer or Global).

The position in the UK and Channel Isles is rather different to the IOM in the size of markets and rules that OFCOM impose. No comparison to the Channel Islands should be made either as they only have one commercial radio station in Guernsey and one in Jersey, both owned by the Newspaper - they are not competing with anyone else. The IOM has three commercial stations.

The newspaper in the IOM commands a unique position and will only serve to favour their own radio station - this will almost certainly result in bias and abuse of position. For example a local event that currently partners with one of the other two stations, could be

enticed to only spend with the newspaper as they will offer print and radio for a cheaper rate. This will hit both other stations who will be unable to compete and almost guarantee will result in greater subsidies required for Manx Radio.

It is also highly questionable to consider this issue while the House of Keys has been dissolved and the COMIN are only housekeeping as the Administration has come to an end. This matter should not have been considered until after a new Administration has been formed and a new COMIN in place. COMIN should only be dealing with matters of public importance right now and not the private requests of commercial businesses and individuals looking to sell off their company. The process being carried out at this time is highly questionable and open to criticism and further scrutiny.

Anon:

The IOM Government subvention in favour of Manx Radio skews the industry unfairly against other participants - relaxation of ownership restrictions will make it easier for other stakeholders to get involved in the media sector. The financial pressures which local broadcasters (without the protection of the subvention) experience can be mitigated if ownership restrictions are relaxed.

The existing restrictions - which were presumably introduced simply as a mirror of previous legislation in England - were probably never required in the Island and in any event we're repealed in England as long ago as 2003 (Communications Act 2003)

Tindle CI Broadcasting:

The benefits to Isle of Man citizens of updating this legislation are significant. In a fast changing and ever more competitive media world, the sustainability and quality of indigenous local media on the Isle of Man will be secured by working in greater partnership.

At present, audiences and revenues come under threat from the explosion of digital content from all over the World in a way unthinkable just a generation ago. Listeners and readers now consume content from a multitude of sources; and advertisers enjoy a range of fresh choices.

The impact of COVID has also brought unprecedented additional challenges for all businesses in the Isle of Man - with media operations no exception. Alongside the staffing challenges, revenues have suffered owing to the impact on advertiser businesses, particularly in retail.

A failure to amend the legislation risks rendering some local media operations unsustainable in the long term. To thrive, they need both to operate efficiently - and generate engaging high-quality content if they are to attract majority audiences and remain a powerful voice for the Isle of Man.

The amendment permits a new alliance; safeguarding the future by enabling Isle of Man media to compete more fairly alongside all other. In the accompanying notes in the passage of the Communications Bill, it was stated that it sought to "largely mirror the UK provisions...". There are parallels in the UK in small markets for local media strength through joint ownership, such as in Kent, where the Kent Messenger Group operates press, radio and local TV.

As now, the content of radio and newspapers will continue to be regulated separately on the Isle of Man, with the radio output subject to the provisions of the Programme Code, as implemented via the Communications Act 2021.

Tindle CI broadcasting is a proven radio operator, managing the two highly-respected commercial radio stations on the Channel Islands which enjoy enviable audiences.

Its interest in this matter is that its parent company seeks to acquire 3FM and run it in partnership with Isle of Man Newspapers.

At a time when social media spreads inaccuracy at speed, dependable news sources are crucial. With the approval of this change, the 3FM newsroom will be boosted by renewed

<p>investment.</p> <p>3FM will benefit from Tindle CI's radio expertise and training – and fresh investment in people.</p> <p>Media choice for advertisers will remain through the assurance of a solid future for the station. Choice in radio advertising platforms will remain through the continued viability of both Isle of Man commercial stations.</p> <p>Administration of the business and office overheads will no longer be duplicated, freeing resource for the generation of quality content.</p> <p>Agreement by the Council of Ministers to the legislative change will heighten the resilience of local media outlets on the Isle of Man and better secure their long-term future.</p>
<p>Manx Radio:</p> <p>See later comments</p>
<p>Dave Martin:</p> <p>Traditional boundaries between media have become so eroded with on-line offerings that this artificial limit should be removed.</p> <p>It might also be opportune to review the regulation of various media, with one regulator given the variety of media a single organisation can use.</p>

Question 8: Do you have any views on the potential for harm or benefits resulting from the proposed change to the Broadcasting Act 1993?

<p>Anon:</p> <p>Yes it risks damaging the income and output quality of several other businesses including one which is owned by and paid for by the taxpayer. If these businesses are not viable enough to survive under the current legislation it should not be for central government to support them in this way without first considering other policies such as posting public notices in the back of the weekly free paper where it can be guaranteed very few people will read them.</p>
<p>Anon:</p> <p>Can't see any potential harm.</p>
<p>Keith Uren Publishing:</p> <p>As already stated</p>
<p>Anon:</p> <p>A possible downside is for a paper and radio owner to leverage the combined advertising power of both mediums to undermine a single radio station. But the reality is that content drives listeners/readers not advertising, make good programming and people will listen.</p>
<p>Anon:</p> <p>Once the genie is out of the bottle it isn't going back. Allowing one company to have absolute control over several different mediums of information is inevitably going to lead to social engineering down the line, as we have seen in other countries (e.g, Sinclair Broadcast Group). A free and diverse media environment is important for a healthy democracy - monopolies aren't.</p>
<p>Anon:</p>

A greater breadth of reporting is a good thing. we should keep the caps in place to ensure this continues.

Anon:

As raised in the previous point, I believe legislation should not be amended as it is not in public interest.

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3FM:

There are obvious benefits to two media organisations coming together namely from an operational point of view. Sharing resources and therefore expenses makes for more job security. Manx Radio enjoys a substantial annual subvention from Government which gives the station a unique position. Times have changed and making the change to the act recognises that the Isle of Man is a business friendly environment and brings the act in line with the UK legislation.

Anon:

Needs to be a level playing field for all with no government subsidies provided

Anon:

These need to be kept as separate entities.

Anon:

As per my comments in response to question 5.

On the whole I feel there are none or very few benefits of the change in legislation for the public. The only people who are benefitting from this are the two companies in question who will gain an unfair advantage in the market place and benefit from economies of scale that aren't afforded to other media providers.

Ed Rowe:

I believe there is a need for more radio choice on the Isle of Man.

Currently, Manx Radio continues to fail its remit and continually needs to be bailed out by Government handouts. The music policy of Manx Radio has become more younger oriented in a bid to attract listeners but has alienated a lot of us in the age demographic which Manx Radio is regulated to cater for.

Three FM and Energy FM seem to be able to maintain a presence with local news and events. I believe if the newspapers were to have control of any commercial outlet it would see a loss of local content.

I listen to the Sound radio on my smart speaker and would prefer it on FM as our internet can be patchy at times.

If the act was to be changed - why can't Isle of Man Newspapers create another radio service for the Island? Tindle have just launched a much need easy listening service in Jersey.

Anon:
encourage diversity of reporting outlets based on unbiased, fair and factual reporting.

Anon:
No comments to make one way or other.

Anon:
Monopoly and unfair advantages

Anon:
On paper and in a hindsight situation I don't have a problem with it at all. It's business. Companies should be allowed to merge, buy and sell.
In this situation though the desire to change the legislation has come about because Tindle want to purchase 100% of 3FM.
If this happens local jobs will be lost.
Just a small amount of research into how Tindle run their operations will show you that on air talent and office admin jobs will go. Tindle will operate these from a central location off island and swallow up the work within their radio network.
Also there is talk of Bauer Media being interested in a take over of Tindle and if that was to happen they would be turned into Greatest Hits Radio which is a great brand and a great station but would mean that remaining local jobs would be further threatened as they bring ALL of their output from one base with exception of breakfast presenter which may remain local.

Anon:
In a small marketplace like the IOM it is critical that small and medium-sized businesses have plurality of supply when it comes to advertising supply. At the moment 3FM is the biggest outlet for radio advertising by far and Isle of Man Newspapers the equivalent in the press field. In the event IOM Newspapers were allowed to own 100% of a broadcaster then there could be a potential of advertising prices being increased for local businesses as they would own all of the mainstream media. There are no mainstream substitutes- Energy FM being targeted at a young audience and having no official Rajar figures and other press being fragmented.

Anon:
I have outlined the potential harm in the first section: I have pasted the paragraphs again below. I do not consider there to be any 'benefits' from this change other than to financially benefit one commercial business and their Shareholders. This is plainly wrong to enable this through changing the law.

COPY from previous:

The points raised by IOM Newspapers are wholly incorrect for the reasons set out below: I also have further comment to make.

The legislation is NOT out of date as the very same provisions regarding the %'s are also set out in the 'brand new' Communications Act.

This Act has only just received Royal Assent and has been widely consulted upon recently and has received heavy scrutiny. It is far from 'out of date'.

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Legislation should not be changed at the request of a single commercial entity. This is an entirely wrong way to deal with primary legislation and a major change such as this should only be considered if it has had wide industry support.

Legislation should also not be changed to facilitate someone wanting to sell off their company to fill their own pockets. They knew the rules and should either sell the company to someone who is not prohibited or restricted by the legislation, or surrender the licence back to the CURA and wind up the company. There will be other 'non prohibited' operators who may wish to take up the licence for additional services.

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Anon:

The benefits include bringing opportunity for stakeholders to consolidate and to compete which will benefit the consumer. Wherever possible regulation should yield to competition and the proposed relaxation is a small counter-balance to the financial support enjoyed by Manx Radio.

I do not consider that there are any harmful consequences of such gravity as to require the ownership restrictions to be continued - the market on Island is limited and so far as local news reporting is concerned, there is no culture of investigative reporting by Island broadcasters.

They many stakeholders mentioned (pg 3) demonstrate that plurality will not be threatened by the proposed relaxation - additionally technological developments have increased so much over the last 20 years that the range of "online" media content available has created far more direct competition between previously distinct and separate sectors of the communications industry.

Tindle CI:

Tindle CI broadcasting believes that agreeing to the change brings significant benefits in safeguarding the future of indigenous media for the Isle of Man by rendering local media operations more sustainable for the long-term and heightening the quality of local news coverage.

Given undertakings can be agreed on how a newspapers and licensed sound broadcaster might operate in partnership - and the two media are regulated distinctly – we believe there is no risk of harm.

In contrast, we believe failure to agree to the change would place local media at risk – and would thus be harmful.

Manx Radio:

The following is the response from Radio Manx Ltd regarding the above.

We have concerns that the proposed change would have an undue and disproportionate effect on the potential advertising revenue of the whole Isle of Man market, not just that of Manx Radio. The combined editorial and commercial might of the Island's only newspaper group controlling one of its three national broadcasters, would be to the commercial detriment of not just the other two FM stations, but also all of the other Island based media both print and digital.

There is, ultimately, a finite pool of commercial advertising and sponsorship spend available and it is a resource which, by dint of geography, is unlikely to grow substantially in the foreseeable future.

The new combined selling power of a single company running the Island's only newspapers in addition to one of its three FM stations could prove to be a final blow to rivals whether on-air, online or in print, as they struggle to recover from the Covid-19 situation.

The new Communications Act, which only received its Royal Assent very recently, was widely debated within Tynwald over a protracted period of time. There were ample opportunities to amend or remove the plurality of ownership rules during this time through the proper democratic process. There now appears to be great haste to retract this particular section at the behest of one company.

The Hansard record for the Legislative Council meeting dated Tuesday 7th May 2019 carries information of a debate on this subject.

Line 1063 from the Attorney General – "clause 36 gives effect to Schedule 2. The latter contains disqualifications which prevent certain people from holding a licence. These restrictions are in place in order to preserve media plurality and prevent undue influence on a broadcaster. These provisions are largely the same as in the 1065 previous legislation. These provisions apply to all forms of broadcasting other than On-Demand Programme Services."

Is the change in ownership by the Tindle Newspapers Ltd (UK based owners of IOM Newspapers), from 20% to 100%, without proper debate by Tynwald, really within the spirit of the new Act?

Section 6.8 of the consultation document refers to "The potential impact on competition within the advertising market, and any associated or related markets, does need to be

taken into account when deliberating on changing the legislation. However, any alternatives to controlling such outcomes also needs to be kept in mind. In this regard potential anti-competitive actions that may or may not occur in the future could be assessed, and remedied if appropriate, under the Competition Act.”

We would question the validity of this comment. If the Act were to be amended as per the request from Tindle Newspapers Ltd, an assessment of the impact on competition within the IOM advertising market ‘after the fact’, would seem a somewhat pointless exercise as the die will already have been cast.

Question 9: Do you have any further comments on this proposal?

Anon:
Positive that you are consulting openly about this proposal

Anon:
I support the proposed changes.

Ed Rowe:
Isle of Man Newspapers owners have previously sold thirteen of their radio station portfolio to large network groups.

Can they confirm there would be no loss to local programming on the Isle of Man.

Bauer Media currently are the sales agent for Tindle stations - would this lead to the loss of current sales marketing executives on Island?

Would they also invest in launching a much needed DAB infrastructure for IOM?

Tindle CI Broadcasting:
We appreciate the instinctive appeal of media ownership plurality – and can fully understand any support from respondents for ‘retaining the status quo’ in legislative terms.
Tindle CI broadcasting feels, however, that retention would, on the contrary, place the operational status quo at risk.
There is no guarantee that, under the existing ownership restrictions, individual local media outlets will survive long term. Indeed, there is considerable evidence to suggest that in today’s competitive media environment there is risk.
We believe that legislative status quo would not, therefore, guarantee to preserve the status quo as far as listeners and readers on the Isle of Man are concerned.

Dave Martin:
Please see earlier comment on possible need for a review of regulation and possibly a unified regulator across all types of media.