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Submission for the new National Cultural Policy
c/o the Office for the Arts

To whom it may concern,

Thank you for considering this submission to the new National Cultural Policy.

This submission represents my expertise as a researcher of the Australian cultural and creative industries, with a specific interest and research background in the Australian live music sector, and over ten years' experience as a professional fulltime researcher. My previous research has included work with Sound NSW, APRA/AMCOS, Creative Australia, the University of South Australia, the SA Music Development Office, City of Adelaide, National Live Music Office, City of Melbourne, Monash University, and the University of Tasmania, and my book *Small Venues* is out now through Bloomsbury. I am also a 2024 Churchill Fellow, and that experience informs this submission directly.

Introduction

This submission draws heavily from my recent [Churchill Fellowship](#), which relates directly to **the challenges and opportunities I see in the cultural sector, namely the live music sector and music industries**. Specifically, my Fellowship, subsequent report (available [here](#)), and this submission provide policy options for how governments and the music industries can support the long-term sustainability of the live music sector and grassroots music venues (GMVs), as my Fellowship focussed specifically on alternative ownership and operating models for GMVs abroad.

As a professional researcher, cultural policy expert, musician and former venue manager, I have been interested in the topic of small, grassroots live music venues (GMVs) for most of my adult life, having written both a PhD (Whiting, 2024a), a book (Whiting, 2023) and multiple publications on the topic (Roberts and Whiting 2025, 2021; Whiting 2024b, 2023, 2021, 2015). In Australia, these venues walk a tightrope between maintaining an engaging program of up-and-coming acts that reflect the cultural zeitgeist as well as the community of their local music scenes, while also having to maintain financial sustainability and regular revenue streams, usually via bar



sales. This creates a tension between commerce and culture that is further exacerbated by external factors, such as gentrification, the financialisation of the property market, inflation, and changing audience behaviours, which places pressure on programming choices and ultimately affects artists, music industry workers and other parts of the supply-chain.

The problem I have identified over the course of ten-plus years researching the Australian music industries is the long-term financial sustainability of for-profit, small GMVs, especially those operating out of commercially leased premises. As these venues are squeezed and this model proves itself to be decreasingly viable, it creates further pressure on musicians, whose earnings have stagnated, particularly at the emergent end of their career pathway. To create a thriving music industry, we need new models of ownership, operation, funding, and resourcing for GMVs, so that all parts of the live music ecosystem can benefit.

The aim of my Churchill Fellowship project was to address two significant problems for Australian grassroots venues:

- 1. Security of tenure, and**
- 2. Financial sustainability.**

My [report](#) and this submission draws on nearly 100 interviews with venues, industry bodies, musicians, and live music advocates across Europe and the UK to inform an understanding as to how venues are resourced and supported in these jurisdictions, and how each of the two problems identified above are addressed.

My Churchill Fellowship focused specifically on not-for-profit venues (NFPs) as an alternative to the current for-profit model dominant in Australia, as well as venues and organisations that have greater control over their premises and security of tenure. This focus reflects research done by the Music Venue Trust, a valuable partner throughout the project, which found that UK venues under 400-capacity are unable to turn a profit in the long-term on performances alone, and must diversify their revenue streams and programming if they wish to remain financially solvent. Further, French and northern European GMVs that I met with broadly acknowledged that without subsidies, they would not be able to operate in the long-term and therefore demonstrate a failure of the private market to support these important cultural spaces and the activities they facilitate. Such an acknowledgement reflects a positioning of live music as a public good, and the need for a set of public policy priorities that recognise it as such. Without a similar systemic approach to these issues, Australian live music risks further inequality and vulnerability, and may be accessible only to those of independent means or wealthy backgrounds.

Recommendations

- **Live music venues need greater security of tenure when it comes to their leaseholds and require improved pathways through which to secure their tenure, ideally in the form of long-term, reasonable leaseholds at a manageable and preferably below market rate.** Community land trusts offer a unique, collectively financed model for ensuring the security of venues in the long-term, and Music Venue Properties (UK) offer a good template for this, as a Community Benefit Society (CBS) collectively owned and financed by community members. Other solutions to the problem of tenure include financing options so that venue operators may purchase the freehold themselves, or local

authorities, such as a state or local government collaborating with venues as benevolent landlords, co-owners of venues, and/or stewards of community and collective ownership models. Long-term cultural leases that designate that a venue must continue to host music may be a feature of some agreements, as in the case of Music Venue Properties. There is already precedent for public ownership of venues across Australia. *Governments should provide funding opportunities for community ownership models, so that music communities are able to collectively protect venues from commercial developer by purchasing these venues themselves.*

- **An Australian equivalent to [Music Venue Properties](#) should be established, and seed funding made available via state and federal governments.** Other community land trusts and/or collectively owned property management initiatives may also be utilized to secure venue freeholds in the long-term. However, to unlock more funding options for venues, I believe a not-for-profit model is ideal for the small-to-medium sector.
- **A not-for-profit model for small-to-medium venues is more sustainable, realistic and reflects what these venues *actually do*. Australian venues need pathways to be set-up as not-for-profits, companies limited by guarantee or other non-commercial models (co-ops, charities etc.).** Venues across the UK are increasingly transitioning to nonprofit venue structures, which have been dominant in northern Europe and France for some time. In Australia, venues need opportunities and pathways to be set-up as not-for-profits, creating new revenue options such as higher thresholds on income tax payments as well as greater eligibility for public and community funding. Nonprofit models that resemble Community Interest Companies (CIC) —i.e. asset locked companies limited by guarantee without onerous governance requirements—offer the most practical option, but other models such as cooperatives, Community Benefit Societies, foundations, member-owned associations, charities, social enterprises, and publicly-run venues all offer alternatives. The two primary nonprofit options that Australian venues might consider are:
 - o *DGR-1 registered charity*: Registered charities can receive tax deductible donations, have a higher threshold for paying income tax on wages, and are eligible for greater funding and tax exemption opportunities. A recent precedent for this model is *Lazy Thinking*, a new venue in Sydney’s Dulwich Hill, that is in the process of being incorporated as a registered charity. However, DGR-1 organisations have high reporting and governance requirements, such as the necessity for a board of directors and transparent, regularly reported finances. Such reporting and governance requirements can be onerous if not resourced properly.
 - o *Companies limited by guarantee (CLG)*: Similar to a CIC, a CLG social enterprise model does not require a significant change in business model and has less onerous reporting and governance requirements than a DGR-1. However, unlike a CIC, Australian social enterprises are often non-descript and do not have a specific legal form. CLG’s address this issue somewhat. They also cannot receive tax deductible donations and have less overall opportunities for revenue and funding, although they are eligible for higher thresholds for the payment of income tax on wages and salaries, a significant advantage.
- **Subsidies, whether direct or indirect, and no matter how significant, are extremely beneficial.** Governments, both local, state and federal, should identify venues for ongoing

operational subsidy, while venues should consider models that increase their eligibility for subsidies, such as charitable status. Venues that are incorporated as nonprofits may be eligible for long-term operational subsidies and funding, like National Portfolio Organisations in the UK. It is difficult and unethical to argue for long-term and/or operational subsidies for for-profit venues, but a proliferation of professional nonprofit venues would be better positioned to advocate for such subsidies. This would improve their ability to take risks on programming and would reduce their reliance on alcohol sales.

- **The Australian concert ticketing market is incredibly concentrated. Governments and the ACCC should investigate anti-competitive practices and act accordingly. The ACCC should receive additional and specific resources to combat anti-competitive practices in the live music sector, especially regarding ticketing and market consolidation by foreign multi-nationals (i.e. Live Nation Entertainment).** Venues, artists and promoters should shop around to promote competition in the market and to identify their best ticketing options, which may include cooperative ‘artist-run’ ticketing services or other novel innovations that disrupt the current ticketing market. More competition in this part of the sector would produce better outcomes for venues, artists and audiences alike. **Market competition needs to be increased in this part of the supply-chain, and both venture capital, governments and music industry stakeholders should be looking to fund new and innovative ticketing initiatives.** Solutions that have proven effective in Europe include collaborative, membership-based, and non-profit models, specifically ones designed to resist acquisition by large corporate players. Innovative examples are present in France and Switzerland, where ticketing systems are owned by national associations and their members. These collectively owned ticketing platforms represent a critical mass of the sector, making them resistant to being bought out or taken over by dominant players.
- **Prohibitively expensive public liability insurance is a uniquely Australian problem. Initiatives and interventions are needed to promote more cost-effective insurance options, while more providers, new market entrants and increased competition for venue insurance may also drive prices down.** Like the ticketing market, initiatives and interventions are needed in the market for venue insurance, which is far too costly and onerous for small, grassroots venues. This was not the case for similar venues in Europe and the UK and reflects a uniquely Australian problem. Clearly venue insurance providers do not have enough competitors and/or risk assessments are too over-zealous.
- **Entry for small-to-medium gigs and venues is too cheap, while the big end of town soaks up all the profits. Venues, artists and promoters need to work together to raise the price of entry for local, grassroots gigs.** Across my fieldwork, entry to a local gig was never less than double the price of a beer (e.g., £10 for entry if a pint was £5). Australians are often paying the same price for entry to a small-to-medium event as a pint of beer (e.g. \$15). This hurts artists and devalues the product, meaning less money in the ecosystem overall, while major tours have increased their ticket prices substantially. Without an increase in ticket prices for grassroots venues, local gigs will ultimately amount to a race to the bottom for emerging acts, increasing inequality across the industry. Artists and promoters need to raise the price of entry for local, grassroots gigs. **A minimum rate of pay per musician for headline acts performing on peak nights for live music, such as Fridays and Saturdays, may be a method for creating upward pressure on ticket prices**

and entry fees. Without a floor on artist wages, there is little incentive to increase ticket prices overall. Venues and promoters should also meet and discuss ways in which they can encourage artists to set higher entry fees.

- **Live music is a public good. New political rather than economic arguments are needed to ensure live music is valued for the contributions it *actually makes*.** Live music is not just something we consume. We participate in it, forming communities and friends for life. This contributes to feelings of belonging and community. Music also reflects our society and our aspirations. Live music can communicate many different things and does so in a communal and group context that can lead to greater social bonds. **It has long been established in northern Europe and now increasingly in the UK that live music is a public good that should be publicly funded and supported, whether through government or community contributions to protect and encourage its important social and cultural roles.** Economic rationalism may work for justifying support for major events and festivals, but it offers diminishing returns as an argument for the grassroots end of the sector, which rarely turns a profit, and risks creating a rhetorical prison of its own making. New political rather than economic arguments are needed to ensure live music is valued for the contributions it *actually makes*, rather than esoteric and difficult-to-measure cost-benefits.
- **Grassroots venues are fundamental to the broader ecosystem of the music sector, and all industry stakeholders should be engaged in supporting them.** They are the ‘growth layer’ that supports broader industry development, facilitates social interactions between music scene participants, and provides emerging artists with opportunities to test and hone new material. However, in Australia, and perhaps due to the competitive, for-profit model that is dominant, there is often little consensus between stakeholders as to how best to support these venues, which often compete for attention from government and industry rather than working together towards cohesive and structural change. Further, these venues often put their needs before those of musicians, alienating a key group in the broader music community. A consensus-based approach that brings various stakeholders together to advocate for the kinds of structural reform outlined above is needed if these venues are to weather the current transition and changes facing the industry. The Music Venue Trust, LiveDMA and other sector-wide venue support organisations, such as the various peak bodies I engaged with throughout my fieldwork, pursue this kind of approach with success. Australian stakeholders and industry advocates need a more cohesive approach to advocacy and decision-making and need to be bolder and more strategic in their approach.
- **Both governments and industry have a role to play in collaborating to assist grassroots venues, with ticket levies serving as a good example of this.** While government interventions and regulation are needed, especially regarding consolidation of the live music market by large multi-nationals, industry-led initiatives are important too, as they may be willing to address structural issues that governments lack the will to investigate. **Ticket levies are a good example of this kind of initiative, bringing different stakeholders together to redistribute and invest in grassroots activities by means that do not necessarily result in reduced earnings for larger venues i.e. such as the Club Euro model or big-ticket levies, which pass most costs on to consumers.** Promoters, venues and festivals need to work together to address these structural challenges, and although government is a key stakeholder and potential instigator, industry should also lead on reform

Ticket Levies

I encountered several industry-led initiatives aimed at redistribution and greater equity across the sector. Notably, local ticket levies were prominent in both Hamburg (Germany) and Swansea (Wales). Germany is now implementing a national ticket levy for arenas and large concert performances, following the implementation of the Stadium and Arena levy in the UK via the recently established Live Trust. Both serve as policy precedents worth pursuing in Australia.

ClubEuro

ClubEuro is an innovative local ticket levy specific to the Hamburg music sector. The collaborative levy is financed by an exclusive ticketing agreement between member venues of Clubkombinat (the Hamburg music industry and venue peak body) and a local ticketing agency, who have reduced their usual per-ticket transaction fee by 50%. The additional uncollected revenue generated by this relinquished fee is pooled and redistributed to member venues, with top-up funding provided by the Hamburg municipal government. Decisions regarding where this funding is allocated are made by Klub Foundation, which is made up of several Clubkombinat venue representatives along with representatives from the local government authority. Other than some additional top-up funding from the Hamburg Ministry of Culture, this initiative requires no additional contribution from audiences, venues or musicians, and is primarily funded by the relinquished portion of the ticket transaction fees. ClubEuro has been so successful that LiveKOMM, the national German peak body for venues and festivals, is extending a voluntary version of the scheme to arenas and large concert promoters across the country and is working hard to bring larger suppliers into the scheme.

House Party and the Swansea Arena Levy

The Swansea Arena in South Wales has committed to a levy on its tickets to be redistributed to the local grassroots music sector via the Music Venue Trust. This voluntary levy demonstrates a commitment to GMVs by a large anchor institution in the area and acknowledges the nature of the live music sector as a distinct ecosystem made up of interdependent components. The Swansea Arena not only acts as an anchor institution for the local live music ecosystem, funding local grassroots venue activities via the levy, but also hosts an annual showcase event at the Arena called 'House Party', which features emerging and early career artists usually prominent on the stages of smaller venues in the Swansea and South Wales region. The event is co-programmed by GMVs in the region. **This kind of holistic approach to a local music sector should be celebrated, and large arenas and concert venues in Australia should also consider how they can give back to their local scenes and live music ecosystems via similar initiatives.**

UK Stadium & Arena Levy

Following consistent advocacy by the Music Venue Trust and the broader grassroots venue and music sector in the UK, a £1 levy on tickets to events of 5,500 capacity or above has recently been implemented. This money will be collected and redistributed by LIVE Trust, a recently established peak body inclusive of many stakeholders across the UK live music sector. The funding will be used primarily to fund and subsidise grassroots venues, artists and promoters, although festivals are also lobbying to be included in the scheme. The campaign for a Stadium & Arena levy was primarily led by MVT and artists, with many artists such as Sam Fender, Enter Shikari and Katy Perry voluntarily administering a similar scheme throughout their UK tours, donating the levied funds to MVT. The threat of legislation of a mandatory statutory ticket levy, with a proposed

timeline for legislation endorsed by the UK Government, also helped to conclude negotiations regarding the voluntary Stadium & Arena levy. **Australian policymakers and industry stakeholders should pay close attention to the potential success of the UK Stadium & Arena levy and seek to replicate it here.**

Government Regulation, Subsidy and Intervention

France

The French have maintained a mandatory levy on all concert tickets of 3.5% of the cost price of the ticket since the 1980s. This funding is redirected to the Centre Nationale de la Musique (CNM), the national body for music within the Ministry of Culture and funds a variety of schemes focused on programming (primarily for emerging and diverse artists), capital works for venues, energy efficiency upgrades and other project funding.¹ As the levy is on the cost price of tickets, it amounts to a progressive tax on tickets and ultimately a big-ticket levy, as larger concerts, arenas and festivals contribute more to the scheme due the progressive nature of the levy. This ensures all venues contribute, which also increases its social license within the sector. The levied fees are also refunded up to 40% in the following financial year, so that the levy only amounts to a 2.1% levy on tickets once the 40% is reclaimed. However, the upfront levy of 3.5% creates greater cashflow for the scheme than if only the 2.1% were levied upfront.

This French ticket levy represents a common-sense and comprehensive method of redistribution, promoting greater equity across the French live music ecosystem. Further, the CNM have also implemented a levy on music streaming revenue, such as Spotify and other digital streaming platforms, which is redirected by the CNM to grassroots music sector activities. Such bold music industry policy is to be applauded and hopefully replicated in Australia.

Liveurope

Liveurope is a Creative Europe-funded EU-wide venue platform and subsidy scheme designed to promote international touring for emerging, early-career artists. One venue in each EU country is eligible for the scheme based on factors such as diversity of programming across different demographics, genres and styles, as well as maintaining a strong track record of platforming emerging artists. Once a venue has proven eligible for the scheme and been granted Liveurope status, they may apply for subsidies to fund performances by international, early career EU artists. Venues receive funding per performance to host these international early career artists, and Liveurope defines early career artists as being within five years of their first public release.

Ideally a diversity of these venues will collaborate to fund an entire tour for an early-career artist or group across the EU outside of their home country. A caveat for the scheme is that artists cannot be hosted by the designated venue in their home country (i.e. wherever they are based). This

¹ In France, there is a strong reliance on the State and a relatively high level of trust in public authorities, which helps to explain why mechanisms such as the CNM ticket levy can be centralised and managed by a public body, something that would not be possible in many other countries.

clause is designed to promote international touring across the EU, as well as greater collaboration and coordination across the venue network.

Along with acting as a subsidised touring network for early career artists across the EU, Liveurope also facilitates networking activities and collaboration between member venues. **There is no reason why such a scheme could not be replicated across the federated states of Australia, run by a national organisation such as Music Australia, possibly with one designated venue in each metropolitan capital city area, and several in the regions of each state, designed to maintain an equal distribution of venues across metro and regional areas. This would facilitate more touring for early career Australian artists and rebuild a national touring network across regional Australia.** A potential obstacle may be designating which venues are eligible for the scheme, but Liveurope's eligibility criteria provides a helpful precedent and if implemented, designated Australian venues might be rotated every 3-5 years to facilitate a diversity of funding opportunities.

Conclusion

The primary observation of my research is that ownership of the venue—as in the literal building that venue activities are operating out of—is fundamental to its long-term sustainability. Whether the venue is owned by a charitable, benevolent landlord in the form of a community land trust, the local municipal government, or the venue itself, case study venues that do not have commercial, private landlords maintained much stronger certainty of planning and continuity of tenure, and were able to weather challenges more easily, as well as apply for grants with more success. Even a longer lease makes a significant difference to a venue's ability to forecast and plan accordingly. Private landlords are not incentivised to support such activities.

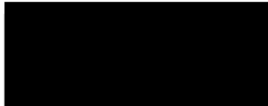
In terms of applying new solutions to the problem of security of tenure for venues, diverse and innovative forms of ownership, such as community and/or public ownership of venues need to be explored. Music Venue Properties serves as an ideal case study of a community land trust, collectively owned by passionate music fans and advocates, and designed to safeguard cultural and music spaces in the long-term. An Australian version of MVP is worth pursuing, perhaps extended to other creative and cultural activities, and with a focus on regional arts centres and venues in terms of procurement, as these assets are both likely cheaper, more at-risk and prone to greater scarcity in regional communities. Further, local and state governments should be leveraged as stewards of these spaces, either as direct owners in the form of public landlords dedicated to protecting GMVs and other cultural spaces, or facilitating the success of community groups, cooperative land trusts and other nonprofit asset managers to protect these spaces independently. Through either public or community investment, council rates or community shares, these venues and spaces need to be protected from private landlords and developers, and collective ownership is the way to do this effectively.

The secondary observation of this research is that venues under a certain size (usually 400 capacity) struggle to turn a profit in the long-term and should be restructured as not-for-profits to take advantage of various tax-breaks and fundraising support—both public, community and philanthropic—to sustain them. There is a long history of subsidised and public or collectively owned venues in France and northern Europe, largely due to an acknowledgement that these venues would be subject to market failure otherwise. A not-for-profit structure therefore acknowledges the reality of these venues, their service to the community, and opens new funding opportunities. However, it is not just the legal status of these spaces that opens access to funding, but also a broader public recognition of these venues as cultural spaces. Although this remains contested in Europe, as music venues are still largely classified as entertainment spaces and often sit outside the remit of cultural policy and public support, advocates have had greater success in making the case for popular music as being part of a shared cultural background, and therefore worthy of inclusion within public and community funding structures. Such lessons are deeply relevant to the current Australian context.

While solutions to the financial sustainability of Australian GMVs face different hurdles to those in the UK and Europe, **a move towards nonprofit venue models would create a much stronger position from which to make a more coherent and ethical case for community and public investment alongside other relief mechanisms such as tax exemptions and greater eligibility for funding.** Advocating to government for greater incentives for venues that adopt these community and nonprofit models, while demonstrating the value of these models to venue operators and industry, is key to shifting the narrative away from failing, for-profit commercial business

practices and towards more financially sustainable models. **Further, novel and pragmatic redistribution methods, such as local ticket levies, alongside a Stadium & Arena levy, are necessary.** Although not a panacea, such interventions will go a significant way towards ameliorating the structural problems beset by many of the GMVs and broader sector in Australia.

Yours sincerely,



Dr Sam Whiting



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