



Response to Watch This Space Green Paper

August 2026

About TAC

1. TAC (Teledwyr Annibynnol Cymru/Welsh Independent Producers) represents independent TV production in Wales. With a value of £460m, our sector is a substantial component of the creative industries in Wales, and Cardiff alone has the third largest film and TV cluster in the UK.
2. There are around 50 TV production companies in Wales, ranging from single owner businesses to some of the leading players in the UK production industry, all providing economic, social and cultural benefits. They produce content for the BBC, ITV, Channel 4, Channel 5 and Sky as well as other commercial broadcasters and platforms.
3. Our member companies produce almost all the content for Welsh-language broadcaster S4C. TAC and S4C partner to provide a training programme to help develop talent and skills within the industry.

About this response

4. TAC has studied the Government's proposals and our responses focus on the questions where we can best contribute an informed view.

Responses to Consultation questions

Question 1.

The green paper covers topics relating to the future of UK television and media. More specifically, it includes content on:

- the current market and audience context
- prominence of news and of public service media
- future of TV distribution and regulation
- a new system for public service media
- media literacy

What are your overall views on the future of television and media in the UK, related to the topics in this green paper?

5. TAC welcomes this Green Paper, which seeks to tackle some of the key current issues in television and media, as well as seeking to gain views on the longer-term future of PSM (public service media).
6. At the core of TAC's vision is the importance of independent production to the Welsh and UK economy. Since the current regulatory system was put in place in 2003 to protect producer's intellectual property, the sector has become a major creative powerhouse, promoting the UK and its individual nations and regions to the world, as well as creating enormous value to the UK economy. In 2024 sector revenues across the UK totalled £3.66bn, with international revenues totalling £1.35bn¹.
7. In commenting on this paper, we therefore emphasise the need for any regulatory and systemic changes to pay heed to the success story of our sector so far. Any new regulatory or systemic changes must be designed to enhance the sector's ability to contribute to UK culture and the economy in the future, rather than detract from it.
8. The UK PSM (public service media) system has long been the envy of the world, with the BBC a standard bearer for free democracy and a beacon to those living under repressive regimes. And for UK audiences, the amount of creative content, with a distinctive British feel, has been a hallmark of PSM content provision their whole lives. This has grown in Wales, with genres such as drama gaining and increasing audience, both in the Welsh and English language.
9. More widely, TV and video content has of course proliferated to the point where it is having a significant effect on the PSM system and its ability to maintain the level of content provided, given greater creative and commercial competition and the dilution of audiences, especially young audiences, away from linear TV and therefore the traditional emphasis on PSM TV.
10. However high-quality long-form content is still in demand and the streaming services are continuing to invest in this in order to maintain and grow their subscription bases. In doing so they, along with the film studios, are regularly turning to the UK production sector, facilities and talent to make this content. In Wales we have seen this on multiple occasions, for example Netflix's *Sex Education* being filmed in Swansea and Daniel Day Lewis' 2025 film *Anenome* being made at ARIA studios on Anglesey.
11. So while the established PSM institutions are under pressure, any measures to assist them to step into the future with confidence must not come at the expense of the wealth of creative programme makers based around the UK, who supply much of the PSM providers' content help to maintain and grow our creative economy.
12. And the diversity of production must continue – again, while PSM providers may be under pressure this must not lead to a watering down of the very rules and

¹ [UK Television Production Survey: Financial Census 2025. O&O for Pact, July 2025, p3](#)

regulations which ensure a range of diverse programming is commissioned. These rules make PSM providers unique and differentiate them from the commercial competition, in particular the diverse range of stories, ideas, talent and knowledge of locations which independent producers in Wales and around the UK, can provide.

13. A policy agenda which focusses on the preservation of institutions ahead of the companies which supply their content will only lead to an environment where it is increasingly hard to differentiate between the content of commercial providers and our own PSM services. Equally a clearly identifiable PSM structure will continue to provide an easy point of reference for audiences.

Question 2.

Chapter one of the green paper describes a series of challenges impacting the UK's TV production ecosystem, including:

- **the spending power of public service media (PSM) providers is decreasing, which impacts their ability to commission new content**
- **the sector faces rising production costs and inflationary pressure, particularly for high-end content like drama**
- **PSM providers are adopting 'fewer, bigger and better' commissioning strategies, often prioritising digital-first content, which has resulted in fewer commissions for some genres**
- **when global streaming platforms commission directly, they typically retain the IP. This inward investment, while filling production expenditure gaps, risks shifting the residual commercial value offshore, creating a challenge for producers to retain IP and long-term economic value**
- **screen-based businesses report unmet finance demand and feel underfunded, despite a high rate of actively using external finance**

What measures do you feel would be most effective for the government to take to overall address these challenges?

14. In relation to the TV production sector in Wales, there are a number of priorities:

- Preserve and strengthen out-of-London production commissioning requirements, which are intended to grow sustainable businesses and investment in the Nations and Regions
- Continue to ensure a level playing field between independent producers and BBC Studios in terms of competing for BBC commissions
- Keep in place the regulatory system protecting producers' IP, which has led to the UK having one of the leading TV production industries in the world
- Introduce tax relief support for minority UK language productions

We discuss each of these in more detail below:

Preserve and strengthen out-of-London production commissioning requirements

15. As stated in our reply to Question 1, it is imperative that the PSM providers continue to be required to commission a wide range of programming from producers around the UK.
16. TAC does recognise that there have been efforts by the PSM providers to increase their work with production companies around the UK, for example Channel 4's '4 All the UK' initiative and the BBC's 'Across the UK' programme, as well as the BBC recently merging network and nations commissioning teams to create a more joined-up structure.
17. This work is underpinned by the continued existence of regulatory mechanisms on out of London commissioning, including:
 - quotas for commissioning out of London
 - the Ofcom criteria which define what qualifies as an out-of-London production
 - the Ofcom annual register of out-of-London productions

Out-of-London quotas

1. **Whether or not the specific rules around out-of-London quotas are reviewed, what we are certain of is that there remains a need for such measures.** While the quotas do require a certain amount of spend outside London, they are not unrealistic and are within what the broadcasters have achieved to date and, in the case of Channel 4, significantly exceeded, with C4C having its own voluntary target of 50% spend outside London, which it introduced as part of its '4 All the UK' strategy in 2019 and which it met well ahead of its scheduled deadline of 2023.
2. Increased foreign ownership of our PSM providers, as with Channel 5 and now ITV, demonstrates the importance of a firm regulatory regime to avoid inevitable shifting imperatives on the part of these provider's commercial overseas owners.
3. Our sector is very aware of the pressures on commissioning budgets, and we have seen some companies close as a result of there being fewer commissions and constrained spend. However, having to spend a certain amount outside London does not require the commercial licensed PSBs to commission a certain number of programmes, or to commission in a certain genre. As DCMS is aware, the Media Act did in fact relax specific PSB genre requirements to give the PSBs more flexibility. And with the exception of Channel 4's nations obligations, the commercial licensed PSM providers are not required spend a particular amount in any specific part of the UK nations and regions.
4. The out-of-London quotas have helped to grow the range of ideas, talent, stories and perspectives originating around the UK, thus ensuring audiences see greater cross-UK representation. Quotas for BBC, ITV, Channel 4 and Channel 5 all vary

according to their commissioning power and level of general PSB obligations, ensuring proportionality in terms of what they are required to commit. Any relaxation of out of London quotas would risk the PSBs reducing such investment in the companies providing this content, thereby leading to decline – this would not serve audiences or the creative sector.

5. It is important to ensure that broadcasters meet their nations and regions commissioning strategies, quotas and targets. Ofcom's letter to Channel 4 on 7 July this year stated that:

...continued investment, focus and engagement with the production sector will be important ... our engagement with independent producers continues to highlight the wider pressures across the creative economy, emphasising the importance of clear, timely and consistent communication with the sector. Looking ahead, greater clarity on how commissioning and skills activity will support the long-term sustainability of the production sector, alongside further evaluation of the impact of 4Skills initiatives, will be valuable.²

Elsewhere the BBC has its 'All Around the UK' strategy in place and we would expect its strategies and quotas on Out of London to continue into the next Charter. With the cuts taking place at the BBC, the amount available to spend on content commissioning may decrease, but we hope this will be addressed in the new funding arrangements to be put in place at the same time that the new Charter begins. We welcome the Memorandum of Understanding between the BBC and Creative Wales which lists among its objectives: *produces content which helps grow the creative ambition and economic scale of the Welsh television sector³*

Review Ofcom OoL criteria

6. As DCMS will be aware, TAC has raised concerns in the past concerning whether the Ofcom's Made-Out-of-London guidance is sufficiently robust to ensure that the spirit, as well as the letter, of legislation on out-of-London commissioning is followed. This includes in correspondence with ministers; responses to consultations; and in front of Parliamentary select committees, for example the Welsh Affairs Committee, whose 2023 report on Broadcasting in Wales acknowledged the issue of 'brass-plating' (where a company from outside establishes a minimal presence in Wales or another UK nation in order to secure a commission):

Brass-plating allows broadcasters to meet their regional production criteria while using production companies that may not be based in Wales. Ofcom acknowledges that relying on the "substantive base" criterion alone provides an opportunity for the system to be manipulated. We recommend that Ofcom

² [Channel Four Television Corporation's Statement of Media Content Policy 2025. Letter from Ofcom to Channel 4, 7 Jul 2026](#)

³ [Memorandum of Understanding between the BBC and Creative Wales. Jan 2026, p2s.](#)

*examine whether this criterion alone should be sufficient to qualify a production as being based in Wales. We call on the Government to amend the Draft Media Bill to address this problem.*⁴

7. While the Government itself did not act on this recommendation, TAC and other organisations worked with Parliamentarians to strengthen the 2024 Media Bill in this respect when it passed through Parliament, both in terms of the level of quotas and the criteria for meeting them. However, this work was not concluded due to the Bill being put through at pace, due to the proximity of Parliament being dissolved ahead of the July 2024 General Election. This new exercise, set in motion by the Watch This Space Green Paper and which could result in additional media legislation, is the ideal opportunity for Government to revisit this issue.
8. Currently a production must meet two out of three criteria⁵ to qualify as made out of London:
 - The production company must have a substantive business and production base in the UK outside the M25
 - At least 70% of the production budget (excluding some specific costs) must be spent in the UK outside the M25
 - At least 50% of the production talent by cost must have their usual place of employment in the UK outside the M25
9. There is no weighting towards any one criterion over another. However if the 'substantive base' criterion is met then it effectively means that the production company is not founded and / or headquartered in Wales. Therefore, over and above the short-term spend on the production, there is none of the longer-term benefits which would be provided by a Wales-based company in terms of added GVA through exploitation of IP and investment in training, skills and the workforce.
10. We do not oppose inward investment and welcome companies coming to make shows in Wales, using local crews and facilities such as ARIA Studios in North Wales. However, in the case of the PSM providers specifically, there are many a case of senior production staff being brought in from outside the nation to make a programme. Wales has senior production talent (executive producers and so on) who work on shows for UK network, as well as for S4C and also in some cases the commercial platforms. Given this, our members are concerned that some of these production appointments come down to the individuals concerned being familiar to the commissioner, rather than whether they are the best person for the job. Welsh production talent is therefore underused, leading to a vicious circle where a lack of

⁴ [Broadcasting in Wales: Fifth Report of Session 2022-23. House of Commons Welsh Affairs Committee. HC620, 27 Oct 2023, p29, para 142](#)

⁵ As set out in the current Ofcom guidance which has applied from 1 January 2021 (see page 3-5): <https://www.ofcom.org.uk/siteassets/resources/documents/tv-radio-and-on-demand/broadcast-guidance/programme-guidance/broadcast-code-guidance/regional-production-and-regional-programme-guidance-from-2021.pdf?v=323999>

suitable production credits means they are not always being considered for working on shows which they are in fact more than capable of making to a high standard.

11. We note that the BBC stated last year that it intended to go beyond the Ofcom guidelines and perhaps this is something which DCMS could incorporate with the new BBC Charter and Agreement, as well as requiring Ofcom, within any new media legislation, to require it of other PSM providers. For example, while ITV Wales has a presence in the nation it is largely news, current affairs and documentary content. This includes very little national portrayal of Wales.
12. **The Media Act should therefore be amended to require that Ofcom reviews the out of London criteria and guidelines no less frequently than every five years.**

Out-of-London Reporting requirements

13. Adequate reporting on out-of-London commissioning is also essential to ensuring that there is transparency in term of how the requirements are met. In our opinion the current Out-of-London programme registers published by Ofcom fall short, in terms of the extent to which they are timely and contain detailed information.
14. We are often asked for evidence of where a programme may not have met the criteria, however this can be difficult to obtain. Evidence around this matter is to some extent anecdotal, given that the out-of-London register is published well after programmes are broadcast, rather than once programmes are commissioned. This means there can be a two-year lead-in time before a programme has been broadcast and so the circumstances around a company's base and operations will have changed in that time.
15. We acknowledge that Ofcom is a post-broadcast regulator, however publishing a report once a year feels to our members like a very 'analogue' solution in a digital era, where surely there could be a more up-to-date interactive online register, either operating in real-time or on, for example, a three-monthly basis. This would not just be of benefit to interested third parties but to Ofcom itself, as it would allow it to keep a much closer eye on the state of out-of-London commissioning and thus make regulation more effective.
16. Over the last few years we have been discussing with some of the PSM providers how information they publish on new commissions could better demonstrate how the programmes and companies concerned meet the MoL criteria. We have previously met with the BBC, Channel 4 and ITV and corresponded with Channel 5, and will continue to discuss this with them.
17. However, for as long as any such situation is voluntary, it will be hard to have a consistent and reliable picture of out of London commissioning, **Therefore we would recommend to DCMS, in any new legislation, to require such reporting and for Ofcom to be required to specify what kind of information it would find useful to publish at the time of commissioning as to whether a particular show qualifies**

as an out-of-London programme, giving information on how the company and programme fits at least two out of the three criteria.

Maintaining a level playing field in commissioning

18. We were concerned at the suggestion in the BBC Charter Review Green Paper that there may be a streamlining of the regulations concerning the relationship between BBC Studios and the BBC's public service operation. Whatever the level of funding in place, commissioning must be on a level playing field between the independent sector and BBC studios. It is crucial for audiences that there is fair creative competition between BBC Studios and the independent production sector to make BBC content.
19. In Wales, while Cardiff's place as the third largest production centre in the UK is to be celebrated, the PSM system needs to be ensuring that companies all around Wales have a fairer opportunity to pitch ideas for new shows. Fair commissioning across the whole of Wales is crucial if the best level of portrayal is to be achieved, and to meet the needs of audiences around that nation and beyond.
- 20. Therefore all current regulatory separations must be kept in place to continue to ensure a level playing field between independent production companies and BBC Studios when competing for BBC commissions.**

Maintaining the current provisions for regulated Terms of Trade

21. The 2003 Communications Act completely revolutionised the UK TV production industry. Previously independent producers had been engaged by the PSBs on a 'cost-plus' model which meant being paid programme costs plus fee, with all IP rights being taken in perpetuity by the broadcaster. This led to broadcasters 'warehousing' rights, not exploiting them fully and acted as a huge brake on the development of the sector, because production companies were not seen as a viable investment opportunity given they could not monetise their IP.
22. The 2003 Communications Act introduced the regulation of the Terms of Trade between independent producers and PSBs, with the broadcasters required to produce Codes of Practice, to be approved by Ofcom. Protections within the codes included independent production companies retaining all of their IP rights and licensing the programme to the PSBs to use in a specified way, in terms of number of transmissions and length of use.
23. Rights to secondary and international sales were to be separate from primary rights and not to be negotiated at the same time, thus giving the freedom for an independent producer to agree a deal with a PSB to show the programme in the UK, but also go to a third-party distributor to sell internationally.

24. With producers in charge of their own IP, the industry was able to monetise its own content much more effectively. It also meant indies had much more potential value to investors, leading to an influx of finance to grow and develop the sector.
25. The Terms of Trade provisions therefore led directly to a multi-billion-pound TV production industry we have in the UK today. Any reversion back to the previous regime would reduce investment in the sector and profits flowing back into the UK from international sales. It would lead to company closures and a further loss of skills in the industry.
26. There is already flexibility within the deals that PSM providers and producers make and increasingly this involves producers having to bring in additional finance to get the production made. If production companies are no longer seen as valuable players within the system their ability to secure finance will be significantly impaired, affecting the ability of PSM providers to maintain the pipeline of high-quality content, thus depriving UK audiences and reducing the sales made of PSM shows abroad, thus shrinking the contribution to the overall UK economy.
- 27. While we understand the PSM providers are under pressure, any attempt to roll back the Terms of Trade provisions is not the solution and will only make matters far worse for UK TV production and therefore UK PSM provision. It is therefore crucial that these protections for producers' IP are maintained.**

Adjusting the High-End TV tax relief threshold to encourage more UK minority language productions

28. Competing for viewers is challenging in the era of ever-greater choice, and for minority language PSBs to compete they need to be able to access the same type of tax relief support which is available to the other UK PSBs via the AVEC high-end TV credit. S4C and others have grown the sector to provide content of the highest standard, but the tax relief system is prohibitive for minority UK indigenous language production.
29. The threshold for a high-end TV production to qualify for the Audiovisual Expenditure Credit (AVEC) is £1m per hour but, taking S4C as an example, given that average high-end S4C production tariffs are £250k-£300k per hour, HETV expenditure credit is not accessible for almost all of its productions.
30. £1m+ per-hour budgets for high-end English language television, in particular drama, is usually financed not just from broadcasters but from a number of different sources including distribution advances and presales. While there have been one or two examples, in general it is not viable to be able to finance minority indigenous language productions at or near the level of £1m an hour.
31. We believe this would be an effective measure, as it would be relatively straightforward to implement and would incur relatively little cost. We are not

suggesting a new expenditure credit for a new activity, rather we are proposing an extension to an established model which according to data provided by the BFI6 has already produced huge value in terms of inward investment.

32. Given that the aim of this proposal is to increase the spend on minority UK language production, we believe this would result in additional revenues for the Treasury, in terms of spend directly on the production concerned but also in terms of the wider benefits to the economy in the nation.
33. The UK's creative industries are world-leading with, as DCMS is aware, an economic contribution worth around £126bn. There is still room to encourage further growth in this area and to more fully promote the UK's unique aspects from all of its nations. Therefore a tax relief which encouraged more Welsh language production, and which further promoted that nation, would benefit not just the creative industries but also tourism and potentially non-TV related exports.
34. We do not believe there would be negative impacts from this proposal, in terms of commissions moving away from other parts of the UK production sector. There are of course independent production companies around the UK nations and regions, however what makes minority UK language services a different case is that they are serviced by localised sectors and the productions emerging from the proposed tax relief would reinforce and grow the sectors in that area without taking away any revenue from other sub-sectors.
35. The Government is rightly keen to ensure that economic growth is spread all around the UK nations and regions and this proposal would further boost the creative industries in the devolved nations, providing a fairer level playing field as well as strengthening UK minority indigenous languages, which have deep cultural associations. There is good evidence that TV and film encourage tourism, as demonstrated by the UK Global Screen Fund research quoted above. This is already being taken advantage of and for example Wales is seeing an upsurge of interest from visitors as people want to visit the sets of TV shows⁷.
36. We are proposing a relatively small addition to the current regime, which could fit within the current BFI system with a minimum of difficulty. It would therefore not impose a significant additional administrative burden. Given the High-End TV tax relief already resides within the Audio-Visual Expenditure Credit, we believe that any legislative requirements for this proposal would be relatively minimal.
- 37. We therefore wish to propose that UK Government introduces a new significantly lower tax relief threshold for minority UK language productions, in order to allow UK minority language broadcasters' higher-end content to qualify. This would not only enhance the production of high-quality programming in languages such as**

⁶ For figures on the success of the audiovisual tax reliefs which preceded the current Audiovisual Expenditure Credit, see <https://www.bfi.org.uk/news/screen-business-report>

⁷ [Set-jetting: the latest trend showcasing Wales to the world. Welsh Government, Jan 2025](#)

Welsh, but also further the aims of levelling up the economy for the benefit of the whole of the UK, as it would help the sustainable growth of production companies and broadcasters.

Question 3. How often do you encounter news you feel is untrustworthy when online (for example, something you consider to be misinformation)?

38. This question is aimed at individuals and we have therefore not submitted views.

Question 4. Do you believe 'trustworthy' news content should be more visible on social media? Options:

- Yes
- No
- Not sure

39. Yes

Question 4a. How would you like this to look in practice, so that audiences can access trustworthy news more easily on social media?

40. This could be achieved through a combination of labelling of PSM-provided content and also requiring social media providers in the UK to aggregate search results in a way that puts PSM content at the top of any list of search results.

Question 5. If the government gives prominence to trustworthy providers of news (meaning by making them more visible online), should this prominence be ongoing, and 'always on,' or only active during periods of crisis?

Options:

- Ongoing and 'always on'
- Only during periods of heightened vulnerability
- Not sure

41. We would recommend that it is ongoing and 'always on', to build up understanding among young audiences as to who the trusted providers are and continue to make that publicly-supported content consistently visible and easily available.

Question 6. Do you feel individual users should be given an option in whether prominence measures for trustworthy news content are switched on or off for them?

Options:

- Yes - users should be given an option in whether prominence measures are switched on or off for them
- No - users should not be given an option in whether prominence measures are switched on or off for them
- Not sure

42. No - users should not be given an option in whether prominence measures are switched on or off for them. People could be encouraged to do so by commercial operators, bad actors or others to deprioritise content which is useful to them and connects them with wider society.

Question 7. How concerned, if at all, are you about the impact of misleading or unreliable information on society?

43. Very concerned.

Question 8. How concerned, if at all, are you about the impact of misleading or unreliable information on democracy?

44. Very concerned.

Question 9. Public service media refers to organisations such as the BBC, ITV, Channel 4 and S4C.

Which of the following statements most closely reflects your view on the role of public service media in helping people critically engage with news and other information they encounter online or offline? (select only one)

Options:

- Public service media has a role in supporting critical engagement, and is currently doing enough
- Public service media has a role in supporting critical engagement, and should do more
- Public service media does not have a role in supporting critical engagement
- Public service media is currently doing too much to support critical engagement, and should do less
- Not sure

45. Public service media has a role in supporting critical engagement, and should do more.

Question 10. How important, if at all, do you think it is for people to be able to judge the accuracy and reliability of information they encounter, for example online or in the news?

46. Very important. Helping the public to do so is an important function of PSM provision.

Question 11. How valuable, if at all, do you believe collaboration between public service media, civil society organisations (for example charities and education groups), and the media sector could be in supporting people to critically assess information?

Options:

- Very valuable
- Somewhat valuable
- Not very valuable

- Not at all valuable
- Not sure

47. Very valuable.

Question 12. Which of the following models, if any, do you consider most effective for further media sector collaboration in this area?

12a. Please provide any supporting evidence as to why you think the model(s) you selected are effective for collaboration between public service media and the media sector.

48. We have no views on this area.

Question 13. Chapter 3.1 of the green paper outlines the government's preference for an IPTV transition from either 2034 or 2044. The following questions seek views and evidence relating to this proposal.

To what extent do you agree or disagree with the government's assessment of the case for change relating to the future of digital terrestrial television?

- Strongly agree - audiences should definitely adopt Internet Protocol Television (IPTV) and similar technologies
- Agree - audiences should adopt IPTV and similar technologies
- Neither agree nor disagree - no strong opinion either way
- Disagree - audiences should not adopt IPTV and similar technologies
- Strongly disagree - audiences should definitely not adopt IPTV and similar technologies
- Not sure

Agree that a DTT switch-off could bring benefits as long as certain conditions are met.

49. We recognise the concern of the broadcasters that the cost of maintaining DTT distribution is becoming an increasingly significant burden, in the light of the other financial pressures they face.

50. We also note that a DTT switch-off would free up financial resource which we would expect to see reallocated to commissioning budgets. In terms of delivering to all audiences, it is important to ensure that rural areas and older generations, both of which are prevalent in Wales, are not left behind and that their PSM providers - S4C, BBC Wales and others – are not losing audiences.

Question 14. The green paper outlines two timing options for digital terrestrial television (DTT) switch-off. These are 31 December 2034 (option 1 at Annex A) and 31 December 2044 (option 2 at Annex A).

Which option do you prefer as timing for DTT switch-off?

Options:

- Strongly prefer 2034

- Somewhat prefer 2034
- No strong opinion either way
- Somewhat prefer 2044
- Strongly prefer 2044
- Neither 2034 or 2044
- Not sure

51. Somewhat prefer 2034. We would generally accept the transition in 2034, provided all the concerns over the various challenges DTT switch-off presents were satisfactorily addressed, by means of a mixed package incorporating the various measures outlined in Question 18.

Question 15. Do you have evidence that another timeframe is preferable to the ones specified in this consultation? If so, please provide further details.

52. No.

Question 15a. For industry/organisations only:

To deliver an IPTV transition would require collaborative working with audience groups, industry and across government. Please outline your organisation's commitment to supporting this work, including relevant experience, resources, and innovative solutions as to how you would deliver this transition.

53. Not applicable to TAC.

Question 16. To what extent do you agree or disagree that the challenges identified in the green paper (delivering for all audiences; maintaining a reliable television service; promoting competition and innovation in the television industry and supporting a sustainable future for PSM providers) capture all of the considerations when making a decision on whether, and how best, to support audiences to adopt IPTV and other similar technologies?

- Strongly agree - the challenges comprehensively capture all of the considerations when making a decision on whether, and how best, to support audiences to adopt IPTV and other similar technologies
- Agree - the challenges capture all of the considerations
- Neither agree nor disagree - no strong opinion either way
- Disagree - the challenges do not capture all of the considerations
- Strongly disagree - the challenges definitely do not capture all of the considerations
- Not sure

54. We agree - the challenges capture all the considerations.

Question 17. In your opinion, which, if any, of the challenges are most important to you? Please rank in order of importance, where 1 is the most important to you.

55. We consider all of these options to be of equal merit, all are highly important.

Question 18. In the event of an IPTV transition, which of the following, if any, do you think are the most important to ensure everyone can still access television from their own home? Please rank in order of importance, where 1 is the most important to you.

Options:

- **Affordable broadband for all, suitable for television viewing**
- **Low-cost or subsidised broadband for people receiving benefits or on low incomes**
- **Low-cost or discounted internet capable television sets for people on low incomes**
- **Simple devices that connect older television sets to the internet with no ongoing fees**
- **Services and systems that feel the same as digital terrestrial television so they are easy to use for people with limited digital skills**
- **Built-in, easy to use accessibility features for disabled users, for example subtitles and audio description**
- **Digital skills required to navigate or set up IPTV**

56. We believe that all of these options must be part of the approach to providing support during any switch-off, given that there will be some among the UK population to whom each of these options is the critical aspect to allow them to switch over, thereby ensuring there is a universally accessible PSM content provision.

57. Continued universality of PSM content is key to the successful delivery of this policy. All of these options are of equal merit and are highly important as options for ensuring that IPTV is universally available at an acceptable rate. Different households are in different circumstances and therefore it will be impossible to adopt a 'one size / few sizes fit all' strategy. Each circumstance must be allowed for and a suitable solution provided.

Question 19. What are the likely environmental impacts associated with both a 2034 transition and 2044 DTT switch-off (transition to IPTV)?

In your response, please provide evidence where possible on:

- **The comparative energy use and carbon emissions of different distribution technologies.**
- **The environmental implications of changes in viewing behaviour (for example, increased streaming or on-demand consumption)**
- **The lifecycle environmental impacts of relevant infrastructure and consumer equipment (such as transmitters, network infrastructure, set-top boxes, and connected televisions)**
- **Opportunities to improve the environmental sustainability of television distribution, including through technological innovation, infrastructure efficiency, or consumer behaviour**
- **Any risks that policy decisions on the future of TV distribution could unintentionally increase environmental impacts**

- **Please include any available data, modelling, or research that could inform the government's assessment of environmental impacts.**

58. TAC supports environmentally-friendly practices and provides training and information to our members. We work with the BAFTA albert scheme to promote its certification process. While we are not in a position to identify accurately any environmental impacts, we would stress that doing so, and seeking to mitigate any impacts as far as is possible, should be central to any DTT switch-off plans.

Question 20. Is there anything else you would like to add regarding the future of TV distribution that has not already been captured?

59. No.

Question 21 Chapter 3.2 of the green paper sets out some of the challenges regarding the future of TV regulation, such as which TV-like services should be regulated going forward, and to what standard. Is there any information or comment you would like to provide in relation to the future of TV regulation?

60. When reviewing regulations, it is important not to weaken key areas which lie at the heart of PSB, as detailed in our response to Question 1 and including:

- Commissioning a range of UK-originated programming, including that which provides a stepping stone for production talent
- Ensuring there are continued robust commitments to commissioning content from all around the UK
- Protecting terms of trade for independent producers
- Preserving regulation around BBC and commissioning regarding a level playing field for both independent production companies and BBC Studios when competing for BBC public service commissions

Question 22 How easy or difficult is it for you to find culturally relevant content on video platforms, including video sharing platforms like YouTube and TikTok and streaming platforms like Netflix and Amazon Prime Video?

Examples of culturally relevant content could include stories set in Britain, with British presenters, representing British values or referencing British events or customs.

Options:

- **Very easy – I have no issues in finding culturally relevant content on these platforms**
- **Somewhat easy – I have very few issues in finding culturally relevant content on these platforms**
- **Neither easy nor difficult – no opinion either way**
- **Somewhat difficult – I have some issues in finding culturally relevant content on these platforms**
- **Very difficult – I have a lot of issues in finding culturally relevant content on these platforms**
- **Not sure**

61. This question is aimed at individuals and we have therefore not offered any views.

Question 23 Prominence can be defined as giving certain content a privileged position, for example, ensuring a specific channel appears at the top of search results or features on a recommendation feed, within a user interface so it is particularly easy for audiences to find and watch.

To what extent do you agree or disagree that content from public service media providers (like the BBC and Channel 4) should be easier to find on video platforms?

Options:

- • Strongly agree – it should definitely be easier to find public service media content on these platforms
- • Agree – it should probably be easier to find public service media content on these platforms
- • Neither agree nor disagree – no opinion either way
- • Disagree – it should probably not be easier to find public service media content on these platforms
- • Strongly disagree – it should definitely not be easier to find public service media content on these platforms
- Not sure

62. We strongly agree that it should definitely be easier to find public service media content on these platforms.

63. PSM content is supported by the public both financially and in other ways, for example via the TV Licence Fee and therefore it is extremely important for the public to have as good a return on that investment as possible, in terms of the content being prominent.

64. In addition, due to the high standards with which PSM providers must be compliant, this content can be considered trusted and therefore it is right to give it higher prominence.

65. Also, for a minority language provider like S4C, it is crucial that its content has prominence and online algorithms, and it may be distorted by viewing habits in mixed language households. This was a concern pointed out by S4C in its response to Ofcom's draft code of practice and draft guidance on the agreement objectives for prominence and accessibility on connected TV platforms, in which it welcomed Ofcom's proposal that at least 50% of disaggregated content areas within primary content areas should be reserved for PSM content, but stated that each designated internet provider service should be guaranteed a minimum share, stating that:

this is particularly relevant in ... dual-language households, where Welsh speakers may represent a minority of overall viewing, their relative consumption

*can be diluted within total household activity, with the result that Welsh-language content is less likely to be surfaced or recommended.*⁸

Concerns over Ofcom's draft prominence Code

66. It should be noted that the point above was one of a number of concerns raised by a number of stakeholders in response to Ofcom's draft Code for prominence and accessibility on connected TV Platforms (published in January this year). Overall it was felt that Ofcom's Code fell far short of carrying out the intention of the Media Act's provisions for greater prominence of PSM content on connected TV platforms. Additional concerns raised by TAC⁹ in our response included:

- The non-binding nature of the code renders it prone to inconsistent adherence and presents a barrier to getting platform operators to act on it unless it is mandatorily applied across their competitors.
- While the draft Code requires PSM provider apps to be prominent at the point of delivery to the consumer, there was no requirement for them to be anchored in place. The ability for prominence of PSM provider apps to be subsequently altered by the user causes concerns regarding the extent to which users might be encouraged to deprioritise PSM provider Apps.
- The absence of a requirement to support Welsh-language text and voice search, which is increasingly central to discovering relevant content.
- 15% of S4C's BARB measured TV viewing hours were from outside of Wales and this rose to 30% for S4C Clic viewing hours¹⁰. Despite this the Code only provides that, where platforms differentiate viewing by location, S4C is only required under the Code to be 'easily discoverable' outside Wales, rather than duly prominent.
- Ofcom's Code stipulates that in terms of search results, both PSB and non-PSB content should be given equal prominence. However this does not sufficiently support PSB content as intended by the prominence legislation and therefore we argued that PSB content should be prioritised.

67. We are hoping these considerations will be taken into account by Ofcom and significant alterations to its draft Code made before it is finalised. Failing this, we would expect DCMS to call in the Code for review in terms of whether it fundamentally meets with the stated intentions of the legislation and therefore fit for purpose.

⁸ [Prominence and Accessibility on Connected TV Platforms: Ofcom Consultation on draft Code of Practice and draft Guidance on the Agreement Objectives. SC Response 24 Mar 2026, p4](#)

⁹ TAC response available here: <https://tac.cymru/wp-content/uploads/2026/04/Ofcom-draft-Prominence-guidance-and-Code-TAC-response-March-2026.pdf>

¹⁰ Figures provided to TAC by S4C, March 2026

Question 23a What do you see as the benefits of content from public service media providers (like the BBC and Channel 4) being easier to find on video platforms?

68. Making PSM providers easier to find on video platform will deliver a number of benefits:

- A better return on public investment in PSM providers and content. At a time when the future funding of the BBC (and by association S4C) is being discussed, it is important to ensure that however the funding is gathered in the future, the spend creates as much benefit as possible, by people being able to find it easily and reliably.
- It brings UK content and culture to the fore for UK audiences.
- Being easier to find helps to promote PSM content to a wider audience both within and beyond the UK, leading to more viewing and greater profile for UK content and programme-making talent.
- Greater prominence for S4C content will help to promote further Welsh language and culture. The S4C series *Dal Y Mellt* was acquired by Netflix and more recently the Welsh language film *Effie o Blaenau* (produced by TAC member Tarian) has just broken records for the biggest opening in a UK box office for a Welsh language film. The discoverability of such content is highly important for maintaining and growing portrayal and authentic story telling across all of the UK nations.

Question 23b What types of content from public service media providers do you think should be easier to find on video platforms? (select all that apply)

Options:

- Arts and classical music
- Children's
- Comedy
- Drama
- Education
- Entertainment
- Factual entertainment
- Feature films
- General factual
- News and current affairs
- Religion and ethics
- Soaps
- Specialist factual
- Sports
- None of the above
- Other [please specify]

69. All of these options are highly important. Together they are crucial to the reason for having a PSM system in the UK – to provide wide range of content across all genres, thereby introducing and attracting wider audiences to different types of programmes and experiences.

Question 23c On which video platforms do you think content from public service media providers should be easier to find?

70. PSM content should be easier to find on as many platforms as possible and to align with their digital strategies, but should clearly include all those with the largest number of viewers/subscribers, examples being YouTube and TikTok, Instagram and Face Book.

Question 24 Do you regularly create video content and upload it to video sharing platforms, such as YouTube and TikTok?

Options:

- Yes, primarily for fun or as a hobby
- Yes, primarily for professional purposes or to generate income
- No
- Prefer not to say

Question 24a As a content creator or someone who uploads content to video sharing platforms, are there additional changes or features that you would want video sharing platforms to offer? For example to increase the visibility of your content, transparency of systems or to make content more discoverable.

Question 24b Thinking about the video sharing platforms you upload and share content on, do you have sufficient awareness of how content is shown to viewers through the algorithms?

Options:

- I have sufficient awareness of how the algorithm works
- I do not have sufficient awareness of how the algorithm works
- Not sure

71. TAC members are increasingly required to create social media video content around programmes to promote content / attract audiences, in addition to commissions to produce digital first content for YouTube, and other social media platforms. While such content is normally uploaded by the broadcaster, some production companies post additional content as part of their own social media activity to further promote the programme. This is important to maintain a regular feed to maintain a current active presence on these platforms.
72. Production companies are also increasingly producing their own non-commissioned content to put on the digital and social media platforms.
73. Data on algorithms is fast paced and regularly shifts and producers need to be able to access data to understand and improve the performance of its content and learn from audience behaviour. If the content is commissioned and being uploaded by the PSM provider, then producers cannot see this data unless they are given access by the commissioning PSM provider.

74. In terms of algorithms, Welsh language audiences are often too small for them to influence algorithms and therefore a service like S4C is at a disadvantage as noted in terms of prominence as per our response to Question 23 above.

Question 25 Which of the following, if any, attributes of public service media content do you value the most? Please select (up to) your top three.

Options:

- **Diverse programming – content that features people like me, and people from different backgrounds**
 - **Quality news – news content that is accurate, and helps me better understand what is going on in the world today**
 - **Regional coverage – programming or content that keeps me informed about my area**
 - **Quality content (non-news) – programmes or content that you see as high-quality and or different in their approach to what is offered by other providers**
 - **Range – the availability of a range of different types of programmes (for example drama, comedy, entertainment, sport)**
 - **Tailored to UK audiences – programmes that are specifically made for UK audiences, and are relevant to me**
 - **Shared viewing opportunities – programmes and broadcast events that I can watch and talk about with others, for example family or my peers**
 - **National cohesion – the broadcasting of events that bring the nation together for a shared viewing experience**
 - **None of the above**
- Not sure**

75. All of these options are equally of high importance as they are all essential aspects for PSM providers.

Question 26 Chapter 4.2 of the green paper outlines the challenges public service media faces and how the system tied to broadcast licences is relatively inflexible. The chapter suggests this limits the options for benefits and obligations Ofcom can place on public service media providers, and makes it harder to open up the system to new providers. It is argued this risks the sustainability of the system as audiences move away from live broadcast TV to switch between linear, on-demand, and user-generated content on multiple devices.

To what extent do you agree or disagree with the suggestion that the public service media system needs to be reformed away from the current model that uses broadcast licences?

Options:

- **Strongly agree – the system definitely needs to be reformed away from using broadcast licences**
- **Agree – I agree that the system may need to be reformed away from using broadcast licences**
- **Neither agree nor disagree – No opinion either way**

- **Disagree – I do not agree that the system necessarily needs to be reformed away from using broadcast licences**
- **Strongly disagree – I feel strongly that the system should continue to use broadcast licences**
- **Not sure**

Question 26a Please provide a reason and any supporting evidence for your view.

76. The current broadcast licences allow for regular debate and scrutiny of PSM providers' responsibilities, and accountability to ensure they meet the requirements.
77. UK Government is right that a shift to different types of viewing may necessitate review but there still needs to be a similar system of a permission to operate over a set number of years, which is tied to set of obligations. Stakeholder input must be part of any renewal process, as it is now.
78. These obligations must include core purposes of PSM provision, including a range of UK original programming and commissioning from all around the UK.
79. In considering any regulatory changes to how PSMs operate, the Government could explore areas where it can enable a more level playing field to be established between the PSM providers and the purely commercial content providers/streamers.
80. For example, regarding product placement and sponsorship, the Government could allow more freedom for commercially-funded PSM providers to enable commercial investment in programming, by relaxing the rules on product placement, undue prominence and sponsored content. There is of course the need to be transparent with audiences, however in the production of factual / factual entertainment / entertainment there would be significant opportunities to bring sponsorship and product placement to bolster production budgets. Younger audiences have grown up with content on non-tv platforms which have been partially funded by commercial entities and would expect future content to be of a similar nature. Some of our members have noted that it can at times be frustrating having to work within current rules and for example, blurring the hint of commercial references in a cookery programme.

Question 27 The green paper outlines four potential principles of the public service media system.

In brief, these are:

- **Universality: to ensure that public service content remains universally available, free of charge, reflecting audience behaviours and media consumption habits.**
- **Public service content: to ensure provision of a wide range of high-quality, distinctive public service content.**
- **Systemic sustainability: to ensure the system of public service media has a mix of providers to increase its resilience to deliver public service media objectives in the**

long-term. It should also be sufficiently flexible to the potential shifts of the current collection of PSM providers and be open to opportunities of mergers, partnerships, and definitions of public service content.

- A sustainable PSM compact: to ensure the benefits PSM providers receive are proportionate to the obligations they must deliver for PSM status so as to be attractive and commercially sustainable.

To what extent do you agree or disagree that each of the following should be considered by government as principles of the public service media system?

Answers:

- Universality

Options: Strongly Agree, Agree, Neither agree nor disagree, Disagree, Strongly Disagree, Not sure

- Public service media content

Options: Strongly Agree, Agree, Neither agree nor disagree, Disagree, Strongly Disagree, Not sure

- Systemic sustainability

Options: Strongly Agree, Agree, Neither agree nor disagree, Disagree, Strongly Disagree, Not sure

- A sustainable public service media compact

Options: Strongly Agree, Agree, Neither agree nor disagree, Disagree, Strongly Disagree, Not sure

81. TAC Strongly agrees with all four of these principles, all of which are essential components for a healthy PSM system.

Question 28 The green paper outlines three illustrative models for our public service media system to align with our proposed principles. These models are outlined below, and a more detailed description on each is presented in chapter 4 of the green paper.

- A model focused on PSM institutions would see institutions, such as broadcasters or streamers, designated as PSM institutions.
- A model focused on PSM services would allow specific 'services' to receive PSM designation if they were to meet agreed requirements. In this context, 'services' could range from linear provision, such as an arts-focused TV channel, a high-quality VoD service, or channels on video sharing platforms, such as a history or documentary channel on YouTube.
- A content-centric approach would determine whether something is public service content subject to an agreed definition (which could evolve in line with cultural/societal needs) rather than a particular provider (institution or service).

Please rank, in order, your preferred model of the public service media system, where 1 is your most preferred model:

Options:

- A model focused on PSM institutions
- A model focused on PSM services
- A content centric approach
- A combination of the models

82. We have set out below some concise observations on the different models set out in the Green Paper. The current system would provide a good degree of certainty around ensuring the maintenance of a sound regulatory regime for aspects such as Terms of Trade and out—of-London requirements, as well as providing a degree of certainty for independent producers wanting to produce PSM content. However, we can see that the other models could also provide benefits.
83. As an overall point, while the current PSM model is certainly challenged it is still successful and it accounts for the large majority of original commissioning in the UK, as evidenced by recent data from Broadcast Intelligence, which showed that the UK-wide PSM providers are responsible for 74% of announced programming in the first half of 2026¹¹. These figures also do not account for minority language PSM providers such as S4C and BBC Alba and therefore the percentage will in reality be significantly higher.
84. We would also like to state that, regarding the future of PSM provision, these are fundamental and far-reaching questions. Given this, while we have offered initial views, we believe that prior to taking any fundamental further steps to pursue any of the proposal models, the Government should carry out further consultation, to look further into the detail of the matters being discussed. Any changes to the PSM system should be with a focus on maintain and growing what has been built over many decades, rather than undermining it.

Comments on the Government's proposed models

- **A model focused on PSM institutions**

- This model most clearly preserves the current PSB ethos contained within institutions such as ITV/BBC/C4/C5/S4C/BBC Alba. This ethos is a clear way of ensuring an organisation is geared fully to making PSM content and the regulatory system can be applied.
- It also allows consistency and certainty of approach to providing PSM in the UK, with clearly-tasked organisations responsible for providing the content for audiences.
- Current PSM organisations provide an easily identified home for creative PSM ideas and provide a certainty in terms of general levels of commissioning for producers wishing to set up and maintain creative businesses to provide PSM content.
- It also allows clear goals to be set for clearly-identifiable PSM institutions, such as out-of-London requirements and so on.
- The suggested introduction of a two-tier system is of potential interest and it could potentially give producers a wider range of commissioners to who to pitch PSM content. However, the addition of 'smaller providers' would need

¹¹ [Redman, A. PSBs account for three-quarters of UK commissioning. Broadcast, 30 July 2026](#)

strong and clear regulation which is on the same level as the current PSM providers. For example, news services which do not meet the highest standards of impartiality, on a level with the BBC and ITN and regardless of the size of the audience, should not be included.

- **A model focused on PSM services**

- We can see that this would have the advantage of allowing a service such as Sky Arts to perhaps be officially recognised in PSM provision.
- This may lead to a wider range of audience for PSM content in terms of attracting those who do not currently engage with the established PSM providers.
- This could potentially bring benefits to the overall picture of PSM content although given the relaxation on PSM genres in the Media Act 2024, there is a concern that this could, to continue with the Sky Arts example, cause even further loss of arts-related programming on the current PSM services, therefore resulting in no net gain for the provision of such content.
- Any services included would need to be subject to the same terms of trade and out-of-London commissioning requirements as the fully PSM institutions.
- There may be an issue with accountability if there is a single PSM service within a larger purely commercial company.
- In addition, and as the Green Paper suggests, bringing additional services which belong to companies which are otherwise non-PSB and essentially commercial in their motivations could allow these other services/channels to be PSB, taking audiences away from the PSBs.
- As per our comments above on the institutions-based model, there would need to be a high bar of entry for any service to be considered a PSM provision. For example, any news services would need to demonstrate high standards of impartiality and accuracy in line with BBC News and ITN.
- It may lead to a less wide definition of PSM content and create a less diverse and creative PSM environment.
- Consideration needs to be given to how PSM radio provision would work under this model – the Green Paper suggests the BBC would have a role irrespective of the government's conclusions in this area. It is important that investment in PSM radio is maintained, for example Radio Cymru which plays an invaluable role within the audio sector in Wales providing news services, entertainment and cultural programmes to Welsh language listeners.

- **A content centric approach**

- This would free PSM content from being decided by a relatively small number of commissioners.
- We previously saw a contestable model piloted by the UK Government in the form of the Young Audiences Content Fund and this was very much welcomed by the sector in Wales, which successfully engaged with the YACF and several shows received funding.

- However such a system could be unwieldy to manage and have the potential to lead to a box-ticking approach to deciding what is PSM.
- There would also need to be an assessment of how it would be regulated to ensure any content deemed to be PSM met the same high standards as the current PSM providers, as well as how it would be subject to Terms of Trade and out-of-London commissioning requirements.
- We would estimate that a large amount of bureaucracy would be needed to assess and approve programme-by-programme.

- **A combination of the models**

- As a first step this may be worth examining:
A preserving of the current PSM institutions while experimenting with a limited number of carefully-assessed additional content, in the manner of the Young Audiences Content Fund, could allow a wider range of PSM content to be recognised and make prominent, while allowing regulation of recognised PSM services on a wider scale, e.g. on out-of-London content.

Question 29 Do you have any further comments you would like to add on the content covered by this chapter, or any further information that will aid us in interpreting your responses?

85. We do not have any additional views