Note on the Adopted Recommendations

Introduction

From 14-15 September 2015, UNESCO hosted a major international conference on community media at its headquarters in Paris. The conference brought together a wide range of community radio stakeholders, representing governments, regulators, practitioners, civil society, academics and other experts, from all regions of the world. An important aim of the discussions was to arrive at some consensus over a set of recommendations to support the ongoing development of the community media sector globally, with a particular focus on sustainability.

In the end, conference participants agreed on 37 recommendations (found in Annex I to this Note), aimed at four different sets of actors, namely Governments and Regulators, Community Media Outlets and their Associations, UNESCO, which is the UN organisation with a specific mandate on communications, and the International Community (Donors, INGOS, IGOs). The recommendations were based on suggestions made in the presentations made by various participants, the discussions that followed the presentations, and sessions specifically devoted to agreeing on recommendations. A draft set of recommendations was presented to participants during a final session of the conference, and agreement was reached on a final version.

The recommendations are wide-ranging in scope, as this Note indicates. But a common theme running through the recommendations, which is stated explicitly in the Background to them, is that airwaves are a public resource which needs to be used in the overall public interest, in accordance with relevant international human rights treaties and obligations. Part of that interest includes promoting a free, independent and pluralistic media and that, in turn, involves supporting and fostering a strong and effective community media sector.

In many ways, the recommendations are similar to other sets of recommendations that have been made in this area, such as those found in Tuning into Development: International Comparative Survey of Community Broadcasting Regulation, a comparative study published by UNESCO of the regulatory frameworks for community broadcasting in over 30 countries around the world, and the World Association of

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Community Radio Broadcasters’ (AMARC) Principles for a Democratic Legislation on Community Broadcasting.²

At the same time, the recommendations are of particular importance for two main reasons. First, they represent the consensus of a wide range of stakeholders from different sectors, including strong representation of government and regulators, rather than simply the views of UNESCO or an NGO. This gives particular weight to the recommendations. Second, they are broader and more comprehensive in scope than earlier sets of recommendations. While they do cover legal and regulatory issues, they go far beyond this, addressing such issues as training, employment diversity, funding mechanisms, technology, professionalism and so on. In the same vein, they are directed at a wide range of stakeholders, including governments and regulators, but also sector actors, UNESCO and the international community.

This Note presents, analyses and provides the background thinking and discussions regarding the recommendations, broken down into sections based on the target of the recommendations, i.e. Governments and Regulators, Community Media Outlets and their Associations, UNESCO, and the International Community (Donors, INGOS, IGOs). It is, of course, impossible to reduce discussions held over two days to a simple Note like this, but an attempt has been made to ensure that the main lines of the discussion are captured here.

**Governments and Regulators**

There are a total of 10 recommendations directed as governments and regulators, including a number of sub-recommendations. These cover legal issues, more development-oriented issues (for example to support training) and more policy-oriented issues (such as to consider carefully any transition to digital terrestrial radio). Taken together, if implemented, these measures would represent a very strong commitment on the part of governments and regulators to support the development and growth of community media, with a particular focus on community broadcasters, especially radio.

The very first recommendation calls on governments to put in place an “enabling legal and regulatory framework for community broadcasters”. This, in turn should be founded on a rights-based approach, by which is meant that it should respect human rights standards, including international human rights standards, most specifically those relating to freedom of expression. International law includes clear recognition of the positive obligation of governments to promote media diversity and from this flows a more specific obligation to put in place various measures to support community media. There is a growing body of authoritative international standard-setting statements in this area, including the 2007 Joint Declaration on Diversity in Broadcasting adopted by the UN Special Rapporteur on Freedom of Opinion and Expression, the OSCE Representative on Freedom of the Media, the OAS Special Rapporteur on Freedom of Expression and the ACHPR (African Commission on Human and Peoples’ Rights) Special Rapporteur on Freedom of Expression and Access to Information³ and the 2011 General

Comment No. 34: Article 19: Freedoms of opinion and expression, adopted by the UN Human Rights Committee.4

The recommendation also calls for the regulatory framework to specifically recognise and define community broadcasters in a way which clearly distinguishes them from commercial and public service broadcasters. There was some discussion at the conference about whether an attempt should be made to define community broadcasters but, ultimately, it was felt that this would be controversial and complex and that, in any case, the definition would need to be tailored to local circumstances. The relevant sub-recommendation does, however, refer to the idea of community broadcasters being non-profit in nature and having strong links to the community, which could be seen as the key distinguishing characteristics of this sector from, respectively, commercial and public service broadcasters.

A key means of promoting community broadcasters is to ensure that they have access to licences and terrestrial broadcasting frequencies, and the recommendation calls on the regulatory framework to reserve an equitable portion of the frequency spectrum for these broadcasters and to ensure that they have access to the main distribution platforms, including digital platforms, where relevant. As part of the system of ensuring access to licences, the recommendation calls for “fair, transparent and equitable” licensing procedures. This recognises that community broadcasters cannot compete with commercial broadcasters in open competitions for licences, due to their often limited human and financial resources, and that, for the same reason, it is appropriate to put in place simpler licensing procedures for this sector.

This key recommendation includes a number of sub-recommendations, of which the third is that the licensing should be done by an “independent regulatory body”. This flows directly from international standards in this area, which dictate that anybody which exercises regulatory powers over the media should be independent in the sense of being protected against both political interference and undue influence on the part of the sector that is being regulated. The sub-recommendation goes further, however, to indicate that the regulator should have “expertise, understanding and the mandate to support and promote community broadcasting”. This is a reflection of the unfortunate fact that, all too often, general broadcast regulators lack these attributes. They often do not understand the particular needs of community broadcasters and they also often lack a clear mandate to support and promote the development of this sector.

The recommendation on the regulatory framework includes two references to financial issues. First, it calls for community broadcasters to benefit from “low fee or free access to licences and frequencies” and, second, it calls for them to be permitted to “access funding from a diverse range of sources”. The first of these is based on a recognition that this sector, with its often limited resources, cannot be expected to pay the same level of fees as commercial broadcasters. The second is a reaction to regulatory systems in all too many countries which impose unrealistic constraints on access by community broadcasters to funding opportunities. While this sector should not be driven by financial considerations, unlike commercial broadcasters, it still needs to access adequate resources to be viable. Imposing unduly strict limits, for example, on access to advertising undermines its ability to survive.

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Another main recommendation to governments and regulators addresses the all-important issue of funding. This was a key theme of the conference and is also a key sustainability consideration for community media around the world. Without access to funds, community media cannot survive. Even if they operate on relatively low budgets, they still need some funds, for example to purchase and maintain equipment and to cover ongoing costs such as rent and utilities.

The recommendation calls for governments and regulators to consider a number of funding support measures. First, it calls for the creation of funds to support community media, whether these are dedicated funds or dedicated allocations from broader funds, potentially including universal service funds. Once again, the importance of independence from government is stressed, as well as the need for transparency and to involve the community media sector in the operation of such funds. Second, it calls for other financial support measures, such as tax or licence fee waivers. Third, the need to allow community media to access relevant sources of funding is reiterated. Finally, the recommendation calls on governments to adopt measures to support the roll-out of community media services to underserved areas, without getting into the specifics of what such measures might include. This will depend on the nature of the particular challenges in reaching out to the underserved area, which could be impacted by factors such as geographic remoteness, other geographic challenges (such as small island features), extreme poverty and so on.

The recommendations also call on governments to support “the establishment of specialised training bodies and/or specialised courses offered by existing training bodies” with a view to ensuring the availability of training services focusing on the particular needs and situation of community media. While many general media or communications courses will be relevant to those working with community media, the latter also have special circumstances and training needs, and these should be reflected in the overall training provision in a country. The same recommendation also calls for those working at community media outlets to have access to training, in recognition of the fact that these individuals often face particular challenges to participating in training activities.

This recommendation is supported by another one calling for government support for research aimed at gaining a better understanding of the needs and challenges facing community media, as well as of the benefits associated with the services they provide. In many countries, too little research is being done in this area, with the result that the knowledge base underpinning policy and other initiatives relating to community media is unduly limited. It is, for example, important to have good, evidence-based research on the benefits of community media so as to foster the adoption and implementation of policies which support the sector. In this vein, another recommendation calls for greater recognition of the particular role of community media, and especially community radio, in emergency and disaster contexts.

A couple of the recommendations focus on the need for governments and regulators to make a particular effort to respect the rights of those working for community media outlets, reflecting the fact that all too often this sector does not enjoy the same rights that are afforded to more traditional media. Specifically, the recommendations call for respect for the right of community media workers to protect the secrecy of their confidential sources of information, an established right for the media and other social communicators, and ensuring their safety and security. In respect of the latter, the
recommendations note the particular needs of female workers, who often face far greater security risks than their male colleagues. The recommendations also call for recognition of the right of young people to work as journalists for community media, a reaction to the fact that some countries impose minimum age conditions on who may be considered to be a journalist.

One recommendation calls on governments and regulators to promote greater engagement of “women, young people, persons with disabilities and marginalised groups in the community media sector”, in part reflecting the idea that community media have a special mandate to serve these groups in society. This could be achieved in part through ensuring representation of these groups on relevant national decision-making bodies, such as broadcast regulators, among other things with a view to ensuring that these bodies are more sensitive to the particular needs of those groups. The recommendation also calls for support to promote the “involvement of these groups in community media outlets and networks”. No specific measures are identified as to how this should be done, which will no doubt depend on a range of local circumstances.

The second calls for the promotion of media and information literacy, once again in recognition of the supportive role this plays in fostering a strong community media sector. It is only where communities recognise the benefits of community media, for example, that they can be expected to support the sector, including through volunteering and participating, which is essentially to the longer-term survival of community media outlets. Promoting media literacy could help to address this.

Another recommendation addresses the issue of the transition to digital, terrestrial radio. While the transition to digital terrestrial television is being driven forward on a relatively tight timetable by the International Telecommunications Union (ITU), in part so as to free up the valuable spectrum used by analogue terrestrial television, no such overriding imperative applies in the radio sector. The transition can be disruptive and costly both to community radio stations and to listeners, who would have to purchase digitally enabled radio receivers. In light of this, the recommendation calls on governments and regulators to “[c]arefully consider whether, when and how to undertake a transition to digital terrestrial radio”. The process should take place only after broad consultation with interested stakeholders and be based on the overall public interest (i.e. rather than, for example, narrow commercial interests).

**Community Media Outlets and their Associations**

The largest number of individual recommendations – 16 out of the total of 37 – was directed to community media outlets and their associations. As with governments and regulators, the recommendations are very varied in nature and address a wide range of issues and themes. Several are directed towards the idea of creating a wider supportive environment for community media, while others are directed towards community media themselves, with a view to enhancing their own operations and ability to serve their communities.

The very first recommendation in this section calls for the development of “local, national, regional and international networks and exchanges” for and about community media issues. These can be used to share “ideas, knowledge, expertise and best practice”, as well as to exchange content and programmes. In a sense this is an obvious recommendation, which recognises the benefits of like-minded organisations and actors
working together to achieve common objectives. To some extent, the very conference which gave rise to the recommendations represents an effort in this area.

At the same time, the idea of sharing content speaks to the very concept of community media, which is about pooling resources and helping the community. It would be odd, for example, to call on commercial media outlets, who are in competition with each other, to share content, but this is natural for community media and there are a number of examples of content sharing schemes around the world.

A third recommendation focuses on collaboration with other actors to promote various goals. One of these is promoting media and information literacy, building on the recommendation to this effect in the first section of the recommendations. Another is to “combat hatred and xenophobia, to contribute to a culture of tolerance”. Underlying this part of the recommendation is a recognition of the growing threat that intolerance is playing in many parts of the world, and the important potential role that community media, with its strong links to local communities, can play in combating it. The idea of promoting mutual respect and understanding is a core value for many community media outlets. Finally, this recommendation focuses on the idea of raising awareness about the role that community media outlets play in their respective target communities. As noted above, such awareness is essential to fostering the community support that is essential for the survival of community media outlets.

The idea of protecting the autonomy and independence of community media is redolent throughout the recommendations, being referenced no less than six times in the first section of the recommendations, directed at governments and regulators. It is not surprising, then, that it also appears in this section, directed at community media outlets and their associations. Here, however, the slant is a bit different, with the recommendation calling for action on the part of these bodies to protect independence (as opposed to the calls to respect it in the previous section).

The recommendation calls for protection against interference from government, which in many countries poses the greatest risk to the independence and autonomy of the sector. But it also goes on to refer to “political parties, the corporate sector and faith-based institutions”. This reflects the fact that all of these actors, in different contexts, pose a threat to the independence of community media. Political parties may to some extent be seen as an extension of the traditional risk of government interference.

The nature of the threat is a bit different when it comes to the corporate sector, which may wish to control or influence community media to achieve its commercial objectives. In this sense, the recommendation is calling for community media and their associations to work to ensure that they are not unduly influenced by corporate interests, while still preserving their right to carry advertising. There is also a growing threat in many countries to the independence of community media from religious bodies, which seek to use these outlets as mouthpieces for their own communications and community outreach objectives. This can be particularly damaging to the independence and sustainability of the sector, for example if government reacts negatively to such influence by closing down the space within which community media can operate.

A related recommendation calls for support for “the ability of community media to focus on its core objectives of enabling voice and access to information for the community”. This is set against the risk that community media may instead serve the “interests of NGOs or powerful community actors, or an exclusively development agenda”. The
importance of this recommendation might not immediately be clear, but it stems from the experience in a number of countries where community media, especially community radio, have been dominated by certain actors which has undermined their ability to focus on the community. While community radio should certainly promote development objectives, it is important that it not become a tool of other actors in doing so, or that it lose sight of its overriding community voice and information mandate. In some countries, powerful local community actors have sought to take over or control community media, as a way of extending their influence and importance. This clearly undermines the ability of these media to serve the community as whole and should be resisted.

Finally, in terms of creating a wider supportive environment for community media, a recommendation in this section calls for “measures to assess sustainability gaps in the community media sector and/or within the media landscape as a whole”, with the idea of spurring measures to fill those gaps, although this is not stated explicitly in the recommendation. The idea here is that, in many contexts, there are structural weaknesses in the sustainability safety net for community broadcasters and that it is important to be aware of them and to take steps to eliminate them. The recommendation also points to UNESCO’s Media Viability Indicators as one tool to help assess those gaps.

As noted above, many of the recommendations in this section are directed towards community media themselves, with a view to enhancing their internal operations and structures. One such recommendation calls for community media outlets and their associations to focus on “diversifying funding sources”, building on earlier recommendations along these lines. It is fairly obvious that community media outlets need to be imaginative in this area and to take advantage of all available sources of funding if they are to survive and prosper. The recommendation particularly singles out “social resource mobilisation” as an area of focus. As has been noted above, mobilising social resources, including in the form of members of the community contributing through volunteering, is key to the longer-term sustainability of community media outlets.

A closely related recommendation calls for encouraging “complementarities and partnerships between community media and other stakeholders”. Once again, this is rooted in the collaborative and sharing approach that is integral to the community media sector and the need to take advantage of working with others to build on respective strengths. This recommendation specifically identifies “training, technology sharing and archival digitisation, cataloguing, storage and monetising” as areas for cooperation, based on the particular value that this can provide to the community media sector. It also specifically identifies public service broadcasters as an object of collaboration, given the overlapping interests and objectives of this sector and the community broadcasting sector.

Another recommendation in this area refers to the need to take full advantage of “information and communications technologies, as well as associated platforms”. In the modern world, no media outlet can survive without taking advantage of new technologies, which have revolutionised the whole media environment. A particular benefit of these technologies is their ability to transform what were traditionally one-way communications – i.e. broadcasting content from a central station to listeners and viewers – into two-way communications platforms, where listeners and viewers can contribute in more profound ways to content. This is of particular importance to community media, for which a defining characteristic is strong relations with the
community. Thus, this recommendation specifically identifies enhancing “service to the community” as one of the potential benefits of making better use of technology.

The recommendation also refers to the idea of enhancing “operational efficiencies”, another key benefit offered by new communications technologies. Once again, this is applicable to all media, but is perhaps of particular importance to community media, given their often limited resource base. The same factor can make it difficult for community media to take full advantage of new technologies, which again reinforces the importance of this recommendation.

A number of recommendations are about the relationship of community media outlets with their target communities, which is obviously a matter of the greatest importance to the sector. Indeed, as noted above, this is the most important defining characteristic of community media, absent which it may be difficult to differentiate the sector from other broadcasting sectors.

One rather general recommendation simply calls for efforts to promote “strong links with the community being served”. It goes on to identify a number of areas where links should be forged and/or strengthened, including “involvement in community media operations, in volunteerism as well as in the creation, ownership and diffusion of content”. In a sense, this covers the two main areas of operation of community media outlets, overall management and operations, and the production of content. This parallels other recommendations in this area, which also identify operations and content as the two main areas for community involvement. The recommendation specifically identifies volunteering as a way of promoting community involvement and this is undoubtedly important. There are, however, a number of other means, such as engaging the community in programme production (i.e. other than formally through volunteering, for example by calling in or appearing as a guest on a programme) and interacting with the community, including through regular meetings, to ensure that programme production meets the needs of the community.

A second recommendation in this area specifically addresses the latter point, calling for the “development of programming focusing on a range of relevant sectors and local issues of public concern”. At the end of the day, this is really what community media is all about, namely producing programming that serves the information and voice needs of the target community. It is, therefore, of great importance that sufficient attention is given to this matter. What specific programming will serve this objective will depend on the nature of the community and various contextual factors. This recommendation points to a number of areas which community broadcasters have traditionally focused on, including “women, indigenous peoples, empowerment, promoting a culture of respect for human rights, livelihoods, health, culture, education, the youth and business”.

Producing programming which is relevant to different groups in society is, ultimately, dependent on involving those groups in the community media outlet. Reflecting this, another recommendation focuses on the need to “ensure internal diversity and representativeness vis-à-vis the community being served”. To some extent, this is a matter of reaching out generally to the community, but it may also require community media outlets to go beyond this, for example by specifically reaching out to certain groups, including women, so as to make them feel comfortable engaging with the outlet. This recommendation refers to a number of groups whose engagement should, typically, be promoted – including “women, young people, persons with disabilities and
marginalised groups” – although the precise needs in this area will depend on the nature of the specific community being served. The recommendation also reiterates earlier references to areas of potential engagement, including “participation, decision-making and the production of content”.

A number of recommendations refer to the idea of transparency and professionalism in terms of the internal operations of community media outlets. One specifically refers to the idea of promoting “transparency and accountability in the operation of community media”. It is clearly important for community media outlets to operate in a manner that accords with their basic principles, which include the ideas of being open and also accountable to the target community. The recommendation specifically calls for these values in relation to funding but similar principles apply to operations and programming.

Another recommendation in the same vein calls for support for the “professional development and internal management systems of community media”. This can be seen in some respects as being a condition for delivering the previous recommendation, since professionalism and good internal management are important support systems for transparency and accountability. Furthermore, they support the sustainability of community media outlets and their ability to deliver a good service to the community.

The final recommendation in this area calls for the promotion of “good practice and self-regulatory measures”. The latter is perhaps particularly important if community media are going to meet their objectives of serving their target communities well. Indeed, it is generally recognised that media outlets should engage in self-regulation as form of accountability towards the public and as a way of promoting professionalism. This recommendation refers to a number of specific areas and measures which should be considered, including “content and organisational audits (both qualitative and quantitative), ethical codes and sector led performance assessment”. These are all established means of engaging in self-regulation and of promoting professionalism and accountability.

Finally, this section of the recommendations calls on community media outlets and their associations to use the recommendations from the conference actively “to advocate in support of community media in other fora, local, national and international”. While this may appear to some to be a bit self-serving, it is in fact a means of promoting the effective use of the recommendations, with a view to supporting the longer term sustainable development of community media.

UNESCO

As with other sections, the five recommendations directed at UNESCO are quite diverse in nature. Some focus on UNESCO’s own activities to support and promote community media, while some call on UNESCO to enhance the engagement of other actors on community media issues. Finally, some focus more on the idea of UNESCO helping community media and their associations achieve their own objectives.

UNESCO has traditionally had an active programme in support of community media in different ways. First, it promotes awareness of and dialogue about community media issues through a series of annual events, such as World Radio Day (13 February), World Press Freedom Day (3 May) and the International Day to End Impunity for Crimes Against Journalists (2 November). These are important forums, bringing together large networks of actors with an interest in these issues, thereby providing ideal opportunities to raise community media issues for discussion. A recommendation in this section calls
on UNESCO to continue to focus on community media issues at these regular events. The same recommendation also calls on UNESCO to continue to address community media issues in its Media Development Indicators studies. These include several indicators which touch on issues of importance to community media, including many of those that are the subject of these recommendations, as well as one indicator specifically on community media issues.

Second, UNESCO’s Regular Programme includes community media, as part of its broader mandate to promote a pluralistic media. The conference which gave rise to these recommendations was part of that work. Sort of running in parallel to this is the funding support that UNESCO provides for activities relating to community media, on a project basis, largely through the International Programme for the Development of Communication (IPDC). The recommendations call on UNESCO to “[c]ontinue and increase” both of these activities.

In addition to a general call to continue these two streams of work, this recommendation puts forward a number of suggestions as to focus areas. All of these build upon the recommendations to governments and regulators and to community media outlets and their associations, which are outlined above. The second calls on UNESCO to promote “community radio services that are low-cost and adapted to developing world conditions”. UNESCO has provided a lot of support for the establishment of new community media outlets, and to keeping existing outlets going, including through the provision of appropriate equipment and operational systems. This sub-recommendation effectively calls on UNESCO to continue this work. It also specifically refers to the need to “take advantage of new information and communication technologies” in this regard, again echoing some of the other recommendations which recognise the important efficiencies that community media outlets may gain from relying on appropriate technologies.

The third sub-recommendation here calls on UNESCO to continue to support “specialised training programmes for community media”, again echoing earlier recommendations which highlighted the need for training focusing on community media issues and workers. This sub-recommendation is quite detailed as to the priority focus areas for such training, listing the following subjects: “sustainability, financial management, governance and production of quality programmes”. The importance of these topics will immediately be apparent to readers, and many of them are the subject of specific recommendations to governments and regulators and/or to community media outlets and their associations. These include, notably, management, engaging the community, technical issues and producing relevant programming, while the other focus areas are closely linked to sustainability and professionalism.

The fourth sub-recommendation in this area calls on UNESCO to provide advice to States in terms of creating “enabling legal and regulatory frameworks for community broadcasting”, which was the subject of the very first recommendation addressed to governments and regulators. UNESCO has substantial expertise and experience in this area, and has been providing advice along these lines, either in the specific context of community broadcasting or as part of wider advice on broadcast regulation, for many years. A good example of this is UNESCO’s 2013 publication, Tuning into Development: International Comparative Survey of Community Broadcasting Regulation.5

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Finally, the recommendation calls on UNESCO to support “relevant research and studies on the community broadcasting sector”, including at the global, regional and national levels. The need for more quality research in this area has already been noted. This sub-recommendation specifically singles out the promotion of a better understanding of the scope and definition of community media as a focus area. As noted above, definitions of community media vary widely according to context and participants at the conference felt it would be useful to foster a better understanding of the issues involved in this somewhat thorny debate.

Moving beyond recommendations directed towards UNESCO’s own internal operations relating to community media, a number of other recommendations effectively call on UNESCO to act as an ambassador for community media with other global actors. The very first recommendation in this section, for example, calls on UNESCO to continue to “enhance global recognition of community broadcasting as a distinct and integral part of a free, pluralistic and independent media landscape”. In other words, UNESCO is being called upon to promote its own understanding of community media as a key element of a pluralistic media among other actors.

This recommendation goes on to link this idea to the Post-2015 Sustainable Development Goals (SDGs), as well as “the objectives of promoting human rights, peace and security”. Goal 16.10 of the SDGs calls on States to “ensure public access to information and protect fundamental freedoms, in accordance with national legislation and international agreements”. It is clear that community media outlets have a role to play in delivering this goal both through their mandate to provide relevant information to their communities and inasmuch as media diversity is a key component of the fundamental right to freedom of expression. The potential role of community broadcasters in promoting human rights, peace and security has long been recognised.

Another sub-recommendation is closely related, calling on UNESCO to “[p]romote national, regional and international debate about community media”. The stated goals here are to bolster understanding of and support for the sector while the focus is on “government, elected officials (parliamentarians) and regulators”. This flows from the fact that UNESCO has good access to officials, as an IGO with States as members. The conference which adopted these recommendations is a good example of this sort of activity, with strong participation from exactly those sectors.

While the previous recommendation focuses on the national level, another recommendation in the same vein focuses on “global and regional IGOs”, calling on UNESCO to foster wider engagement among this set of actors in support of community media. A number of IGOs – including UNICEF and FAO – have worked in particular with community radios to deliver their common objectives, but such work remains limited and somewhat sporadic in nature, as opposed to more institutionally grounded. UNESCO, as the leading IGO on this issue, clearly has a mandate and the ability to expand the focus of other IGOs on community media issues. The recommendation puts forward the idea of an inter-agency working group as one potential way to take this effort forward.

In addition to calling on UNESCO generally to reach out to different sets of actors – both national and inter-national – the recommendations also specifically call on UNESCO to
work to ensure that a recognition of the importance of a free, independent and pluralistic media, and by implication the importance of community media, are integrated into the work of WSIS and IGF. These are both international processes which are of great importance to community media. The importance of new technologies for the community media sector has already been highlighted, while it is clear that the WSIS process touches on matters of direct relevance to the community broadcasting sector.

Beyond a general call to recognise the importance of community media in the mandates of these two processes, the recommendation specifically calls for community media interests to be taken into account, as a reflection of the wider public interest, in decisions relating to Internet governance. Closely related is another recommendation calling for a recognition that the frequency spectrum is a common good – something which already finds recognition in the laws and often constitutions of different countries – and that, as a result, it needs to be managed in the public interest rather than based purely on financial criteria. Underlying this recommendation is a concern about the fact that telecommunications providers, who often compete directly with broadcasters for frequency spectrum, tend to have far greater resources at their disposal. This has led to a growing global phenomenon of these players being able to take over ever-greater parts of the frequency spectrum, often to the detriment of broadcasting uses. This recommendation refers specifically to this issue, calling for an “equitable and transparent allocation of spectrum to broadcasting uses, including community broadcasters”. What constitutes equitable would need to be established on a country-by-country basis; the principle that equitable considerations, rather than simply financial ones, should guide decision-making in this area is the key point here.

The same recommendation ends up calling for measures to address the digital divide. This is really a separate issue, which is very complex in its own right, and which clearly has implications for a wide range of actors, including community broadcasters. There are several different aspects to the digital divide, including formal questions of accessibility (is the Internet available in the community), questions of costs (if it is available, is it realistic for people in the community to obtain access, given average disposable income metrics) and other issues such as language (i.e. is sufficient content available on the Internet in a language that is spoken in the community). For community media, working in a community with a higher level of Internet has multiple advantages – in terms of connecting to the community, in terms of distribution, in terms of engaging the community in programmes and so on – although much can also be done with mobile phones, which tend to have a much wider reach in less developed areas.

A couple of other recommendations in this section are directed more towards efforts UNESCO should be making to provide direct support to community media outlets and their associations. The first calls on UNESCO to take steps to “increase the participation of women, young people, persons with disabilities and marginalised groups in the community media sector”, with a particular focus on the decision-making level. This goal is reflected in recommendations directed at both governments and regulators and community media outlets and their associations, so that UNESCO is, in effect, being called upon to support those efforts. The recommendation does, however, specifically call on UNESCO to do this “by supporting cooperative approaches and partnerships within the UN system”, suggesting that the aim is to engage other UN actors, presumably including organisations like UN Women and UNICEF, in these efforts.

Second, UNESCO is called upon to “[s]upport cooperation and networking among community media, and between community media and other relevant stakeholders”.
Once again, this runs parallel to a recommendation directed at community media outlets and their associations, so that UNESCO’s role here can again be seen as supporting their efforts in this area. Again, as in the recommendation to community media players, there is a special reference here to public service broadcasters, based on the special synergies that exist between these two broadcasting sectors.

Finally, the last recommendation is rather different in nature, calling on UNESCO to “[p]ropose that IPDC allocates lesser priority to funding assistance for countries which do not recognise community broadcasting as a third tier of broadcasting, including by law”. This is, in effect, a call for a kind of conditionality which would mean that Member States which failed to respect their international obligations to recognise community broadcasting, as supported in the first section of the recommendations, would suffer from diminished priority when applying for UNESCO funding in the area of communications. Although certain kinds of donor conditionalities have been widely criticised, this is not generally the case for conditions which relate to ensuring respect for a fundamental human right, in this case freedom of expression which requires States to recognise community broadcasting. While the direct impact of such a condition may not be significant – given the modest amounts of funding flowing through the IPDC – the formalisation of such a condition would do quite a lot to highlight the importance of formal recognition of community broadcasting in law.

**The International Community (Donors, INgos, IGOs)**

As with other sections, the recommendations in this section are diverse in nature, perhaps especially so taking into account the fact that this section addresses a particularly wide range of actors, comprising bilateral donors, IGOs and international civil society actors.

Several of the recommendations in this section run in parallel to those from earlier sections. Thus, the first recommendation here is to “[p]romote and advocate for the adoption of an enabling legal framework for community broadcasting”. This obviously reflects the very first recommendation to governments and regulators, and supports a similar recommendation directed at UNESCO. It may be noted that different actors will have different ways of delivering this recommendation. Donors might use their spending power and soft diplomacy to support the adoption of enabling legal frameworks, while NGOs may be more likely to use public forms of advocacy, such as the media and mobilising public support. IGOs like UNESCO might focus more on providing technical assistance and support to governments to draft strong legal frameworks.

The next two recommendations are about funding. The first calls directly for the earmarking of funding to support the community media sector, “in line with the recommendations above to UNESCO”. The latter incorporates the funding priorities identified for UNESCO into this recommendation (i.e. support for radio services, the provision of training, advice on legal frameworks and the undertaking of relevant research). These are all important areas for donor engagement, although there will be different needs in different countries and donors should always be responsive to those local conditions.

Importantly, this recommendation also calls for donor support to take into account “the need for funding models that support sustainability beyond donors’ funding cycles”. This is a plea for funding to be based on local need, rather than donors’ priorities and interests. This is always a tension in development funding, but it is perhaps of particular importance in relation to community broadcasting, where support over time can be
essential to getting media outlets sufficiently well-established to the point where they are sustainable. Indeed, there are all too many cases of community broadcasting projects being dropped by donors mid-stream, with the result that many outlets have been unable to survive.

The second funding recommendation calls for the development of “national, regional and international funding mechanisms”. This recognises that funding initiatives need to be tailored at different levels, depending on what they are proposing to do. It also reflects the idea that more broad-based mechanisms are less susceptible to the vagaries of individual donor projects and the issue of ‘funding cycles’ identified above.

Another recommendation calls for the integration of an understanding of the potential of community media into relevant sectoral programmes, with agriculture and children being given as examples. This is related to a recommendation directed at UNESCO, calling on it to promote the engagement of a wider range of actors in the community media sector. It is based on an understanding that, while specific programmes in support of community media will always be important, there is also a significant role for community media components in broader development work. There are a number of good examples of this, such as using community media in sustainable agriculture projects to help farmers to identify markets and obtain fair prices for their products.

The last two recommendations are directed at other actors. One calls for the promotion of the idea of corporate social responsibility in support of community media. This is a somewhat cutting edge recommendation, and the details of how this might work remain to be spelled out. However, it is intuitively obvious that there are many potential ways for the corporate sector to support community media. Local businesses can make an effort to direct advertising towards community media outlets, businesses working in related sectors, such as telecommunications, might provide specially tailored or lower cost services to community media outlets and so on.

Finally, the last recommendation calls on the international community to “[m]onitor cases of interference with community broadcasting ... and take action in cases where this occurs”. While this is relevant for a range of international actors, it is perhaps particularly directed at international civil society organisations, which are more likely to engage in monitoring of this sort. A wide range of possible actions might be appropriate for different actors when interference occurs, much as different actors engage in different forms of advocacy in support of the adoption of enabling legal frameworks. Indeed, this recommendation singles out “roll-backs in terms of the enabling framework for community media” as an area for special attention in this regard.