



Response to Consultation:

# Draft Strategy Statement 2025 to 2027

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# 1. Introduction

Coimisiún na Meán (“An Coimisiún”) is Ireland’s agency for developing and regulating a thriving, diverse, creative, safe and trusted media landscape. It was established on 15 March 2023 by the Online Safety and Media Regulation Act 2022 which amended the Broadcasting Act 2009.

In 2024, An Coimisiún began the process of developing our inaugural Strategy Statement for the period 2025 to 2027 inclusive. As part of that process, we published a draft Strategy Statement for public consultation on 6 November 2024, with responses requested by 4 December 2024. The consultation invited comments regarding the following:

1. The proposed Mission and Values of An Coimisiún, and the extent to which they explain what we do (our mission) and our ambitions for the future (vision)
2. Our proposed strategic outcomes, and the extent to which they are appropriate in the context of our role and the environment in which we are operating
3. Areas of work respondents would like to see us pursuing under one or more of the proposed strategic outcomes
4. Additional priorities that should be considered for inclusion in the final Strategy Statement.

Respondents were requested to provide their views by means of an online form. Those interested in participating were also given the option to provide input in other written format, or by alternative means in certain circumstances. In accordance with our [Consultation Guidelines](#), we are publishing this Response to Consultation following the conclusion of the public consultation process.

The purpose of this Response to Consultation is to set out the key issues and suggestions emerging from the submissions received during the public consultation, and to explain how we have considered these matters and our response to them.

We greatly value the feedback received and thank those who participated in the public consultation process.

## 2. Consultation Response

A total of 12 submissions was received from the 11 organisations listed below, and a copy of each submission is appended to this document.

1. National Disability Authority
2. Local Ireland (RNPAI)
3. MPC-TV
4. Screen Producers Ireland [x2]
5. Technology Ireland, IBEC (referred to in this report as Technology Ireland)
6. Mediahuis
7. An independent radio & TV producer
8. Sky Ireland
9. RTÉ
10. Audiovisual Ireland
11. An Coimisiún Toghcháin

We have considered carefully all of the submissions received, and with due regard to the submissions as a whole, we have exercised our judgement and formed a collective view on the final version of the Strategy Statement to be adopted.

In section 2.2 we provide an account of the matters raised in the public consultation that have resulted in amendments being made to the draft Strategy Statement, as well as the matters that could not be considered for practical, legal or policy reasons. It is not intended to be exhaustive, and the failure to refer to any specific matter should not be taken as failure on our part to have regard to any particular part of a submission or the submission as a whole.

### 2.1 Overview of feedback received

The proposed vision, mission and values were considered clear and credible and were broadly supported by the respondents.

There was a high level of agreement across all submissions regarding the proposed strategic outcomes, though some respondents suggested that greater emphasis could be placed on certain aspects. Where potential gaps were identified, some respondents made recommendations for addressing them and suggested additional priorities for inclusion in the final Strategy Statement.

### 2.2 Thematic analysis and response to submissions

Following an analysis of the submissions, we have summarised the main findings under the following headings:

- Theme 1: An Coimisiún's vision, role and approach to delivering its mandate
- Theme 2: Funding /economic sustainability/ commercial viability of the Irish media sector
- Theme 3: Plurality, diversity and inclusion
- Theme 4: Visibility of particular sectors and content types
- Theme 5: Communication, consultation and collaboration
- Theme 6: Irish language and culture
- Theme 7: Artificial Intelligence and other emerging opportunities and challenges
- Theme 8: Implementation of the Strategy

In a small number of cases, feedback received was considered relevant under more than one thematic area and has therefore been included under each relevant heading.

## Theme 1: An Coimisiún’s vision, role and approach to delivering its mandate

### *Comments from respondents:*

There was broad welcome for the vision and strategic outcomes articulated in the draft Strategy Statement. Audiovisual Ireland, for example, particularly welcomed the clear commitment in the vision to supporting democracy and democratic values, MPC-TV considered that the vision is properly formulated, RTÉ considered the aspirations in the strategy laudable, and Sky Ireland noted its support for the vision and agreed with all six strategic outcomes.

A number of respondents recommended modifications. The National Disability Authority, for example, welcomed the draft vision but suggested that An Coimisiún consider replacing the word ‘diverse’ with ‘inclusive’. Screen Producers Ireland noted that the draft vision is very welcome but suggested that it could be amended to include the words “in Ireland” at the end, for absolute clarity. Sky Ireland, while agreeing with the six strategic outcomes, proposed some additional text for consideration under a number of these.

Technology Ireland and Mediahuis Ireland considered there is a need to be clearer regarding the parameters within which An Coimisiún regulates and suggested that some of the terminology in the draft Strategy Statement could be misleading.

Our role as an independent regulator was mentioned by both RTÉ and Screen Producers Ireland, who considered that, as an independent regulator, greater emphasis could be placed on ensuring funding decisions are made on an independent basis.

Technology Ireland and RTÉ referenced the value of courage that underpins our regulatory approach. While RTÉ suggested the final Strategy Statement should express a higher commitment to action in An Coimisiún’s role as an advocate for change in the evolving media landscape, Technology Ireland expressed its view that *Courage* is not appropriate and should be amended as it is not for regulators to take risks or to “challenge the status quo”.

Audiovisual Ireland sought greater emphasis on our role as a thought leader for the sector, independently researching important priority issues and, as appropriate, advocating for them.

Technology Ireland sought increased emphasis on the principles of transparency and proportionality as standalone values or principles underpinning all our existing values. In a similar vein, they invited An Coimisiún to elaborate a clearer sequence of engagement with regulated entities, beginning with consultation and ending with enforcement, in order to avoid enforcement becoming the primary measure of success. They also recommended that we include *Operational Excellence* as a value underpinning our work, ensuring that An Coimisiún has the appropriate resources, skills, and processes in place to facilitate the efficient running of our operations.

### *Coimisiún na Meán consideration and response:*

We agree wholeheartedly with the importance of everyone, including people with disabilities, being enabled to engage in and with the media landscape, and we are fully committed to working with all stakeholders to ensure this. This is reflected in the fact that “Diversity and Inclusion” is one of our six strategic outcomes, and in the references to inclusion and accessibility throughout the document.

In light of our statutory remit for aspects of regulation at international level, we do not consider it appropriate to include the words “in Ireland” at the end of our vision statement.

While we have not amended the vision statement, having reflected on the feedback from the National Disability Authority, we have increased the emphasis on accessibility and inclusion elsewhere in the document, including in the Foreword which now accompanies the final strategy statement.

We agree that clarity regarding our role as a regulator is important. We note that the mission statement included in the draft Strategy Statement reflects our legislative framework. We further note that many

respondents to the consultation process explicitly supported the proposed mission statement. Audiovisual Ireland, for example, considered that it clearly explains what An Coimisiún does, MPC-TV considered the mission to be properly formulated, Sky Ireland noted their support for it, and the National Disability Authority and Screen Producers Ireland welcomed it. Taking all of the above into account, we do not consider it appropriate to amend the draft mission statement.

We agree that our role as an independent regulator is significant, and we note that this is referenced in the draft Strategy Statement, where we commit to playing our role as a “strong, courageous, independent, action-oriented regulator”. In response to the feedback received, we have increased the emphasis on our independence by referencing it explicitly in the Foreword that now accompanies the final Strategy Statement.

An Coimisiún does indeed advocate for change, and our work in supporting and developing the media sector is already covered extensively in the draft Strategy Statement. We consider that further additions are unnecessary, and would be disproportionate in the context of a relatively short, concise Strategy Statement.

As a regulator, our role involves taking calculated risks and challenging the status quo, where the status quo does not support our vision and the achievement of our strategic outcomes. As such, we consider that courage is an important value underpinning our work.

We agree that we have an important role to play as a thought leader in the sector. We will leverage our delivery tool, “Research and Future Focus” to enact this role, by monitoring emerging policy, research and technological developments and using these insights to inform our regulatory and media development work. While we consider that this aspect of our role is already adequately covered in the draft Strategy Statement, we have referenced it again, for added emphasis, in the Foreword that accompanies the final Strategy Statement.

We agree that transparency and proportionality are key principles that must underpin all of our work, and we wish to correct any misunderstanding that enforcement might be considered the primary measure of success. As set out in the draft Strategy Statement, we have an extensive set of tools at our disposal, and we will use them judiciously in the execution of our mandate. We will do so in a way that is transparent and proportionate, and we are satisfied that our commitment to these principles is already extensively covered in the Strategy Statement. For example, the draft Strategy Statement references our approach as being “fair, proportionate, transparent and consistent” and elsewhere highlights the “effectiveness, fairness and transparency of our approach”. There are references to our transparent decision-making and to promoting transparency in media ownership, as well as a commitment to building an open and transparent organisation. Being proportionate is implicit in the references to our risk-based approach. Taking all of this into account, we do not consider that further amendments are needed.

We agree that operational excellence is a critical value for any organisation, and it is one to which we are committed. While we do not believe it is necessary to reference the term operational excellence explicitly, we are satisfied that it is implicit in much of the existing wording in the “Delivery Enablers” section, specifically, “utilising best practice”; “agile, effective and well-managed” as well as “makes economic and efficient use of resources”. Furthermore, the values articulated in the draft Strategy Statement are drivers of behaviours that support operational excellence. We do not believe it is necessary, therefore, to add operational excellence as a distinct value.

## Theme 2: Funding / commercial viability / sustainability of the Irish media sector

### *Comments from respondents:*

Many of the submissions included comments under this broad heading, with most recognising An Coimisiún's important role in supporting the sector and promoting its economic viability.

Sky Ireland, for example, sought an increased emphasis in the final Strategy Statement on the economic sustainability of the Irish media sector and noted that this is particularly important in the case of commercial TV operators who, they suggest, are operating in an increasingly challenging environment. In a similar vein, RTÉ suggested that "Economic Sustainability" be included as a standalone strategic outcome to address, more comprehensively, the long-term resilience and viability of the media sector. They also suggested that the text accompanying the strategic outcome, "Irish Culture and Media", could be edited to include the descriptor "vibrant". Audiovisual Ireland noted that the achievement of the strategic outcomes is dependent on the sector being well resourced and having full editorial and creative independence. They noted that this ultimately depends on the sector being economically viable and commercially successful. In that context, they raised the issue of piracy of audiovisual content, and the need to protect content creators and the media sector more broadly. The issue of piracy was also raised by Sky Ireland in its submission, and they proposed a number of explicit references to piracy for inclusion in the final Strategy Statement.

Some respondents highlighted areas they considered to be in need of funding priority. For example:

Audiovisual Ireland highlighted:

- Regional production and skills development
- The development, production and delivery of Irish language content to showcase Irish culture and heritage
- Public service broadcasting

Screen Producers Ireland highlighted:

- Stable and properly resourced Public Sector Media (PSM) funding
- Dedicated Sound & Vision funding for independent producers

Sky Ireland noted the importance of investment being made in content production that brings greater diversity to the sector, while MPC-TV sought more support for local community TV that, it argued, better utilises talent in rural Ireland and better showcases the beauty / diversity of Ireland at local level. In a similar vein, Local Ireland highlighted the value that local news publishers bring.

A number of the submissions related to the allocation of funding by An Coimisiún. For example:

- Mediahuis suggested that the challenges faced by the media sector and the supports that can assist them should be framed much more broadly than public service broadcasters
- Local Ireland sought a level playing field for funding and cautioned against actions that might create a significant imbalance in terms of competitiveness
- RTÉ sought a commitment to progress the proposed media levy for services that provide SVOD services in Ireland.
- Technology Ireland sought a commitment that levied funds will be used fairly, transparently and efficiently in areas directly related to the regulation of a service category under the DSA, TCOR or the OSMR. They urged that An Coimisiún avoid a circumstance where service providers would be subject to higher (or duplicated) levies at a national level than, for example, supervisory fees under the DSA.

The submission by Audiovisual Ireland offered a number of potential funding mechanisms for further exploration. For example, they suggested that An Coimisiún could:

- conduct an exploratory study on the potential introduction of a Section 481 tax credit incentive uplift for producers based in Gaeltacht areas.
- conduct a scoping exercise regarding the potential introduction of a visual effects (VFX) specific measure in Budget 2026.

They also proposed that we support Irish creative talent by conducting an exercise to benchmark Screen Ireland's resources against those provided to similar agencies in comparable countries.

One submission related to the licence fee. MPC-TV proposed that the licence fee be reviewed for small community TV stations.

The potential tension between funding and innovation was raised by Sky Ireland, who drew attention to the investment being made by commercial operators in innovation and highlighted the risk of jeopardising this where funding rules are too prescriptive.

Screen Producers Ireland pointed out that there is no reference in the draft Strategy Statement to investment obligations and levies to promote the production of European Works and national works. They highlighted changed patterns of consumption, whereby large subscription revenues are going to cable services and VOD platforms, and note that this challenges the capacity of Irish broadcasters to maintain the flow of culturally relevant content.

Mediahuis suggested that An Coimisiún should engage with stakeholders about the types of support schemes that will be necessary to sustain them in their role as public service content providers.

#### *Coimisiún na Meán consideration and response:*

We agree wholeheartedly regarding the importance of the media sector being vibrant and economically sustainable. Economic sustainability was referenced prominently in our draft Strategy Statement under our strategic outcome, "Irish Culture and Media", and it is implicit in all references to sustainability elsewhere in the Strategy Statement. Vibrancy is appropriately captured in the use of the descriptors "creative" and "thriving". Accordingly, we do not consider further amendments necessary.

With regard to piracy, we recognise fully the challenges posed by piracy and the impact that it could have, if unchecked, on the economic viability of the creative industries. Notwithstanding that, as pirated content is considered illegal content, we do not believe an explicit reference to piracy in the Strategy Statement is warranted. We wish to assure respondents that the Trusted Flagger regime is working to address the broader issue of illegal online content.

While we understand the need for greater clarity on the strategy to be adopted to address issues relating to large subscription revenues, this will be addressed as part of a feasibility study into the European Works Levy.

We have considered the feedback from Sky Ireland in relation to funding being allocated to content that brings greater diversity to the sector. We wish to highlight that a core purpose of our programme funding scheme, Sound & Vision, is to support and develop high-quality programme content that reflects our diverse culture, heritage, and experience and serves a diversity of audiences across community, commercial and public service broadcasters, both audio and audiovisual. Our assessment process involves a consideration of the diversity in the proposed programme content, including gender, equality, diversity and inclusion, as well as the access services that will be provided for in content production.

We note the feedback from MPC-TV regarding the licence fee, and wish to clarify that this does not fall within our statutory remit. We have also noted the particular areas that are suggested for funding priority, and we wish to reiterate that our regulatory role applies to the entire media sector (including public service media, commercial and community media). This is reflected in the draft Strategy Statement in under the delivery tool, "Supporting and Developing the Irish Media Sector". In order to further emphasise the breadth of media organisations encompassed by this definition, and make explicit our commitment to supporting community broadcasting, the following underlined edit has been incorporated in the final Strategy Statement: "We will use our funding schemes and our role in overseeing PSM

organisations and commercial and community broadcasters to support a thriving, diverse, creative, safe and trusted media sector”.

With regard to levy funding, we will adhere to our obligations under Section 21(4) of the Online Safety and Media Regulation Act to use levies to meet expenses properly incurred. We will continue to engage in public consultation in relation to our levy orders, but do not consider it appropriate to specify how monies from levies will be apportioned as part of the Strategy Statement.

We have considered the feedback from Sky Ireland regarding the potential tension between funding and innovation. We believe that editorial and creative independence, and access to opportunities for innovation, are fundamental to the production of high-quality content. For that reason, we have updated the draft Strategy Statement under the strategic outcome, “Irish Culture and Media”, to include the following updated text as underlined: “An innovative and creative production sector that reflects and delivers on the interests of Irish society”. We have also updated the text under the strategic outcome, “Democracy”, as follows: “Editorial independence and freedom of expression is protected and a wide variety of political views is lawfully expressed”

We are committed to engaging with our stakeholders when shaping, developing and reviewing our funding schemes.

### **Theme 3: Pluralism, diversity and inclusion**

#### *Comments from respondents:*

There was broad welcome for our commitment to pluralism, diversity and inclusion, particularly as reflected in our vision, mission and strategic outcomes. A small number of requests for clarity, further elaboration or amendment was received. RTÉ, for example, considered that An Coimisiún’s commitment to diversity and inclusion is admirable, but sought greater clarity regarding the importance of maintaining a plurality of views, on the basis that some opinions though not strictly lawful may still have a value in fostering open civil discourse. The National Disability Authority welcomed the focus on pluralism in our mission statement, but requested that the word ‘diverse’ in our vision be replaced with the word ‘inclusive’. Their rationale is that while diversity focuses on representation in the media, inclusion is about building a media landscape that ensures everyone can participate, including people with disabilities. They also welcomed the strategic outcome, “Diversity and Inclusion”, and our ‘Gender, Equality, Diversity and Inclusion (GEDI) Strategy’, and suggested that our commitment to implementing the GEDI strategy could be more explicit. They further requested that we reflect the provisions of the UN Convention on the Rights of Persons with Disabilities, follow a Universal Design approach in our work, including our communication, and outline steps to strengthen the monitoring of the quality of access services, with the participation of access users.

Under the heading, “Research and Future Focus”, the National Disability Authority proposed the draft Strategy Statement be updated to include research on the representation and portrayal of disabled people in broadcast media.

Screen Producers Ireland requested that we present a more balanced picture of the diversity of media content, by adding the underlined text below to the following delivery action:

“We will design, develop and implement new initiatives that stimulate the provision of high-quality media content in English and Irish, including journalism, news and current affairs, documentary, drama, animation, factual and entertainment screen content, that is appropriately diverse, innovative, accessible, inclusive, and representative of contemporary Irish society.”

The National Disability Authority has called for An Coimisiún to outline the steps we intend to take to strengthen the monitoring of the quality of access services, with the participation of access users. More

broadly, it requested that we outline how we intend to meet our obligations under the European Accessibility Act (EAA).

*Coimisiún na Meán consideration and response:*

We agree fully regarding the importance of maintaining a plurality of views. Having reviewed the draft Strategy Statement afresh, we consider that the concept of plurality is sufficiently reflected in the body of the document, including in our draft mission statement and in our strategic outcome, “Irish Culture and Media”. We further note that the right to freedom of expression and our commitment to upholding that right are also extensively referenced, including in Section 1 (“Introduction”), in the text accompanying the strategic outcome, “Democracy”, and in Section 5 (“Our Implementation Framework”). In addition, we have also referenced the right to freedom of expression in the Foreword that now accompanies the final Strategy Statement.

As set out in our response under Theme 1, we wholeheartedly agree with the importance of everyone being enabled to engage in and with the media landscape, and we are fully committed to working with all stakeholders to ensure this. This is reflected in the strategic outcome, “Diversity and Inclusion”, and in the many references to inclusion and accessibility throughout the document. We have now increased the emphasis on accessibility and inclusion, including in the Foreword accompanying the final Strategy Statement.

We welcome the National Disability Authority’s endorsement of the provisions of our GEDI strategy, and we are fully committed to it and to working with stakeholders to ensure it is delivered. This is clear in the draft Strategy Statement, and we do not consider further amendments to be necessary. We are also committed to meeting our obligations under the EU Accessibility Act and are currently preparing for this. We will set out further detail in our annual work programmes.

We note that the National Disability Authority has invited us to reflect the provisions of the UN Convention on the Rights of Persons with Disabilities, and to follow a Universal Design approach in our work, including our communications activities. We continue to enhance the accessibility of our communications resources, including through the provision of sign language to support information videos, and we have recently launched our new website which has been designed in accordance with Web Content Accessibility Guidelines. Furthermore, EDI is one of two main drivers identified in our draft People Strategy. Our People Strategy will reflect our commitment to fostering an inclusive workplace that supports all staff, including those with disabilities, and will embed accessibility into our recruitment processes to ensure equal opportunities and our ability to attract a diverse range of talent. We do not consider it necessary, however, to include this level of detail in our Strategy Statement.

We are currently scoping a Deaf-led pilot research project on the quality of subtitling and ISL, and we note the Authority’s suggestion regarding a separate future research opportunity. We will consider that further in the context of the development of our Research Strategy.

We also note the suggested amendment from Screen Producers Ireland regarding the diversity of media content types and agree that the proposed edit enhances the existing text and better represents the breadth of content development that we support. We have incorporated this into the final Strategy Statement, save the word “screen”, as we wish to be as inclusive as possible of all types of content.

## Theme 4: Visibility of particular sectors and content types

### *Comments from respondents:*

A number of respondents sought greater visibility in the final Strategy Statement of particular sectors and content types, including independent radio production (and the independent production sector more broadly), independent journalism, public service media and public service content.

Screen Producers Ireland, for example, sought more prominence for the independent production sector, and suggested additional text for consideration. They further suggested that the Strategy Statement should include a strategy for sustaining and developing the independent production sector.

RTÉ sought greater visibility for high-quality independent journalism online, and called for the introduction of measures to help audiences distinguish trusted sources of information and foster a healthy online information ecosystem. Local Ireland echoed this point and, in the context of the emergence of generative AI, highlighted the importance of media literacy being taught in schools.

With specific reference to public service media and public service content, Local Ireland highlighted the vital role of public service media content providers, while RTÉ highlighted the importance of public service content being visible, and called for adequate prominence rules (provided for in the OSMR Act 2022). In that context, RTÉ contended that to foster a fair and competitive media ecosystem, and ensure equitable access by media content providers to audience measurements and end-user engagement metrics, it will be imperative to establish clear limits to the behaviour of dominant platforms such as self-preferencing in ranking.

### *Coimisiún na Meán consideration and response:*

We understand the centrality of the independent production sector to the creative industries in Ireland, and are committed to supporting it through our programme funding scheme, Sound & Vision. In referencing the production sector in the draft Strategy Statement, we consider that independent production is understood as being included and, for that reason, we have not referenced it separately. The operationalisation of our support for the production sector, including independent production, will be addressed through annual work programmes that will be published on our website.

We agree that the existence of a trusted media landscape, including high-quality independent journalism, is a vital public good. Our commitment to a trusted media landscape is explicit in our vision, and in our articulation of what the strategic outcomes, “Democracy” and “Public Safety” might look like in practice (“Public Service Media organisations and other regulated providers are seen as trusted sources of content”; “People seek out, identify and consume content from trusted sources of information, contributing positively to public health and safety”).

Our commitment to funding and promoting media literacy and education initiatives so that audiences can distinguish trusted sources of information (online and across all media) is also clearly outlined under the delivery tool, “Empowering and Supporting the Public”.

Our commitment to sustaining independent and impartial journalism is explicit under the delivery tool, “Supporting and Developing the Irish Media Sector” and will be operationalised through our annual work programmes, and particularly the Local Democracy Reporting Scheme and the Courts Reporting Scheme which require that applicants for funding must be regulated entities (i.e., regulated by either An Coimisiún or the Press Council).

It should be noted that, in the Foreword that accompanies the final Strategy Statement, we have explicitly referenced the importance of independent, high-quality journalism and content creation. We have also made clear our commitment to working to ensure that people have the tools and skills to understand how media content is created and presented to them by different types of services.

We recognise that the visibility of public service content and PSM more broadly is important to the future of the sector and its audiences. Our commitment to the future development of the media sector, defined in broad terms, is referenced extensively in the Strategy Statement, particularly under the delivery tool, “Supporting and Developing the Irish Media Sector”. Accordingly, no further change is deemed necessary in the Strategy Statement.

## **Theme 5: Communication, Consultation, Collaboration**

### *Comments from respondents:*

Technology Ireland suggested that a commitment to clear communication be added in the final Strategy Statement, including a commitment to consult on publications such as draft guidance, strategy documents and annual work programmes. The National Disability Authority advised that our final Strategy Statement should reflect our commitment to comply with the Web Accessibility Directive and Irish Sign Language Act 2017.

A number of respondents also raised the matter of An Coimisiún’s collaborative activities:

- Local Ireland articulated their hope that we will work collaboratively with the Press Council.
- Technology Ireland contended that the final Strategy Statement should clarify when, and on what basis, An Coimisiún is working with other regulators.
- An Coimisiún Toghcháin noted the potential for collaboration between our two organisations in areas such as research, educational initiatives and in the context of our respective work programmes related to democracy, trust and public safety.

### *Coimisiún na Meán consideration and response:*

Our commitment to clear and effective communications is reflected in the draft Strategy Statement. Furthermore, as outlined previously in this Response to Consultation, we are continuing to enhance the accessibility of our communications resources, including through the provision of sign language to support information videos, and we have recently launched our new website which has been designed in accordance with Web Content Accessibility Guidelines.

We are committed to consultation with our stakeholders, and this is referenced explicitly under the delivery tool, “Holding Regulated Entities to Account”. Since our establishment, many documents such as Codes, guidance materials and levy orders have been the subject of comprehensive consultation processes. The drafting of our Strategy Statement has been informed by extensive stakeholder engagement, including this public consultation process. We will also consult on all future Strategy Statements. Our work programmes will be fully aligned with our Strategy Statements and will be published on our website. We are very transparent about how we consult, and our Consultation Guidelines are available [here](#).

Our draft Strategy Statement recognised that the strategic outcomes included therein are not directly within our control. For that reason, it is imperative that we work with stakeholders and with fellow regulators to influence participants in the media landscape to bring about change. Our delivery tool, “Collaborating and Cooperating for Impact”, identifies the statutory bodies we are working closely with in Ireland, and also highlights our collaborative engagement with the European Commission, Digital Services Coordinators and media regulators in other Member States. In some cases, we have written agreements regarding how our cooperative and collaborative arrangements will work in practice, and the details of these are publicly available<sup>1</sup>.

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<sup>1</sup> See, for example, [AA-CONNECT-Coimisiun-na-Mean.pdf](#) and [20240523\\_GOSRN-Position-St-on-Reg-Coherence\\_ENG\\_DMB.pdf](#) and [Advertising Standards Authority \(ASA\) signs agreement with Coimisiún na Meán - Coimisiún na Meán](#)

We share the openness of An Coimisiún Toghcháin to collaboration and would welcome an opportunity to explore their suggestions further. In that context, we have updated the draft Strategy Statement to make explicit reference to them under the delivery tool, “Collaborating and Cooperating for Impact”.

We work closely with the Press Council, particularly in the context of the Local Democracy Reporting Scheme and the Courts Reporting Scheme, and we look forward to further cooperating with them over the term of our Strategy Statement.

## **Theme 6: Irish language and culture**

### *Comments from respondents:*

Screen Producers Ireland suggested that greater emphasis could be placed on the promotion of Irish culture, and called for the articulation of a strategy for the promotion of Irish culture and Irish creative talent on screen. They suggested our mission statement be amended to include the underlined text here: “We regulate, support and develop a media landscape which underpins fundamental rights, promotes Irish culture and fosters an open, democratic and pluralistic society”. They also suggested that the following text under the outcome, “Irish Culture and Media”, could be amended as underlined: “Content that promotes Irish culture and 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”. In reference to the latter bullet point, Audiovisual Ireland suggested that this may be open to the misinterpretation that the Irish language is culturally niche.

Under the heading, “Research and Future Focus”, Screen Producers Ireland suggested that research regarding 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, be incorporated as an additional area of research.

Finally, Audiovisual Ireland have suggested Irish language content requires greater attention. Specifically, they propose that An Coimisiún promote the development, production and delivery of Irish language content to showcase Irish culture and heritage by expanding our current funding initiatives. In making this suggestion, they note that this could be covered in An Coimisiún’s annual work programmes.

### *Coimisiún na Meán consideration and response:*

The promotion of Irish culture is central to our work, and it is for this reason that we have identified Irish Culture and Media as one of our six strategic outcomes. We are committed to developing a media landscape that reflects and shapes who we are as a society. In response to the points made under this theme, the final Strategy Statement includes the following underlined edit: “Content champions Irish culture, reflects the many facets and growing diversity of society, including the need for content that is accessible to all and that pays special attention to the Irish language, as well as to culturally niche audiences”. It is noteworthy that our programme funding scheme, Sound & Vision, allocates more than 25% of total funding to Irish language programming, and we remain committed to supporting Irish language content during the lifetime of this Strategy Statement.

We note the research idea proposed by Screen Producers Ireland, and we will consider this further in the context of the development of our Research Strategy.

## Theme 7: AI and other emerging opportunities and challenges

### *Comments from respondents:*

A number of emerging opportunities and challenges were highlighted by respondents, including:

- Artificial Intelligence (AI)

RTÉ noted the rapidly transformative role AI will play in shaping the media landscape and the way in which it is becoming integral to content production, dissemination, and consumption. In that context, they sought more detail on the integration of AI into the regulatory framework, and noted that additional rules and technical solutions will be required to reliably trace the sources of AI generated content. They suggested that the final Strategy Statement could include more detail on policy measures to foster a healthy online information system, including by ensuring journalistic protections.

In a similar vein, Mediahuis requested that we be proactive in identifying and managing the implications of generative AI for the future of the Irish media landscape, while Local Ireland sought assurance that An Coimisiún is fully informed about the threats and opportunities of AI and how it can be used as a tool to benefit media without jeopardising trust.

- Online safety of journalists

Mediahuis requested that An Coimisiún review where functions relating to online safety and harm overlap with issues relating to threats and abuse that journalists face online.

- Audiovisual Media Services Directive (AVMSD)

Screen Producers Ireland noted the importance of our delivery tool “Playing a Leading Role in the European Regulatory Framework”. In that context, they highlighted an anomaly in the draft Strategy Statement whereby the AVMSD was referenced in the glossary but not referenced within the draft Strategy Statement. Sky Ireland also sought clarity on our position regarding upcoming discussions at an EU level on the reopening of the AVMSD in 2025/2026.

- Research opportunities

A number of the submissions highlighted potential research opportunities for An Coimisiún, or for An Coimisiún in collaboration with other stakeholders.

RTÉ, for example, suggested that we should undertake in-depth market research on the media landscape (e.g. consumption patterns, emerging trends) that would enable more evidence-based policy making, while An Coimisiún Toghcháin suggested we explore the sharing of research ideas and solutions with them on areas of mutual interest.

As outlined earlier, the National Disability Authority proposed we conduct research on the representation and portrayal of disabled people in broadcast media.

### *Coimisiún na Meán consideration and response:*

We are alert to the rapid pace of change in the media landscape, and the actual and potential impact of AI on how content is produced, distributed and consumed. We understand that AI has the potential to benefit users, and also poses risks. We need to ensure that the emergence of new types of content services, and changes in how existing ones are operated, do not damage our fundamental rights or our society itself.

Given the potentially transformative role AI will play in shaping the media landscape, we agree that it should be afforded more explicit attention in the final Strategy Statement. Accordingly, we have included reference to it under our delivery tool, “Research and Future Focus”. Our Foreword, which accompanies the updated Strategy Statement and sets the scene for our work, also references the opportunities and challenge associated with AI.

We are aware of the issue of journalists being targets for threats and abuse online and understand that it is a matter of great concern to individual journalists and to the sector more broadly. We share that concern. We will consider this further as part of the process of developing our annual work programmes and implementing the online safety framework.

We thank Screen Producers Ireland for drawing our attention to the anomaly regarding the AVMSD. This had been omitted from the draft Strategy Statement and is now included under the delivery tool, “Playing a Leading Role in the European Regulatory Framework”.

We note the research opportunities suggested by respondents and will consider them further in the context of the development of our Research Strategy.

## **Theme 8: Implementation of the Strategy**

### *Comments from respondents:*

A number of respondents made reference to the implementation of the Strategy Statement.

Technology Ireland, for example, suggested that An Coimisiún should develop a concise Work Programme for 2025 and 2026 on which it would consult publicly. In a similar vein, RTÉ suggested we provide more detail, and enhance the emphasis, on the steps and timelines for implementation. Technology Ireland suggested that the implementation framework, as referenced in the draft Strategy Statement, be published together with the qualitative and quantitative indicators that will be tracked and monitored over the life of the plan. With specific reference to the delivery tool “Holding Regulated Entities to Account”, they sought further clarity regarding the key actions identified (such as Codes and Rules) and how they 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 An Coimisiún will use these actions.

### *Coimisiún na Meán consideration and response:*

As outlined earlier in this document, the drafting of this Strategy Statement has been informed by a stakeholder engagement phase and, more recently, a public consultation process. We will, in turn, consult on all future Strategy Statements. As our annual work programmes will be fully aligned with our Strategy Statements, we do not consider it necessary or appropriate to consult separately on those.

We are committed to publishing our annual work programmes, and we have updated the Strategy Statement to clarify this. Our 2025 Work Programme will be published to coincide with the publication of our final Strategy Statement, 2025 to 2027. We will proactively monitor and assess progress in respect of this Strategy Statement, and have clarified our intention to report on the outcomes and effectiveness of this Strategy Statement in our next Strategy Statement.

### 3. Next Steps

The draft Strategy Statement has been updated to reflect the amendments outlined in this Response to Consultation. The final Strategy Statement will be published on our website on 13 March 2025.

In order to ensure the key elements of the Strategy are as accessible to as diverse an audience as possible, a Plain English version of the Executive Summary will be published as a separate document on the same day.

In light of feedback received above in relation to implementation, our Work Programme for 2025 will be published on the same day, and our 2026 and 2027 work programmes will be published in due course.

# Appendix

## Submission on behalf of: 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



## Submission on behalf of: 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

## Submission on behalf of: 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

## Submission on behalf of: 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

## Submission on behalf of: 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. Smalled, community TV stations are more flexible that huge corporation like RTE and they should be supported. Diversity and Inclusion should be really supported in Ireland to avoid any anti-social, racists 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 Coimisium 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>

## **Submission on behalf of: 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

## **Submission on behalf of: 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

## Submission on behalf of: 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

## Submission on behalf of: 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

## Submission on behalf of: 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

## Submission on behalf of: 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.

## **Submission on behalf of: 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