



MEAA Submission – Commercial Radio Code of Practice

The Media, Entertainment and Arts Alliance (MEAA) welcomes the opportunity to submit to the Commercial Radio Code of Practice review. MEAA is the union for creative and media sector workers, including journalists and musicians.

Australia's Commercial Radio Code of Practice is subject to a co-regulatory arrangement between ACMA and CRA. It covers a) what content can be broadcast on radio, and b) what audience protections are in place. This submission relates to both aspects of the Code.

MEAA notes that the last major review of the Code took place in 2016-17. Since then, a series of technological, economic, and cultural shifts have significantly transformed the radio sector. In particular, we note the development of digital radio, which is an increasingly popular way for Australians to access audio content.¹

As ACMA notes, digital radio currently sits outside the remit of the Code, meaning that the standards that apply to both content and audience protections do not necessarily apply when radio is broadcast through this medium. This is problematic because it leaves regulatory gaps in the application of the Code, including in relation to local content quotas and journalistic standards of practice.

The need to maintain content quotas for Australian music is more important than ever. Research shows that, particularly over the last decade, Australian music is being heard less by Australian listeners. For example, in 2000, the percentage of Australian and New Zealand artists in the ARIA top 100 charts sat at 16%. By 2023, this had fallen to just 2.5%.² This trend is putting the next generation of Australian musicians at risk and threatening Australia's local music scene.

Radio has traditionally played a strong role in supporting the careers of early-stage Australian musicians, formalised through content quotas that applied to all commercial radio stations through the Code. However, the rise of digital and online forms of radio means that, as audiences transition to these forms of listenership, these content quotas no longer apply. This is a significant issue, and

¹ ACMA (2024) *How we watch and listen to content*, <https://www.acma.gov.au/publications/2024-12/report/communications-and-media-australia-how-we-watch-and-listen-content>

² Kelly, Tim (2024) 'Down and under pressure: US and UK artists are taking over Australian charts, leaving local talent behind', *The Conversation*, <https://theconversation.com/down-and-under-pressure-us-and-uk-artists-are-taking-over-australian-charts-leaving-local-talent-behind-239822>

we encourage Commercial Radio Australia to voluntarily adopt the content quotas set by the Commercial Radio Code of Practice for all its digital activities.

Recommendation 1: Commercial Radio Australia adopt content quotas outlined in the Commercial Radio Code of Practice for radio content delivered online.

MEAA holds a strong interest in maintaining strong standards for codes of practice relating to news media. Since 1944, MEAA (through its predecessor, the Australian Journalists Association) has set out clear standards for journalists operating in the Australian news media sector through the *Journalist Code of Ethics*.³ These standards emphasise honesty, fairness, independence, and respect for the rights of others. They are codified into 12 principles, including the need to disclose conflicts of interest; use fair, responsible and honest means to obtain material; and to do the utmost to achieve fair correction of errors.

MEAA is concerned about the potential for a lack of (or perceived lack of) transparency, accountability, or standards in the commercial radio sector to drive declining trust in news. Trust in commercial radio is crucial because it is likely to have widespread ramifications not just for the sector, but for other areas of the media. It is essential, therefore, that the sector adhere to strong standards of practice to mitigate any such concern and build audience trust. The fact that services delivered by commercial radio through online platforms are not currently covered by the Commercial Radio Code of Practice is concerning and should therefore be navigated by the explicit adoption of these standards in the provision of online services.

Recommendation 2: Commercial Radio Australia adopt content standards outlined in the Commercial Radio Code of Practice for radio programs delivered online.

Last, MEAA is aware of the use of AI-generated hosts in the commercial radio sector. Recently, CADA, a Sydney-based Australian Radio Network (ARN) station, used a fake host, dubbed ‘Thy’, for over six months without telling audiences.⁴ CADA only revealed that ‘Thy’ was AI-generated following an investigation by journalist Stephanie Coombes.⁵ This use was only deceptive but concerning in relation to the public’s trust in media. Research continues to show that the public does not trust the use of AI in journalism. For example, the Reuters

³ See MEAA (2025) *MEAA Journalist Code of Ethics*, <https://www.meaa.org/meaa-media/code-of-ethics/>

⁴ Fike, Ashely (2025) ‘Radio Station Duped Audience and Secretly Used an AI Host for Six Months’, *Vice*, <https://www.vice.com/en/article/radio-station-dupes-audience-and-secretly-used-an-ai-host-for-six-months/>

⁵ Coombes, Stephanie (2025) ‘Meet Thy – the radio host I don’t think exists’, *The Carpet*, <https://www.thecarpet.com.au/p/meet-thy-the-radio-host-i-dont-think>

Institute found that “comfort levels” for the use of AI in journalism were “low across the board”, especially “about more consequential topics, such as politics”.⁶ As such, we urge Commercial Radio Australia to adopt strong safeguards around the use of AI in the generation or presentation of news content, including full disclosure, labelling, and meaningful human oversight. However, even with these necessary safeguards, MEAA considers any use of AI to present news a potential threat to the public trust in news media, and as such, generally cautions against its use.

Recommendation 3: that the Commercial Radio Code of Practice adopt strong safeguards around the use of AI in the presentation or generation of news media.

⁶ Arguedas, Amy (2024) ‘Public attitudes towards the use of AI in journalism’, *Reuters Institute*, <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2024/public-attitudes-towards-use-ai-and-journalism>