



Freagra ar
Chomhairliúchán:

Dréacht-Ráiteas Straitéise 2025 go 2027

Dáta foilsithe: Márta 2025

Clár Ábhar

1. Réamhrá	3
2. Freagra ar an gComhairliúchán	4
2.1 Forléargas ar an aiseolas a fuarthas	4
2.2 Anailís théamach agus freagra ar aighneachtaí	4
3. Na chéad chéimeanna eile	17
Aguisín	18
Aighneacht thar ceann: Audiovisual Ireland	18
Aighneacht thar ceann: Independent Radio and TV Producer	20
Aighneacht thar ceann: Local Ireland (RNPAI)	21
Aighneacht thar ceann: Mediahuis Ireland	22
Aighneacht thar ceann: MPC-TV	24
Aighneacht thar ceann: National Disability Authority	25
Aighneacht thar ceann: RTÉ	27
Aighneacht thar ceann: Technology Ireland, IBEC	29
Aighneacht thar ceann: Sky Ireland	31
Aighneacht thar ceann: Screen Producers Ireland (1 of 2)	33
Aighneacht thar ceann: Screen Producers Ireland (2 of 2)	34
Aighneacht thar ceann: An Coimisiún Toghcháin	36

1. Réamhrá

Is é Coimisiún na Meán ('An Coimisiún') gníomhaireacht na hÉireann chun tírdhreach meán faoi bhláth, éagsúil, cruthaitheach, sábháilte agus iontaofa a fhorbairt agus a rialáil. Bunaíodh é an 15 Márta 2023 leis an Acht um Rialáil Sábháilteachta ar Líne agus na Meán, 2022 lenar leasaíodh an tAcht Craolacháin, 2009.

In 2024, chuir an Coimisiún tús leis an bpróiseas chun ár gcéad Ráiteas Straitéise a fhorbairt don tréimhse 2025 go 2027, agus an dá bhliain sin san áireamh. Mar chuid den phróiseas sin, d'fhoilsíomar dréacht-Ráiteas Straitéise le haghaidh comhairliúcháin poiblí an 6 Samhain 2024, agus d'iarramar freagraí a fháil faoin 4 Nollaig 2024. Iarradh barúlacha sa chomhairliúchán maidir leis na nithe seo a leanas:

1. Misean agus Luachanna beartaithe an Choimisiúin, agus a mhéid a mhíníonn siad an méid a dhéanaimid (ár misean) agus ár n-uaimhianta don todhchaí (fís)
2. Na torthaí straitéiseacha atá beartaithe againn, agus a mhéid atá siad oiriúnach i gcomhthéacs ár ról agus na timpeallachta ina bhfuilimid ag feidhmiú
3. Réimsí oibre ar mhaith le freagróirí go dtabharfaimis fúthu faoi cheann amháin nó níos mó de na torthaí straitéiseacha beartaithe
4. Tosaíochtaí breise ba cheart a bhreithniú lena gcur san áireamh sa Ráiteas Straitéise deiridh.

Iarradh ar fhreagróirí a dtuairimí a chur in iúl trí fhoirm ar líne. Tugadh an rogha dóibh siúd ar spéis leo páirt a ghlacadh ionchur a sholáthar i bhformáid scríofa eile, nó trí mhodhanna malartacha in imthosca áirithe. De réir ár [dTreoirlínte Comhairliúcháin](#), tá an Freagra seo ar Chomhairliúchán á fhoilsiú againn tar éis an próiseas comhairliúcháin poiblí a thabhairt chun críche.

Is é cuspóir an Fhreagra seo ar Chomhairliúchán na príomh-shaincheistean agus na príomh-mholtaí a eascraíonn as na haighneachtaí a fuarthas le linn an chomhairliúcháin poiblí a leagan amach, agus míniú a thabhairt ar an gcaoi ar bhreithníomar na hábhair sin agus ar an bhfreagra a thugamar orthu.

Is mór againn an t-aiseolas a fuarthas agus gabhaimid buíochas leo siúd a ghlac páirt sa phróiseas comhairliúcháin poiblí.



2. Freagra ar an gComhairliúchán

Fuarthas 12 aighneacht san iomlán ó na 11 eagraíocht atá liostaithe thíos, agus tá cóip de gach aighneacht i gceangal leis an doiciméad seo.

1. An tÚdarás Náisiúnta Míchumais
2. Local Ireland (RNPAI)
3. MPC-TV
4. Léiritheoirí Scáileáin na hÉireann [x2]
5. Technology Ireland, IBEC (dá ngairtear Technology Ireland sa tuarascáil seo)
6. Mediahuis
7. Léiritheoir neamhspleách raidió & teilifíse
8. Sky Ireland
9. RTÉ
10. Audiovisual Ireland
11. An Coimisiún Toghcháin

Rinneamar breithniú cúramach ar na haighneachtaí go léir a fuarthas, agus aird chuí á tabhairt againn ar na haighneachtaí ina n-iomláine, rinneamar ár mbreithiúnas a fheidhmiú agus thángthamar ar chomhdhearcadh maidir leis an leagan deiridh den Ráiteas Straitéise atá le glacadh.

I roinn 2.2 soláthraímid cuntas ar na hábhair a ardaíodh sa chomhairliúchán poiblí a raibh leasuithe ar an dréacht-Ráiteas Straitéise mar thoradh orthu, chomh maith leis na hábhair nárbh fhéidir a bhreithniú ar chúiseanna praiticiúla, dlíthiúla nó beartais. Níl sé i gceist go mbeadh sé uileghabhálach, agus níor cheart a mheas gurb ionann mainneachtain tagairt a dhéanamh d'aon ábhar ar leith agus mainneachtain aird a thabhairt ar aon chuid ar leith d'aighneacht nó don aighneacht ina hiomláine.

2.1 Forléargas ar an aiseolas a fuarthas

Measadh go raibh an fhís, an misean agus na luachanna atá beartaithe soiléir agus inchreidte agus thacaigh na freagróirí leo tríd is tríd.

Bhí leibhéal ard comhaontaithe ar fud na n-aighneachtaí go léir maidir leis na torthaí straitéiseacha atá beartaithe, cé gur mhol roinnt freagróirí go bhféadfaí béim níos mó a chur ar ghnéithe áirithe. I gcás inar sainaithníodh bearnaí a d'fhéadfadh a bheith ann, rinne roinnt freagróirí moltaí chun aghaidh a thabhairt orthu agus mhol siad tosaíochtaí breise lena gcur san áireamh sa Ráiteas Straitéise deiridh.

2.2 Anailís théamach agus freagra ar aighneachtaí

Tar éis anailís a dhéanamh ar na haighneachtaí, rinneamar achoimre ar na príomhthorthaí faoi na ceanteidil seo a leanas:

- Téama 1: Fís, ról agus cur chuige an Choimisiúin maidir lena shainordú a chur i gcrích
- Téama 2: Maoiniú/inbhuanaitheacht eacnamaíoch/inmharthanacht tráchtála earnáil meán na hÉireann
- Téama 3: Iolrachas, éagsúlacht agus cuimsiú
- Téama 4: Infheictheacht earnálacha áirithe agus cineálacha ábhair áirithe
- Téama 5: Cumarsáid, comhairliúchán agus comhar
- Téama 6: An Ghaeilge agus cultúr na hÉireann
- Téama 7: Intleacht Shaorga agus deiseanna agus dúshláin eile atá ag teacht chun cinn
- Téama 8: Cur chun feidhme na Straitéise

I líon beag cásanna, measadh go raibh an t-aiseolas a fuarthas ábhartha faoi níos mó ná réimse téamach amháin agus dá bhrí sin cuireadh san áireamh é faoi gach ceanteideal ábhartha.



Téama 1: Fís, ról agus cur chuige an Choimisiúin maidir lena shainordú a chur i gcrích

Barúlacha ó fhreagróirí:

Bhí fáilte mhór roimh an bhfís agus roimh na torthaí straitéiseacha a cuireadh in iúl sa dréacht-Ráiteas Straitéise. Chuir Audiovisual Ireland, mar shampla, fáilte ar leith roimh an tiomantas soiléir san fhís chun tacú leis an daonlathas agus le luachanna daonlathacha, mheas MPC-TV go bhfuil an fhís leagtha amach i gceart, mheas RTÉ go raibh ardmhianta na straitéise inmholta, agus chuir Sky Ireland a thacaíocht don fhís in iúl agus d'aontaigh sé leis na sé thoradh straitéiseacha go léir.

Mhol roinnt freagróirí modhnuithe. D'fháiltigh an tÚdarás Náisiúnta Míchumais, mar shampla, roimh an dréacht-fhís ach mhol sé go smaoiníodh an Coimisiún ar 'cuimsitheach' a chur in ionad an fhocail 'ilghnéitheach'. Chuir Léiritheoirí Scáileáin na hÉireann in iúl go bhfáiltítear go mór roimh an dréacht-fhís ach mhol siad go bhféadfaí í a leasú chun na focail "in Éirinn" a chur san áireamh ag an deireadh, ar mhaithe le soiléireacht iomlán. Mhol Sky Ireland, cé gur aontaigh sé leis na sé thoradh straitéiseacha, roinnt téacs breise le breithniú faoi roinnt de na torthaí sin.

Mheas Technology Ireland agus Mediahuis Ireland go bhfuil gá le bheith níos soiléire maidir leis na paraiméadair a rialaíonn an Coimisiún laistigh díobh agus mhol siad go bhféadfadh cuid den téarmaíocht sa dréacht-Ráiteas Straitéise a bheith míthreorach.

Luaigh RTÉ agus Léiritheoirí Scáileáin na hÉireann ár ról mar rialtóir neamhspleách, agus mheas siad go bhféadfaí, mar rialtóir neamhspleách, níos mó béime a chur ar a chinntiú go ndéantar cinntí maoinithe ar bhonn neamhspleách.

Rinne Technology Ireland agus RTÉ tagairt do luach an mhisnigh atá mar bhonn agus mar thaca ag ár gcur chuige rialála. Cé gur mhol RTÉ gur cheart tiomantas níos airde a léiriú sa Ráiteas Straitéise deiridh do ghníomhú i ról an Choimisiúin maidir le bheith ag tacú le hathrú i dtírdhreach athraitheach na meán, chuir Technology Ireland a thuairim in iúl nach bhfuil *Misneach* oiriúnach agus gur cheart é a leasú toisc nach faoi rialtóirí atá sé rioscaí a ghlacadh ná "dúshlán a thabhairt don status quo".

D'iarr Audiovisual Ireland go gcuirfí níos mó béime ar ár ról mar cheannaire smaoinimh don earnáil, ag déanamh taighde neamhspleách ar shaincheistanna tábhachtacha tosaíochta agus ag tacú leo, de réir mar is cuí.

Lorg Technology Ireland tuilleadh béime ar phrionsabail na trédhearcachta agus na comhréireachta mar luachanna nó prionsabail neamhspleácha atá mar bhonn taca leis na luachanna uile atá againn cheana. Ar an gcaoi chéanna, d'iarr siad ar an gCoimisiún tuilleadh sonraí a thabhairt faoi shraith rannpháirtíochta níos soiléire le heintitis rialáilte, ag tosú le comhairliúchán agus ag críochnú le forfheidhmiú, ionas nach í forfheidhmiú an phríomhshlat ar dá réir a thomhaistear rath. Mhol siad freisin go gcuirfimis *Barr Feabhais Oibríocháin* san áireamh mar luach atá mar bhonn taca lenár gcuid oibre, ag cinntiú go bhfuil na hacmhainní, na scileanna agus na próisis chúí i bhfeidhm ag an gCoimisiún chun feidhmiú éifeachtach ár n-oibríochtaí a éascú.

Breithniú agus freagra Choimisiún na Meán:

Aontaímid go hiomlán leis an tábhacht a bhaineann le gach duine, lena n-áirítear daoine faoi mhíchumas, a chumasú chun páirt a ghlacadh i dtírdhreach na meán agus leis na meáin, agus táimid tiomanta go hiomlán oibriú leis na páirtithe leasmhara go léir chun é seo a chinntiú. Léirítear é sin sa mhéid go bhfuil 'Éagsúlacht agus Cuimsiú' ar cheann de na sé thoradh straitéiseacha atá againn, agus sna tagairtí don chuimsiú agus don inrochtaineacht ar fud an doiciméid.

I bhfianaise ár sainchúraim reachtúil maidir le gnéithe den rialáil ar an leibhéal idirnáisiúnta, ní mheasaimid gur cuí na focail "in Éirinn" a áireamh ag deireadh ár ráitis físe.

Cé nach bhfuil leasú déanta againn ar an ráiteas físe, tar éis machnamh a dhéanamh ar an aiseolas ón Údarás Náisiúnta Míchumais, tá níos mó béime curtha againn ar inrochtaineacht agus ar chuimsiú in áiteanna eile sa doiciméad, lena n-áirítear sa Bhrollach a ghabhann leis an ráiteas straitéise deiridh anois.

Aontaímid go bhfuil soiléireacht maidir lenár ról mar rialtóir tábhachtach. Tugaimid dár n-aire go léiríonn an ráiteas misin atá sa dréacht-Ráiteas Straitéise ár gcreat reachtach. Tugaimid dár n-aire freisin gur thacaigh go leor freagróirí ar an bpróiseas comhairliúcháin go sainráite leis an ráiteas misin atá beartaithe. Mheas Audiovisual Ireland, mar shampla, go mínítear go soiléir ann an méid a dhéanann an Coimisiún, mheas MPC-TV go raibh an misean curtha le chéile i gceart, chuir Sky Ireland a thacaíocht in iúl, agus chuir an tÚdarás Náisiúnta Míchumais agus Léiritheoirí Scáileáin na hÉireann fáilte roimhe. Agus an méid thuas ar fad á chur san áireamh, ní mheasaimid gur cuí an dréacht-ráiteas misin a leasú.

Aontaímid gur suntasach an ról atá againn mar rialtóir neamhspleách, agus tugaimid dár n-aire go ndéantar tagairt dó sin sa dréacht-Ráiteas Straitéise, ina ngeallaimid ár ról mar 'rialtóir láidir, misniúil, neamhspleách, dírithe ar ghníomhú' a chomhlíonadh. Mar fhreagra ar an aiseolas a fuarthas, chuireamar leis an mbéim ar ár neamhspleáchas trí thagairt a dhéanamh dó go sainráite sa Bhrollach a ghabhann leis an Ráiteas Straitéise deiridh anois.

Go deimhin, tacaíonn an Coimisiún le hathrú, agus tá ár gcuid oibre maidir le tacú le hearnáil na meán agus í a fhorbairt clúdaithe go forleathan cheana féin sa dréacht-Ráiteas Straitéise. Measaimid nach bhfuil gá le tuilleadh breisithe, agus go mbeadh siad díreireach i gcomhthéacs Ráiteas Straitéise atá cuibheasach gearr agus achomair.

Mar rialtóir, is éard atá i gceist lenár ról ná rioscaí tomhaiste a ghlacadh agus dúshlán a chur roimh an status quo, i gcás nach dtacaíonn an status quo lenár bhfís agus lenár dtorthaí straitéiseacha a bhaint amach. Mar sin, measaimid gur luach tábhachtach é misneach atá mar bhonn taca lenár gcuid oibre.

Aontaímid go bhfuil ról tábhachtach againn mar cheannaire smaoinimh san earnáil. Bainfimid leas as ár n-uirlis seachadta, "Taighde agus Béim Amach Anseo" chun an ról sin a chur i bhfeidhm, trí mhonatóireacht a dhéanamh ar fhorbairtí beartais, taighde agus teicneolaíochta atá ag teacht chun cinn agus trí úsáid a bhaint as na léargais sin chun bonn eolais a chur faoinár gcuid oibre rialála agus forbartha meán. Cé go measaimid go bhfuil an ghné seo dár ról clúdaithe go leordhóthanach cheana sa dréacht-Ráiteas Straitéise, rinneamar tagairt dó arís, chun béim bhreise a chur air, sa Bhrollach a ghabhann leis an Ráiteas Straitéise deiridh.

Aontaímid gur príomhphrionsabail iad trédhearcacht agus comhréireacht nach mór a bheith mar bhonn taca lenár gcuid oibre go léir, agus is mian linn aon mhíthuiscint a cheartú go bhféadfaí forfheidhmiú a mheas mar phríomhshlat ar dá réir a thomhaistear rath. Mar a leagtar amach sa dréacht-Ráiteas Straitéise, tá sraith fhairsing uirlisí ar fáil dúinn, agus bainfimid úsáid astu go breithiúnach chun ár sainordú a chur i gcrích. Déanfaimid é sin ar bhealach atá trédhearcach agus comhréireach, agus táimid sásta go bhfuil ár dtiomantas do na prionsabail sin clúdaithe go forleathan sa Ráiteas Straitéise cheana féin. Mar shampla, tagraítear sa dréacht-Ráiteas Straitéise dár gcur chuige mar chur chuige atá "cothrom, comhréireach, trédhearcach agus comhsheasmhach" agus in áiteanna eile leagtar béim ar "éifeachtacht, cothroime agus trédhearcacht ár gcur chuige". Tá tagairtí ann dár gcinnteoireacht thrédhearcach agus do thrédhearcacht a chur chun cinn in úinéireacht na meán, chomh maith le tiomantas d'eagraíocht oscailte thrédhearcach a thógáil. Tá comhréireacht intuigthe sna tagairtí dár gcur chuige rioscabhunaithe. Agus an méid sin go léir á chur san áireamh, ní mheasaimid go bhfuil gá le tuilleadh leasuithe.

Aontaímid gur luach ríthábhachtach é barr feabhais oibriúcháin d'aon eagraíocht, agus is ceann é a bhfuilimid tiomanta dó. Cé nach gcreidimid gur gá tagairt shainráite a dhéanamh don téarma barr feabhais oibriúcháin, táimid sásta go bhfuil sé intuigthe i gcuid mhaith den fhocláíocht atá ann cheana sa roinn 'Áisitheoirí Seachadta', go sonrach, 'dea-chleachtas a úsáid'; "atá solúbtha, éifeachtach agus dea-bhainistithe" chomh maith le "úsáid eacnamaíoch agus éifeachtúil a bhaint as acmhainní". Ina theannta sin, spreagann na luachanna a chuirtear in iúl sa dréacht-Ráiteas Straitéise iompraíochtaí a

thacaíonn le barr feabhais oibriúcháin. Ní chreidimid gur gá, dá bhrí sin, barr feabhais oibriúcháin a chur leis mar luach ar leith.

Téama 2: Maoiniú / inmharthanacht tráchtála / inbhuanaitheacht earnáil meán na hÉireann

Barúlacha ó fhreagróirí:

Áiríodh le go leor de na haighneachtaí tuairimí faoin gceannteideal leathan seo, agus aithníonn an chuid is mó díobh ról tábhachtach an Choimisiúin maidir le tacú leis an earnáil agus a hinmharthanacht eacnamaíoch a chur chun cinn.

D'iarr Sky Ireland, mar shampla, go gcuirfí níos mó béime sa Ráiteas Straitéise deiridh ar inbhuanaitheacht eacnamaíoch earnáil meán na hÉireann agus chuir sé in iúl go bhfuil tábhacht ar leith ag baint leis seo i gcás oibreoirí teilifíse tráchtála atá, dar leis, ag feidhmiú i dtimpeallacht atá ag éirí níos dúshlánaí. Ar an gcaoi chéanna, mhol RTÉ go n-áireofaí 'Inbhuanaitheacht Eacnamaíoch' mar thoradh straitéiseach neamhspleách chun aghaidh a thabhairt, ar bhealach níos cuimsithí, ar athléimneacht agus inmharthanacht fhadtéarmach earnáil na meán. Mhol sé freisin go bhféadfaí eagarthóireacht a dhéanamh ar an téacs a ghabhann leis an toradh straitéiseach, 'Cultúr na hÉireann agus na Meáin', chun an tuairisceoir 'bríomhar' a chur san áireamh. Chuir Audiovisual Ireland in iúl go bhfuil baint amach na dtorthaí straitéiseacha ag brath ar acmhainní maithe a bheith ag an earnáil agus ar neamhspleáchas iomlán eagarthóireachta agus cruthaitheachta a bheith aici. Chuir sé in iúl go mbraitheann sé sin ar deireadh thiar ar an earnáil a bheith inmharthana ó thaobh na heacnamaíochta de agus rathúil ó thaobh na tráchtála de. Sa chomhthéacs sin, d'ardaigh sé saincheist na píoráideachta ar ábhar closamhairc, agus an gá atá le cruthaitheoirí ábhair agus earnáil na meán a chosaint ar bhonn níos leithne. D'ardaigh Sky Ireland saincheist na píoráideachta ina aighneacht freisin, agus mhol sé roinnt tagairtí follasacha do pháirídeacht le cur san áireamh sa Ráiteas Straitéise deiridh.

Leag roinnt freagróirí béim ar réimsí a mheas siad a raibh tosaíocht mhaoiniúcháin de dhíth orthu. Mar shampla:

Leag Audiovisual Ireland béim ar na nithe seo a leanas:

- Léiriú réigiúnach agus forbairt scileanna
- Ábhar Gaeilge a fhorbairt, a léiriú agus a sheachadadh chun cultúr agus oidhreacht na hÉireann a thaispeáint
- Craoltóireacht seirbhíse poiblí

Leag Léiritheoirí Scáileáin na hÉireann béim ar na nithe seo a leanas:

- Maoiniú atá cobhsaí agus a bhfuil acmhainní cuí aige do na Meáin Seirbhíse Poiblí (PSM)
- Maoiniú tiomnaithe Fuaimne & Físe do léiritheoirí neamhspleácha

Chuir Sky Ireland béim ar an tábhacht a bhaineann le hinfheistíocht a dhéanamh i léiriú ábhair a thugann níos mó éagsúlachta don earnáil, agus d'iarr MPC-TV go dtabharfaí níos mó tacaíochta do theilifís phobail áitiúil a bhaineann, dar leis, úsáid níos fearr as tallann faoin tuath in Éirinn agus a thaispeánann níos fearr áilleacht/éagsúlacht na hÉireann ar leibhéal áitiúil. Ar an gcaoi chéanna, leag Local Ireland béim ar an luach a bhaineann le foilsitheoirí nuachta áitiúla.

Bhain roinnt de na haighneachtaí le leithdháileadh maoinithe ag an gCoimisiún. Mar shampla:

- Mhol Mediahuis gur cheart tagairt i bhfad níos leithne ná craoltóirí seirbhíse poiblí a dhéanamh i gcomhthéacs na ndúshlán atá roimh earnáil na meán agus na dtacaíochtaí ar féidir leo cabhrú leo
- D'iarr Local Ireland cothromaíocht maidir le maoiniú agus thug siad rabhadh i gcoinne gníomhartha a d'fhéadfadh éagothroime shuntasach a chruthú ó thaobh iomaíochais de.

- Lorg RTÉ tiomantas chun an tobhach meán atá beartaithe a chur chun cinn do sheirbhísí a sholáthraíonn seirbhísí SVOD in Éirinn.
- Lorg Technology Ireland gealltanas go n-úsáidfeadh cistí toibhithe go cothrom, go trédhearcach agus go héifeachtúil i réimsí a bhaineann go díreach le rialáil catagóire seirbhíse faoin DSA, faoin TCOR nó faoin OSMR. D'áitigh siad go seachnódh an Coimisiún cás ina mbeadh soláthraithe seirbhíse faoi réir tobhaigh níos airde (nó dhúblacha) ar an leibhéal náisiúnta ná, mar shampla, táillí maoirseachta faoin DSA.

Chuir an aighneacht ó Audiovisual Ireland roinnt sásraí maoinithe féideartha ar fáil lena n-íniúchadh tuilleadh. Mar shampla, mhol siad go bhféadfadh an Coimisiún na nithe seo a leanas a dhéanamh:

- staidéar taiscéalaíoch a dhéanamh ar an bhféidearthacht ardú dreasachta creidmheasa faoi Alt 481 a thabhairt isteach do léiritheoirí atá lonnaithe i gceantair Ghaeltachta.
- Cleachtadh scóipe a dhéanamh maidir le beart sonrath amharcéifeachtaí (VFX) a d'fhéadfaí a thabhairt isteach i mBuiséad 2026.

Mhol siad freisin go dtacóimis le tallann chruthaitheach na hÉireann trí chleachtadh a dhéanamh chun acmhainní Scáileán Éireann a thagarmharcáil i gcoinne na n-acmhainní sin a chuirtear ar fáil do ghníomhaireachtaí comhchosúla i dtíortha inchomparáide.

Bhain aighneacht amháin leis an táille cheadúnais. Mhol MPC-TV go ndéanfaí athbhreithniú ar an táille cheadúnais do stáisiúin bheaga teilifíse pobail.

Tharraing Sky Ireland aird ar an teannas a d'fhéadfadh a bheith ann idir maoiniú agus nuálaíocht, agus tharraing sé aird ar an infheistíocht atá á déanamh ag oibreoirí tráchtála sa nuálaíocht agus tharraing sé aird ar an mbaol go gcuirfí é sin i mbaol i gcás ina bhfuil rialacha maoiniúcháin róshaintreorach.

Thug Léiritheoirí Scáileán na hÉireann le fios nach bhfuil aon tagairt sa dréacht-Ráiteas Straitéise d'oibleagáidí agus tobhaigh infheistíochta chun léiriú Saothair Eorpacha agus oibreacha náisiúnta a chur chun cinn. Leag siad béim ar phatrúin athraithe tomhaltais, trína bhfuil ioncam mór síntiús ag dul chuig seirbhísí cábla agus ardáin VOD, agus cuireann siad in iúl go dtugann sé sin dúshlán do chumas chraoltóirí na hÉireann sreabhadh ábhair atá ábhartha ó thaobh cultúir de a choinneáil.

Mhol Mediahuis gur cheart don Choimisiún dul i dteagmháil le páirtithe leasmhara maidir leis na cineálacha scéimeanna tacaíochta a bheidh riachtanach chun iad a chothú ina ról mar sholáthraithe ábhair seirbhíse poiblí.

Breithniú agus freagra Choimisiún na Meán:

Aontaímid go huile agus go hiomlán leis an tábhacht a bhaineann le hearnáil na meán a bheith bríomhar agus inbhuanaithe ó thaobh an gheilleagair de. Rinneadh tagairt shuntasach d'inbhuanaitheacht eacnamaíoch inár ndréacht-Ráiteas Straitéise faoinár dtoradh straitéiseach, 'Cultúr na hÉireann agus na Meán', agus tá sé intuigthe i ngach tagairt d'inbhuanaitheacht in áiteanna eile sa Ráiteas Straitéise. Cuirtear beocht in iúl go cuí le húsáid na dtuairisceoirí 'cruthaitheach' agus 'faoi bhláth'. Dá réir sin, ní mheasaimid go bhfuil gá le tuilleadh leasuithe.

Maidir leis an bpíoráideacht, aithnímid go hiomlán na dúshláin a bhaineann leis an bpíoráideacht agus an tionchar a d'fhéadfadh a bheith aici, mura ndéanfaí í a sheiceáil, ar inmharthanacht eacnamaíoch na dtionscal cruthaitheach. D'ainneoin sin, ós rud é go meastar gur ábhar mídhleathach é ábhar bradach, ní chreidimid go bhfuil gá le tagairt fhollasach don phíoráideacht sa Ráiteas Straitéise. Is mian linn a dhearbhu do fhreagróirí go bhfuil córas na gComharthóirí lontaofa ag obair chun aghaidh a thabhairt ar shaincheist níos leithne an ábhair mhídhleathaigh ar líne.

Cé go dtuigimid an gá atá le soiléireacht níos fearr maidir leis an straitéis atá le glacadh chun aghaidh a thabhairt ar shaincheistanna a bhaineann le hioncaim mhóra síntiús, tabharfar aghaidh air sin mar chuid de staidéar féidearthachta ar Thobhach na nOibreacha Eorpacha.

Bhreithníomar an t-aiseolas ó Sky Ireland maidir le maoiniú a leithdháileadh ar ábhar a thugann níos mó éagsúlachta don earnáil. Is mian linn a chur in iúl go bhfuil sé mar phríomhchuspóir ag ár scéim mhaoinithe, Fuaim & Físe, ábhar cláir ardchaighdeán a fhorbairt agus tacú leo, ar ábhar é a léiríonn ár gcultúr, ár n-oidhreacht agus ár dtaithí éagsúil agus a fhreastalaíonn ar éagsúlacht lucht féachana/éisteachta ar fud craoltóirí pobail, tráchtála agus seirbhíse poiblí, idir ábhar fuaime agus ábhar closamhairc. Is éard atá i gceist lenár bpróiseas measúnaithe breithniú a dhéanamh ar an éagsúlacht in ábhar an chláir atá beartaithe, lena n-áirítear inscne, comhionannas, éagsúlacht agus cuimsiú, chomh maith leis na seirbhísí rochtana a chuirfear ar fáil i léiriú ábhair.

Tugaimid dár n-aire an t-aiseolas ó MPC-TV maidir leis an táille cheadúnais, agus is mian linn a shoiléiriú nach dtagann sé sin faoinár sainchúram reachtúil. Tá aird tarraingthe againn freisin ar na réimsí ar leith a mholtar le haghaidh maoiniú tosaíochta, agus ba mhaith linn a athdhearbhú go mbaineann ár ról rialála le hearnáil iomlán na meán (lena n-áirítear na meáin seirbhíse poiblí, na meáin tráchtála agus na meáin phobail). Léirítear é sin sa dréacht-Ráiteas Straitéise faoin uirlis seachadta, 'Ag Tacú le hEarnáil na Meán in Éirinn agus í a Fhorbairt'. Chun béim bhreise a leagan ar fhairsinge na n-eagraíochtaí meán a chuimsítear sa sainmhíniú seo, agus chun ár dtiomantas do bheith ag tacú le craoltóireacht phobail a chur in iúl go soiléir, tá an leasú líneach seo a leanas ionchorpraithe sa Ráiteas Straitéise deiridh: 'Úsáidimid ár scéimeanna maoiniúcháin agus ár ról chun maoirseacht a dhéanamh ar eagraíochtaí PSM agus ar chraoltóirí tráchtála agus pobail chun tacú le hearnáil meán faoi bhláth, éagsúil, chruthaitheach, shábháilte agus iontaofa'.

Maidir le maoiniú tobhaigh, cloífidimid lenár n-oibleagáidí faoi Alt 21(4) den Acht um Rialáil Sábháilteachta ar Líne agus na Meán chun tobhaigh a úsáid chun costais a thabhaítear go cuí a íoc. Leanfaimid orainn ag dul i mbun comhairliúcháin phoiblí maidir lenár n-orduithe tobhaigh, ach ní mheasaimid gur cuí a shonrú conas a chionroinnfear airgead ó thobhaigh mar chuid den Ráiteas Straitéise.

Bhreithníomar an t-aiseolas ó Sky Ireland maidir leis an teannas a d'fhéadfadh a bheith ann idir maoiniú agus nuálaíocht. Creidimid go bhfuil neamhspleáchas eagarthóireachta agus cruthaitheachta, agus rochtain ar dheiseanna nuálaíochta, ríthábhachtach chun ábhar ardchaighdeán a léiriú. Ar an gcúis sin, tá nuashonrú déanta againn ar an dréacht-Ráiteas Straitéise faoin toradh straitéiseach, 'Cultúr na hÉireann agus na Meáin', chun an téacs nuashonraithe seo a leanas a chur san áireamh mar a bhfuil líne faoi: 'Earnáil léirithe nuálach agus chruthaitheach ina léirítear agus ina bhfreastalaítear ar leasanna shochoaí na hÉireann'. Rinneamar an téacs a nuashonrú freisin faoin toradh straitéiseach, 'Daonlathas', mar seo a leanas: 'Cosnaítear neamhspleáchas eagarthóireachta agus saoirse chun tuairimí a nochtadh agus cuirtear raon leathan tuairimí polaitiúla in iúl go dleathach'

Táimid tiomanta do dhul i dteagmháil lenár bpáirtithe leasmhara agus ár scéimeanna maoiniúcháin á múnú, á bhforbairt agus á n-athbhreithniú againn.

Téama 3: Iolrachas, éagsúlacht agus cuimsiú

Barúlacha ó fhreagróirí:

Fáiltíodh go forleathan roimh ár dtiomantas don iolrachas, don éagsúlacht agus don chuimsiú, go háirithe mar a léirítear inár bhfís, inár misean agus inár dtorthaí straitéiseacha. Fuarthas líon beag iarrataí ar shoiléireacht, ar níos mó sonraí a thabhairt nó ar leasú breise. Mheas RTÉ, mar shampla, go bhfuil tiomantas an Choimisiúin don éagsúlacht agus don chuimsiú inmholta, ach d'iarr sé soiléireacht níos fearr maidir leis an tábhacht a bhaineann le hiolrachas tuairimí a choinneáil, ar an mbonn go bhféadfadh luach a bheith fós ag roinnt tuairimí, cé nach bhfuil siad dleathach go docht, chun dioscúrsa sibhialta oscailte a chothú. Chuir an tÚdarás Náisiúnta Míchumais fáilte roimh an mbéim ar iolrachas inár ráiteas misin, ach d'iarr sé go gcuirfí an focal 'cuimsitheach' in ionad an fhocail 'éagsúil' inár bhfís. Is é an réasúnaíocht atá acu ná go ndíríonn an éagsúlacht ar ionadaíocht sna meáin, ach baineann cuimsiú le tírdhreach meán a thógáil a chinntíonn gur féidir le gach duine a bheith rannpháirteach, lena n-áirítear daoine faoi mhíchumas. Ba dhíol sásaimh dóibh freisin an toradh straitéiseach, 'Éagsúlacht agus Cuimsiú', agus ár 'Straitéis maidir le Inscne, Comhionannas, Éagsúlacht agus Cuimsiú (GEDI)',

agus mhol siad go bhféadfadh ár dtiomantas do straitéis GEDI a chur chun feidhme a bheith níos follasaí. D'iarr siad freisin go léireodís forálacha Choinbhinsiún na Náisiún Aontaithe ar Chearta Daoine faoi Mhíchumas, go leanfaimis cur chuige an Dearaidh Uilíoch inár gcuid oibre, lena n-áirítear ár gcumarsáid, agus go leagfaimis amach céimeanna chun an mhonatóireacht ar cháilíocht na seirbhísí rochtana a neartú, le rannpháirtíocht úsáideoirí rochtana.

Faoin gceannteideal, 'Taighde agus Béim Amach Anseo', mhol an tÚdarás Náisiúnta Míchumais an dréacht-Ráiteas Straitéise a thabhairt cothrom le dáta chun taighde ar ionadaíocht agus léiriú daoine faoi mhíchumas sna meáin chraolta a chur san áireamh.

D'iarr Léiritheoirí Scáileáin na hÉireann go gcuirfimis íomhá níos cothroime i láthair maidir le héagsúlacht ábhar na meán, tríd an téacs thíos a bhfuil líne faoi a chur leis an ngníomh seachadta seo a leanas:

'Déanfaimid tionscnaimh nua a dhearadh, a fhorbairt agus a chur chun feidhme lena spreagfar soláthar ábhair ardchaighdeán meán i mBéarla agus i nGaeilge, lena n-áirítear iriseoireacht, nuacht agus cúrsaí reatha, ábhar faisnéise, drámaíochta, beochana, fíorasach agus ábhar scáileáin siamsaíochta, atá éagsúil, nuálach, inrochtana, cuimsitheach agus ionadaíoch go cuí ar shochaí chomhaimseartha na hÉireann.'

D'iarr an tÚdarás Náisiúnta Míchumais ar an gCoimisiún breac-chuntas a thabhairt ar na céimeanna atá beartaithe againn a ghlacadh chun an mhonatóireacht ar chaighdeán na seirbhísí rochtana a neartú, le rannpháirtíocht úsáideoirí rochtana. Ar bhonn níos leithne, d'iarr sé go leagfaimis amach conas atá sé i gceist againn ár n-oibleagáidí faoin Ionstraim Eorpach Inrochtaineachta (EAA) a chomhlíonadh.

Breithniú agus freagra Choimisiún na Meán:

Aontaímid go hiomlán leis an tábhacht a bhaineann le hionacht tuairimí a choinneáil. Tar éis dúinn athbhreithniú a dhéanamh ar an dréacht-Ráiteas Straitéise as an nua, measaimid go bhfuil coincheap an iolrachais léirithe go leordhóthanach i gcorp an doiciméid, lena n-áirítear inár ndrúacht-ráiteas misin agus inár dtoradh straitéiseach, 'Cultúr na hÉireann agus na Meán'. Tugaimid ar aire freisin go ndéantar tagairt fhorleathan don cheart chun tuairimí a nochtadh agus dár dtiomantas seasamh leis an gceart sin, lena n-áirítear i Roinn 1 ('Réamhrá'), sa téacs a ghabhann leis an toradh straitéiseach, 'Daonlathas', agus i Roinn 5 ('Ár gCreat Cur Chun Feidhme'). Ina theannta sin, rinneamar tagairt freisin don cheart chun tuairimí a nochtadh sa Bhrollach a ghabhann leis an Ráiteas Straitéise deiridh anois.

Mar atá leagtha amach inár bhfreagra faoi Théama 1, aontaímid go hiomlán leis an tábhacht a bhaineann le gach duine a chumasú chun páirt a ghlacadh i dtírdhreach na meán agus leis na meáin, agus táimid tiomanta go hiomlán oibriú leis na páirtithe leasmhara go léir chun é sin a chinntiú. Léirítear é sin sa toradh straitéiseach, 'Éagsúlacht agus Cuimsiú', agus san iliomad tagairtí do chuimsiú agus d'inrochtaineacht ar fud an doiciméid. Tá níos mó béime curtha againn ar inrochtaineacht agus ar chuimsiú anois, lena n-áirítear sa Bhrollach a ghabhann leis an Ráiteas Straitéise deiridh.

Cuirimid fáilte roimh mholadh an Údarás Náisiúnta Míchumais d'fhorálacha ár straitéise GEDI, agus táimid tiomanta go hiomlán di agus do bheith ag obair le páirtithe leasmhara chun a chinntiú go gcuirfear ar fáil í. Tá sé sin soiléir sa dréacht-Ráiteas Straitéise, agus ní mheasaimid go bhfuil gá le tuilleadh leasuithe. Táimid tiomanta freisin dár n-oibleagáidí faoin Ionstraim Eorpach Inrochtaineachta a chomhlíonadh agus táimid ag ullmhú faoi láthair dó sin. Leagfaimid amach tuilleadh sonraí inár gclár oibre bhliantúla.

Tugaimid ar aire gur iarr an tÚdarás Náisiúnta Míchumais orainn forálacha Choinbhinsiún na Náisiún Aontaithe ar Chearta Daoine faoi Mhíchumas a léiriú, agus cur chuige an Dearaidh Uilíoch a leanúint inár gcuid oibre, lena n-áirítear ár ngníomhaíochtaí cumarsáide. Leanaimid orainn ag cur le hinrochtaineacht ár n-acmhainní cumarsáide, lena n-áirítear trí theanga chomharthaíochta a sholáthar chun tacú le físeáin faisnéise, agus sheolamar ár suíomh Gréasáin nua le déanaí a dearadh de réir na dTreoirínte maidir le hInrochtaineacht Ábhair ar an nGréasán. Ina theannta sin, tá EDI ar cheann de dhá phríomhspreagthóir a sainithníodh inár ndrúacht-Straitéis Daoine. Léireofar inár Straitéis Daoine ár dtiomantas d'ionad oibre cuimsitheach a chothú a thacaíonn leis an bhfoireann go léir, lena

n-áirítear iad siúd atá faoi mhíchumas, agus a leabóidh inrochtaineacht inár bpróisis earcaíochta chun comhdheiseanna a chinntiú agus chun ár gcumas raon éagsúil tallainne a mhealladh. Ní mheasaimid gur gá, áfach, an leibhéal sin mionsonraí a chur san áireamh inár Ráiteas Straitéise.

Tá treoirthionscadal faoi stiúir na mBodhar á ullmhú againn faoi láthair maidir le caighdeán an fhotheidealaithe agus Theanga Chomharthaíochta na hÉireann, agus tugaimid ar aire an moladh ón Údarás maidir le deis taighde ar leith a bheith ann amach anseo. Déanfaimid é sin a mheas tuilleadh i gcomhthéacs fhorbairt ár Straitéise Taighde.

Tugaimid ar aire freisin an leasú atá molta ag Léiritheoirí Scáileáin na hÉireann maidir le héagsúlacht na gcineálacha ábhair meán agus aontaímid go gcuireann an leasú atá beartaithe leis an téacs atá ann cheana agus gur fearr a léiríonn sí fairsinge na forbartha ábhair a dtacaímid léi. Tá sé sin ionchorpraithe againn sa Ráiteas Straitéise deiridh, seachas an focal “scáileán”, mar is mian linn a bheith chomh cuimsitheach agus is féidir maidir le gach cineál ábhair.

Téama 4: Infheictheacht earnálacha áirithe agus cineálacha áirithe ábhair

Barúlacha ó fhreagróirí:

Lorg roinnt freagróirí infheictheacht níos fearr sa Ráiteas Straitéise deiridh maidir le hearnálacha agus cineálacha ábhair ar leith, lena n-áirítear léiriú raidió neamhspleách (agus an earnáil léiriúcháin neamhspleách ar bhonn níos leithne), iriseoireacht neamhspleách, na meáin seirbhíse poiblí agus ábhar seirbhíse poiblí.

Lorg Léiritheoirí Scáileáin na hÉireann, mar shampla, níos mó suntasachta don earnáil léiriúcháin neamhspleách, agus mhol siad téacs breise lena bhreithniú. Mhol siad freisin gur cheart go n-áireofaí sa Ráiteas Straitéise straitéis chun an earnáil léiriúcháin neamhspleách a chothú agus a fhorbairt.

Lorg RTÉ infheictheacht níos fearr d'iriseoireacht neamhspleách ardchaighdeáin ar líne, agus d'iarr sé go dtabharfaí isteach bearta chun cabhrú le lucht féachana/éisteachta foinsí iontaofa faisnéise a idirdhealú agus éiceachóras faisnéise sláintiúil ar líne a chothú. Luaigh Local Ireland an pointe sin freisin agus, i gcomhthéacs theacht chun cinn IS giniúnaí, leag sí béim ar an tábhacht a bhaineann le litearthacht sna meáin a mhúineadh i scoileanna.

Ag tagairt go sonrach d'ábhar na meán seirbhíse poiblí agus na seirbhíse poiblí, leag Local Ireland béim ar an ról ríthábhachtach atá ag soláthraithe ábhair meán seirbhíse poiblí, agus leag RTÉ béim ar an tábhacht a bhaineann le hábhar seirbhíse poiblí a bheith infheicthe, agus d'iarr sé go mbeadh rialacha leordhóthanacha suntasachta ann (dá bhforáiltear in Acht OSMR 2022). Sa chomhthéacs sin, mhaígh RTÉ go mbeidh sé ríthábhachtach teorainneacha soiléire a bhunú ar iompar na n-ardán ceannasach amhail tosaíocht sa rangú chun éiceachóras meán atá cothrom agus iomaíoch a chothú, agus rochtain chothrom ag soláthraithe ábhair meán ar thomhais lucht féachana/éisteachta agus ar mhéadracht rannpháirtíochta úsáideoirí deiridh a chinntiú.

Breithniú agus freagra Choimisiún na Meán:

Tuigimid an tábhacht a bhaineann leis an earnáil léiriúcháin neamhspleách do na tionscail chruthaitheacha in Éirinn, agus táimid tiomanta do thacaíocht a thabhairt di trínár scéim maoiniúcháin cláir, Fuaim & Fís. Agus tagairt á déanamh don earnáil léiriúcháin sa dréacht-Ráiteas Straitéise, measaimid go dtuigtear go bhfuil léiriú neamhspleách san áireamh agus, ar an gcúis sin, ní dhearnamar tagairt dó ar leithligh. Tabharfar aghaidh ar oibríochtú ár dtacaíochta don earnáil léiriúcháin, lena n-áirítear léiriú neamhspleách, trí chlár oibre bhliantúla a foilseofar ar ár suíomh gréasáin.

Aontaímid gur earra poiblí ríthábhachtach é timpeallacht iontaofa a bheith ann do na meáin, lena n-áirítear iriseoireacht neamhspleách ardchaighdeáin. Tá ár dtiomantas do thírdhreach iontaofa meán sainráite inár bhfís, agus inár gcur in iúl maidir le cén chuma a d'fhéadfadh a bheith ar na torthaí straitéiseacha, ‘Daonlathas’ agus ‘Sábháilteacht Phoiblí’ sa chleachtas (‘meastar gur foinsí iontaofa

ábhair iad eagraíochtaí Meán Seirbhíse Poiblí agus soláthraithe rialáilte eile'; 'Déanann daoine ábhar ó fhoinsí iontaofa faisnéise a lorg, a shainaithint agus a ídiú, rud a chuireann go dearfach leis an tsláinte agus leis an tsábháilteacht phoiblí').

Leagtar amach go soiléir freisin ár dtiomantas do thionscnaimh litearthachta agus oideachais sna meáin a mhaoiniú agus a chur chun cinn ionas gur féidir le lucht féachana idirdhealú a dhéanamh idir foinsí iontaofa faisnéise (ar líne agus ar fud na meán uile) faoin uirlis seachadta, 'An Pobal a Chumhachtú agus ag Tacú leis an bPobal'.

Tá ár dtiomantas d'iriseoireacht neamhspleách agus neamhchlaonta a chothú soiléir faoin uirlis seachadta, "Ag Tacú le hEarnáil na Meán in Éirinn agus í a Fhorbairt" agus déanfar é a oibríochtú trínár gcláir oibre bhliantúla, agus go háirithe tríd an Scéim Tuairiscithe Daonlathais Áitiúil agus Scéim Tuairiscithe na gCúirteanna a éilíonn nach mór d'iarratasóirí ar mhaoiniú a bheith ina n-eintitis rialáilte (i.e. arna rialú ag an gCoimisiún nó ag Comhairle an Phreasa).

Ba cheart a thabhairt faoi deara, sa Bhrollach a ghabhann leis an Ráiteas Straitéise deiridh, go bhfuil tagairt shainráite déanta agann don tábhacht a bhaineann le hiriseoireacht neamhspleách ardchaighdeán agus le cruthú ábhair. Tá sé curtha in iúl go soiléir agann freisin go bhfuilimid tiomanta do bheith ag obair chun a chinntiú go mbeidh na huirlisí agus na scileanna ag daoine chun tuiscint a fháil ar an gcaoi a gcruthaítear ábhar meán agus ar an gcaoi a gcuireann cineálacha éagsúla seirbhísí ábhar meán i láthair dóibh.

Aithnímid go bhfuil infheictheacht ábhair seirbhíse poiblí agus PSM tábhachtach ar bhonn níos leithne do thodhchaí na hearnála agus dá lucht féachana/éisteachta. Déantar tagairt fhorleathan dár dtiomantas d'fhorbairt earnáil na meán amach anseo, atá sainithe i dtéarmaí leathana, sa Ráiteas Straitéise, go háirithe faoin uirlis seachadta, 'Ag Tacú le hEarnáil na Meán in Éirinn agus í a Fhorbairt'. Dá réir sin, ní mheastar go bhfuil gá le haon athrú breise sa Ráiteas Straitéise.

Téama 5: Cumarsáid, Comhairliúchán, Comhar

Barúlacha ó fhreagróirí:

Mhol Technology Ireland go gcuirfí tiomantas do chumarsáid shoiléir leis an Ráiteas Straitéise deiridh, lena n-áirítear gealltanas dul i gcomhairle le foilseacháin amhail dréacht-treoracha, doiciméid straitéise agus cláir oibre bhliantúla. Mhol an tÚdarás Náisiúnta Míchumais gur cheart go léireodh ár Ráiteas Straitéise deiridh ár dtiomantas cloí leis an Treoir maidir le hInrochtaineacht Gréasáin agus leis an Acht um Theanga Chomharthaíochta na hÉireann, 2017.

D'ardaigh roinnt freagróirí an cheist maidir le gníomhaíochtaí comhoibríochta an Choimisiúin freisin:

- Chuir Local Ireland a ndóchas in iúl go n-oibreoidimid i gcomhar le Comhairle an Phreasa.
- D'áitigh Technology Ireland gur cheart go soiléireofaí sa Ráiteas Straitéise deiridh cathain, agus cén bonn ar a bhfuil an Coimisiún ag obair le rialtóirí eile.
- Chuir an Coimisiún Toghcháin in iúl go bhféadfadh an dá eagraíocht oibriú i gcomhar lena chéile i réimsí amhail taighde, tionscnaimh oideachais agus i gcomhthéacs ár gclár oibre faoi seach a bhaineann le daonlathas, muinín agus sábháilteacht phoiblí.

Breithniú agus freagra Choimisiún na Meán:

Léirítear ár dtiomantas do chumarsáid shoiléir agus éifeachtach sa dréacht-Ráiteas Straitéise. Ina theannta sin, mar atá leagtha amach roimhe seo sa Fhreagra seo ar Chomhairliúchán, táimid ag leanúint le feabhas a chur ar inrochtaineacht ár n-acmhainní cumarsáide, lena n-áirítear trí theanga chomharthaíochta a sholáthar chun tacú le físeáin faisnéise, agus sheolamar ár suíomh gréasáin nua le déanaí a dearadh de réir na dTreoirínte maidir le hInrochtaineacht Ábhair ar an nGréasán.

Táimid tiomanta do chomhairliúchán lenár bpáirtithe leasmhara, agus déantar tagairt dó sin go sainráite faoin uirlis seachadta, 'Eintitis Rialáilte a Thabhairt chun Cuntais'. Ó bunaíodh muid, tá go leor doiciméad amhail Cóid, ábhair threoracha agus orduithe tobhaigh ina n-ábhar do phróisis

chuimsitheacha chomhairliúcháin. Tá dréachtú ár Ráitis Straitéise bunaithe ar rannpháirtíocht fhorleathan páirtithe leasmhara, lena n-áirítear an próiseas comhairliúcháin phoiblí seo. Rachaimid i gcomhairle freisin maidir le gach Ráiteas Straitéise a bheidh ann amach anseo. Déanfar ár gclár oibre a ailíniú go hiomlán lenár Ráitis Straitéise agus foilseofar iad ar ár suíomh gréasáin. Táimid an-trédhearcach faoin gcaoi a dtéimid i gcomhairle, agus tá ár dTreoirínte Comhairliúcháin ar fáil [anseo](#).

Aithníodh inár ndrúacht-Ráiteas Straitéise nach bhfuil na torthaí straitéiseacha atá san áireamh ann go díreach faoinár smacht. Ar an ábhar sin, tá sé rithábhachtach go n-oibrímid le páirtithe leasmhara agus le comhrialtóirí chun tionchar a bheith againn ar rannpháirtithe i dtírdhreach na meán sa chaoi go ndéanfaí athrú. Inár n-uirlis seachadta, ‘Comhar agus Comhoibriú le haghaidh Tionchair’, sainaitnítear na comhlachtaí reachtúla a bhfuilimid ag obair go dlúth leo in Éirinn, agus leagtar béim freisin ar ár rannpháirtíocht chomhoibríoch leis an gCoimisiún Eorpach, le Comhordaitheoirí Seirbhísí Digiteacha agus le rialtóirí meán i mBallstáit eile. I gcásanna áirithe, tá comhaontuithe i scríbhinn againn maidir leis an gcaoi a n-oibreoidh ár socrúithe comhoibrítheacha agus comhoibríocha go praiticiúil, agus tá sonraí fúthu sin ar fáil go poiblí¹.

Táimid ag teacht leis an gCoimisiún Toghcháin maidir le hoscailteacht do chomhar agus chuirfimis fáilte roimh dheis chun a chuid moltaí a fhiosrú tuilleadh. Sa chomhthéacs sin, tá an dréacht-Ráiteas Straitéise tugtha cothrom le dáta againn chun tagairt shainráite a dhéanamh dó faoin uirlis seachadta, ‘Comhar agus Comhoibriú le haghaidh Tionchair’.

Oibrímid go dlúth le Comhairle an Phreasa, go háirithe i gcomhthéacs na Scéime Tuairiscithe Daonlathais Áitiúil agus Scéim Tuairiscithe na gCúirteanna, agus táimid ag tnúth le bheith ag comhoibriú leo tuilleadh feadh théarma ár Ráitis Straitéise.

Téama 6: An Ghaeilge agus cultúr na hÉireann

Barúlacha ó fhreagróirí:

Mhol Léiritheoirí Scáileáin na hÉireann go bhféadfaí béim níos mó a chur ar chur chun cinn chultúr na hÉireann, agus d’iarr siad go gcuirfí straitéis in iúl chun cultúr na hÉireann agus tallann chruthaitheach na hÉireann a chur chun cinn ar an scáileán. Mhol siad go leasófaí ár ráiteas misin chun an téacs a bhfuil líne faoi a chur san áireamh anseo: “Déanaimid tírdhreach meán atá mar bhonn agus mar thaca ag cearta bunúsacha, a chuireann cultúr na hÉireann chun cinn agus a chothaíonn sochaí oscailte, dhaonlathach agus iolraíoch a rialú, a fhorbairt agus tacaímid leis”. Mhol siad freisin go bhféadfaí an téacs seo a leanas faoin toradh, ‘Cultúr na hÉireann agus na Meáin’, a leasú leis an méid a leanas a bhfuil líne faoi: ‘Ábhar a chuireann cultúr na hÉireann chun cinn agus a léiríonn go leor gnéithe agus éagsúlacht na sochaí atá ag fás, lena n-áirítear ábhar atá inrochtana do chách, agus ina dtugtar aird ar leith ar an nGaeilge, agus ar lucht féachana nideoige ó thaobh cultúir de’. Maidir leis an bpointe urchar deiridh sin, mhol Audiovisual Ireland go bhféadfadh sé seo a bheith oscailte don mhíthuisicint gur nideoig chultúrtha í an Ghaeilge.

Faoin gceannteideal, ‘Taighde agus Béim Amach Anseo’, mhol Léiritheoirí Scáileáin na hÉireann go ndéanfaí taighde maidir leis an ioncam tráchtála a ghintear i dtírdhreach na meán in Éirinn, agus a mhéid atá na daoine a ghineann an t-ioncam sin ag cur le cultúr agus ábhar scáileáin na hÉireann do lucht féachana na hÉireann, a ionchorprú mar réimse breise taighde.

Ar deireadh, tá sé molta ag Audiovisual Ireland gur gá aird níos mó a thabhairt ar ábhar Gaeilge. Go sonrach, molann sé go gcuirfeadh an Coimisiún forbairt, léiriú agus seachadadh ábhair Ghaeilge chun

¹ Féach, mar shampla, [AA-CONNECT-Coimisiun-na-Mean.pdf](#) agus

[20240523_GOSRN-Suíomh-St-on-Reg-Coherence_ENG_DMB.pdf](#) agus

[Comhaontú á shíniú ag an Údarás um Chaihdeáin Fhógraíochta \(ÚSB\) le Coimisiún na Meán — Coimisiún na Meán](#)

cinn chun cultúr agus oidhreacht na hÉireann a thaispeáint don phobal trínár dtionscnaimh mhaoiniúcháin reatha a leathnú. Agus an moladh sin á dhéanamh aige, cuireann sé in iúl go bhféadfaí é sin a chumhdach i gcláir oibre bhliantúla an Choimisiúin.

Breithniú agus freagra Choimisiún na Meán:

Tá cur chun cinn chultúr na hÉireann lárnach dár gcuid oibre, agus is ar an gcúis sin atá Cultúr na hÉireann agus na Meáin aitheanta againn mar cheann dár sé thoradh straitéiseacha. Táimid tiomanta do thórdhreach meán a fhorbairt a léiríonn agus a mhúnlaíonn cé muid féin mar shoचाई. Mar fhreagra ar na pointí a rinneadh faoin téama seo, áirítear sa Ráiteas Straitéise deiridh an t-athrú seo a leanas a bhfuil líne faoi: 'Cuireann an t-ábhar cultúr na hÉireann chun cinn, léiríonn sé an iliomad gnéithe agus éagsúlacht na sochaí atá ag fás, lena n-áirítear an gá atá le hábhar atá inrochtana do chách agus a thugann aird ar leith ar an nGaeilge, chomh maith le lucht féachana/éisteachta nideoige ó thaobh cultúir de'. Is fiú a lua go leithdháileann ár scéim mhaoiniúcháin, Fuaim & Fís, níos mó ná 25% den mhaoiniú iomlán ar chlár Gaeilge, agus táimid tiomanta i gcónaí do thacaíocht a thabhairt d'ábhar Gaeilge le linn shaolré an Ráitis Straitéise seo.

Tugaimid dár n-aire an smaoineamh taighde a mhol Léiritheoirí Scáileáin na hÉireann, agus déanfaimid é sin a mheas tuilleadh i gcomhthéacs fhorbairt ár Straitéise Taighde.

Téama 7: IS agus deiseanna agus dúshláin eile atá ag teacht chun cinn

Barúlacha ó fhreagróirí:

Leag freagróirí béim ar roinnt deiseanna agus dúshláin atá ag teacht chun cinn, lena n-áirítear:

- Intleacht Shaorga (IS)

Chuir RTÉ in iúl an ról claochlaitheach a bheidh ag IS i múnú thórdhreach na meán agus an chaoi a bhfuil sé ag éirí lárnach i dtáirgeadh léiriú, scaipeadh agus úsáid ábhair. Sa chomhthéacs sin, lorg sé níos mó sonraí maidir leis an intleacht shaorga a chomhtháthú sa chreat rialála, agus chuir sé in iúl go mbeidh gá le rialacha breise agus réitigh theicniúla bhreise chun foinsí an ábhair a ghintear leis an intleacht shaorga a rianú go hiontaofa. Mhol sé go bhféadfaí níos mó sonraí a áireamh sa Ráiteas Straitéise deiridh maidir le bearta beartais chun córas faisnéise sláintiúil ar líne a chothú, lena n-áirítear trí chosaintí iriseoireachta a chinntiú.

Ar an gcaoi chéanna, d'iarr Mediahuis go mbeimis réamhghníomhach maidir le himpleachtaí IS giniúnaí do thodhchaí thórdhreach na meán in Éirinn a aithint agus a bhainistiú, agus d'iarr Local Ireland dearbhú go bhfuil an Coimisiún go hiomlán ar an eolas faoi bhagairtí agus deiseanna IS agus conas is féidir í a úsáid mar uirlis chun leas na meán gan muinín a chur i mbaol.

- Sábháilteacht iriseoirí ar líne

D'iarr Mediahuis ar an gCoimisiún athbhreithniú a dhéanamh ar chásanna ina bhfuil forluí idir feidhmeanna a bhaineann le sábháilteacht agus díobháil ar líne agus saincheisteanna a bhaineann le bagairtí agus mí-úsáid a bhíonn roimh iriseoirí ar líne.

- Treoir Sheirbhísí na Meán Closamhairc (AVMSD)

Chuir Léiritheoirí Scáileáin na hÉireann in iúl an tábhacht a bhaineann lenár n-uirlis seachadta 'Ról Ceannasach a Imirt i gCreat Rialála na hEorpa'. Sa chomhthéacs sin, tharraing siad aird ar aimhrialtacht sa dréacht-Ráiteas Straitéise inar tagraíodh don TSMC sa ghluais ach nár tagraíodh di sa dréacht-

Ráiteas Straitéise. D'iarr Sky Ireland soiléireacht freisin maidir lenár seasamh i ndáil leis an bplé atá ar na bacáin ar leibhéal an AE maidir le AVMSD a athoscailt in 2025/2026.

- Deiseanna taighde

Leagadh béim i roinnt de na haighneachtaí ar dheiseanna féideartha taighde don Choimisiún, nó don Choimisiún i gcomhar le páirtithe leasmhara eile.

Mhol RTÉ, mar shampla, gur cheart dúinn taighde margaidh domhain a dhéanamh ar thírdhreach na meán (e.g. patrúin tomhaltais, treochtaí atá ag teacht chun cinn) a chumasódh ceapadh beartais bunaithe níos mó ar fhianaise, agus mhol an Coimisiún Toghcháin go bhféachfaimis ar smaointe agus réitigh taighde a roinnt leo ar réimsí leasa choitinn.

Mar a leagadh amach níos luaithe, mhol an tÚdarás Náisiúnta Míchumais go ndéanfaimis taighde ar ionadaíocht agus léiriú daoine faoi mhíchumas sna meáin chraolta.

Breithniú agus freagra Choimisiún na Meán:

Táimid airdeallach ar luas tapa an athraithe i dtírdhreach na meán, agus ar thionchar dáiríre agus féideartha IS ar an gcaoi a ndéantar ábhar a léiriú, a dháileadh agus a thomhailt. Tuigimid go bhfuil sé d'acmhainn ag an intleacht shaorga dul chun tairbhe d'úsáideoirí, agus go bhfuil rioscaí ag baint léi freisin. Ní mór dúinn a chinntiú nach ndéanfaidh teacht chun cinn cineálacha nua seirbhísí ábhair, ná athruithe ar an gcaoi a n-oibrítear na seirbhísí atá ann cheana, díobháil dár gcearta bunúsacha ná dár sochaí féin.

I bhfianaise an ról a d'fhéadfadh a bheith ag IS maidir le tírdhreach na meán a mhúnlú, aontaímid gur cheart aird níos follasaí a thabhairt uirthi sa Ráiteas Straitéise deiridh. Dá réir sin, tá tagairt dó curtha san áireamh againn faoinár n-uirlis seachadta, 'Taighde agus Béim Amach Anseo'. Déanann ár mBrollach, a ghabhann leis an Ráiteas Straitéise nuashonraithe agus a leagann síos an bealach dár gcuid oibre, tagairt freisin do na deiseanna agus na dúshláin a bhaineann leis an intleacht shaorga.

Táimid ar an eolas faoin tsaincheist a bhaineann le hiriseoirí a bheith ag díriú ar bhagairt agus ar mhí-úsáid ar líne agus tuigimid gur ábhar mór inní é d'iriseoirí aonair agus don earnáil i gcoitinne. Tá an t-ábhar inní sin againn araon. Déanfaimid é sin a mheas tuilleadh mar chuid den phróiseas chun ár gclár oibre bhliantúla a fhorbairt agus chun an creat sábháilteachta ar líne a chur chun feidhme.

Gabhaimid buíochas le Léiritheoirí Scáileáin na hÉireann as ár n-aird a tharraingt ar an aimhrialtacht maidir leis an AVMSD. Fágadh é sin ar lár ón dréacht-Ráiteas Straitéise agus tá sé san áireamh anois faoin uirlis seachadta, 'Ról Ceannasach a Imirt sa Chreat Rialála Eorpach'.

Tugaimid dár n-aire na deiseanna taighde a mhol freagróirí agus déanfaimid tuilleadh machnaimh orthu i gcomhthéacs fhorbairt ár Straitéise Taighde.

Téama 8: Cur Chun Feidhme na Straitéise

Barúlacha ó fhreagróirí:

Rinne roinnt freagróirí tagairt do chur chun feidhme an Ráitis Straitéise.

Mhol Technology Ireland, mar shampla, gur cheart don Choimisiún Clár Oibre achomair a fhorbairt do 2025 agus 2026 a rachadh sé i gcomhairle leis go poiblí ina leith. Ar an gcaoi chéanna, mhol RTÉ go soláthróimis níos mó sonraí, agus go gcuirfimis feabhas ar an mbéim, ar na céimeanna agus ar na hamlínte maidir le cur chun feidhme. Mhol Technology Ireland ann go bhfoilseofaí an creat forfheidhmithe, mar a thagraítear dó sa dréacht-Ráiteas Straitéise, in éineacht leis na táscairí cáilíochtúla agus cainníochtúla a dhéanfar a rianú agus a ndéanfar monatóireacht orthu thar shaolré

an phlean. Agus tagairt shonrach á déanamh don uirlis seachadta 'Eintitis Rialálte a Thabhairt chun Cuntais', d'iarr siad tuilleadh soiléireachta maidir leis na príomhghníomhaíochtaí a saináithníodh (amhail Cóid agus Rialacha) agus maidir leis an gcaoi a gcuirfear chun feidhme iad trí phleananna oibre foirmiúla nó trí dhoiciméid riosca, beartais agus tosaíochta ar leithligh ionas gur féidir leis an tionscal a chinntiú go dtuigeann sé an bealach is fearr chun comhlíonadh a chinntiú agus conas a úsáidfidh an Coimisiún na gníomhaíochtaí sin.

Breithniú agus freagra Choimisiún na Meán:

Mar a leagadh amach níos luaithe sa doiciméad seo, tá dréachtú an Ráitis Straitéise seo bunaithe ar chéim rannpháirtíochta páirtithe leasmhara agus, le déanaí, ar phróiseas comhairliúcháin phoiblí. Rachaimid i gcomhairle, ina dhiaidh sin, le gach Ráiteas Straitéise a bheidh ann amach anseo. Ós rud é go mbeidh ár gcláir oibre bhliantúla ailínithe go hiomlán lenár Ráitis Straitéise, ní mheasaimid go bhfuil sé riachtanach ná cuí dul i gcomhairle ar leithligh leo sin.

Táimid tiomanta dár gcláir oibre bhliantúla a fhoilsiú, agus tá an Ráiteas Straitéise nuashonraithe againn chun é sin a shoiléiriú. Foilseofar ár gClár Oibre 2025 i gcomhthráth le foilsiú ár Ráitis Straitéise deiridh, 2025 go 2027. Déanfaimid monatóireacht agus measúnú réamhghníomhach ar dhul chun cinn maidir leis an Ráiteas Straitéise seo, agus tá soiléiriú tugtha againn ar an rún atá againn tuairisc a thabhairt ar thorthaí agus ar éifeachtacht an Ráitis Straitéise seo inár gcéad Ráiteas Straitéise eile.



3. Na chéad chéimeanna eile

Tugadh an dréacht-Ráiteas Straitéise cothrom le dáta chun na leasuithe atá leagtha amach sa Fhreagra seo ar Chomhairliúchán a léiriú. Foilseofar an Ráiteas Straitéise deiridh ar ár suíomh gréasáin an 13 Márta 2025.

Chun a chinntiú go mbeidh príomhghnéithe na Straitéise chomh hinrochtana agus is féidir do lucht léite chomh héagsúil agus is féidir, foilseofar leagan Béarla soiléir den Achoimre Fheidhmeach mar dhoiciméad ar leithligh an lá céanna.

I bhfianaise an aiseolais a fuarthas thuas maidir le cur chun feidhme, foilseofar ár gClár Oibre do 2025 an lá céanna, agus foilseofar ár gclár oibre 2026 agus 2027 in am trátha.



Aguisín

Aighneacht thar ceann: Audiovisual Ireland

Question 1: The proposed Mission and Values of An Coimisiún are set out on page 8 of the draft Strategy Statement. Please share your views on these and the extent to which you feel they explain what we do (our mission) and our ambitions for the future (vision)?

The proposed Mission and Values of An Coimisiún as set out in the draft Strategy Statement clearly explain what it does and its future ambitions and are very credible. The clear commitment to supporting democracy and democratic values is particularly welcome and important in the current environment when democracy faces unprecedented challenges.

Question 2: Our proposed Strategic outcomes are on pages 8 to 10. Do you think they are appropriate in the context of our role and the environment in which we are operating?

The proposed Strategic outcomes are appropriate in the context of An Coimisiún's role and the environment in which it is operating. Many of the Strategic outcomes are dependent on the sector being well-resourced and having full editorial and creative independence. This ultimately depends on the sector being economically viable and commercially successful. This should be reflected in the Strategic outcomes. The Irish language merits a stand-alone sentence in the Strategic outcomes. The current wording (below) could be interpreted as implying the Irish language is culturally niche. This wording would create a misleading impression as An Coimisiún is very supportive of the Irish language so it should be amended. "Content that reflects the many facets and growing diversity of society, including content that is accessible to all, and where special attention is paid to the Irish language, and to culturally niche audiences".

Question 3: Is there any particular area of work you would like to see us pursuing under one or more of the proposed Strategic outcomes?

The Strategic outcomes should include objectives that will contribute to the sector's economic viability. While in some cases the measures required will be outside An Coimisiún's direct remit, it should advocate for their implementation. One example is digital piracy, which is a significant threat to the economic viability of content creators in the screen sector as well as to employment and to Exchequer tax revenue. The EU Intellectual Property Office's Executive Director has highlighted how "copyright infringement in the digital era remains a very serious concern and a direct threat to the creative industries in Europe." The Office's latest research estimates that pirated film and television content was accessed some 21.48 billion times annually by EU based internet users. According to Parks Associates, the value of pirated video services accessed by pay-TV and non-pay-TV consumers was estimated at \$67 billion globally annually. The situation is proportionately at least as bad in Ireland. Additional resources need to be allocated within An Garda Síochána to combat digital piracy through increased investigation and prosecution, thereby building on their recent successful prosecutions of resellers of pirated content. The Outcomes can intersect. For instance, the recent global success of 'An Cailín Ciúin' and 'Kneecap' highlights an international appetite for quality Irish language content and provides an opportunity to showcase Irish culture. However digital piracy steals income from the creators of this content and undermines their financial viability. Hence addressing digital piracy helps Irish language content creation.

Question 4: Are there any additional priorities which you think should be considered for inclusion in the final Strategy Statement?

An Coimisiún has a role as a thought leader for the sector and can independently research important priority issues and, as appropriate, advocate for them. The detail does not necessarily have to feature in the final Strategy Statement, but it should incorporate the themes and the detail can be covered in the work programme. Such issues include the following and supplementary material will be sent to An Coimisiún to explain more fully. Supporting Irish creative talent and attracting inward production: Promote funding adequate to support Irish creative talent and to attract inward production by benchmarking Screen Ireland's resources (current and capital) against that provided to similar agencies in comparable countries. Tax Incentives: Conduct a study to explore introducing a Section 481 tax credit incentive uplift for producers based in Gaeltacht areas. Conduct a study to explore the scope to

introduce a visual effects (VFX) specific measure in Budget 2026 as mentioned in the Minister for Finance's Budget 2025 speech. Regional Production and Skills Development: Encourage additional investment in regional skills development and production, including interim funding to bridge the gap until new regionally focused Section 481 measures are developed. Irish Language Content: Promote the development, production and delivery of Irish language content to showcase Irish culture and heritage by expanding An Coimisiún 's current funding initiatives. Public Service Broadcasting: Explore how to best reform the funding of public service media and content production to fully address the needs of Irish audiences in the current media and audiovisual production and distribution landscape.

Additional Documentation / Info Received

N/A



Aighneacht thar ceann: Independent Radio and TV Producer

Question 1: The proposed Mission and Values of An Coimisiún are set out on page 8 of the draft Strategy Statement. Please share your views on these and the extent to which you feel they explain what we do (our mission) and our ambitions for the future (vision)?

No response.

Question 2: Our proposed Strategic outcomes are on pages 8 to 10. Do you think they are appropriate in the context of our role and the environment in which we are operating?

No response.

Question 3: Is there any particular area of work you would like to see us pursuing under one or more of the proposed Strategic outcomes?

Within the aim to have 'an economically sustainable Irish media sector', CnaM could do a lot more to support independent radio producers, who typically work alone or in small companies. Screen Producers Ireland (SPI) is funded by a large number of independent television production companies and can employ full-time staff. The independent radio production sector is much smaller and does not have the resources to employ legal advisors or representatives who would negotiate terms and conditions with the national broadcaster. It is invidious for individual producers, who are also suppliers of programmes and therefore dependent on commissions from the broadcaster, to negotiate on behalf of the sector. In past years independent radio producers had AIRPI (Association of Independent Radio Producers of Ireland) which ran training sessions and attempted to do some negotiation with RTÉ on members' behalf. The organisation was unsustainable as it received limited financial support from the BAI, was too small to employ staff, and survived only by voluntary input by members. Inevitably, this was unsustainable.

Question 4: Are there any additional priorities which you think should be considered for inclusion in the final Strategy Statement?

No response.

Additional Documentation / Info Received

N/A



Aighneacht thar ceann: Local Ireland (RNPAI)

Question 1: The proposed Mission and Values of An Coimisiún are set out on page 8 of the draft Strategy Statement. Please share your views on these and the extent to which you feel they explain what we do (our mission) and our ambitions for the future (vision)?

Local Ireland supports the proposed mission and values as outlined in the draft Strategy Statement. The key issue for local news publishers in print and online is sustainability based on trust. The basis for supporting local news publishers is the value they bring to communities in terms of social cohesion, as forums for democratic debate and as platforms of record for the administration of justice; they reflect all aspects of social activity, including sport and culture. With regard to children, media literacy should be taught in schools to mitigate the negative effects of social media, where disinformation and deliberate misinformation is rife.

Question 2: Our proposed Strategic outcomes are on pages 8 to 10. Do you think they are appropriate in the context of our role and the environment in which we are operating?

As stated in the answer to Q1, media literacy is key to raising awareness about the need for trusted media sources and where they can be found. In terms of democracy, greater public awareness of the vital democratic role of public service content providers is very important in creating an environment where public funds are used to support publishers and broadcasters. Editorial independence is critical to trust, as is freedom of expression within the boundaries of ethical and legal reporting. We acknowledge the need for publishers to be open to scrutiny and would hope the Coimisiún will work collaboratively and productively with the Press Council. Local Ireland publishers are committed to reflecting inclusion and diversity in their coverage

Question 3: Is there any particular area of work you would like to see us pursuing under one or more of the proposed Strategic outcomes?

Local Ireland supports the delivery tools as outlined. In terms of Research and Future Focus, it will be important to be fully informed about the threats and opportunities of AI and how it can be used as a tool to benefit media without jeopardising trust. In many respects, it is an extension of media literacy that applies to the media industry and regulators, as well as the general public.

Question 4: Are there any additional priorities which you think should be considered for inclusion in the final Strategy Statement?

Following the recommendations of the Future of Media Commission there has been a new impetus created to support all public service content providers. The Coimisiún should ensure that there is a level playing field for funding. Ring-fencing any sector for areas of fundamental editorial coverage at the exclusion of another would create a significant imbalance in terms of competitiveness.

Additional Documentation / Info Received

N/A

Aighneacht thar ceann: Mediahuis Ireland

Question 1: The proposed Mission and Values of An Coimisiún are set out on page 8 of the draft Strategy Statement. Please share your views on these and the extent to which you feel they explain what we do (our mission) and our ambitions for the future (vision)?

We agree with this important step by CnaM, as a new institution with an increased suite of powers and obligations, to set out its Strategy Plan in an open and transparent way. While we welcome CnaM's commitment to developing a media landscape that "underpins fundamental rights and fosters an open, democratic and pluralistic society" and we look forward to working with CnaM to achieve this, it is important to be clear about the parameters of CnaM's remit. CnaM's statutory powers and functions include a broad remit to "ensure diversity" and "provide a regulatory environment that will sustain independent and impartial journalism", but its regulatory powers predominantly apply to broadcast and audiovisual media service providers. CnaM does not regulate news publishers. There are references in the Mission statement which indicate the potential for confusion and an unhelpful blurring of lines. We have this out in more detail in our response to Question 2. It is important to emphasise that this is not merely semantics, it is about the need for a clear understanding of CnaM's role so that it can target its attention and resources most appropriately and effectively. In this regard, it is vital that all relevant stakeholders are fully and properly consulted. By way of observation, it is of some concern that at the very start of this online submission process, when asked to select a category that best describes who we are, there is no option that reflects the wider media such as news publishers.

Question 2: Our proposed Strategic outcomes are on pages 8 to 10. Do you think they are appropriate in the context of our role and the environment in which we are operating?

CnaM's proposed strategic outcomes provide a useful structural framework within which CnaM can work with stakeholders to ensure a vibrant and sustainable media landscape. However, as stated in our response to Question 1, and perhaps unsurprisingly given the breadth of the responsibilities with which CnaM has been tasked, there does appear to be a lack of clarity about the distinction between regulation of certain media and support / development of the wider media landscape. For example, under the Democracy heading one strategic outcome is stated to be, "Public Service organisations and other regulated providers are seen as trusted sources of content" and under Irish Culture and Media an outcome is "Public awareness of the value of the PSM organisations to Irish society". However, under Trust it states, "Details are provided by media organisations of all economic arrangements / payments made, transparently and in an easily accessible manner. CnaM needs to be clear about its differing roles in regulating certain media organisations (which will include PSM) and promoting and supporting the wider media ecosystem, which will include public service content providers who do not otherwise fall under CnaM's statutory remit. The Strategy Document needs to be precise and consistent in its use of terminology such as "PSM", "public service content providers", "media landscape" and "media organisations" so that, in turn, CnaM's policy development and stakeholder engagement is clear about the different issues and varied perspectives that need to be considered.

Question 3: Is there any particular area of work you would like to see us pursuing under one or more of the proposed Strategic outcomes?

Mediahuis Ireland encourages CnaM to immediately engage with stakeholders about what types of support schemes (both in substance and in delivery mechanism) will be necessary to help media to continue providing a meaningful and sustainable role as public service content providers. While welcome, the support schemes introduced to date have proven to be unwieldy and difficult to operationalise. In keeping with our earlier observations about the line of division between CnaM's regulatory and support roles, we would repeat that CnaM needs to ensure that consideration of the challenges faced by the media sector and the supports that can assist them is framed much more broadly than PSBs and in particular, RTÉ. The national broadcaster is a vital part of our national media and is clearly a key regulatory function for CnaM, but it should not dominate the debate about ensuring a diverse and sustainable media landscape.

Question 4: Are there any additional priorities which you think should be considered for inclusion in the final Strategy Statement?

CnaM will need to be proactive in identifying and managing the implications of generative AI for the future of the Irish media landscape. We have made separate submissions to CnaM on this issue as part of its consultation on media plurality. We would also suggest that CnaM should look at how its separate

functions relating to online safety and harm overlap with issues relating to threats and abuse that journalists face online. A more proactive approach by CnaM on this issue would be welcome.

Additional Documentation / Info Received

N/A

Aighneacht thar ceann: MPC-TV

Question 1: The proposed Mission and Values of An Coimisiún are set out on page 8 of the draft Strategy Statement. Please share your views on these and the extent to which you feel they explain what we do (our mission) and our ambitions for the future (vision)?

The Mission and Values are properly formulated. No other comments.

Question 2: Our proposed Strategic outcomes are on pages 8 to 10. Do you think they are appropriate in the context of our role and the environment in which we are operating?

Very appropriate. Spot on.

Question 3: Is there any particular area of work you would like to see us pursuing under one or more of the proposed Strategic outcomes?

More support to local community TV broadcasters. There is only 2 licenced community TV stations in Ireland and national broadcaster, RTE, has no capacity to showcase the beauty of diversity in our modern, Irish localities and regions. Smaller, community TV stations are more flexible than huge corporation like RTE and they should be supported. Diversity and Inclusion should be really supported in Ireland to avoid any anti-social, racist behavior in the community. Licence fee should be reviewed for small community TV station to create a thriving, inclusive and creative future broadcasting sector in Ireland which not only promote huge corporation like RTE. There are plenty of talents in the rural Ireland, journalists, technicians, producers and they have no places to work because RTE cannot take them obviously. There should be more local community TV, like in other EU countries (Salzburg community TV), and it is an absolute scandal that the national broadcaster, RTE is paying 300k + for the single individual and they don't even come to the All Ireland RTE Drama Festival in Athlone to do a proper broadcast! That is why Coimisiún should support more smaller community based media organizations but not only community radios because the most interesting nowadays in audio-visual broadcast, not only radio! Look at the young people watching tiktok and youtube! They don't listen to local community radio. Please check <https://www.youtube.com/@MPC-TV> and help smaller TV broadcasters to develop - then we will have a thriving, inclusive, diversified media which showcase local beauty!

Question 4: Are there any additional priorities which you think should be considered for inclusion in the final Strategy Statement?

As above.

Additional Documentation / Info Received

<https://www.youtube.com/@MPC-TV>

Aighneacht thar ceann: National Disability Authority

Question 1: The proposed Mission and Values of An Coimisiún are set out on page 8 of the draft Strategy Statement. Please share your views on these and the extent to which you feel they explain what we do (our mission) and our ambitions for the future (vision)?

The NDA welcomes the proposed Mission and Vision of An Coimisiún, as set out in the draft Strategy Statement. In particular, we consider as positive the focus on human rights and pluralism in the Mission Statement. The NDA also welcomes the Commission's proposed vision of a thriving, diverse, creative, safe and trusted media landscape. However, we would suggest the Commission consider replacing the word 'diverse' with 'inclusive'. While diversity focuses on representation in the media, inclusion is about building a media landscape that ensures everyone can participate, including people with disabilities. An inclusive media landscape will also value diversity and seek to address the barriers experienced by underrepresented groups, including disabled people.

Question 2: Our proposed Strategic outcomes are on pages 8 to 10. Do you think they are appropriate in the context of our role and the environment in which we are operating?

The NDA welcomes the Strategic outcomes proposed by An Coimisiún. We particularly welcome the standalone Strategic outcome on 'Diversity and Inclusion'. We also welcome the focus on pluralism and participation under the Strategic outcome on 'Irish Culture & Media'.

Question 3: Is there any particular area of work you would like to see us pursuing under one or more of the proposed Strategic outcomes?

The NDA recommends the work of Coimisiún na Meán reflect the provisions of the UN Convention on the Rights of Persons with Disabilities, including the positive representation of and accessibility of media services to persons with disabilities. Under the Strategic outcome on 'Diversity and Inclusion', the NDA would therefore welcome updated research on the representation and portrayal of disabled people in broadcast media. Published by the NDA and the former Broadcasting Commission of Ireland, the last comprehensive study on this topic dates from 2009. The NDA also advises that the strategy statement include a commitment to implementing the Commission's 'Gender, Equality, Diversity and Inclusion Strategy', which contains important initiatives concerning disabled people, and is not referenced in the draft.

The NDA is aware that the quality of access services varies across different broadcasters, with access users expressing the view that the figures supplied by broadcasters about meeting qualitative targets are inaccurate. The NDA advises the Commission to outline steps it can take to strengthen the monitoring of the quality of access services, with the participation of access users. One of the indicators of success of the Strategic outcome on 'Irish Culture and Media' is content which is accessible to all. In realising this, the NDA advises the Commission to follow a Universal Design approach in its work, including its communications. We produced guidance materials – namely the 'Customer Communications Toolkit for Services to the Public - A Universal Design Approach 2023' – which will assist the Commission in this regard.

Question 4: Are there any additional priorities which you think should be considered for inclusion in the final Strategy Statement?

The NDA advises that the Commission's final Strategy Statement reflect its obligations to ensure compliance with the Web Accessibility Directive (2023 Accessibility Score was 32.73%), Part 3 and 5 of the Disability Act 2005 (target exceeded under Part 5) and the Irish Sign Language Act 2017 (section 8 contains specific obligations in respect of broadcasting). We also suggest that the Commission commits to implementing relevant recommendations from the NDA's review of the Irish Sign Language Act 2017, including to change the assessment of ISL targets from a 24-hour day to an 18-hour day (from 7am to 1am). Finally, the NDA advises the Commission to outline the steps it intends to take to meet its obligations under the European Accessibility Act (EAA), which becomes applicable in June 2025 (as outlined in Statutory Instrument 636/2023).

The EAA identifies the product and service features that must be accessible for persons with disabilities, including equipment related to digital television services and access to audio-visual media services. The EEA introduces specific accessibility requirements in respect of Electronic Programming Guides and access services, which are directly linked to the work of the Commission. The harmonised standards that underpin the EAA are also directly mapped to the ISO 9000 series of Quality Management. The Commission has acknowledged that it has responsibilities regarding the EAA and

notified that it will address these through a process separate to the Access Rules. The NDA recommends that the strategic plan sets out the Commission's plans in this respect.

Additional Documentation / Info Received

N/A

Aighneacht thar ceann: RTÉ

Question 1: The proposed Mission and Values of An Coimisiún are set out on page 8 of the draft Strategy Statement. Please share your views on these and the extent to which you feel they explain what we do (our mission) and our ambitions for the future (vision)?

The values and aspirations outlined in its strategy are laudable and highly principled and the Strategy provides a foundation for An Coimisiún's work to achieve them. There are opportunities however to strengthen its impact to fully address the challenges that lie ahead in the Irish media environment. An area where the commitment to courage could be strengthened would be to express a higher commitment to action in the regulator's role as an advocate for change in the evolving media landscape. An ambition of Coimisiún na Meán as the independent regulator should be to ensure that decisions regarding funding of PSM, (and other media services), are made on an independent basis; the significance of this is articulated within the provisions of both the EMFA and the FOMC report. The Strategy's commitment to diversity and inclusion is admirable however a recognition of the importance of maintaining a plurality of views could be made clearer, on the basis that some opinions though not strictly lawful may still have a value in fostering open civil discourse.

Question 2: Our proposed Strategic outcomes are on pages 8 to 10. Do you think they are appropriate in the context of our role and the environment in which we are operating?

The 'Irish Culture and Media' could be framed as 'a vibrant, sustainable Irish media sector' and would be a clearer expression of this goal. Not expressing economic sustainability as a standalone outcome is a missed opportunity to address the long-term resilience and viability of the national media sector more comprehensively.

Question 3: Is there any particular area of work you would like to see us pursuing under one or more of the proposed Strategic outcomes?

Prominence codes are vital for ensuring the visibility of public service content and safeguarding the social and democratic role of the media. Adequate prominence rules (provided for in the OSMR Act 2022) are urgently needed to enable users of online platforms and AI tools to directly access PSM content /content of general interest, that is both properly attributed in terms of origin and for which the content provider is adequately compensated. To foster a fair and competitive media ecosystem, it is equally necessary to establish clear limits to behaviour of dominant platforms such as selfpreferencing in ranking and to ensure equitable access by media content providers to audience measurements and end-user engagement metrics. A detailed consideration at policy level of the threats and opportunities presented by AI in the media sector is needed. In the context of generative AI, the existing copyright framework is being challenged. Additional rules and technical solutions will be required to reliably trace the sources of AI generated content. More on the development of policy measures to tackle existing dependencies and foster a healthy online information ecosystem including by ensuring journalistic protections. Increasing the visibility of high-quality independent journalism online. For example, the use of labelling and trust indicators are measures which could help audiences in distinguishing trusted sources of information.

Question 4: Are there any additional priorities which you think should be considered for inclusion in the final Strategy Statement?

Addressing the rapidly transformative role AI will play in both shaping the media landscape and the way in which AI Technology tools are becoming integral to content production, dissemination, and consumption. More detail on the integration of AI into the regulatory framework would be welcome. A commitment to progress the proposed media levy for services which provide SVOD services here, as accommodated within the AVMSD. A more developed commitment to undertake considered in-depth market research on the media landscape, e.g. consumption patterns, emerging trends would add depth and adaptability to this Strategy and would enable more evidence-based policy making. More explicit assurances that as the independent media regulator in Ireland, the key aims of the EMFA are reflected in terms of regulatory policies that preserve the sustainability and viability of PSM as well as its independence. A stronger emphasis and more detail in articulating the steps and timelines for the implementation of the Strategy would be welcome and would bolster its capacity to deliver meaningful impact.

Additional Documentation / Info Received

N/A



Aighneacht thar ceann: Technology Ireland, IBEC

Question 1: The proposed Mission and Values of An Coimisiún are set out on page 8 of the draft Strategy Statement. Please share your views on these and the extent to which you feel they explain what we do (our mission) and our ambitions for the future (vision)?

We welcome Coimisiún na Meán (CnaM) engaging with stakeholders, including industry, about the goals it seeks to achieve via the enforcement of its Codes. We welcome CnaM's commitment to: ○ a risk-based approach, led by data and evidence; ○ exercise its powers in a fair, proportionate, transparent, and consistent way; ○ regulate only as necessary in a democratic society in pursuit of legitimate objectives set out in law. In relation to CnaM's core 'values', although featured as aspects of some of the values ('trust' and 'integrity'), we respectfully suggest that the principles of transparency and proportionality (particularly in terms of CnaM's rules and application of the rules) are included as either a distinct and separate value or are clearly included as core features of all the values. This will ensure public trust in CnaM and that these principles are prioritised in everything CnaM does. The Strategy Statement blends all pillars of regulation and blurs the lines between different regulatory frameworks and the outer limits of CnaM's role. The Vision, Mission and Outcomes should be clearly tethered to CnaM's legislative mandate and internal 'pillar' structure. Terminology should be clearer e.g.: "media landscape" is a broad term that could include non-broadcast news and other services not regulated by CnaM. "Online services" and "content" are also overly broad and vague terms.

Question 2: Our proposed Strategic outcomes are on pages 8 to 10. Do you think they are appropriate in the context of our role and the environment in which we are operating?

The Statement outlines (at clause 1.3) that the approach of CnaM to regulation will be fair, proportionate, transparent and consistent. We welcome detail on how this will be implemented in practice and what measures will be put in place to ensure that these values are considered in every case that CnaM's objectives and strategy is enforced. A concise Work Programme (for 2025 & 2026) with clear timelines outlining planned consultations or workshops would assist CnaM in achieving its objectives of transparency and consistency. The presentation of 'outcomes' is overly generalized. Outcomes would be better presented as a table to make it clear which outcome is relevant to each of CnaM's regulatory 'pillars'. Regulated entities need reassurance there are effective boundaries around each pillar and that measures are in place to avoid 'mission creep' or regulatory overreach. ● "Collaborating and cooperating for impact" - It should be clear to regulated entities when and on what basis CnaM is working with other regulators. ● "Communications" - Should add a commitment to clear communications with regulated entities and a 'no surprises' approach. This should include a commitment to consult on draft guidance, strategy documents and annual work programme. In relation to CnaM's tools and 'Holding regulated entities to account' we would welcome further information or documentation on CnaM's prioritisation principles. Elaborate a clearer sequence of engagement with regulated entities, beginning with consultation on actionable guidance to aid compliance and ending with enforcement. This would also avoid enforcement becoming the primary measure of success.

Question 3: Is there any particular area of work you would like to see us pursuing under one or more of the proposed Strategic outcomes?

CnaM's approach to any future levying should be underpinned by a commitment to use funds levied efficiently and avoid frivolous or unrelated costs which are not directly related to the regulation of a service category under the DSA, TCOR or the OSMR. CnaM's approach should be fully transparent, so that providers have clarity on (i) what CnaM costs have been incurred and how they have been allocated

across specific service categories, and (ii) how CnaM has ensured that it is relying on 'like-for-like' inputs such as provider data (eg, their user number or EU-wide revenue) and thereby limiting the risk of unequal treatment. CnaM's approach should ensure that no one provider is paying a levy amount that is unfair, unpredictable or puts it at a competitive disadvantage. CnaM should define a 'total fee cap' for entities. In order to provide business certainty, CnaM should provide clearer timelines for the process and allocation of their various proposed levy calculations. For those providers also required to pay a supervisory fee to the European Commission, a situation should be avoided where service providers are subject to higher or duplicated levies at a national level by CnaM than, for example, supervisory fees under the DSA. While we respect the competencies of the European Commission and CnaM depend on the circumstances of the particular case, there is a significant risk of 'double charging' of the service providers concerned.

Question 4: Are there any additional priorities which you think should be considered for inclusion in the final Strategy Statement?

We note that in relation to the 'Holding Regulated Entities to Account' tool, some key actions are identified (such as Codes and Rules) and would welcome further clarity and transparency in relation to how these will be implemented either through formal work plans or separate risk, policy and prioritisation documents so that industry can ensure it understands the best means of ensuring compliance and how CnaM will use these actions. Outlined documents and information should be published by CnaM so as to properly ensure its regulatory powers and the principles of transparency and proportionality are being applied to all investigations and decisions made. The 'implementation framework' references a framework which is not published alongside this Strategy Statement. CnaM should commit to publishing it; perhaps as its first Work Programme. The "qualitative and quantitative indicators that will be tracked and monitored over the life of the plan" and related targets should also be public.

In the values section, consider the following:

- "Trust" - This should be closely tied to the delivery tools e.g. communications, governance and engagement with regulated entities.
- "Courage" - Amend this 'value'. It is not for regulators to take risks or to "challenge the status quo".
- "Impact" – We welcome the setting of clear goals. This should be an annual Work Programme which CnaM consults on publicly.
- We recommend a value on "Operational Excellence" ensuring that CnaM has the appropriate resources, skills, processes in place to facilitate the efficient running of CnaM's operations.

Additional Documentation / Info Received

N/A

Aighneacht thar ceann: Sky Ireland

Question 1: The proposed Mission and Values of An Coimisiún are set out on page 8 of the draft Strategy Statement. Please share your views on these and the extent to which you feel they explain what we do (our mission) and our ambitions for the future (vision)?

Sky Ireland supports the Vision and the Mission of An Coimisiún (CnaM) and in particular the Vision to have a thriving, diverse and creative media landscape. CnaM should look at all media players and what value they can add to support this Vision. Sky Ireland has a prominent role in the media sector in Ireland, our investment in both current affairs, via our Sky News Desk correspondents, and original content production brings greater diversity and creativity to the Irish media sector. For example, most recently we produced 'Blue Road - The Edna O'Brien Story' which is a Sky Original supported by Screen Ireland. Upcoming Irish content includes a three-part Boyzone documentary and a Chris O'Dowd production 'Small Town, Big Story' which was filmed in Dublin and the South-East of the country. Both will premiere in Dublin in Q1 2025. Sky Ireland's position as a platform that brings together content from the Irish PSBs, Sky Original content and content from other sources means we have an important stake in what is needed to ensure a thriving, diverse and creative media landscape. It is critical that the position of operators in the media sector are well understood, and taken into account, before any market interventions are considered to support the industry; in particular those that would negatively impact our content investment in Ireland.

Question 2: Our proposed Strategic outcomes are on pages 8 to 10. Do you think they are appropriate in the context of our role and the environment in which we are operating?

Sky Ireland agrees with all six outcomes, however, we do recommend that additional points need to be included. The fourth key outcome 'Irish Culture & Media' includes the objective of: 'An economically sustainable Irish media sector'. Sky Ireland views this as important point, particularly for commercial television operators which are operating in an increasingly challenging environment; this is not just the case in Ireland but across Europe. As CnaM will be aware from their online safety role, viewing patterns and how people view content has changed drastically in the last decade. Sky is consistently innovating to ensure we can deliver content in a way that meets customers' expectations, e.g., recording capability, on-demand capability, red-button, new user interfaces. This innovation, of course, comes at a cost to Sky Group which operates in different markets, including Ireland, across Europe. Any rules or regulations that are too prescriptive could jeopardise this innovation and they should be very carefully considered. This is an even more acute issue for Sky Ireland where we are reliant on Sky Group technology, and prescriptive rules for the Irish market as opposed to principle based rules, could negatively impact product roll-out and updates for Irish audiences. Piracy of audio-visual content is another area that needs to be addressed within the draft Strategy Statement, further detail on this topic can be found in the following response for Question 3.

Question 3: Is there any particular area of work you would like to see us pursuing under one or more of the proposed Strategic outcomes?

As CnaM will be aware, piracy of audiovisual content is an ongoing issue in Ireland and it has a detrimental impact on the audiovisual industry. More must be done to tackle piracy in Ireland and protect the media and content sector in Ireland. Sky Ireland believes that CnaM must be a key driver in this space, in particular to ensure it can deliver on its 'Vision' for a 'thriving, diverse, creative, safe and trusted media landscape'. In particular, any strategic objectives that CnaM has in relation to developing the media sector and content development in Ireland has to include initiatives to tackle piracy. With that in mind, Sky Ireland recommends that CnaM lengthens the first and second bullet point under Trust to read as: o 'Platforms take swift action to remove fraudulent content, including pirated content' o 'Public awareness of the risks of online fraud, exploitation and scams and how to mitigate them, including the risks of piracy of audiovisual content' CnaM should note that audiovisual content providers are ready to provide support in addressing piracy of audiovisual content. In particular, it would be beneficial if CnaM could bring together key stakeholders within the industry to examine what actions can be taken to address piracy.

Question 4: Are there any additional priorities which you think should be considered for inclusion in the final Strategy Statement?

Sky Ireland fully supports the 'Delivery tool' of the CnaM aim of 'Playing a Leading Role in the European Regulatory Framework'. CnaM has an important role to play, this is particularly the case for the AVMSD, which as CnaM, will know was only transposed in 2023 in Ireland. There will be discussions at an EU

level regarding the reopening of the AVMSD in 2025/2026, CnaM should be conscious that due to late transposition in Ireland and other Member States, Guidance and Rules are only now being implemented by media operators. A reopening of the AVMSD would be premature, audiovisual media services need a stable and flexible legal framework that drives investment. Stability is important for securing existing financing mechanisms and giving stakeholders time to adapt to rules which were only recently implemented in some Member States. It also means recognising the fact that stakeholders face a multitude of national interpretations. While Flexibility is important for parties freedom to contract on terms that make sense commercially. It also means being able to invest in and distribute content based on consumer demand rather than quotas and/or investment obligations.

Additional Documentation / Info Received

N/A



Aighneacht thar ceann: Screen Producers Ireland (1 of 2)

Question 1: The proposed Mission and Values of An Coimisiún are set out on page 8 of the draft Strategy Statement. Please share your views on these and the extent to which you feel they explain what we do (our mission) and our ambitions for the future (vision)?

In relation to the Vision and Mission, the Vision and Mission are both very welcome. We would suggest the addition of the words "in Ireland" at the end of the Vision. The Mission, we believe, should include "promotes Irish culture" after "underpins fundamental rights". In relation to the Vision, we hope that the word "thriving" includes economically and culturally thriving in Ireland and that the word "creative" includes a recognition of the role of the creative industries. The independent film and television production sector is a central part of the creative industries in Ireland. For it to thrive, it needs recognition both in the regulation and funding and development of media that Coimisiun Na Mean is tasked to undertake. These include (i) Stable and properly resourced PSM funding, (ii) minimum PSM and other media investment obligations, (iii) Terms of Trade with IP retention and (iv) Sound and Vision screen content funding dedicated to independent producers.

Question 2: Our proposed Strategic outcomes are on pages 8 to 10. Do you think they are appropriate in the context of our role and the environment in which we are operating?

In relation to "Strategic outcomes", Irish culture is mentioned in the heading of "Irish Culture and Media" but "Irish Culture" is not referred to in the text. We welcome the reference to an economically sustainable media sector and a production sector that reflects and delivers on the interests of Irish society. We would suggest that, in the second bullet point after "production sector", the words "including the independent production sector" be included. In the third bullet point under this heading, after the words "Content that", we would suggest that the words "promotes Irish culture and" be added. The words "culturally niche audiences" are very culturally limiting without a reference to Irish culture generally earlier in the sentence

Question 3: Is there any particular area of work you would like to see us pursuing under one or more of the proposed Strategic outcomes?

The areas of work that we would like to see Coimisiun Na Mean pursuing under one or more of the strategic outcomes would include additions as follows; In relation to Supporting and Developing the Irish Media Sector, the text is focussed on PSM organisations, commercial broadcasting and news and current affairs content. All of this is very welcome and we suggest the addition of the word "production" after "independent" in the third sub-bullet point in bullet point number one. In bullet point number six, after the words "news and current affairs" the words "documentary, drama, animation, factual and entertainment screen content" might be added. In relation to Research and Future Focus, we would suggest an additional area of research as follows: "We will conduct research in relation to the commercial revenues generated in the media landscape in Ireland and the extent to which those generating such revenues are contributing to Irish culture and screen content for Irish audiences"

Question 4: Are there any additional priorities which you think should be considered for inclusion in the final Strategy Statement?

The role of Coimisiun Na Mean in promoting European Works and national works, including the 50% quota for broadcasters and the 30% quota for on demand platforms and the prominence obligations, as well as investment obligations and levies to promote the production of such works by independent producers, is not mentioned in the Strategy Statement. It is worth noting that the Glossary in the Strategy Statement refers to the AVMS Directive, which sets out these quotas and funding measures, but the Strategy Statement itself contains no reference to the AVMS Directive. This is all the more important in the context of the AVMS Directive being reviewed and updated by new legislation in 2026, in the lifetime of this Strategy Statement. We would urge that the AVMS Directive and its policy priorities be specifically referred to in the Strategy Statement, in addition to the OSMR Act.

Additional Documentation / Info Received

N/A

Aighneacht thar ceann: Screen Producers Ireland (2 of 2)

Screen Producers Ireland represents over 200 independent production companies in the island of Ireland. Independent producers produce audiovisual programmes for broadcasters and other media service providers, distributors and exhibitors across many genres including scripted and unscripted. The screen content includes feature films, TV drama series, documentaries and factual programming, entertainment and reality programming, sport and childrens and animation content. Independent producers produce almost five hundred hours of programming a year for RTE as well as much of the programming on TG4 and programming for Virgin Media. Independent producers are the most important creative partners for public service media in Ireland.

1. Our first suggested addition to the draft Statement of Strategy is to add references to "independent production/independent production companies/independent producers". Currently there are no such references anywhere in the draft Statement. As well as being the most important PSM creative partner, the independent production sector has statutory recognition in the Broadcasting Act 2009 and in the OSMR Act 2022. It is also vital for Ireland's media landscape that Irish independent production companies provide multiple and diverse access points for a wide diversity of creative talent and many voices. This is also important for the promotion of cultural and creative entrepreneurship and the development of indigenous IP. We believe that any strategy for media in Ireland should include a recognition of the role of the independent production sector and a strategy for sustaining and developing it.
2. Our second suggested addition would be that, while news and current affairs are recognised and policy for them articulated in the draft Statement, the other genres which fill the media in Ireland (apart from one mention of fiction) need to be referenced in the Statement as well. The content not specifically mentioned includes scripted and unscripted screen content. It includes feature film and TV drama, documentary and factual programmes, entertainment and reality programmes, children's and animation programmes. For the most part news and current affairs programmes are produced in-house by broadcasters and other media, whereas other forms of screen content are often contracted out to the independent production sector. The roles of Coimisiún na Meán are as both the regulator in relation to and the funder of screen content production in Ireland. We believe that any strategy for media regulation, funding and development needs a balanced approach to all forms of screen content. If news and current affairs are referenced, so should the other forms of media content and a strategy articulated for them.
3. Our third suggested addition relates to a strategy for the promotion of Irish culture. While Irish culture is referenced twice in the draft Statement in a heading under "Outcomes", no mention is made in the text of the Strategy. No strategy is specifically outlined for the promotion of Irish culture, including the promotion of Irish creative talent and Irish storytelling in drama or documentary on screen, in the media landscape in Ireland. Again because of the multiple roles of Coimisiún na Meán in both regulating and developing and funding content for media in Ireland, it would be important in our view that a strategy for the promotion of Irish culture and Irish creative talent on screen would be articulated.
4. Our fourth suggested addition relates to Coimisiún na Meán 's role in implementing the provisions of the AVMS Directive. These include the promotion of "European works", including national works through broadcaster and VOD platform quotas as well as investment obligations and levies to fund such works. It is worth noting that the AVMS Directive is mentioned in the glossary in the draft Statement but does not appear anywhere in the text of the draft Statement. The draft Statement contains a heading about "playing a leading role in the European regulatory framework". The AVMS Directive is up for review in 2026 and it is anticipated that new legislation will be passed at that stage and within the lifetime of the draft Statement of Strategy 2025 to 2027. The Revised AVMS

Directive 2018 has yet to be fully implemented in Ireland and we would welcome additional clarity in the draft Statement about the strategy for addressing the full implementation of the AVMS Directive and the developing policy positions in the EU in advance of a revised Directive/Regulation. This is particularly important for the future of the independent production sector in Ireland as well as in the rest of Europe.

5. Our fifth addition would be in relation to the description of "the media landscape in which we operate". Ireland's media landscape is particularly unique in that Irish audiences pay a large volume of subscriptions to and are targeted with a large volume of advertising on media service providers, which for the most part do not create and deliver screen content specifically for those Irish audiences.

A policy position was expressed by Dr Pauric Travers, the chair of the Broadcasting Authority of Ireland in its annual report of 2018 as follows: "The mixed funding model for Irish broadcasting has been undermined by the decline in advertising revenue and the growth of opt-out advertising on foreign channels serving the Irish market. This has been exacerbated by the rise of online platforms such as Google, Amazon, Netflix and Facebook which have radically transformed the media landscape. These platforms have simultaneously changed patterns of consumption, diminished the advertising pool for Irish broadcasters and challenged the capacity to ensure the continued flow of culturally relevant content. The existing regulatory structure and funding model require an overhaul. As part of that overhaul, ways need to be found to ensure that providers who take revenue from the Irish market give something back in return, in terms of appropriate content or otherwise."

The circumstances outlined by Dr Travers have amplified in the last eight years, particularly with the very large subscription revenues going to Sky satellite services, Virgin Media cable services and additional VOD platforms such as Amazon Prime and Disney+. We would welcome additional clarity on the strategy to be adopted to address these issues.



Aighneacht thar ceann: An Coimisiún Toghcháin

We note the publication of the draft strategy statement and welcome an opportunity to contribute to the strategy statement of Coimisiún na Meán as it prepares to set out the strategic priorities for the coming years. Our organisations are of similar age, relatively recently established and face many common challenges. I welcome the fact that our teams are already engaging and collaborating well and hope that this will continue in the future as we each pursue our respective mandates. We note in particular that Coimisiún na Meán has set out to ensure that it promotes a media landscape that supports democracy and democratic values, underpins civic discourse and reduces the impact of disinformation. The purpose of An Coimisiún Toghcháin as set out in our own Strategy Statement 2024-2026 is to safeguard and strengthen democracy in Ireland by building public understanding, participation and trust in the electoral system. We clearly share common objectives and goals underpinned of course by shared public service values. We consider therefore that there are a number of opportunities for engagement and collaboration including the areas set out below.

Research

Like us you set out research as a key priority and enabler in your draft Strategy Statement. An Coimisiún Toghcháin's research programme published in July 2024 sets out an ambitious programme of research for the coming years including a longitudinal National Election and Democracy Study and research on online mis and disinformation as it impacts on democracy and elections. We see a strong link between our work and Coimisiún na Meán's intention to conduct research on how the media landscape affects democracy and civic discourse. We note that you commit to pursuing strategic partnerships at national and international levels to share research, ideas and solutions and to undertake collaborative research and data sharing where appropriate. We would be very happy to explore areas of potential collaboration with you in furtherance of this commitment.

Media literacy and Education

An Coimisiún Toghcháin is currently developing an Education and Active Participation Strategy whose objective is to educate and raise awareness among all to inform and engage in electoral events. This strategy will involve the roll out of educational content and initiatives. Partnerships and alliances with stakeholder groups regarding voter projects and development of a communications strategy encompassing our approach across media platforms. We see a strong link to Coimisiún na Meán's Democracy outcome in this space.

Regulation

It is anticipated that An Coimisiún Toghcháin's legislative powers to regulate online paid for political advertising and postings of online misinformation and disinformation will commence during 2025. We consider that there is a considerable overlap in Coimisiún na Meán's outcomes, under Democracy, Trust and Public Safety with those of An Coimisiún Toghcháin for those headings and we would welcome collaboration between our two organisations on our respective roles in achieving those outcomes