



The Right Honourable Stephen Crabb MP  
Chair  
The Welsh Affairs Committee

welshcom@parliament.uk

22 August 2022

Dear Chair,

### **Consultation - The future of public service broadcasting in Wales**

Thank you very much for the opportunity to take part in the above consultation. The role of the Welsh Language Commissioner was created by the Welsh Language (Wales) Measure 2011 with the aim of promoting and facilitating the use of Welsh. The Measure confers a number of regulatory functions and specific powers on the Commissioner, including imposing and enforcing Welsh language standards, determining complaints and investigations. In achieving its aim, the Measure also enables the Commissioner to make representations to any person, by virtue of which we make the following representations on the future of public service broadcasting in Wales.

Welsh language broadcasting is vitally important in terms of the prominence of the Welsh language and opportunities for people to hear and use the Welsh language on a daily basis. As noted in the Welsh Government's [Cymraeg 2050 Strategy](#), 'the broadcast media has played a key role in our efforts as a nation to revitalise the language over a number of decades'. It is no overstatement to say that that key role has never been as important as it is today, given the prominence of digital media in our lives. Ensuring that the Welsh language is given prominence on digital services is a huge challenge and is particularly important in trying to ensure that young people in particular engage regularly with the Welsh language and see it as a normal part of their lives. The Welsh language must be an integral part of current and future digital developments.

In the [licence fee settlement for 2022-27](#) the UK Government decided to freeze the fee for two years, and then it would increase in line with inflation for the period until 2027. S4C, like the BBC, now receives all its funding from the licence fee. [DCMS announced a settlement](#) of £88.85 million a

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year for S4C for 2022-23 and 2023-24. That will increase in line with inflation for the following four years. It is positive that this settlement includes an additional £7.5 million from the licence fee to support its digital developments, thus recognising the importance of digital developments in the Welsh language. In its [recent white paper on its vision for broadcasting](#), the UK Government outlined the intention to update S4C's remit to include digital and online services and remove the current geographic broadcast restrictions. This move is positive in terms of extending S4C's reach on new platforms. Similarly, the proposed introduction of a new prominence regime for on-demand television to ensure public service content is available and easy to find on designated TV platforms.

Of course, S4C and the BBC have a close relationship. The Broadcasting Act 1990 requires the BBC to provide no less than 520 hours of content to S4C each year. However, the UK Government in its [recent white paper](#) has outlined the intention to enable the BBC and S4C to agree together an alternative arrangement that better suits the evolving broadcasting landscape and the changing way people access content. It must be ensured that these alternative arrangements do not undermine the existing provision, and indeed extend it. The BBC is also the main Welsh language content provider on the radio, and the only one to broadcast exclusively in Welsh. In that respect, the Welsh language provision available on commercial radio stations is limited and Ofcom, the broadcasting regulator, does not have powers to require the Welsh language to be included in commercial radio formats. BBC Cymru Fyw is the BBC's digital service and provides a range of content in news, general content and sport through the medium of Welsh. S4C and the BBC have developed partnerships over recent years with national bodies operating to promote the Welsh language, who also receive funding from the Welsh Government, including Mudiad Meithrin and the National Centre for Learning Welsh. This highlights the importance of broadcasting in Welsh in order to attract new audiences to the Welsh language and to support new speakers to learn and use the language.

The importance of the Welsh media to the economic viability, as well as the community viability, of the language must be recognised. Not only because they reflect and express the aspirations and lives of those people who speak the language, but they also offer opportunities for Welsh speakers to work through the medium of Welsh, giving value to the ability to speak Welsh. In turn, therefore, the importance of the economic contribution of Welsh culture and media to the viability of Welsh-speaking communities must be emphasised as they employ so many people in those communities.

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In its [annual report for 2021-22](#), S4C refers to research commissioned by Arad research company. The research found that in 2019-20 S4C created an economic impact of £197.4m on the UK economy, and £141.1m on the Welsh economy. This means that for every £1 of income received by S4C in 2019-20 an economic impact of £2.03 was created on the UK economy, £1.45 on the Welsh economy and £0.19 in Carmarthenshire where the headquarters of S4C is now based.

According to the BBC's [annual report 2021/22](#) the amount of the licence fee collected in Wales in 2022 was £190 million. Total spend from the licence fee in Wales (covering S4C, Radio Cymru, Radio Wales etc) was £188 million, but the BBC's spend on network programmes made in Wales is in addition to that. Of course, viewers/users in Wales also use those network services.

There is no doubt that there are real risks to Welsh culture due to the current reliance on publicly funded broadcasting services, and specifically the BBC. A number of key decisions are made about broadcasting at a British level and it must be ensured that the views and priorities of the Welsh Government and the Welsh Parliament are fully respected in such decisions. In its [recent white paper](#), the UK Government outlined its intention to undertake a review of the licence fee funding model before the next BBC Charter period. Therefore, beyond 2027 it is currently unclear how the BBC, and therefore its Welsh language services, and S4C will be funded. Sufficient support and funding must be made available in the future to ensure that S4C, the BBC and others are able to provide suitable provision in Welsh to coincide with the changes in the digital world and to contribute fully to the vision of Cymraeg 2050. It is therefore absolutely essential that Welsh language broadcasting receives the support it needs to thrive from 2027 onwards in order to ensure the prosperity of Welsh as a modern, living language. The importance of Welsh language broadcasting culturally, economically and in the interests of the prosperity of the language must be part of the review's remit. We ask you as a Committee to try to ensure that this is one of the recommendations of your investigation into public service broadcasting in Wales.

We would like to draw your attention to the European Charter for Regional or Minority Languages, which was signed by the UK Government in 2001. Among the clauses which are relevant to the Welsh language is Article 11 – Media. This section includes clauses which refer to important principles in the context of broadcasting in regional or minority languages. We ask you to ensure that the UK Government continues to operate in accordance with these principles by supporting Welsh language broadcasting. We ask the UK Government to support a Welsh language broadcasting channel and, where the law creates provision for costs, that the Government meets

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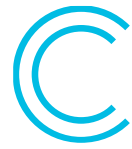
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any additional costs arising in connection with Welsh language broadcasting, giving the necessary financial assistance to support the service. Another crucial principle is ensuring that users' interests are represented.

You also ask for representations on whether moving away from free-to-air sports broadcasting would increase investment in grassroots sports in Wales. National and international sports broadcasting by S4C over the years has been an important means of attracting new audiences to S4C, as well as reflecting an important part of Welsh culture, as expected by public service providers. S4C's annual report for 2021-22 notes that each of the six nations rugby matches broadcast in the period had a reach of over 100,000 each, with over 10,000 views each on Clic and iPlayer. Hearing sport being discussed naturally through the medium of Welsh on the media is a vital way of normalising the use of the language naturally when participating in grassroots sport. In terms of the use of the Welsh language, therefore, broadcasting sport in Welsh is vitally important. The impact of any move away from free-to-air sports on the use of Welsh on the ground would therefore need to be considered, as well as on the reach of a Welsh-speaking audience. If there was a further move away from free-to-air sports broadcasting, it would be necessary to ensure that a Welsh-language commentary was provided. It may be possible to do so by amending the [OFCOM code on specified sports and events](#).

We hope that these representations will be useful to you in carrying out your investigation.

Yours faithfully,

Gwenith Price  
**Deputy Welsh Language Commissioner**

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