DIGITAL RIGHTS AND ACCESS TO INFORMATION SERIES 3

COMMUNITY MEDIA IN SUB-SAHARAN AFRICA - PART 1

Community media for community development and change

Birgitte Jallov June, 2022 Community media (specifically community radio) are an important platform for empowerment, development and community transformation in sub-Saharan Africa. Community media are media of, by and for a community. For community media to realise their transformation potential, they need government attention, support and care.

This paper makes a strong case for what it will take to achieve sustainable community media, giving examples of legislation and community impact and transformation from several sub-Saharan countries. Once well established, the potential of community media can be reached through community ownership and participation.

The transformative development potential of community radio is vast. This paper presents examples of changes generated by communities shaping the narrative and their future direction. It also explores what needs to be in place for community radio to achieve its potential, namely, an enabling environment through a legal framework and fair and transparent regulations. A discussion of three sustainability-furthering frameworks is also included.



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INTRODUCTION

1

THE COMMUNITY'S MEDIA

By its very definition (being of, by and for the community), community media promotes human rights and the rights of women and minorities. It gives communities a voice and allows them to define their path, pandering neither to political nor commercial interests. Community media is in the unique aposition of only operating in the interests of the community it serves. It is a platform for the community's freedom of expression, a fundamental human right in a democracy. Whereas traditional media communicate from the outside-in, community media communicate from the insideout and inside-in. It communicates horizontally rather than vertically, 'talking together' vs 'talking at' or 'being talked at', dialogical-sharing as opposed to top-down information being provided.

TRANSFORMATION AND COMMUNITY DEVELOPMENT IMPACT

The most popular community medium in sub-Saharan Africa is community radio. When this is organised based on the 'non-negotiables' of community radio: participation, community ownership and management, community content production of local issues, use of local languages, celebrating local culture and strengthening local identities. This helps to strengthen local identities, and community radio becomes a trusted source of information which can be relied upon. Its suggestions and recommendations are followed and can lead to community change, transformation and empowerment. To ensure that these potentials are reached, it is important to build social, organisational and financial sustainability in and around community radio stations.

AN ENABLING ENVIRONMENT AND THE THREE SUSTAINABILITY FRAMEWORKS

For community radio to fulfil its potential, governments need to create an enabling environment. With this in place, each community must develop sustainability frameworks for a robust social, organisational and financial way forward for their community radio station. 2

THE POWER OF COMMUNITY MEDIA – COMMUNITY RADIO

In simple terms, community media can be defined¹ as *media* of, by and for a community. Media of the community points to community ownership; media by the community directs us to the community (volunteer) broadcasters; and media for a community highlights the audience as well as the contents of the community media.

Community media promote human rights and those of women and minorities. They give communities a voice and allow them to define their path forward, pandering neither to political nor commercial interests. Community media are recognised as the third media sector, after public and commercial media. They are considered invaluable in promoting development and democracy, and as indicators of a plural and diverse society.

Community media are in the unique position of only operating in the interests of the communities they serve. They create a platform for a community's freedom of expression, a fundamental human right in a democracy. Community stations present a wealth of information in a locally understood and meaningful context and, in many communities, help break the silence around rights violations (such as violence against women and children), leading to more equality and justice.

One can say that whereas traditional media communicate from the outside-in, community media communicate from the inside-out and the inside-in. They communicate horizontally rather than vertically, 'talking together' vs 'talking at', dialogical-sharing as opposed to top-down information being provided. A top-down information-providing station is better than nothing in a community with no other information sources of local relevance. But 'our own' community station, where the community shapes the narrative and shares challenges and celebrations, is more effective as a platform for development and desired community change. Community radio is "90% community, 10% radio", as Zane Ibrahim, co-founder and the first Director of Bush Radio² in Cape Town, South Africa, is widely quoted as saying.

THE PEOPLES' ALTERNATIVE: COMMUNITY MEDIA IN AFRICA. WHERE DID THEY COME FROM?

Community media, as communication tools driven by communities and groups of listeners, took off in the Americas (Columbia, Bolivia and the USA) in the second half of the 1940s. They mushroomed up through Europe from the 1970s to the 1990s, starting in the south and moving northwards. In Africa, they took root in the 1990s; and in Asia, with a few earlier exceptions, since the 2000s.

The first 'real' African community radio3 was started in 1982 in Homa Bay, Kenya, with the support of UNESCO. Two years later, it was closed by the government without explanation. Founders claim that the station was politically ahead of its time.4 In the 1990s, community radio took off in many African countries as a part of what has been called 'the third wave of democratisation in Africa'.⁵

When these community media movements started, it was all radio. Today, radio has become 'audio' or 'sound' in many realities, and a growing number of worldwide audiences have substituted this traditional flow-listening for on-demand

^{1. &#}x27;A community radio is a radio owned and managed by the community; the programmes are produced by the community and they deal with issues arising within and of relevance to the community.' http://www.amarc.org/documents/manuals/What_is_CR_english.pdf

Bush Radio is still going strong and this 5-minute video presents the role of Bush Radio in one of the poorest areas of Cape Town: https://tinyurl.com/ mtw36pc4

^{3.} Africa had rural radio initiatives in the 1960s, kickstarted by UNESCO, hosting a first African meeting in Moshi, Tanganyika, in September 1961 focusing on educational radio in sub-Saharan Africa. Ghana became the first pilot-testing ground in 1964-65, from where it spread to other countries in sub-Saharan Africa. These educational radio initiatives were taken in by the national broadcasting organisations, which in many countries still have rural radio programmes continuing this tradition.

^{4. &#}x27;Technically it was a great success but politically it was very much ahead off its time.' <u>http://mallardconcepts.org.uk/gal/ke.htm</u> and personal interview by the author with the then station manager of Homa Bay community radio, John Nkinyangi.

^{5.} Democratization in Africa 1990–2010: An Assessment by Gabrielle Lynchm Gordon Crawford. <u>https://www.jesuisbaher.com/post/the-miraculous-and-uneven-wave-of-democratization-in-africa-in-the-1990s</u>.

listening. At the same time, more stations broadcast via the FM band and different digital and online services, and some include TV or video via their internet platforms.

In sub-Saharan Africa, listening to community radio via the FM band is still the most common. Where stations make online listening possible, this is not an option for many rural audiences as internet access is expensive, and most mobile phones owned in rural areas are not 'smart'.

Mali, a country where only 33% of the population and only 22% of women can read and write,⁶ has a strong community radio network with more than 170 private radio stations, 121 of which are primarily rural-based community radios. More than 20 million people (nearly half of the country's population) listen to the radio.⁷

In South Africa, about 80% of the population of 60 million tuned into a radio station during a one-week period in 2021, with most listening on traditional radio sets. The country has 40 commercial and public broadcast stations and 284 community stations. Radio audience numbers have not declined in South Africa as in the global north. It is interesting to note that there is a high listenership among young people, who listen to the radio as a source of news and companionship.⁸

Zimbabwe, a country of 15 million inhabitants, is a very particular case where community radio licensing only started in 2020. By February 2022, there were 14 stations on the air. Leading up to that was a 17-year struggle initiated in 2003 by the Zimbabwe Association of Community Radio Stations (ZACRAS). ZACRAS advocated for community radio in Zimbabwe as the airwaves in neighbouring countries (Tanzania, Mozambique, Malawi and Zambia) were opening up. With a firm advocacy strategy, *'only when the people's demands can no longer be overheard will government give in and open our space'*, ZACRAS supported the development of 24 community radio stations in Zimbabwe.⁹ It also trained 100-200 volunteers at each station, put governance structures in place, carried out community mapping for the whole community, and developed clear editorial priorities.

COMMUNITY RADIO STATIONS GENERATING COMMUNITY TRANSFORMATION AND CHANGE

Impact assessments carried out in various communities with community-owned radio stations show that dramatic changes have occurred, and initial changes in social norms are evident. All results shared hereunder were carefully scrutinised, examining whether the change could instead be attributed to other changes in the local reality. Only cases where this was not so have been included below.^{10, 11}

- Reduction of female genital mutilation in a Maasai community in Tanzania. It took an intense two years of community debate to transform genital mutilation rituals in this area. Through regular community radio programmes and community debate sessions involving elders, cutters, trusted health practitioners, and women and men of the community, a new way was found to transition a young girl into womanhood. Within the traditional celebratory community event, the often deadly or debilitating cutting was substituted with a ceremony where the woman's genitals were cleansed with a traditional herb.
- "We recognise that human rights is the mother of all important change" was the central result when the community of Kyakabadiima in Western Uganda was asked about the most significant change since Kagaadi-Kibale Community Radio (KKCR) went on air. People shared examples where KKCR programmes on human rights had led to positive changes at both household and community levels.¹² "We have learnt about our rights. In this community, the police used to behave as if they were completely above the law. If they wanted to extort money from you, all they did was to arrest you and put you in detention without any charge or with very flimsy charges. We never thought that there was a law which protected us as citizens. Since the programmes on the radio started, now everyone knows that you cannot be detained for more than 28 hours without being charged."
- 300 annual cholera deaths transformed to 0 (zero!) in a community in central Mozambique. In this area, annual rain used to bring cholera to the community. In a typical year, thousands would become ill, and around 300 would die, despite advice from the Ministry of Health, UNICEF, Red Cross volunteers and health NGOs. After the advent of the community radio, people adopted better practices during heavy rains, such as boiling drinking water and adding chlorine. Due to these changes, although some people still fell ill, no one died of cholera for five years. (The author did not follow it after that).
- Sexual harassment, incestuous relationships, rape and defilement dramatically reduced, and men are more positive and sensitive to the needs of girl children in

^{6.} https://www.slideshare.net/DataReportal/digital-2022-mali-february-2022-v01

^{7.} https://farmradio.org/mali/

^{8.} https://theconversation.com/radio-is-thriving-in-south-africa-80-are-tuning-in-176846

^{9.} Working hard to obtain licences, the ZACRAS movement from 2014 moved into doing 'community radio for empowerment and change' via WhatsApp and even a Free to Air TV channel. A description of this process and what it looked like in 2015 by the ZACRAS community radio trainer and mobiliser, Kudzai Kwangari, can be found here: https://tinyurl.com/3n6fyzdz.

^{10.} https://empowerhouse.dk/site/wp-content/uploads/2022/02/measuring_change-BJ-article.pdf

^{11.} These cases are all experienced by the author herself through her 40 years of active work with community media around the world. These and other cases are documented in her book: <u>https://empowerhouse.eu/empowerment-radio-the-book/</u>

^{12.} https://empowerhouse.dk/site/wp-content/uploads/2022/01/Stories-of-Change-through-Community-Radio-in-East-Africa.pdf

the Mang'elete Community in Kenya's Eastern Province following the launch of Radio Mang'elete (RM). Women of the Matangini village shared how the radio station had positively impacted a painful and frustrating issue. Before RM started broadcasting, women did not talk about the high rate of rapes, defilement and other forms of sexual harassment. From childhood, women were taught not to speak openly about these acts, particularly if the offending party was an older member or head of the household who should not be 'put to shame'. RM changed all that: women and girls could finally talk openly about the problem, which helped to reduce the occurrences. These are a few examples of the numerous transformations in communities across sub-Saharan Africa, where communityowned and community-run stations are found. This change does not happen through ordinary local stations or in situations where the community does not trust the station and its programmes. For community transformation to occur, the community must consider the radio *theirs* and the programmers reliable.

3

SUSTAINABLE COMMUNITY RADIO AND COMMUNITY MEDIA/RADIO

Key characteristics of a community radio station are that it is two-way and not-for-profit. It requires the 'non-negotiables' of community media: participation, community ownership and management, community content production of local issues, use of local languages, celebrating local culture and strengthening local identities. As a result, community radio is often a trusted source of information. Communities rely upon the stations, following their suggestions and recommendations. This is why the impact of community radio is usually more powerful than any other type of media.

To make a community radio sustainable, three aspects are fundamental: social sustainability, organisational sustainability and financial sustainability. Above this is the overall enabling environment. Books could be (and have been) written about each of these. What follows is a brief introduction.

The overall enabling environment sets the framework conditions, which include legal framework, licensing procedures, fee payments and taxation of the station, and frequency allocation. Individual stations have no control over these framework conditions. However, in many sub-Saharan African countries, community radio stations have formed associations and networks that advocate for appropriate legislation, realistic and manageable license fees, and good, transparent and fair licensing structures. The associations organise training courses for member stations; establish local, national and international partnerships; raise funds; and carry out collective fundraising and advertising drives. The African Commission for Human and Peoples' Rights (ACHPR), in their *Declaration of Principles on Freedom of Expression and Access to information in Africa,* highlights several of these enablers in their section on specific measures,¹³ stressing in which ways states can secure an enabling environment for community media. Adopted in 2019, implementing these principles underscores the ongoing democratisation seeking to secure civil, political, and social-economic rights and the physical security of African citizens.

3.1 COMMUNITY RADIO LEGISLATION IN DIFFERENT COUNTRIES IN SUB-SAHARAN AFRICA

In many realities, the absence of a legislative framework for small, not-for-profit community stations has resulted in arbitrary and politically motivated decisions when granting licenses; lengthy application procedures; and often, community stations pay the same taxes and licence fees as larger-scale commercial stations. With no enabling environment regulating access fairly and transparently, the community's freedom of expression is limited. The below examples provide a glimpse into some vastly different realities in different countries in sub-Saharan Africa.

 In Ethiopia, several laws and directives govern the media sector. The key document for local and community radios is the Directive on Community Radio (January 2011) which sets forth the substantive and operational

^{13.} Within its General Principles.

requirements, including the definition of community radios, their roles and responsibilities, their board members and broadcasters, types of community radio stations, accreditation and licensing processes, feedback and complaints processes, broadcast language and area, the content of broadcasts, public service announcements and sponsorship procedures. Unfortunately, the legislation and development plans are "...not really being implemented according to rules and regulations. The community radio landscape is scattered, and most stations are in desperate need of resources, equipment, and management support."¹⁴

- In Mozambique, there are currently 144 licenced community radio stations.¹⁵ The sector saw a boom at the end of the 1990s, and the last 30 years have seen licenses being provided through a fairly transparent process as media of civic associations. These associations are the legal personae and license-holder through which the communities can run their radio stations. As long as there is a positive inclination in government, the stations stay on the air. However, several recent challenges¹⁶ have shown the vulnerability that exists when the community radio/media are not embedded in a proper legal framework. In 2020 a proposal for a Lei da Radiodiffusão17 (radio broadcasting law) was submitted by the Council of Ministers to the Assembly of the Republic for consideration but is still being debated. At the same time, the government wants the ICS (the state communication institute) to take over and absorb all the radios in one public (governmental) network.
- In Angola, community media legislation has existed for the past 10 years. However, applying for licences is not yet possible as no regulation for implementing the legislation has been passed. It is presently being debated again.¹⁸ The problem stems from the fact that the Angolan government does not recognise the definition of community media commonly used in other SADC countries. In Angola, community media encompasses local media, which includes media that are state-owned or formally private but linked to people connected to the ruling elite.¹⁹
- Burkina Faso has 51 community radios, of which 8 (16%) are in the Burkinabè part of Liptako-Gourma.²⁰ Generally, these radios have been authorised by various regulatory

bodies (CSI, then CSC)²¹ to which they are bound by an agreement. They maintain good partnership relations with the CSC, visiting them as part of control missions and during electoral campaigns. Radio stations submit annual activity reports to the CSC, which decides whether they are eligible to submit applications for state subsidies. Due to insecurity and fear caused by armed attacks by terrorist groups or unidentified armed individuals and kidnappings, some radios have reduced the number of hours or programmes.

Niger had a bold head-start in 1999 when UNDP and a consortium of NGOs spearheaded the launch of a national community radio project with a vision to cover Niger with 160 radios.²² Today, Niger has 188 community radios, of which 33 (18%) are in the conflict zone (Liptako-Gourma) with problems similar to Burkina Faso above (this also impacts Mali). Niger's 2010 Constitution 'ensures and guarantees' the freedom and independence of audio-visual communication of the written and electronic press in compliance with the law. Programming by public, private, community and associative radio and television channels is overseen by the CSC. In Niger, community radio and TV are financed by public or private subsidies, which is unique in Africa.²³ Furthermore, contributions come from the stations' members and other resources authorised by law, and they have access to the advertising market.

In these vastly different realities, ordinary people, their champions and communities struggle – sometimes taking grave risks – to advance their rights and space to, together, define the development path of their community. Besides the regulated environments presented above in Niger, Mali and Burkina Faso, properly implemented community radio legislation can only be found in South Africa.

3.1.1 Licensing and frequency allocation

For community media to survive in a national media landscape, they need special licences with low annual fees, if any, and fair and objective requirements according to which licences are granted. In many countries in sub-Saharan Africa, such legal frameworks do not exist or are not correctly implemented. The clear answer to these challenges is the specific recognition of community broadcasting in law and the establishment of tailor-made licensing procedures to

^{14.} As reported by a media organisation operating in Ethiopia presently, working to strengthen the structures and stations.

^{15.} Some stations included local TV. For a full listing: https://www.caicc.org.mz/index.php/caicc/parceiros

^{16.} The case presented in this video clip is set in Macequece in Central Mozambique in 2012: https://tinyurl.com/3yh4sbf6

^{17.} AR- IX Prop.Lei/105/07.12.2020

^{18.} The legislation was again discussed in the parliament this year. The outcome is not yet clear. https://angolatelegraph.com/politics/law-on-community-radios-passed-in-the-country/

^{19.} As reported by a community radio advocate and one of the co-founders of the Angolan Journalists' Union.

^{20.} The Central Sahel area, and in particular the Liptako Gourma region, which borders Burkina Faso, Mali and Niger, is affected by a complex crisis involving growing competition over dwindling resources; climatic variability; and violence related to organised crime and Non-State Armed Groups. The crisis has led to the death of an estimated 5,000 people in 2021 and triggered significant displacement of populations in the four affected countries.

^{21.} CSC is the Conseil Superieure de la Comunication – the high (superior) communication council.

^{22.} The author experienced this first-hand, and it is documented in unpublished reports.

^{23.} South Africa also provides financial support to licensed community radio stations.

ensure that small community broadcasters can operate and access prevalent distribution platforms, including airwaves.

The ACHPR Declaration's Principle 15 highlights licensing and allocation of frequency spectrum for community media as important aspects for African states to pay attention to:

- Licensing processes shall be simple, expeditious and costeffective, and guarantee community participation.
- Licensing requirements shall fulfil the objectives of community broadcasting and shall not be prohibitive.

In addition to specific community radio legislation, the above recommendations should be included in the national broadcasting legislation to ensure fair access to licences for community initiatives.

In Tanzania, MISA Tanzania writes: "The main challenges community radio and television face in the region are lack of legislation, regulation and infrastructure to support the establishment and licensing of community media; and the inability to sustain themselves beyond donor seed money."²⁴ Furthermore, getting a license in Tanzania often takes at least two years.²⁵

In Liberia, with a situation similar to many African countries, at the time of preparing this document (2022), there were no standards described for licensing of radio and TV stations (apart from legal documentation of the applying entity required and information on payment of the fees).²⁶ This means that space is left – and used - for politically motivated arbitrary decisions, which further exacerbates the continually shrinking space for freedom of the media and expression.²⁷

3.1.2 Radio frequency spectrum allocation for community media

Along with the importance of fair access to licences, a challenge in many parts of sub-Saharan Africa is space available in the radio frequency spectrum. The ACHPR Declaration formulates the recommendation to the states in the region:

States shall allocate a fixed percentage of available radio frequency spectrum to community broadcasters to encourage diversity.

Recommendations include:28

• Policy and regulations shall reserve a minimum percentage of the available spectrum for community radios. This is

the best way to guarantee a fair distribution.

- Community broadcasters should have the right to distribute their content freely over the internet.
- Consideration should be given, where appropriate, to requiring cable and satellite distribution operators to carry community broadcasting channels either for free or at a low cost.

3.2 THE THREE SUSTAINABILITIES

Once the enabling environment is in place, community radio stations can and should focus on the following:

3.2.1 Social sustainability

This is about strengthening the social fabric around a community radio station, securing community ownership, participation and community engagement. It is engaging the community in the formulation of the strategic direction: the vision of the community (and therefore also the station) and the mission (what is it the community radio will, can and should do to advance the vision), engaging the community in the mapping of all 'communities within the community', and involving them in identifying the core thematic issues around which editorial groups of community (volunteer) broadcasters can be formed. Social sustainability also celebrates all the other 'non-negotiables' of community media.

3.2.2 Organisational sustainability

This is about good, participatory, transparent and inclusive organisational principles at the core of a human rights-based work approach, building social accountability that relies on civic engagement, empowering ordinary citizens and CSOs to participate directly or indirectly in exacting accountability from the duty bearers. And internally, inside the station, the organisation will be sustained by having clear organisational operating principles known by all involved.

Community media governance is important, as a community radio can only be sustainable and play its role as a trusted democracy furthering tool when its organisation is based on principles of community ownership and participation, and transparency and accountability towards the community. In addition, access and inclusion of all marginalised groups and genders must be properly reflected in the mission and implementation framework and the operating principles, leaving no one behind.

^{24.} https://tanzania.misa.org/issues-we-address/broadcasting-regulation/

^{25.} Personal interview with community radio activist, trainer and advocate in Tanzania. Name is known to the author.

^{26.} Referenced in the MICAT Fees Collection Handbook. Only available in hard copy.

^{27.} Freedom House 2022 describes Liberia's freedom of expression environment as being 'partly free', as repression of people – including journalists – exercising their constitutional rights risk harassment. https://freedom.world/2022

^{28.} With inspiration from: https://en.unesco.org/community-media-sustainability/policy-series/spectrum

3.2.3 Financial sustainability

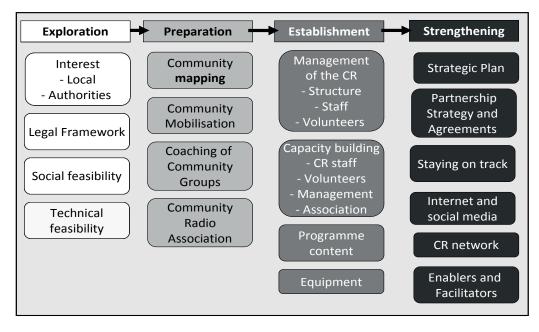
This a challenge in every national and local context in sub-Saharan Africa. Being not-for-profit and often operating in rural or non-affluent city areas, the social and organisational aspects of the station frequently support and ensure financial sustainability. This part of the sustainability framework covers a variety of factors, from building realistic budgets and identifying local, national and international financial (noncommercial) advertisers and sponsors, to opportunities for in-kind-contribution and exchange of services, as well as the need for a varied and healthy funding mix.²⁹ Furthermore, good transparency and accountability towards the community are as important as good financial and grant management.

Lisa Cannon has coined so well what it takes to achieve financial sustainability: ...the ability of an organisation to secure and manage sufficient resources to enable it to achieve its mission effectively and consistently over time without excessive dependence on any single funding source [...]. Sustainable organisations have, at minimum, a clear mission and strategic direction; the skills to attract resources from a variety of local, national and international sources and the know-how to manage them efficiently [...].

The allocation and management of frequencies is a contentious issue in many sub-Saharan African countries. In Ghana, for instance, the Ghanaian Community Radio Network (GCRN) has been very critical of the National Communications Authority's (NCA) allocation of frequencies,³⁰ which according to them, has favoured commercial interests at the expense of community radio.

3.3 DEVELOPING SUSTAINABLE COMMUNITY RADIO/MEDIA

Community radio is not a quick fix that can be created overnight. It requires local champions who can facilitate the community mobilisation and organisation process. It is a stepby-step process, not necessarily limited to the steps below but including most of these:



Generic phases of community radio development³¹

^{29.} https://empowerhouse.dk/site/wp-content/uploads/2022/09/GCRN-DWA_Community-Radio-Handbook-on-Human-Rights_190826_FINAL-DRAFT-2.pdf

^{30.} See more details here: https://empowerhouse.dk/site/wp-content/uploads/2022/08/Manual-ZIM-Financial-Sustainability-of-Radio-Stations-A-ZACRAS-Community-Radio-Handbook-final1-copy.pdf

^{31.} From: Empowerment Radio – Voices building a community. Birgitte Jallov. EMPOWERHOUSE (2012)

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ABOUT THIS PROJECT

fesmedia Africa is the regional media project of the Friedrich Ebert-Stiftung (FES) in Africa. Its work promotes a free, open, liberal and democratic media landscape that enables ordinary citizens to actively influence and improve their lives, as well as those of the communities and societies they live in. *fesmedia* Africa believes that in order to participate in public life and decision-making, people need to have the means, skills and opportunities to access, exchange and use information and knowledge. They need to be able to communicate and exchange ideas, opinions, data, facts and figures about issues that affect them and their communities.

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Community media for community development and change

Community media (specifically community radio) are an important platform for empowerment, development and community transformation in sub-Saharan Africa. Community media are media of, by and for a community. For community media to realise their transformation potential, they need government attention, support and care.

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This paper makes a strong case for what it will take to achieve sustainable community media, giving examples of legislation and community impact and transformation from several sub-Saharan countries. Once well established, the potential of community media can be reached through community ownership and participation. The transformative development potential of community radio is vast. This paper presents examples of changes generated by communities shaping the narrative and their future direction. It also explores what needs to be in place for community radio to achieve its potential, namely, an enabling environment through a legal framework and fair and transparent regulations. A discussion of three sustainability-furthering frameworks is also included.

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