DOCUMENTARY ORGANIZATION OF CANADA
DOCUMENTARISTES DU CANADA

Submitted Electronically

January 20, 2025

Mr. Marc Morin
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario
K1A 0N2

Dear Mr. Morin:

Re: Intervention of the Documentary Organization of Canada - Broadcasting Notice of Consultation CRTC 2024-288: The Path Forward – Defining "Canadian program" and supporting the creation and distribution of Canadian programming in the audio-visual sector

Executive Summary

This public proceeding is critical for the future of Canadian and Indigenous programming, and in particular for long-form documentaries (category 2(b)) made in regions across the country. Canada has a long history of outstanding documentaries that have defined and redefined the genre, that consistently receive international acclaim, and have a powerful impact on social and political discourse. The documentary genre is where many creators begin and grow their careers, providing an important gateway into the sector. Documentaries are also an important genre for Indigenous creators, and a diversity of creators whose perspectives are prioritized within the *Broadcasting Act* as being of critical importance to Canadians.

For decades, the Commission has affirmed that these long-form documentaries are an important genre of Canadian and Indigenous content within our broadcasting system. While the Commission's Programs of National Interest (PNI) rules can be modernized, clear and enforceable Canadian Programming Expenditure obligations with a particular focus on independent, original programs and at-risk content such as documentaries are essential for maintaining a strong, vibrant audiovisual sector.

DOC submits that in order to meet the objectives of the current *Broadcasting Act*, the Policy Direction to the CRTC of November 2023 and the objectives of this public proceeding, the new framework must include mandatory expenditures that provides a net benefit to the independent production sector through a focus on Canadian-owned IP and a modernized approach to prioritizing at-risk genres such as documentaries.

Introduction

1. This submission is the intervention of the Documentary Organization of Canada in relation to Broadcasting Notice of Consultation CRTC 2024-288 (BNC 2024-288). The Documentary Organization

of Canada (DOC) is the collective voice of Canada's independent documentary creators. Founded in 1983, DOC has grown to 1,400 members across six chapters from coast to coast. DOC's mandate is to advocate for an equitable, sustainable environment for documentary production and to strengthen the sector within the broader cultural industry. In light of the critical issues discussed in this proceeding, DOC respectfully requests the opportunity to appear at the public hearing scheduled to start March 31, 2025 in Gatineau, Quebec to elaborate upon our written submissions.

2. This is a historic moment in our sector. While documentary content continues to be extremely popular with audiences[1], documentaries are highly vulnerable within our broadcasting sector. The production of Canadian and Indigenous long-form Category 2(b) documentary programs is decreasing every year.[2] There have been great strides in Canada's audiovisual production sector in support of equity, inclusion, diversity and accessibility. However, because communities prioritized within the *Online Streaming Act*[3] are largely represented in the documentary genre, decreased investment for documentaries negatively impacts these objectives of both the Act and the Policy Direction[4]. DOC is compelled to participate in these proceedings in order to speak for one of the most socio-economically, culturally and racially diverse creative communities in Canada, that produces content that is key to Canada's cultural autonomy and the spirit and intent of the *Online Streaming Act*.

3. As part of DOC's participation in this public proceeding, DOC is undertaking several overviews of the documentary sector in Canada. Firstly, DOC is conducting consultations with independent documentary creators across Canada. To date, DOC has consulted with documentary creators in Alberta, Manitoba, the NorthWest (Yukon, NWT, British Colombia) region and Quebec. By the March hearings, DOC will have produced a *What We Heard* report that includes the Atlantic region and Ontario as well. Please see **Appendix A** for take-aways from the consultations to date that are relevant to this proceeding. Secondly, DOC has commissioned a report from Nordicity on documentary production in Canada from 2013 – 2023. Nordicity's Preliminary Research can be found in **Appendix B**. The final report will be submitted as evidence in the March hearings. DOC has collected letters from Canadian documentary creators about their experiences producing documentary films, that demonstrate that this genre is still very much at-risk and in need of regulatory support (**Appendix C**). Lastly, DOC is submitting research into the definition of a documentary across the country by Federal and Provincial institutions, in order to nourish a discussion about how we define the genre in light of proposed actions to remove obligations for at-risk content **(Appendix D).**

4. In this submission, DOC addresses notable key issues raised in BNC 2024-288, primarily relating to the following areas:

[1] According to Parrot Analytics, the number of original streaming documentaries has increased about 77 percent between January 2019 and July 2022 https://www.hollywoodreporter.com/movies/movie-features/documentary-streaming-age-filmmaker-debate-ethics-payments-1235221541/
[2] *Getting Real 2025: Preliminary Research* (**Appendix B**)
[3] "Canadians from Black or other racialized communities and Canadians of diverse ethnocultural backgrounds, socio-economic statuses, abilities and disabilities, sexual orientations, gender identities and expressions" Online Streaming Act 3.1(d)(iii)
[4] Order Issuing Directions to the CRTC, 12 (g)(i) & (ii)

A. The Importance of Documentaries to Canada and our Broadcasting System

5. Documentaries are a critical cultural medium that help shape and preserve Canadian identity by capturing and reflecting the nation's diverse cultural, social, and political narratives. Documentaries offer a means to share and document unique experiences, histories, and perspectives that are often overlooked or misrepresented in mainstream media. Just a few notable examples from 2024 alone include *Wilfred Buck*, Lisa Jackson's portrait of a Cree Elder that brings to life ancient teachings of Indigenous astronomy and cosmology; *Any Other Way: the Jackie Shane Story* about the trailblazing Canadian transgender performer; *Intercepted* in which the devastating impacts of Russia's full-scale war in Ukraine are brought into intimate focus through intercepted calls home by Russian soldiers; *The Movie Man* about a tiny community in the backwoods of Ontario whose five-screen cinema palace welcomes upwards of 50,000 visitors every summer; and *Plastic People* about the growing threat of microplastics on human health.

6. Canada is a recognized leader in the documentary genre, and our films often receive international acclaim and awards. In 2023, Canadian documentary filmmaker Daniel Roher won the Oscar for best documentary for *Navalny* about the deceased Russian dissident, and two of the five nominated documentaries that year were made by Canadians. Last year, Canadian documentary filmmaker Nisha Pahuja was nominated for the Academy Award for best documentary for *Kill a Tiger*. This year, two of the most buzzed about documentaries on the Oscar-shortlist are made by Canadians: *Union* and *Sugarcane*. Canadian documentaries are consistently celebrated at the world's top festivals such as Sundance and Berlin. These incredible films bring Canadian perspectives to the world, and amplify our cultural content onto the international stage.

7. Canadian documentary filmmakers who are now succeeding at the highest levels have been nurtured by our country's broadcasting sector, within existing regulatory policies that provide support to this important genre. Before taking home the 2023 Academy Award for *Navalny* and directing the 2024

documentary *Blink* for National Geographic films, Daniel Roher honed his craft within Canada's regulatory system making documentaries for broadcast. Before receiving an Oscar nomination for her international hit *To Kill A Tiger*, Nisha Pahuja spent twenty years building up her documentary career in Canada. The team behind *Yintah*, the first Indigenous Netflix Original, spent a decade making this risky and important story of Indigenous land defenders before Netflix picked it up this past Fall. Netflix is also a partner on the comedy series *North of North* along with CBC and APTN. This highly anticipated show is led by producers Arnaquq-Baril and Stacey Aglok MacDonald, who began their careers in documentary.

8. Many documentary films produced within Canada's broadcasting sector continue to resonate for years after their release. During DOC's 2024-2025 consultations, filmmakers spoke about some of these long-lasting, impactful documentaries from their region. Films such as *Foster Child*, the seminal 1987 documentary made in Alberta by Gil Cardinal, cited by Jesse Wente as having "made it possible for us to think about putting our own stories on the screen"[5]. Or Guy Maddin's internationally celebrated 2007 documentary *My Winnipeg* that the Criterion Collection describes as a "hypnotic, expertly conceived paean to that wonderful and terrifying place"[6]. Or Baljit Sangra's 2019 BC-based documentary *Because We Are Girls*, that produced 18 million viewing minutes on Amazon Prime.[7]

9. Documentaries also fulfill an important role in public discourse. In an increasingly polarized Canada, seeing the daily struggles of a Canadian on the other side of the country has never been more important. Documentary filmmaker Barri Cohen states that "When my last film received 11 million engagements, it also included thousands of comments because the film – about children institutionalized with intellectual disability and harmed -- touched nearly everyone in Canada. I received comments from people sharing stories about their family members or themselves, and how they suffered in one institution or another in Canada – being locked up for being different."[8] Vancouver-based Story, Money Impact (SMI) connects films with audiences in order to bring Canadians together through documentaries and dialogue. In 2024, SMI hosted 412 screenings in 137 cities and towns, bringing films to 11,825 Canadians for whom these important, in-person events resulted in 96% of viewers planning to take action in support of the issues addressed in the film.[9] Topics from this year included food insecurity, infertility and reproductive rights, and accessibility. These in-depth stories help us understand critical topics while also introducing us to people and stories we would otherwise never know.

[5] https://collection.nfb.ca/film/foster_child
[6] https://www.criterion.com/films/27969-my-winnipeg?srsltid=AfmBOorLRfAxn8MbVR9tEnwMynV_ATUAz4Uud0NPtRzG31pfoJ-OhXLX
[7] https://povmagazine.com/nfb-strategic-plan-interview-joli-coeur-roy-dufour/
[8] Appendix C
[9] Story, Money Impact 2024 Annual Report

B. Documentaries as a Gateway into Independent Production for all Creators, Especially for Creators from Underrepresented Communities

10. Documentary is an accessible platform to develop one's craft and share meaningful stories, and is often the first entry point into the independent production sector. Documentaries often begin with the simple act of picking up a camera and documenting a story unfolding in one's own community. Documentaries are less expensive to produce than fiction, and this enables emerging creators to build a foundation for their careers. Some of Canada's most celebrated filmmakers began in documentary: before Sarah Polley's *Women Talking* came the documentary *Stories We Tell*, and Denis Villeneuve, now one of the world's most celebrated directors, began his career with the documentary program *La Course destination monde* on Radio-Canada. On CBC's list of the 50 greatest films directed by Canadians, notable names whose early films were documentaries include Denys Arcand (*The Barbarian Invasions*), Zacharias Kunuk (*Atanarjuat: The Fast Runner*), Claude Jutra (*Mon Oncle Antoine*), Elle-Máijá Tailfeathers (*The Body Remembers When the World Broke Open*) and Alanis Obomsawin.[10]

11. Canada's broadcasting policy objectives under the updated *Broadcasting Act* recognize the importance of supporting communities who have been historically under-represented within our broadcasting sector.[11] The *Broadcasting Act* also includes provisions giving the Commission the authority to make orders imposing conditions on broadcasting undertakings related to the proportion of programs to be broadcast that shall be devoted to specific genres, in order to ensure diversity of programming.[12]

12. Documentary programming plays a vital role in ensuring diversity and amplifying underrepresented voices and is a gateway into the sector for those who face historic barriers rooted in systemic racism, colonialism, and other forms of oppression. A survey conducted by the Canada Media Fund reveals that at 93%, respondents were definitive on the importance of the documentary genre to preserve language and reflect cultural identity and on the importance of the documentary genre as an entry point for new and underrepresented filmmakers.[13] In 2021, DOC created a free, introductory membership category for documentary creators who are Indigenous, Black or racialized. This led to a 100% increase in our membership and today, documentary filmmakers from these communities make up half of DOC's 1,400 members across the country while being consistently under-represented within the broader production sector.

13. Many of the Indigenous, Black and racialized creators who are accessing new production funds targeted to their communities are making documentary films. In 2021, the Canada Media Fund created the Pilot Program for Racialized Communities (PPRC) to fund content by Black and racialized creators. Sixteen of the 37 projects that received PPRC production funding in fiscal 2021-2022 and fiscal 2022-2023 were documentaries, as were twenty-five of the 34 productions financed through the CMF's Indigenous program during the same period. The CMF's 2024 demographic report shows that diverse

[10] https://www.cbc.ca/artsprojects/50greatestfilms.
[11] *Broadcasting Act*, Section 3(1) (iii.11) provide opportunities to Black and other racialized persons in Canada by taking into account their specific needs and interests, namely, by supporting the production and broadcasting of original programs by and for Black and other racialized communities.
[12] *Broadcasting Act*, Section 9.1(1)(d).
[13] *CMF Genre Report: Children & Youth and One-Off Documentary*

communities[14] are highly represented within the documentary genre with 46% representation in key roles.[15]

C. Documentaries and Canada's reconciliation with Indigenous peoples

14. Documentaries are key to Canada's reconciliation with our history of genocide against Indigenous peoples. Documentaries by filmmakers such as Tasha Hubbard, Alethea Arnaquq-Baril, Lisa Jackson, Kim O'Bomsawin, Neil Diamond, Loretta Todd, and Alanis O'Bomsawin - whose documentaries have inspired multiple generations of Indigenous filmmakers - are transforming the narrative of Canadian history and the documentary genre. In spite of living with the generational trauma of residential schools, the sixties scoop, the epidemic of missing and murdered Indigenous women and girls, and systemic racism against Indigenous peoples that continues to this day, Indigenous filmmakers have made seminal documentaries that are fundamental to our collective process of reconciliation.

15. Before making the 2022 film *Bones of Crows*, the largest-scale Indigenous-led production in Canada at that time[16], Marie Clements directed *The Road Forward*, a documentary connecting the beginnings of Indigenous Nationalism in the 1930s with the powerful momentum of First Nations activism today. And as noted above, the 2025 hit comedy *North of North* that is currently the largest Indigenous led-production in this country was initiated by documentary filmmakers. In the Canada Media Fund's Demographic Report, Indigenous key creatives are represented at 66% of English documentary production.[17] And of the ninety-one submitted applications for production funding to the Indigenous Screen Office in 2024-25, almost half (47%) of the submissions were for documentaries.[18]

D. CRTC's ongoing Recognition of the Importance of Documentary Programming

16. Documentaries have been recognized by the Commission as a nationally important genre for Canadian and Indigenous content within our broadcasting system for many years. In Public Notice CRTC 1999-97 the Commission acknowledged documentaries as culturally valuable, stating, "Canada has a rich and successful tradition of documentary production for which there is an increasing demand. This type of programming is popular around the world, and highly exportable. In addition, Canadian producers have a world-class reputation in this field. The inclusion of long-form documentaries as priority programs will ensure the continuation of this success."[19]

17. In 2010, the Commission introduced a more formal definition for long-form documentaries as part of its regulatory framework, that distinguished documentaries from reality television and reinforced their cultural importance. The Commission stated, "though this type of programming ["docusoaps" and

[14] Self-identified to at least 1 Diverse Community (Indigenous People to Canada, Racialized, 2SLGBTQ+, Person living with one or more Disabilities)
[15] Canada Media Fund 2023-2024 Demographic Report, p.28
[16] https://playbackonline.ca/2022/10/19/mipcom-22-building-bones-of-crows-hybrid-model/
[17] Canada Media Fund 2023-2024 Demographic Report p.33
[18] Data provided by the Indigenous Screen Office
[19] CRTC 1999-97 at para 34.

"docudramas"] may be factual, it lacks or has very minimal amounts of in-depth critical analysis of a specific subject or point of view that is the key defining element of category 2(*b*) Long-form documentary programming.[20]" In 2015, as part of Let's Talk TV, the Commission upheld the importance of documentary programming by continuing to include it in its definition of programs of national interest (PNI), labelling this type of programming as "generally expensive to produce and carrying a greater risk of unprofitability" as well as programming that "in the absence of regulatory support would not otherwise be available to Canadians."[21] The Commission's 2017 decision sought to ensure access to a world-class communications system through "…continued support for compelling, diverse Canadian programming … that reflects Canadian attitudes, opinions, ideas, values and artistic creativity. This includes supporting the production of dramas [and] long-form documentaries…"[22]

18. In addition to the Commission historically recognizing documentaries as a nationally important genre, Canadians have also consistently expressed interest in the availability of documentary programming. In the CRTC's 2018 *Harnessing Change: The Future of Programming Distribution in Canada* Report, documentary programming was considered to be important programming for three in five (61%) of Canadians.[23]

E. Documentaries are At-Risk Content

19. Despite their importance to Canadians, broadcasters have been consistently reducing their support for documentary programs. The most recent CMPA Profile report shows that production on 2b documentaries decreased by 17.9% in 2023-24[24] and the drift away from specifically at-risk documentary programming has been keenly felt by filmmakers across the country for many years.

20. During DOC's recent Community Consultations, an Alberta filmmaker said that "a big hurdle we have here in Alberta is that we don't have a broadcaster, unlike in in Toronto ... We don't have the access." They described how even when filmmakers can raise the money to travel to key markets, it is very difficult to convince a Toronto-based broadcaster that these local stories have value.

21. In Manitoba, filmmakers spoke about the importance of the local documentary series *MTS: Stories from Home,* that not only nourished the local production sector for many years but continues to be a reference point for the community. Filmmakers spoke about the long-term impacts of the 2016 sale of the MTS network to Bell, a fear also expressed at the time by intervenors in the Commission's BNC 2016-847.[25] At DOC's Manitoba consultation, a filmmaker said that with the sale of MTS, "for a number of the projects that people are talking about [as significant to the region] the path to funding that project no longer exists." Another documentary filmmaker noted that "not only did [MTS Stories from Home]

[20] Broadcasting Regulatory Policy CRTC 2010-808 at para 7.
[21] Broadcasting Regulatory Policy CRTC 2015-86 at para 276.
[22] Broadcasting Decision CRTC 2017-148 https://crtc.gc.ca/eng/archive/2017/2017-148.htm
[23] https://crtc.gc.ca/eng/publications/s15/eval.htm#r1.
[24] CMPA Profile 2024, p.24
[25] https://crtc.gc.ca/eng/archive/2016/2016-487.htm

create all kinds of voices, all kinds of stories about Manitoba that would never otherwise exist, but [MTS] also created entire production companies that are now employing dozens and dozens of people. It was a huge economic driver."

22. The drift away from documentary programs is not only felt in the regions, but also in our major urban centres. Toronto-based DOC member Robert Lang states that "While I continue to produce highly successful documentaries for broadcast, the number of commissions we get has seriously declined and certainly the advent of streaming services has not increased the possibilities as we anticipated."[26]

23. These experiences on the ground are reflected in the CRTC's PNI expenditure data, which shows that spending on documentary programs has been consistently decreasing. Across every large private ownership group, spending on long-form documentary in 2023 is well below 2015 levels.

Title: PNI expenditures by CBC/SRC and large private ownership groups, by program category ($ millions), 2015-2023

Ownership Group	Program Category	2015	2016	2017	2018	2019	2020	2021	2022	2023
CBC/SRC	Long-form documentary	38.2	44.7	48.1	34.2	33.8	36.8	29.6	30.6	28.7
BCE	Long-form documentary	54.9	38.8	43	43.5	44.8	45.1	42.8	43.2	47.5
Corus*	Long-form documentary	6.4	20.8	16.9	18.5	11.1	9.85	12.9	15.6	23.2
Rogers	Long-form documentary	4.1	6.5	6.3	5.5	1.6	0.5	3	3.3	3.6
Shaw*	Long-form documentary	23.4								
Total	Long-form documentary	148.9	139.2	146.8	128.1	117.9	92.6	88.3	93	103

Source: Source: Public disclosure of aggregate annual returns for large ownership groups, CRTC data TV-T35[27]

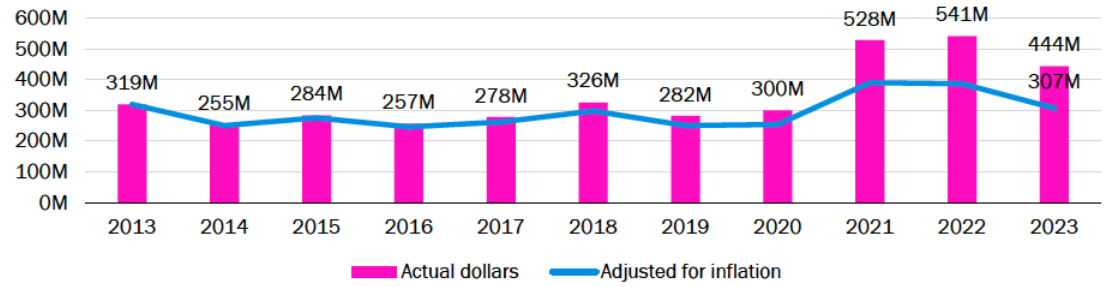
24. DOC commissioned Nordicity to research the levels of documentary production in Canada over the ten-year period between 2013 and 2023, included in this intervention as **Appendix B**. In real 2013 dollars, spending on long-form documentary decreased by 38% during the 2013-2023 period. When comparing 2013 and 2023, this decline represents a loss of $60 million in real dollars of long-form documentary

[26] Appendix C
[27] Following Corus's acquisition of Shaw Media, many specialty services are now listed under Corus Entertainment.

contributions.[28]

25. According to Nordicity's research, when adjusted for inflation, documentary production volume in Canada is 4% lower than the annual average in 2013.

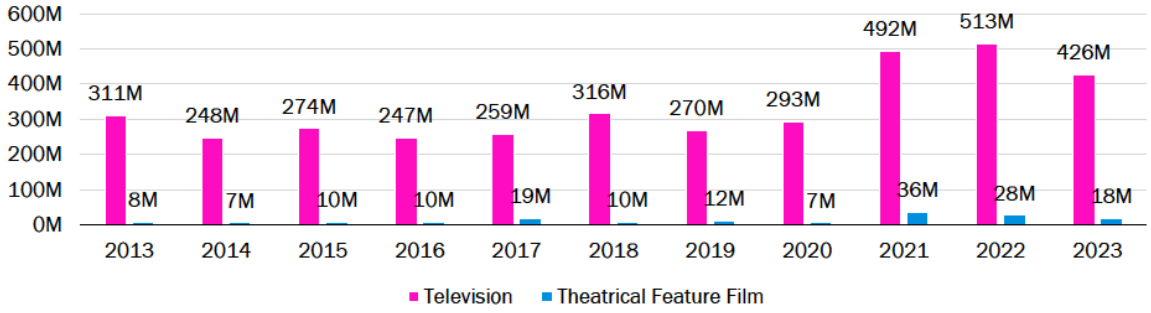
Figure 1 - Volume of Canadian documentary production



Source: Estimates based on data collected from CAVCO.

26. Within these decreasing numbers, broadcast has remained incredibly important for documentary production in Canada, representing an annual average of 96% of documentary productions during this ten-year period. The impacts of absolving broadcasters of any obligations towards documentary programs would be disastrous for the genre's production in Canada.

Figure 2 – Volume of Canadian documentary production by release medium



Source: Estimates based on data collected from CAVCO.

[28] Getting Real 2025, p.8

F. Canadian Expenditure Obligations: Supporting Category 2(b) Documentary Programming and Independent, Original content

27. The Commission's preliminary view in BNC 2024-288 states that both online and traditional audio-visual undertakings that have $25 million dollars (or more) in annual Canadian gross broadcasting revenues should be required to make expenditures on Canadian programming.[29] DOC agrees with this preliminary approach that online and traditional audio-visual undertakings should have obligations to make expenditures to support Canadian programming, including long-form documentary productions.

28. The Commission should ensure that as a minimum requirement, Canadian Programming Expenditure (CPE) obligations result in a net benefit to Canada's broadcasting system. CPE obligations for both traditional broadcasting and online undertakings are consistent with section 3(1)(e) of the *Broadcasting Act* which says that "each element of the Canadian broadcasting system shall contribute in an appropriate manner to the creation and presentation of Canadian programming." These measures are also consistent with section 3(1)(i)(v) of the *Broadcasting Act* which states, "the programming provided by the Canadian broadcasting system should include a significant contribution from the Canadian independent production sector."

29. CPE Contributions should include significant obligations for independent, original programming. In addition, if the Commission chooses to implement minimum French- and English-language expenditure requirements as it did within the base contribution allocations in BRP CRTC 2024-121-1, it must include safeguards regarding the original language of production. Without such measures, it could be possible for undertakings to meet a minimum French-language expenditure requirement by allocating funds to dubbing English-language content into French, rather than investing in original French-language productions. This result would undermine the policy objectives of the *Broadcasting Act* by diverting resources away from French-language creators and reducing the amount of original French-language productions available to Canadian audiences.

30. Within obligations to Canadian programming, DOC agrees with the Commission's position that control over the creative and financial aspects of a production are important elements of what makes a program Canadian and that Canadian ownership and control of Intellectual Property are central to ensuring Canadian-led content.

31. Programs of National Interest (PNI) are a subset of Canadian Programming Expenditures that support the production of high-value, culturally significant content, such as dramas, long-form documentaries, and Indigenous programming, which are central to communicating Canadian stories and values but are typically costly to produce and challenging to monetize without regulatory support. Such requirements are also vital to a strong, rich and diverse broadcasting system for Canada.

32. DOC is very concerned about the Commission's preliminary view set out at paragraph 46 of BNC 2024-288, which suggests that Programs of National Interest, including documentary productions, are no

[29] CRTC BNC 2024-288 at para 43.

longer at-risk genres of content and do not require regulatory support in the current media environment. Indeed, the Commission has expressed its preliminary view relating to existing PNI stating that, "in an 'on-demand' system driven by online undertakings whose business models are based on the programs that underscore the current definition of PNI, such as drama and documentaries, the current approach to PNI is no longer needed."[30]

33. DOC respectfully submits that long-form documentaries continue to be highly at-risk and require CRTC supportive regulatory requirements to ensure that they are developed, produced and distributed to audiences across the country. **Appendix C** to this submission includes statements by documentary filmmakers that speak unanimously of the risks of making documentary content, and the lack of support by streamers for independently made Canadian documentaries. These important stories take many years to create. Broadcast licenses are harder and harder to come by, especially for local stories.

34. Online undertakings tend not to support Canadian and Indigenous long-form documentaries, and the types of documentaries that are linked to streamers' business models are have little in common with those identified by the Commission as being important to the broadcasting sector. Despite an initial interest in high quality documentary content, the era of streaming services investing in premium documentaries is now largely considered to be over. The "Golden Age" of documentaries has been replaced by the current "Corporate Age", defined by an appetite for low-cost documentary content led by true crime stories[31] or celebrity-driven vehicles.[32] Canadian platforms that must compete with American platforms are obligated to mirror this type of content.

35. Veteran film executive Keri Putnam (HBO, Disney/Miramax, Sundance) researched the current drift by streamers away from premium documentary films as part of her Harvard Kennedy School research. Putnam explains the drift as being a very deliberate business decision:

> Six major companies capture 80% of our subscription streaming time and analysts expect further consolidation in the coming year. … mandates [are] to focus on mass-appeal hits that will attract and retain to the widest possible audience (and advertisers for new ad-supported options), while avoiding risk or controversy.
>
> According to a document prepared by the agency WME for its clients and reviewed by Business Insider, Netflix is looking for crime, celeb, sports, and history-themed stories when it comes to unscripted fare, but "nothing too political."[33]

[30] CRTC BNC 2024-288 para 46.
[31] https://www.vulture.com/article/tv-documentaries-ethical-standards.html
[32] https://www.newstatesman.com/culture/tv/2023/07/golden-age-documentary-myth
[33] https://shorensteincenter.org/commentary/whats-risk-streaming-media-age/

36. Canadian documentary filmmaker Brett Story's latest film "Union" premiered at the 2024 Sundance Film Festival and has been a high-profile presence across the International festival circuit over the last year. *Union* is an Oscar contender, having made the official Shortlist. But due to its subject matter, the unionization by Amazon workers, the documentary cannot find a home on a major streaming platform[34] and has been called a film that "Hollywood and Corporate America don't want you to see" by the New Yorker.[35]

37. The lack of interest from streaming platforms in Canadian documentaries is evident, with 2024 marking the first time a Canadian documentary, the Indigenous production *Yintah*, was picked up as a Netflix Original. DOC Atlantic member Millefiore Clarkes states that "Being a filmmaker from a small and rural province means that I am one of a small group of voices that are able to reflect this community's collective experiences to the community itself, and the world at large. If we do not tell the stories of smaller communities, what we are left with is a homogeneity of perspectives and a watering down of national identity… despite how impactful and important my films are to Canadians and to international audiences, I don't often see the types of documentaries I make reflected on major streaming platforms"[36]

38. Beyond a lack of interest in these local Canadian stories, the streamers' preference for documentaries that align with their specific business models is having a detrimental impact on the genre, thereby limiting the diversity and scope of stories that are supported and distributed.

> A genre that had always existed in part to inform and enlighten was now primarily a commercial product.… A decade after journalism suffered through its own period of disruption, its onscreen cousin entered a kind of clickbait era of its own: Make it fast, see what works, repeat.[37]

39. There is also a clear shift in strategy for online streaming services. Platforms are increasingly investing in live event programming, particularly sports, which diverts resources away from supporting at-risk PNI programming. Netflix reportedly paid $150 million to stream two NFL games on Christmas Day 2024 and Apple has committed to a 10-year partnership with Major League Soccer worth $2.5 billion.[38] In July 2024, the NBA signed an 11-year deal with Disney, NBC Universal and Amazon estimated at $76 billion[39].

40. DOC maintains that both traditional and online expenditure obligations are necessary to support at-risk, culturally significant documentary programs and to ensure a diversity of genres. A modernized

[34] https://www.thestar.com/entertainment/movies/this-controversial-new-film-depicts-a-david-vs--goliath-fight-against-amazon-heres-whats/article_d614669e-a38f-11ef-b5f5-8ba623128c37.html
[35] https://www.newyorker.com/culture/critics-notebook/documentaries-of-dissent
[36] Appendix C
[37] https://www.vulture.com/article/tv-documentaries-ethical-standards.html
[38] https://www.forbes.com/sites/dereksaul/2024/12/25/netflix-set-for-150-million-nfl-christmas-test-as-stock-heads-to-best-year-since-2015/#; https://www.apple.com/ca/newsroom/2022/06/apple-and-mls-to-present-all-mls-matches-for-10-years-beginning-in-2023/; https://www.nytimes.com/athletic/3490012/2022/06/14/mls-agrees-to-10-year-broadcast-deal-with-apple-worth-2-5-billion-sources/
[39] https://www.npr.org/2024/07/24/nx-s1-5050991/nba-tv-deal-disney-nbc-amazon-tnt

regulatory framework that includes minimum requirements for these important long-form documentary productions is consistent with key public policy objectives of the Broadcasting Act and in particular: section 9.1(1)(d), which reads as follows:

> "The Commission may, in furtherance of its objects, make orders imposing conditions on the carrying on of broadcasting undertakings that the Commission considers appropriate for the implementation of the broadcasting policy set out in subsection 3(1), including conditions respecting d) the proportion of programs to be broadcast that shall be devoted to specific genres, in order to ensure the diversity of programming;"[40]

41. Minimum expenditure requirements by traditional and online broadcasting undertakings for the most at-risk and culturally significant Programs of National Interest are highly relevant in the digital age. DOC notes that in BRP CRTC 2024-121, the Commission ordered online undertakings to make contributions to production funds to advance key policy objectives, such as supporting the creation, production and distribution of Canadian and Indigenous content in Canada's two official languages, as well as in Indigenous languages. Imposing CPE obligations and requirements to support long-form documentary programming on both traditional and online audio-visual undertakings similarly aligns with these broadcasting policy objectives. These types of obligations will ensure consistent and meaningful support for Canadian and Indigenous storytelling across all platforms by maintaining adequate investment in programming that is of National importance to Canadians.

G. Definition of Canadian Program: Modernized and Updated Key Creative Scale for Long-form Documentaries

42. The Commission has presented its preliminary view that additional points be permitted to contribute to the definition of a Canadian program, and that a program meet nine of the potential fifteen points in order to qualify as a Canadian program. The Commission has further proposed that when productions (such as documentaries) do not use certain key creative positions, the Commission will grant Canadian certification provided that Canadians fill all key creative positions and the production therefore earns a perfect score.

43. Documentary film productions are often led by small teams, and do not use many of the points listed by the Commission as contributing to the definition of a Canadian program. It is rare for a documentary program to use the positions of showrunner, lead performer, art director, head of costume design, make-up/hair, or visual effects director. Of the points listed, most documentaries use:

[40] *Broadcasting Act*

- Director (2 points)
- Screenwriter, often the same individual as the director (2 points)
- Director of Photography (1 point)
- Editor (1 point)
- Music Composer (1 point)

44. This means that an average documentary program will attain 7 points, rather than the nine points minimum proposed by the Commission.

45. Some DOC members travel internationally to bring their Canadian perspective to an international story. For many of our members whose films are shot outside of Canada, these stories are rooted in their own diasporic communities, and intrinsically linked to Canada's evolving national identity. In accordance with current ethical standards of documentary filmmaking, Canadian broadcasters, funders and institutions ask documentary creators to adhere to principles of narrative positioning and accountability, whereby the community being represented on-screen is also represented among the key creative team. This means that where a production is being filmed internationally, a Canadian documentary value is to hire a local key creative to be a part of the creative team.

46. From a financial and sustainability perspective, hiring one crew member locally such as a cinematographer reduces the production's carbon footprint, while saving the production a significant amount of money on airfare and accommodations. Having a local crew member also means that important story elements can be filmed as they unfold, rather than scrambling to book a Canadian on an expensive last-minute shoot. This is especially important on documentary films, that are typically shot over a period of many years with key story elements often emerging at unexpected moments.

47. Within the documentary sector, the important roles of cinematographer or editor can also increase the project's ability to attract the attention of international funders, festivals, and distribution, much like the use of certain well-known actors in a live-action drama production. Star editors or cinematographers are regularly interviewed in prestigious industry publications, invited to be jurors at festivals, and asked to appear on panel discussions, all of which amplify the project's status.

48. DOC proposes that for documentary programs, the Commission set up seven possible points, and obligate meeting six of the seven points rather than all of the available positions.

H. Modernizing the Definition for Category 2(b) Documentary

49. In addition to modernizing the scale, the Commission might consider updating the definition of long-form documentaries to reflect the diverse formats currently being produced in this genre. This approach would align with the Commission's existing practice for drama, which encompasses a variety of sub-genres under category 7. Similarly, revising the definition of long-form documentary categories and

sub-genres could enable the Commission to focus on challenging, long-form, and at-risk documentaries that hold particular importance for Canadian audiences.

50. DOC notes the Canada Media Fund's (CMF) definition of Point-of-View (POV) documentaries, where the director's perspective and intent—along with the depth of research—determine whether a project qualifies as a POV documentary. Notably, the CMF's definition excludes certain types of content, such as factual programming and projects based on light informational formats. [41]

51. DOC is including **Appendix D** that outlines the variety of definitions being used across Canada by Federal and Provincial agencies. DOC also notes that the question of defining a documentary led to a rich and dynamic discussion at DOC's Quebec consultations, the results of which will be presented within our What We Heard report and submitted as evidence at the hearings into this Consultation.

I. Data Collection

52. BNC 2024-288 outlines various questions about the collection and publication of data from broadcasting undertakings. The Commission's preliminary view states that the revenues and the programming expenditures of Canadian and foreign broadcasting undertakings should be made public to provide transparency and ensure the Commission's ability to monitor the broadcasting system.[42]

53. DOC agrees with the Commission's preliminary view. In particular, this data should include annual revenues, both in aggregate and broken down by individual undertakings, to provide insight into the financial scale and contributions of each broadcaster and streamer. It should also capture annual expenditures on public-interest, long-form documentaries, specifying support for original documentary productions and expenditures on other types of documentary content. This information is critical for understanding the financial commitment of these entities to culturally significant programming and for evaluating their compliance with regulatory obligations.

54. Additionally, the CRTC should require detailed reporting on contributions to various production funds under the framework established in BRP 2024-121-1. This includes the total amounts directed by streamers to each fund, as well as how they spent the up to 1.5% of contributions that they are not required to allocate to the CMF. Furthermore, the CRTC should collect data on support for content created by individuals from underrepresented groups, enabling an assessment of the effectiveness of current policies in promoting diversity and inclusion within the industry. Making this data public would enhance transparency, encourage compliance, and support informed decision-making to strengthen Canada's broadcasting sector.

[41] https://cmf-fmc.ca/document/appendix-a-definitions-and-essential-requirements/
[42] BNC CRTC 2024-288 at para 53.

55. DOC notes the Racial Equity Media Collective's (REMC) recommendations for implementing a National Data System within its 2023 Report: *A National Data System & Benchmarking For Racial Equity*[43] and supports the Commission aligning with the REMC's recommendations as to how to effectively approach our sector's transformation using data collection, among other tools.

J. CRTC should not approve Applications from Broadcasters Seeking Relief from Expenditure Requirements

56. Over the past two years, several broadcasters operating under the group-based licensing approach have sought relief from their CPE and/or PNI obligations and/or Satellite Relay Distribution Undertaking (SRDU) Contributions. DOC does not support any reduction in PNI obligations for broadcasters at this time, and maintains that these requests should be evaluated within the context of a fully established policy framework. Premature reductions could undermine the effectiveness of the new framework and jeopardize support for culturally significant programming. Moreover, DOC is opposed to Rogers proposal to include popular genres of programs in the Commission's PNI definition other than long-form documentaries and dramatic productions.

Questions and Answers Section: Answers Only

A1: The Commission should create a distinct points system for documentary productions, similar to the framework it already has in place for animation. DOC proposes a 7-points framework for documentary, with a minimum of 6 points required in order to be certified as Canadian. Implementing a distinct point system for documentary productions will allow the Commission and the broader sector to more effectively administer and support the creation and production of Canadian documentaries.

A4: Documentaries do not typically use the position of "showrunner".

A13: DOC supports an IP ownership model in which IP is fully owned by the independent Canadian production company, and supports a model in which a significant percent of Canadian Programming Expenditures support independent, original Canadian programming.

A14: DOC supports ensuring that the producer position is filled by a Canadian.

A18: As noted above, the Commission's view regarding PNI does not align with current business models. Where flexible regulations do exist currently for broadcasters, investment in long-form documentary content decreases. Furthermore, as noted above, long-form documentary content produced in the public interest is not

43 https://static1.squarespace.com/static/5da5e203aca5a576a25ef17f/t/654278c7ecff72509c65c5af/1698855112184/REMC+Data+System+and+Benchmarking+Report_EN.pdf p.33

part of the business models of online platforms. As outlined in this submission, streaming platforms are gravitating toward lighter, more commercially viable content and live event programming such as sports, rather than PNI programming. The increasing focus on event-based content demonstrates that these platforms prioritize high-revenue, broad-appeal programming over culturally significant PNI content. Without regulatory safeguards, the availability of long-form documentary and other PNI programming will continue to erode, leaving a gap in Canadian storytelling and reducing the diversity of content available to audiences.

A19: No. CPE obligations without obligations to at-risk programs, such as documentaries, would result in the sharp decline, and eventual extinction of important genres across the broadcasting sector. The types of high-quality documentary programs that are able to be exported internationally take years to develop and produce and require a significant amount of financing. Without targeted CPE obligations that include protections for at-risk content like documentaries, there would be a significant reduction in the production of high-quality exportable Canadian documentary content. This result would not only limit Canadian audiences' access to domestically produced, culturally significant documentaries, but would also diminish Canada's ability to contribute to the global documentary landscape, weakening the country's presence in international markets.

A20: Equitable CPE and PNI requirements should be established to ensure that all major players in Canada's broadcasting ecosystem contribute fairly to the development, production, and distribution of Canadian and Indigenous programming.

A21: DOC agrees with the Commission's preliminary approach that online and traditional audio-visual broadcasting undertakings should have obligations to make expenditures to support Canadian programming, including long-form documentary productions. In particular, undertakings should be required to allocate expenditures to support original, independent Canadian programming, including obligations for at-risk PNI programming such as long-form documentaries.

A23: A modernized expenditure framework must include obligations or incentives within CPE obligations in order to ensure that content created by and for equity-deserving groups, OLMCs, and Canadians of diverse backgrounds is meaningfully supported. These frameworks must be set up through meaningful engagement.

DOC notes the Racial Equity Media Collective's (REMC) submission to the Commission regarding "A modernized CRTC regulatory framework on diversity and inclusion" and specifically its point that "it would be greatly beneficial to the causes of diversity and inclusion for the CRTC to convene a standing Engagement Group for representatives of equity-deserving communities. We also believe such a group would help the CRTC to fulfil the community engagement mandate set out in the government's policy directions under SOR/2023-239… it is important that members of those communities have access to a space where they can directly relay their own experiences of those consultations, and of their experiences with broadcasters more broadly. It is our view that the proposed Engagement Group could be an effective mechanism to address this asymmetry, along with many additional issues relating to diversity and inclusion."[44]

[44] REMC comments on *A modernized CRTC regulatory framework on diversity and inclusion*, para.32 - 34

As a pillar of the audiovisual sector alongside English and French content, ensuring that a portion of CPE is directed towards funding Indigenous programming would help support a robust Indigenous screen sector. This support should include direct funding to the ISO, Canada's only Indigenous-led independent funding body for the screen sector, which plays a critical role in fostering Indigenous storytelling that is key to Canada's reconciliation with Indigenous peoples.

DOC would like to take this opportunity to express our support for the positions of the ISO with regards to the Co-Development of an Indigenous Broadcasting Policy[45], specifically Appendix A of the ISO's submission including the *Definition of Indigenous Content and Certification requirements* and *Additional Measures and Means for Non-Indigenous Broadcasters and Online Undertakings to Support the Indigenous screen-based Sector*.[46]

It is also important to note that documentary production provides an accessible and vital entry point into the sector, particularly for underrepresented individuals. Documentaries often require lower production budgets than scripted content, making them a more feasible avenue for emerging creators, including those from Indigenous communities, equity-deserving groups, and OLMCs. Additionally, the documentary format allows for authentic storytelling that reflects lived experiences, cultural histories, and social issues that may otherwise be overlooked in mainstream media. By supporting documentary production through targeted CPE obligations, the Commission is not only preserving a critical genre but also fostering a more diverse and inclusive industry where underrepresented voices have the opportunity to create, share, and amplify their stories on a national and international stage.

A24: For the reasons outlined in DOC's submission, a modernized CPE framework should support the production of long-form documentary programs, which are both at-risk and essential to achieving the objectives of the *Broadcasting Act*. These programs are expensive to produce, often requiring years of development and significant financing, yet they are difficult to monetize. Unlike other types of content that benefit from advertising, subscription models, or international sales, long-form documentaries often struggle to secure sustainable funding within the current broadcasting system, making regulatory support critical to their continued production and availability.

A27: Yes, the Commission should set out reporting requirements for all broadcasting undertakings operating in Canada, whether they are Canadian or foreign and whether they operate on traditional platforms or online. The Commission's preliminary view in BNC 2024-288 recognizes the need for public disclosure of revenues and programming expenditures from both Canadian and foreign broadcasting undertakings.

Transparency in revenue generation and programming expenditures is essential to ensuring regulatory oversight and maintaining a balanced and sustainable broadcasting system. In particular, annual revenue data should be reported in both aggregate form and broken down by individual undertakings, offering insight into the financial scale and commitments of each broadcaster and streaming service. Additionally, expenditures on key programming categories, including long-form documentaries and other public-interest content, should be

[45] Broadcasting Notice of Consultation CRTC 2024-67: Call for Comments on the Codevelopment of an Indigenous Broadcasting Policy
[46] BNC 2024-67, ISO submission p. 19

detailed, specifying funding allocated to original documentary productions versus other types of documentary content.

Furthermore, the Commission should require detailed reporting on contributions to production funds under the framework established in BRP 2024-121-1. This includes full disclosure of total amounts directed by streaming platforms to various funds, as well as an accounting of how streamers allocate the up to 1.5% of contributions that they are not required to allocate to the CMF. Data collection should also extend to support for content created by individuals from underrepresented groups, ensuring a more comprehensive assessment of industry efforts to promote diversity and inclusion.

A28: Yes, the Commission should require the public disclosure of revenues and programming expenditures for all broadcasting undertakings subject to CPE requirements. Public transparency is essential for ensuring accountability, enabling stakeholders, including policymakers, industry participants, and the public, to assess whether these entities are fulfilling their regulatory obligations. Given the significant role that both traditional broadcasters and online streaming services play in shaping Canada's media landscape, it is crucial that their financial contributions to Canadian content are clearly documented and accessible.

A29: Published revenue and CPE data should be broken down in as granular a way as possible to ensure transparency and accountability. This would include publishing by ownership group, by platform, by individual "channel", by program category, as well as further segmentation by language and by the self-identification of the key creatives. This type of segmentation of data is necessary in order to provide a clearer picture of how different entities are investing in Canadian and Indigenous content.

A30: The production report should include detailed data such as the programming genre, region, self-identification of the key creative team and production company, language, and other indicators that can track contributions to Canadian content production ever year. Collecting this data will provide valuable insights into contributions to Canadian content creation, ensuring transparency and accountability in meeting diversity and regional representation goals. Additionally, this data will help assess the effectiveness of regulatory measures in supporting Canadian and Indigenous storytelling across the industry.

A33: DOC notes the detailed recommendations by the REMC on Implementing a National Data System, Targets and Quotas in its 2023 Report *A National Data System and Benchmarking for Racial Equity*. The REMC suggests a 7-step phased approach:

> Overall, the Canadian film and television industry needs greater harmonization in data collection and statistical reporting. This research indicates that establishing a national data system would be the most effective way to achieve these aims. … the ultimate goal of any national data system should therefore be to capture data across all of the Canadian creative industries. The phased approach presented here would ensure feedback is collected and incorporated after each step, allow industry stakeholders to adapt to new reporting requirements, and ensure the system is both

effective and robust. Learning would be ongoing, and testing and piloting would be critical to progress.[47]

A36: The success of the new framework for expenditures on Canadian programming should be measured by tracking overall spending on Canadian programming and assessing whether there is sustained or increasing investment in at-risk genres, such as long-form documentaries, which are culturally significant but difficult to create and produce.

A37: The Commission should support the production of granular reporting such as DOC's *Getting Real* reports in order to analyze which formats within PNI are at-risk and which align with current business models. Financing and using such research would allow the Commission to better identify programming that requires regulatory support to ensure continued production and accessibility of at-risk programming within the broadcasting system.

Conclusion

57. Documentarians are an incredibly diverse community of creators, whose highly successful, award-winning content connects Canadians coast to coast with shared stories and values and brings our perspective to the world. Greater support measures are required to support, strengthen and ensure a strong presence of Canadian and Indigenous insightful and engaging long-form documentaries within our broadcasting sector. DOC appreciates the opportunity to speak on behalf of Canada's documentary community in this proceeding and looks forward to engaging with the other intervenors on these and other issues related to the revised *Broadcasting Act* in the reply phase of this proceeding. We look forward to reading the submissions of others and commenting further.

Sincerely,

Sarah Spring
Executive Director, Documentary Organization of Canada

* * * End of Document * * *

[47] *A National Data System and Benchmarking for Racial Equity* p.33 - 35

DOCUMENTARY ORGANIZATION OF CANADA
DOCUMENTARISTES DU CANADA

APPENDIX A

Preliminary Findings - What We Heard (2025) - Documentary Organization of Canada
January 20th 2025

The Documentary Organization of Canada commenced a national consultation with documentary filmmakers in fall 2024 to inform its forthcoming *What We Heard* report.

To date, four consultations have concluded and three have been input for analysis. DOC Executive Director Sarah Spring met with DOC members in its Manitoba, Northwest (British Columbia, Yukon and Northwest Territories), Alberta and Quebec chapters to gather their feedback on the state of documentary filmmaking in Canada.

Preliminary findings from Manitoba, Alberta and NorthWest regions:

1. Projects that resonate with DOC members and Canadian audiences often focus on socio-political or current issues affecting Canadians, spotlight Canadian history and heritage, reflect local stories and communities, and are emotionally evocative.

2. There is deep concern about the current state of documentary filmmaking in Canada, where funding structures have become more difficult to navigate, artistic integrity is at risk, and local content struggles to find an audience. However, there is optimism that by harnessing new funding models, creating community-driven support, and leveraging digital platforms, filmmakers can overcome these challenges. Additionally, redefining success to include cultural impact rather than just profitability could help sustain the craft of filmmaking while also supporting the local and provincial communities that rely on it.

3. Canadian filmmakers are tenacious and resourceful. As there is limited funding available for marketing campaigns, they often rely on community relationships and collaborative networks to gain valuable insights and strengthen the impact of their storytelling. Filmmakers have also found success with impact campaigns and grassroots marketing to create sustainable distribution channels and build their audiences, for example community screenings, partnering with local organizations or educational institutions.

4. While it is tremendous to lock in an international streamer on a project, many Canadian documentary filmmakers still have to fund and lead their own marketing to draw in audiences.

5. Documentary films in Canada are primarily made through independent or community financing, government grants, or broadcast licenses. With broadcast licenses and funding for feature-length documentary dwindling, filmmakers are left with fewer means to fund their projects and reduced negotiating power regarding ownership. This leads to compromises in creative vision and risks trust built with story subjects and community.

Several filmmakers shared that owning their IP allows them to generate passive income through educational distributors or streaming platforms like Amazon, even years after the film's release. This provides long-term financial stability and control over the content. Filmmakers also discussed how non-exclusive licensing with distributors allows them to retain ownership while making their project available on multiple platforms, expanding their reaching without losing control and revenue.

6. Challenges around discoverability are largely driven by insufficient funding for marketing and promotion of projects by broadcasters and streamers. Filmmakers expressed frustration over traditional broadcasters and streamers retaining the rights or significant control of their projects but inadequately promoting it. Even for free-to-access streaming platforms, without active marketing and promotion, audience discoverability isn't a give-in. Filmmakers are exploring alternative distribution models where they would have more control and easier access to audience insights. Platforms mentioned include YouTube. Filmmakers also suggested the introduction of or support for alternate funding models that prioritize grassroots models and community-based distribution, as well as grants for audience development.

7. Documentary filmmakers find merit in the current Canadian content points system and see it as a vital tool to elevate Canadian content and its creators by incentivising projects that hire Canadians in key creative roles and boost Canada's competitiveness in the global marketplace. However, for filmmakers (namely Indigenous and racialized Canadians) who want to tell stories outside of Canada and work with non-Canadian talent or tell culturally-specific and authentic stories, the points system is restrictive. They must choose between local funding, including tax credits, or the integrity of their story.

APPENDIX B

Preliminary Research

Getting Real 2025

Prepared for: Documentary Organization of Canada

January 2025

Nordicity

Table of Contents

1. Introduction

This report contains the preliminary research for an update of Getting Real commissioned by the Documentary Organization of Canada (DOC) from Nordicity. The update is to be published in early 2025. This report provides available-to-date data that will contribute to the final version of Getting Real 2025. The data and information contained in this report is subject to change as research and analysis is finalized.

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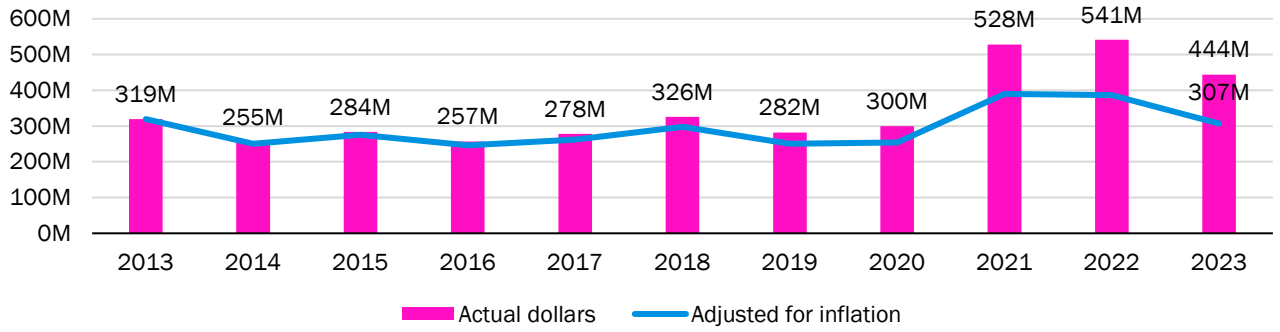
Nordicity

2. Production Volume

2.1. Overview

Using preliminary data received from CAVCO, Nordicity estimates that the total production volume of Canadian documentary was $444 million in 2023, a 39% increase over the $319 million recorded in 2013. The annual average volume from 2013 to 2023 was $347 million. However, it is important to nuance this apparent increase in production volume through the lens of inflation. In real 2013 dollars,[1] the average annual production volume from 2013 to 2023 was $294 million, 4% less than the annual average in 2013 (see section 3 for a discussion of the broader economic context).

Figure 1 - Volume of Canadian documentary production



Source: Estimates based on data collected from CAVCO.

[1] In economic terms, "real dollars" or "constant dollars" refer to a dollar value that has been adjusted to remove the effects of inflation, essentially representing the purchasing power of a dollar in a chosen base year, allowing for accurate comparisons of economic data across different time periods. For this exercise, an industry-specific inflation rate was calculated by examining the average full-time equivalent cost in the audiovisual sector (CMPA Profile) and the base year is 2013.

Striking in Figure 1 is the spike in total production volume in 2021 and 2022, representing an increase of nearly $200 million above the annual average production volume of $288 million recorded from 2013 through 2020. This sudden increase in production drops by $100 million in actual dollars in 2023, which when expressed in real 2013 dollars suggests a return to an average total production volume around $300 million.

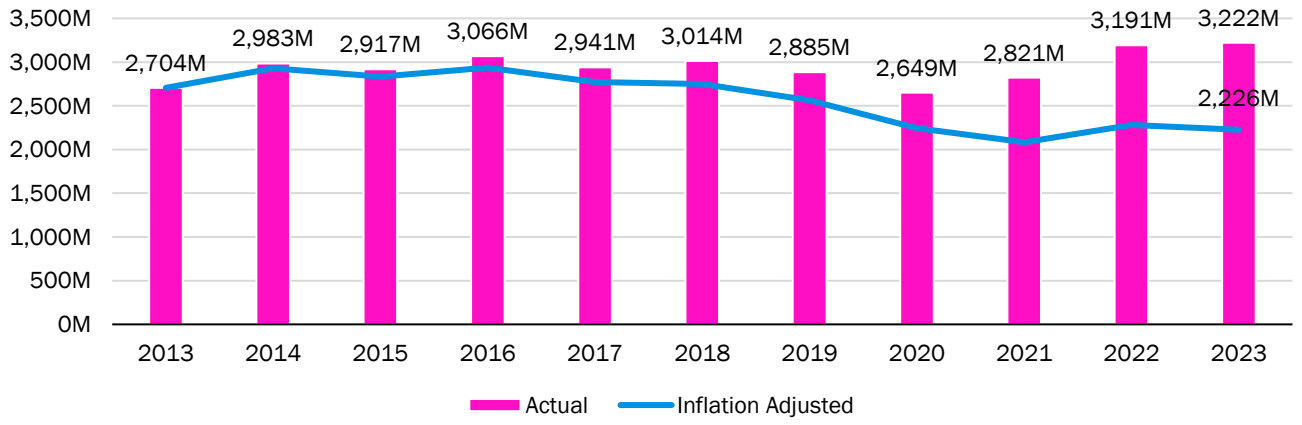
Worldwide, audiovisual production stopped for several months in 2020 during the first year of the COVID-19 pandemic, then steadily picked up over 2021 through 2023. Documentary production, however, with its relatively small crew size, appears to have experienced less interruption than dramatic productions.

Canadian broadcasting undertakings in both language markets are required to direct 30% of their gross revenue to Canadian programming expenditures (CPE) and a minimum of 5% of their gross revenue to programs of national interest (PNI), a subset of CPE. Licensees must provide annual reports on their CPE and PNI, which allows the CRTC to monitor progress on its objective to increase the production and distribution of Canadian programs.

Figure 1 shows the total annual CPE from 2013 through 2023 in both English- and French-language markets combined.[2] Total CPE averaged $3 billion annually over this ten-year period. The dip in annual CPE during broadcast years 2019, 2020, and 2021 is due to production stoppages in accordance with health restrictions during the COVID-19 pandemic.

The high levels of CPE contributions in 2022 and 2023 may be attributed to regulatory relief by the CRTC. The CRTC allowed large ownership groups and independent broadcast services that incurred CPE shortfalls as of August 31, 2020, to "catch up" on CPE by August 31, 2023.[3] This provided a measure of stability during an unpredictable time for the independent Canadian content production industry.

Figure 2 – Total Canadian programming expenses (CPE)



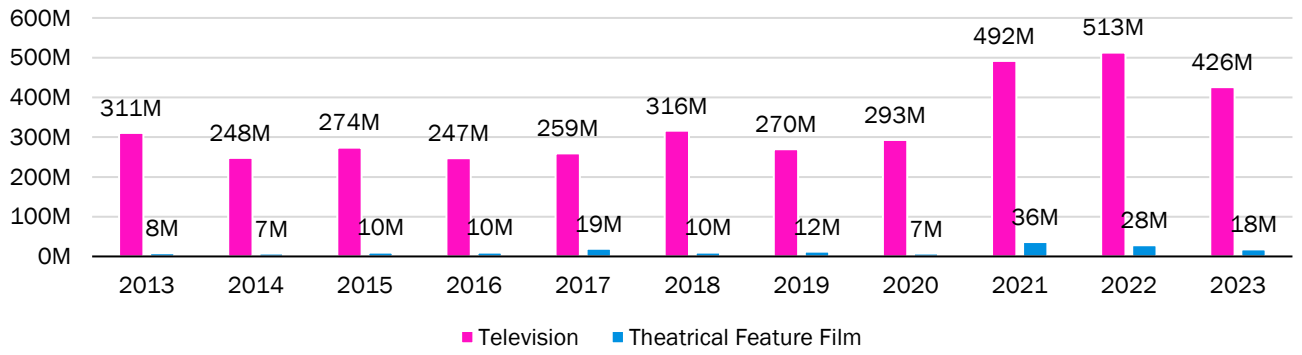
Source: CRTC, Open Data (TV-T32)

[2] This graph includes public and private broadcaster and online undertakings with CPE requirements.

[3] Broadcasting Decision 2021-271 allowed broadcaster 10% flexibility in regard to CPE and PNI under-expenditures until the end of the extended payment period, with the exception of the last year. Flexibility relating to under-expenditures on locally reflective news was maintained at 5%.

The increase in CPE contributions (Figure 2) may have contributed in part to the total documentary production volume documented in Figure 1. A breakdown of the total production volume of Canadian documentary by release medium confirms that most documentary in Canada is produced for television broadcast. The volume of documentary production for television increased by 37%, with most of the growth taking place between 2021 and 2023. On average, television projects represented 96% of the total annual documentary production volume. Starting from a much lower production volume in 2013, theatrical documentary productions have increased by a remarkable 125%.

Figure 2 – Volume of Canadian documentary production by release medium



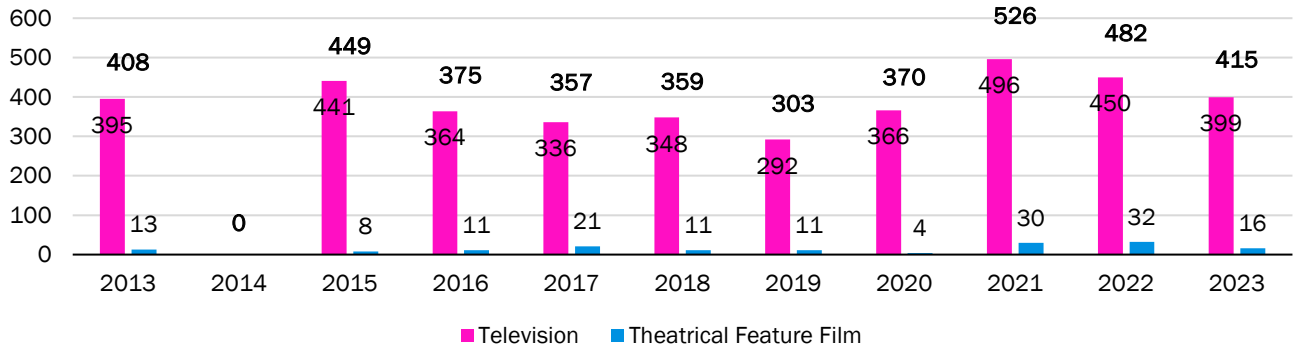
Source: Estimates based on data collected from CAVCO.

A closer look at the total production volume of Canadian documentary in real 2013 dollars, demonstrates a more modest, yet significant 55% increase in the theatrical documentary production volume since 2013. The production volume of television documentary in real 2013 dollars, however, is in fact, 5% lower than it was in 2013; and, total documentary production volume has decreased by 4%. The impact of inflation is compounded by other factors discussed in Section 3.

Category	2013-2023, Actual	2013-2023, Real
Television	+37%	-5%
Theatrical	+125%	+55%
TOTAL	**+39%**	**-4%**

The Figure 3 below shows the evolution of the number of Canadian documentary productions. On average, 404 documentary projects were produced every year between 2013 and 2023. Following the increased total production volume in 2021 and 2022, there was a corresponding uptick in the number of documentary projects. Television documentaries accounted for an annual average of 96% of documentary productions during the ten-year period.

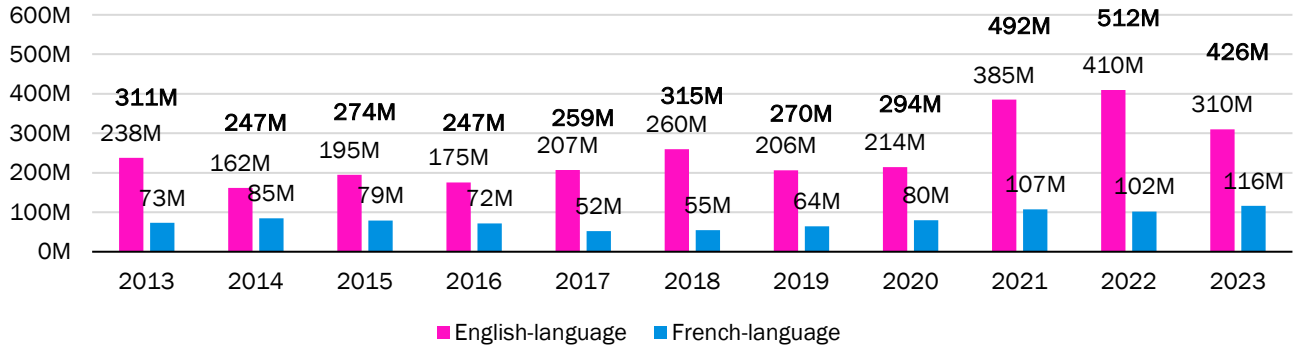
Figure 3 – Number of Canadian documentary projects, by release medium



Source: Estimates based on data collected from CAVCO. Note: no data for 2014.

Focusing on television documentary production, Figure 4 indicates that, on average, English-language production accounted for 74% of the total annual documentary production volume, reaching 80% in 2017, 2018, and 2022. Over the past decade, the volume of English-language production has increased by 28%, with a significant uptick in 2021 that tapers off in 2023. The increase in 2021 was less significant for French-language production, but overall, French-language documentary production grew at a faster rate than English-language production from 2013 to 2023 representing an overall 40% increase.

Figure 4 – Volume of Canadian TV documentary production, by language market



Source: Estimates based on data collected from CAVCO.

While actual production volumes show solid increases, accounting for inflation shows a declining trend, although more nuanced in the French market.

Category	2013-2023, Actual	2013-2023, Real
English-language	+28%	-12%
French-language	+40%	-4%
TOTAL	**+39%**	**-4%**

2.2. Programs of National Interest

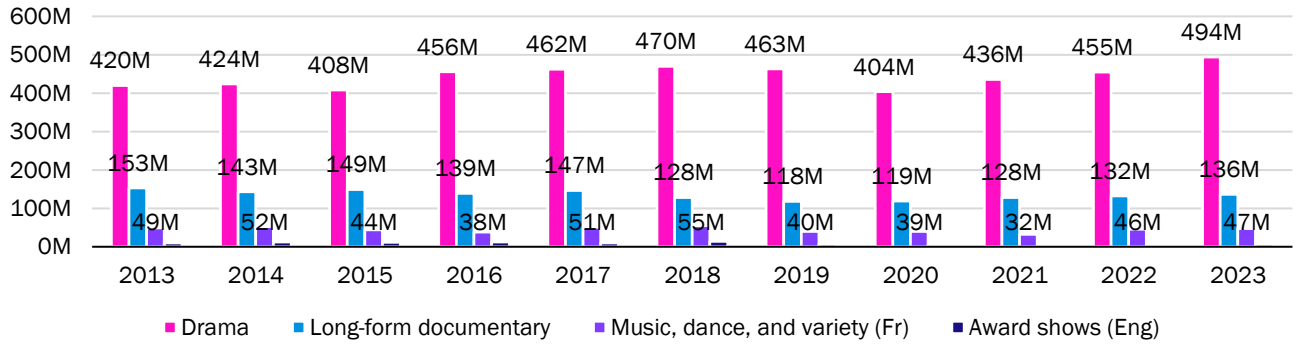
In Broadcasting Regulatory Policy CRTC 2010-167, the CRTC set out a framework for a group-based approach for licensing private broadcasting services. In an effort to adapt to audiences' shift to on demand viewing, the Commission reintroduced expenditure requirements for priority programs, which had been eliminated in the 1999 Television Policy. Under the group-based approach, priority programs were redescribed as programs of national interest (PNI) and the categories were defined as:

- Drama and comedy programming (category 7)
- Long-form documentaries (category 2(b))
- Canadian award shows celebrating Canadian creative talent
- Music (categories 8(a), 8(b) and 8(c)) and variety (category 9) programming (French-language only)

In establishing the Group-based approach, the Commission noted that "*Drama programs and documentary programs are expensive and difficult to produce, yet are central vehicles for communicating Canadian stories and values.*"

Figure 5 below shows that a total (both language markets) of $685 million was invested in PNI by Canadian broadcasters in 2023, an 8% increase compared to 2013. Similar to CPE, PNI spending dips in 2019 and 2020 before catching up at a compound annual growth rate of 6.7% for the 2020-2023 period.

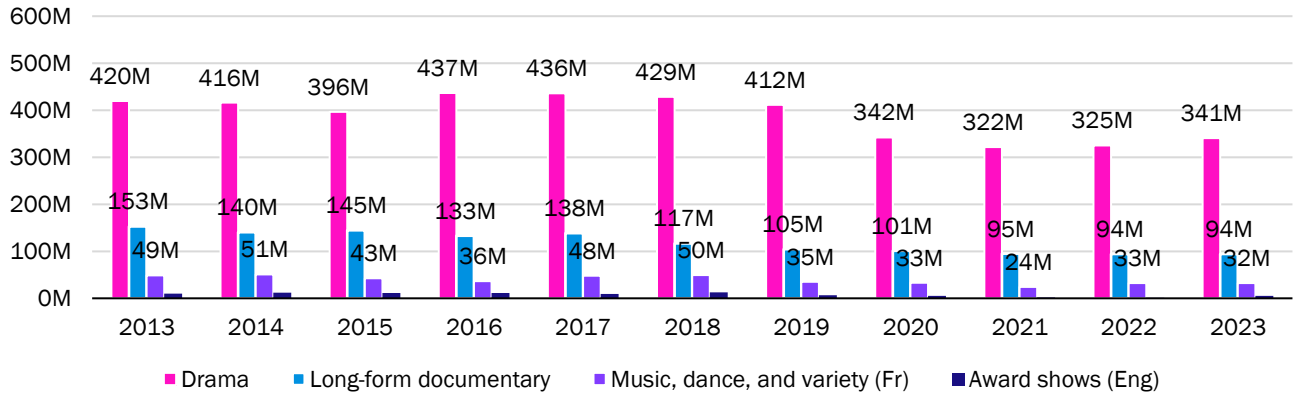
Figure 5 - Total PNI expenditures, by program category, actual dollars, English- and French-language markets



Source: CRTC Open Data (TV- T34), Communications Monitoring Report 2015

The analysis is nuanced when annual spending is adjusted for inflation revealing significant drops in real dollars across all program categories. In real 2013 dollars, spending on long-form documentary decreased by 38% during the 2013-2023 period. When comparing 2013 and 2023, this decline represents a loss of $60 million in real dollars of Long-form documentary contributions.

Figure 6 - Total PNI expenditures, by program category, adjusted for inflation (2013 dollars)



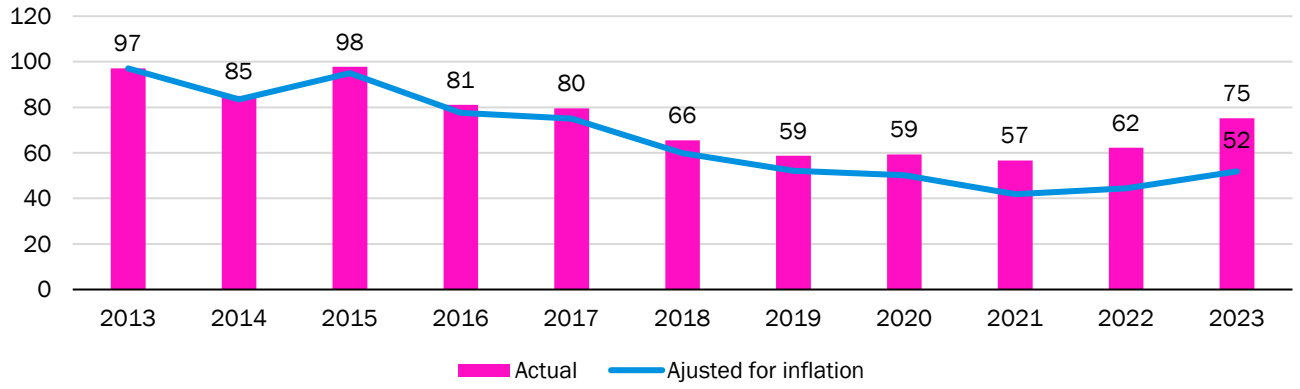
Source: CRTC Open Data (TV- T34), Communications Monitoring Report 2015

Category	2013-2023, Actual	2013-2023, Real
Drama	+18%	-19%
Long-form documentary	-11%	-38%
Music, dance and variety	-4%	-34%
Award shows	-24%	-48%
TOTAL PNI	**+8%**	**-25%**

English-language market

While total PNI investment in Long-form documentary across both English- and French-language markets has increased from 2013 to 2023, Figure 7 below shows that in the English-language market, contributions have declined, dropping to $75 million in 2023, a decline of 23% from 2013. Increased investment in 2022 and 2023 is likely driven by broadcasters catching up on their respective shortfalls CPE in 2020; however, a downward trend was present prior to the pandemic with PNI expenditure dropping by 39% in actual dollars between 2013 and 2019.

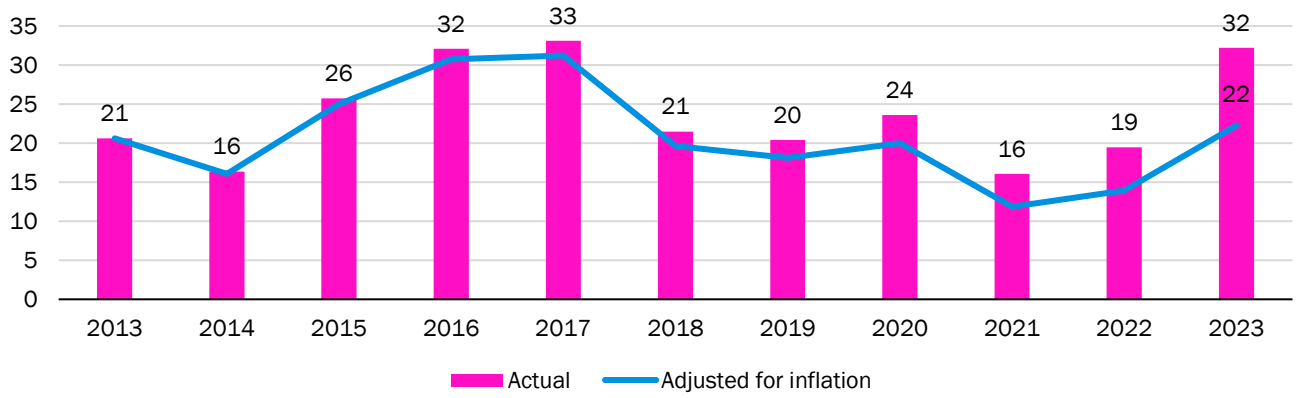
Figure 7 – Long-form documentary PNI expenditures, CBC and Large Groups, English-language



Source: CRTC, Annual/Monthly Reports Filed by Broadcasting Industry Players

CBC contributions to English-language Long-form documentary fluctuate between $16 million and $32 million. On average, CBC spent 18% of its annual English-language PNI contribution on Long-form documentary.

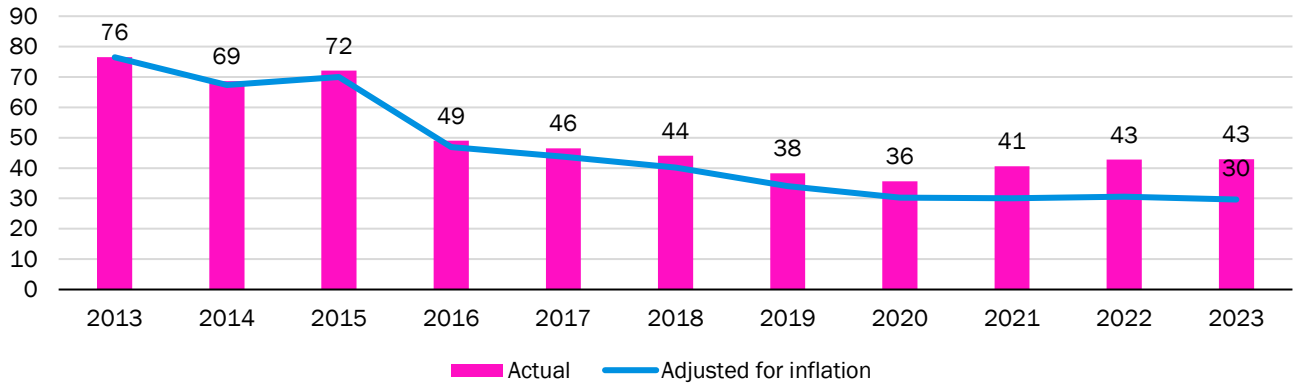
Figure 8 - Long-form documentary PNI expenditures, CBC, English-language



Source: CRTC, Annual/Monthly Reports Filed by Broadcasting Industry Players

The downward trend in PNI contributions to Long-form documentary is striking when considering the large ownership groups (BCE Inc., Rogers Communications and Corus+Shaw) in Figure 9 below. PNI contributions to Long-form documentary by the large ownership groups was $76 million in 2013, dropping to $43 million in 2023, a decrease of 44% in actual dollars (a 61% decline in real 2013 dollars). Large ownership group investment in Long-form documentary PNI appears to have stagnated since 2016, averaging $42 million annually (actual dollars) from 2016 to 2023, with a slight dip during the pandemic.

Figure 9 - Long-form documentary PNI expenditures, Large Ownership Groups (BCE, Corus+Shaw, Rogers), English-language



Source: CRTC, Annual/Monthly Reports Filed by Broadcasting Industry Players

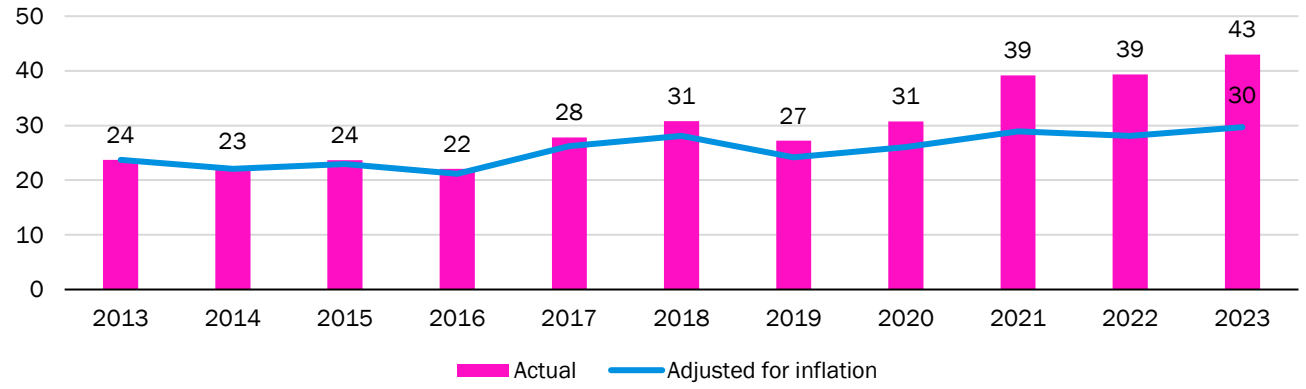
The table below summarizes the average volume, and evolution of PNI contributions in the English-language market, comparing actual to real dollar contributions.

PNI, Long-form Documentary, English-language	2013-2023 Actual Delta	2013-2023 Real Delta	2013-2023 Actual Average	2013-2023 Real Average
CBC	+56%	+85%	$24M	$21M
Private Groups	-44%	-61%	$51M	$45M
TOTAL PNI	**-23%**	**-47%**	**$74M**	**$66M**

French-language market

The overall dynamics are different on the French-language market, which shows an 81% increase in PNI contributions from 2013 to 2023 with an acceleration since 2017. PNI expenditures in the French-language market represent 20% of total PNI Long-form documentary contributions in 2013, rising to 36% of total PNI Long-form documentary spending in both language markets.

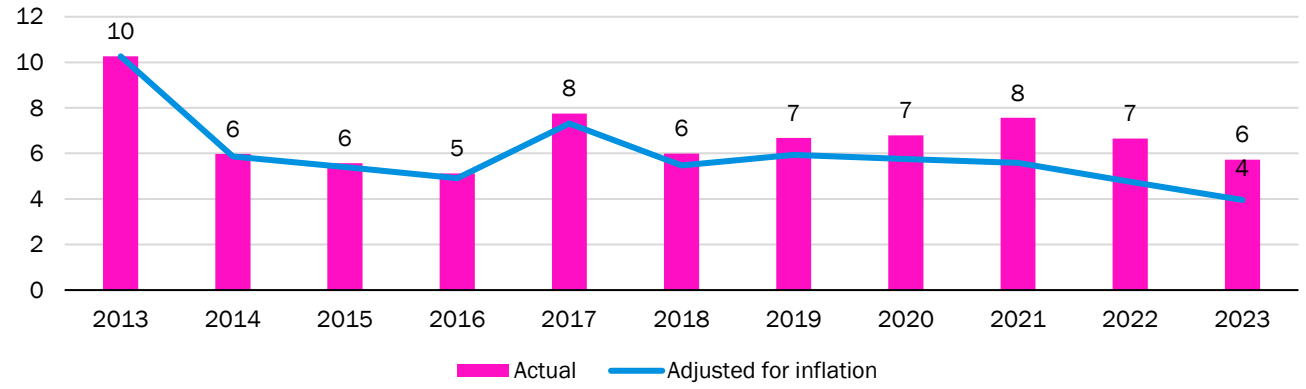
Figure 10 - Long-form documentary PNI expenditures, SRC and Large Groups, French-language market



Source: CRTC, Annual/Monthly Reports Filed by Broadcasting Industry Players

As illustrated below, Radio-Canada (SRC) has maintained its contributions to French-language Long-form documentary at an annual average of $7 million from 2013 to 2023.

Figure 11 - Long-form documentary PNI expenditures, SRC, French-language



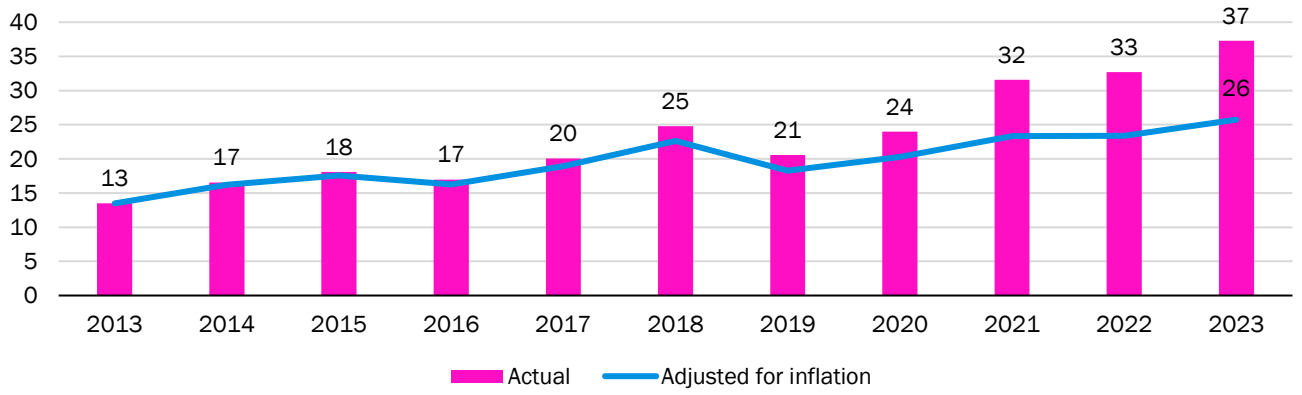
Source: CRTC, Annual/Monthly Reports Filed by Broadcasting Industry Players

It is the PNI investments made by private broadcasters that have driven the growth of Long-form documentary in the French-language market representing a striking increase of 176%. Even when taking into account the impact of inflation, PNI Long-form documentary contributions in the French-language market have increased by 91% from 2013 to 2023. This growth may be attributed to:

1. Broadcasting Decision CRTC 2017-145 regarding licence renewals for Corus' French-language television services, which imposed a minimum PNI expenditure requirement for all services in Corus's French-language Group at 15% of the previous broadcast year's gross revenues.

2. Broadcasting Decisions CRTC 2020-116 and 2020-154 regarding the ownership and effective control of V Interactions Inc., and the creation of a new French-language Bell Media Group. PNI expenditures for the new French-language Bell Media Group were set at 16.5%.

Figure 12 - Long-form documentary PNI expenditures, large ownership groups, French-language market



Source: CRTC, Annual/Monthly Reports Filed by Broadcasting Industry Players

Finally, the table below consolidates the key trends in PNI Long-form documentary contributions in the French-language market, illustrating the impact of inflation.

PNI, Long-form Documentary, French-language	2013-2023 Actual Delta	2013-2023 Real Delta	2013-2023 Actual Average	2013-2023 Real Average
SRC	-44%	-61%	$7M	$6M
Private Groups	+176%	+91%	$23M	$20M
TOTAL PNI	**+81%**	**+25%**	**$30M**	**$26M**

3. Budgets and Financing

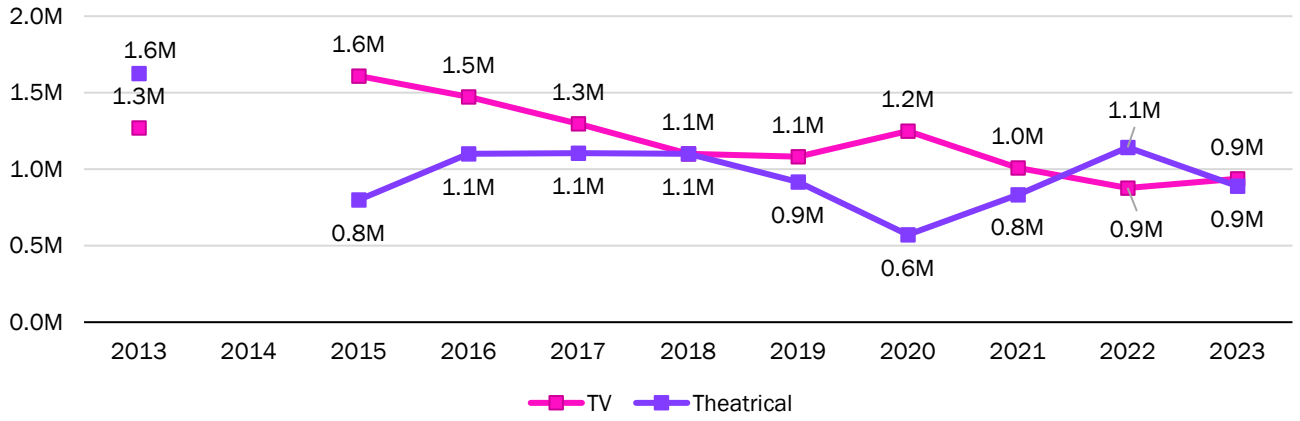
3.1. Average Budgets

Budget per project

While both the number of projects, and the production volume, have increased from 2013 to 2023 (Figures 1 and 3), the average size of production budgets has decreased (Figure 13). This observation suggests that documentary projects may be more costly to produce in 2023 than in 2013, or that more smaller-scale, potentially less risky projects have been given the green light.

In fact, for both television and theatrical documentary, the average budget now sits under $1 million per project where the average budgets in 2013 were $1.3 and $1.6 million respectively. This decline in the average production budget represents a 26% decrease for the average television documentary budget, and a 45% decrease for the average theatrical documentary budget.

Figure 13 – Average budget by project, by release medium



Source: Estimates based on data collected from CAVCO. Note: no data for 2014.

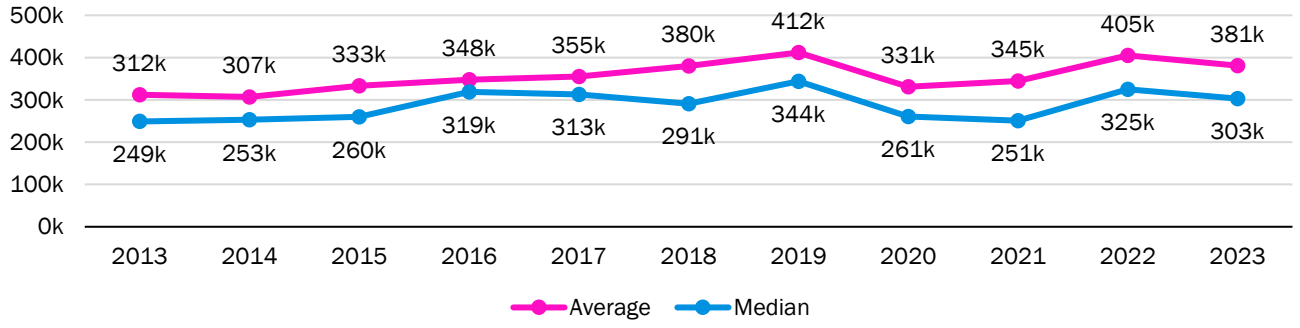
Increased production costs have been driven by the global economic slowdown and inflated prices of various materials that began during the pandemic. Supply-chain shortages, the rising cost of talent, costs related to new health safety protocols, and rising insurance costs contribute to the higher cost of documentary production.

Budget per hour

As observed in previous sections of this report, investments in PNI Long-form documentary programs have decreased by 11% from 2013 to 2023 (Figure 5) while overall Canadian documentary television production has increased by 37% over the same period (Figure 2).

Figures 14 and 15 below highlight the rising cost of production for this type of programming. Where an hour of English-language documentary programming cost $312,000 to produce in 2013, the average hourly budget in 2023 is $381,000 per hour, a 22% increase. PNI contributions in the English-language market decreased, amplifying the challenge of managing the surge in production costs, suggesting that fewer hours of English-language Long-form documentary are now being produced.

Figure 14 – Average budget of Canadian TV documentary production, English language ($000s per hour)

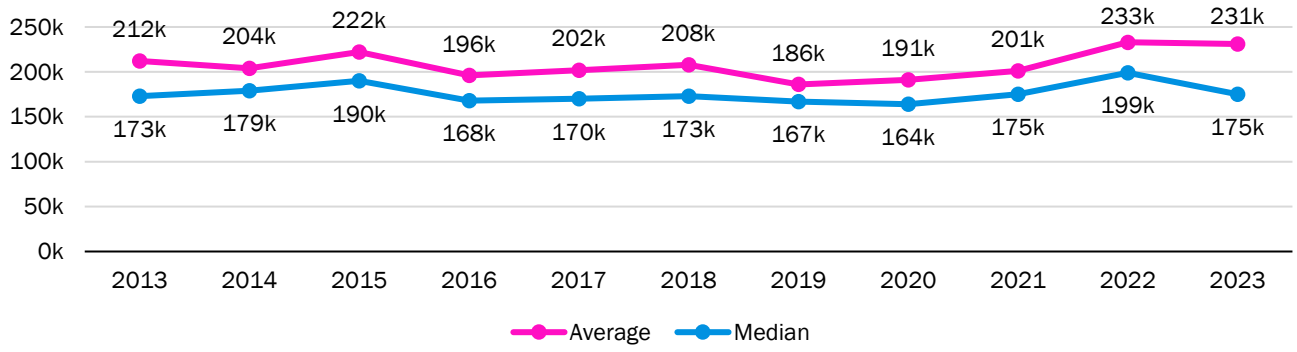


Source: Estimates based on data collected from CAVCO.

Note: The data does not include an estimate (as used in other exhibits) of CRTC-certified television production.

The story is again slightly different in the French-language market where the average hourly budget for television documentary projects only grew by 9% over the ten-year period. Increased private investments in this market have outpaced the increased production costs, allowing for more hours of programming and potentially more ambitious projects to be produced.

Figure 15 - Average budget of Canadian TV documentary production, French language ($000s per hour)



Source: Estimates based on data collected from CAVCO.

Note: The data does not include an estimate (as used in other exhibits) of CRTC-certified television production.

TV documentary production, hourly budget	2013-2023 Actual Delta	2013-2023 Real Delta
English-language	+22%	-16%
French-language	+9%	-25%

3.2. Financing

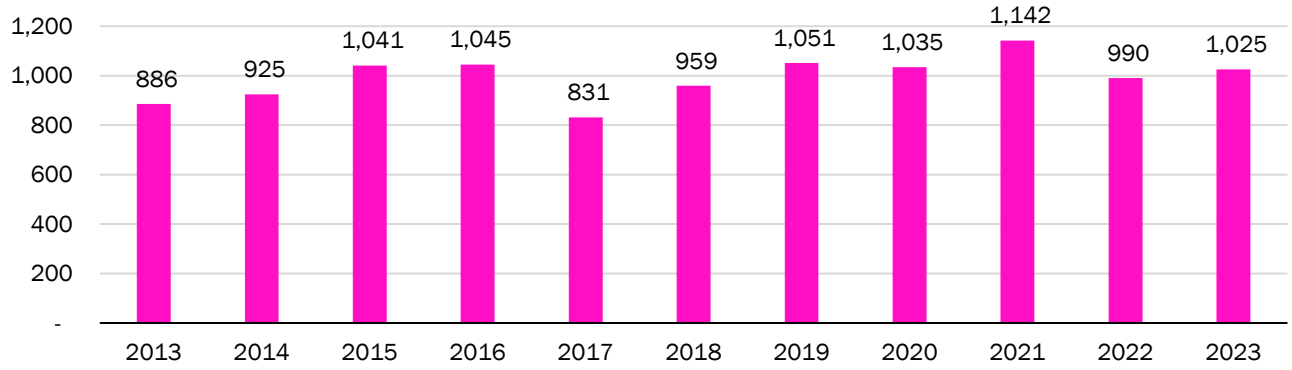
This section explores data provided by various funding sources as well as the financing structure of television documentary productions.

CMF

The Canada Media Fund (CMF) is funded by the Government of Canada, as well as cable-television, direct-to-home (DTH) satellite and Internet protocol television (IPTV) service providers, collectively known as broadcasting distribution undertakings (BDUs). The CMF fosters, develops, finances, and promotes the production of Canadian content for all audiovisual media platforms.

In 2023/24, the CMF had an overall program budget of more than $384 million, of which $80 million was allocated to documentary (21%). On average, the CMF has supported 994 hours of documentary television annually over the past decade, with relatively small year-over-year differences.

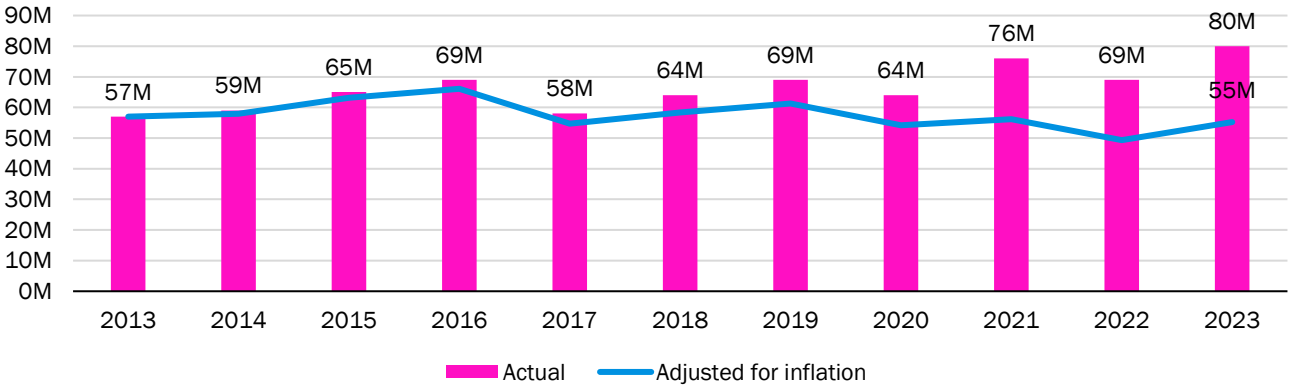
Figure 16 – Number of CMF-supported hours of TV documentary



Source: CMF

In terms of its financial contribution, the figure below shows the CMF has increased its investment in documentary projects from 2013 to 2023 by 40%. This increase in funding has helped to offset the impact of inflation, with an average annual contribution of $58 million in real 2013 dollars.

Figure 17 – CMF contribution to TV documentary



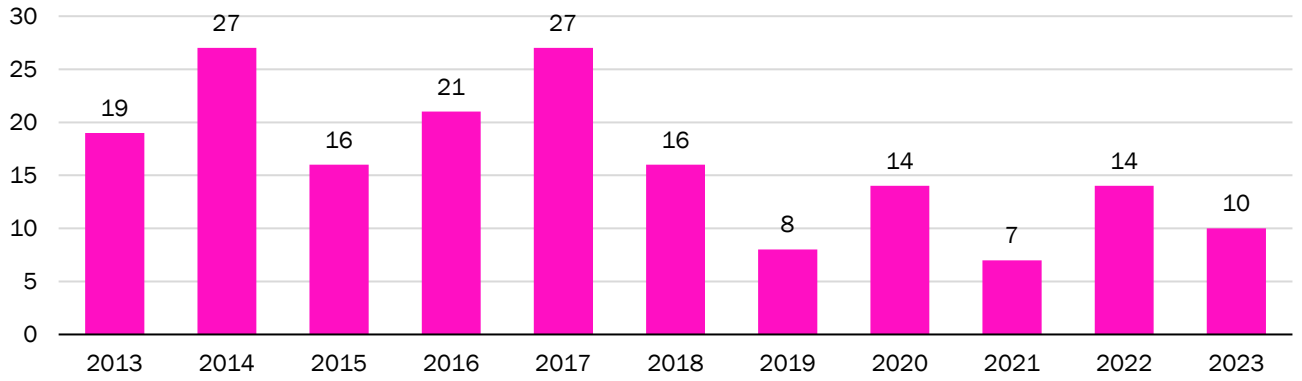
Source: CMF

Treaty Coproductions

The Government of Canada currently has audiovisual coproduction treaties or memoranda of understanding with close to 60 partners. These agreements offer Canadian and foreign producers the opportunity to combine their creative, technical and financial resources to make coproductions that can be granted national production status in each of the partnering countries.

The annual volume of treaty coproductions can be prone to significant year-to-year fluctuations due to a small number of large-budget productions. However, Canada appears to be producing fewer coproduction documentary projects in 2023 than in 2013. An average of 21 projects were greenlit every year from 2013 to 2018, while the annual average has decreased to 11 from 2019 to 2023.

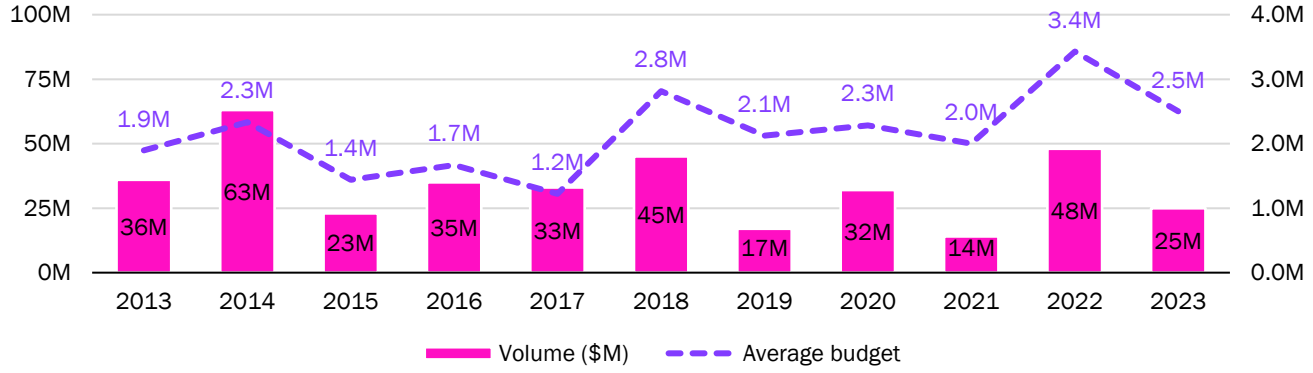
Figure 18 – Number of audiovisual treaty coproduction documentary projects



Source: Telefilm Canada.

Further examination of the total volume of documentary treaty coproductions reveals an increase in the average budget of these projects. The average budget was $1.9 million for projects produced between 2013 and 2018, and $2.5 million for the period between 2019 and 2023. Further research is required to identify the cause for this increase as it is well above inflation. Increasing production costs are a part of the story, but an increase in budget size of this magnitude suggests producers are securing more ambitious or complex projects, and/or that international markets require documentary productions with a higher production value (hence a greater investment in production).

Figure 19 – Audiovisual treaty coproduction, volume and average of documentary projects

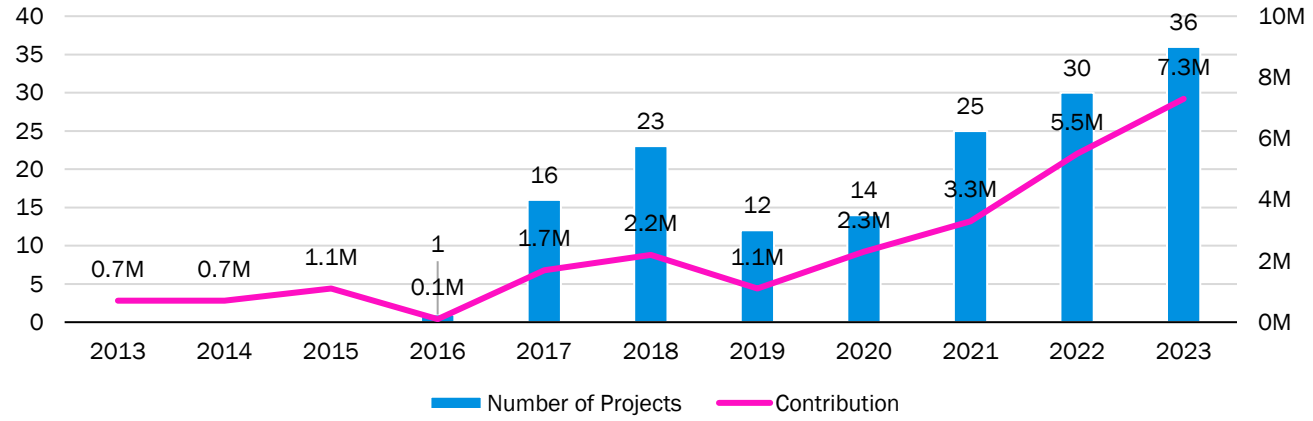


Source: Telefilm Canada.

Telefilm Canada

Telefilm's Theatrical Documentary Program finances feature-length documentary projects in production (for projects with a minimum budget of $400,000) and post-production. Since its inception, the Theatrical Documentary Program has supported the production and post-production of more than 150 Canadian releases. As demonstrated in Figure 20, Telefilm has steadily increased its contribution to reach a total of $7.3 million in 2023, with a combined contribution of $26 million over the past decade.

Figure 20 – Telefilm Theatrical Documentary Program, Contribution and Number of Projects



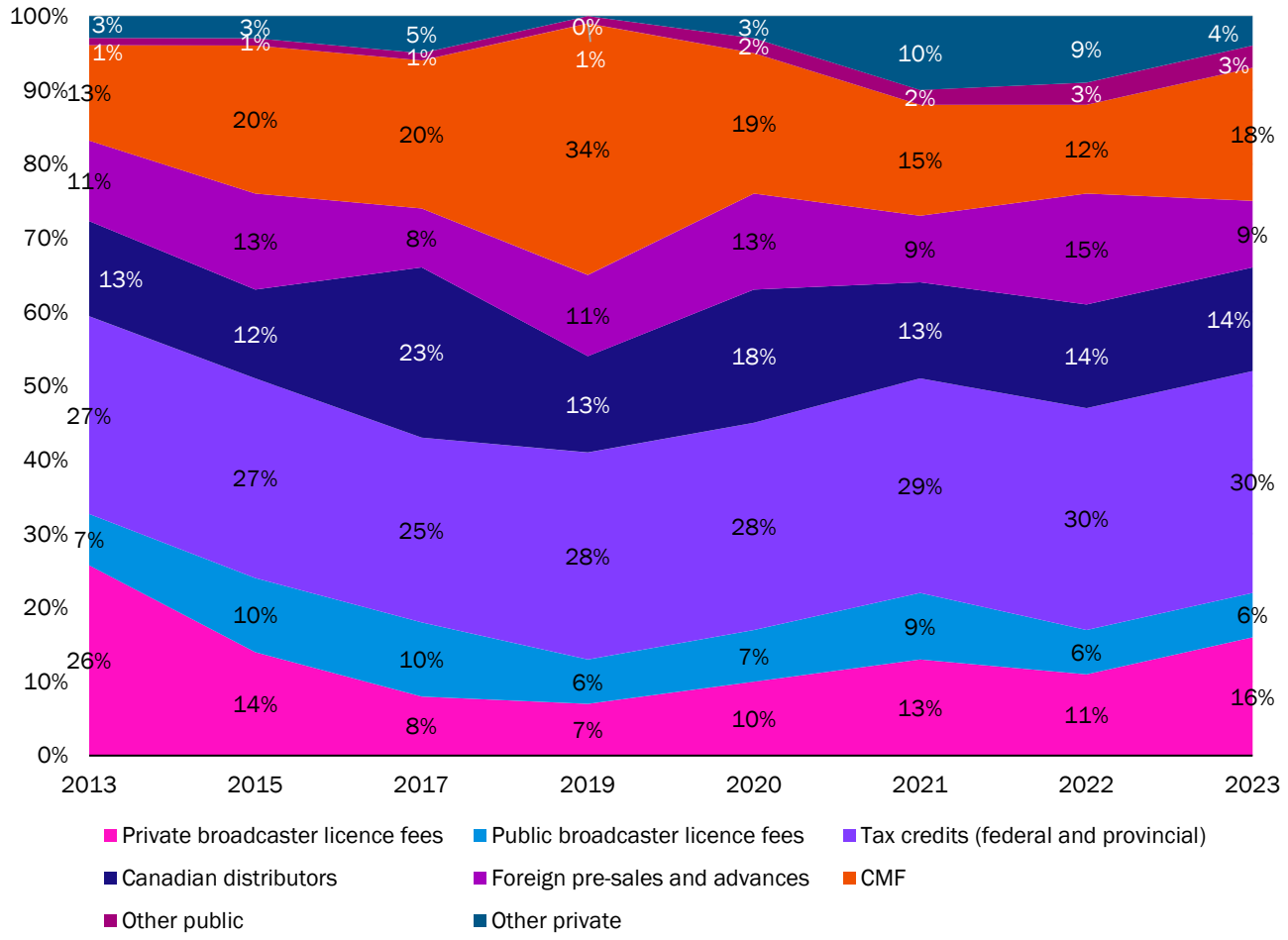
Source: Telefilm Canada.

TV Production Financing

Figures 21 and 22 below examine the financing structure of Canadian television documentary projects.

Despite some fluctuations, private broadcaster licence fees have accounted for an average of 13% of English-language television documentary projects. While the share covered by private sources slowly declined between 2013 and 2019, it appears that there was some reinvestment in documentary since 2019. The following figure also suggests that financing documentary projects has been less predictable with sources like foreign pre-sales seeing year-over-year fluctuations.

Figure 21 - Financing of Canadian English-language television documentary production

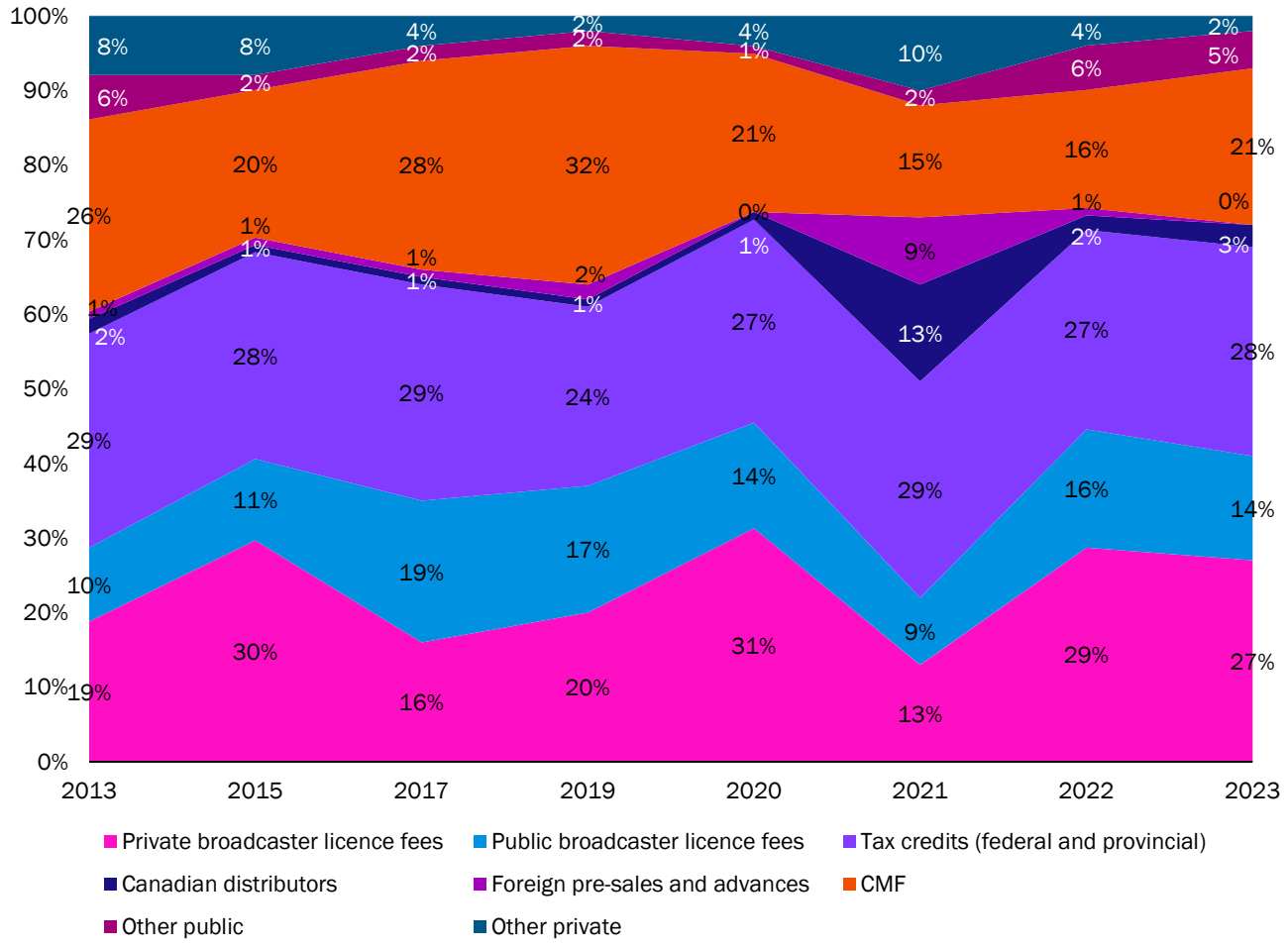


Sources: Estimates based on data obtained from CAVCO and CMF.

Note: Some totals may not sum due to rounding. Data includes an estimate of CRTC-certified television production.

In the French-language market, private broadcaster licence fees take up a more substantial share of the financing (as discussed in Section 2.2), for an average of 23% over the ten-year period. The limited nature of the Canadian (and global) market for French-language productions explains why the share of Canadian distributors and foreign presales remains so low (an average 3% and 2% respectively). This challenge is, to some extent, overcome by a more important participation of the public broadcaster, as compared to its English-language counterpart.

Figure 22 - Financing of Canadian French-language television documentary production



Sources: Estimates based on data obtained from CAVCO and CMF.

Note: Some totals may not sum due to rounding. Data includes an estimate of CRTC-certified television production.

This document was prepared by:

Nordicity
www.nordicity.com

ADVOCACY

DOC Community Consultations

NOVEMBER 25, 2024

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- What challenges does each region face in creating documentary content
- What types of support are needed in order to facilitate discoverability of our documentary content
- What have been effective mechanisms of systemic and sectoral change towards an equitable documentary industry

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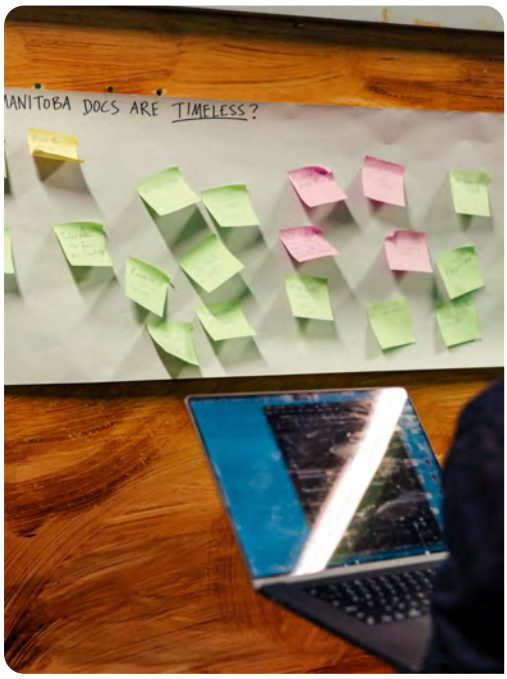
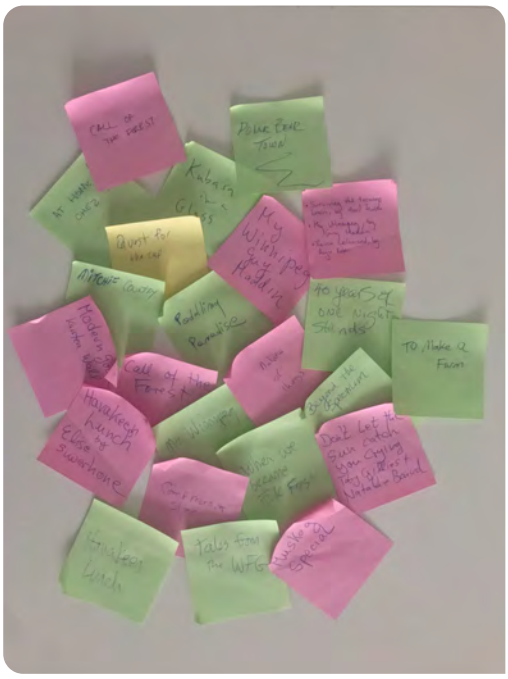
CANADA MEDIA FUND FONDS DES MÉDIAS DU CANADA

DOC MANITOBA

Influential Films in Canada:

Participants were asked to identify influential Canadian films that they think remain timeless and relevant, appealing to audiences across generations. Below are the list of films that came out of the Manitoba session. The participants were also asked what they think are the key factors for these films to be made and what connected the films to their audience.





Key factors for the above films to be made

Factors that were mentioned most frequently:

Compelling Story & Authenticity: Good story, authenticity of the story, universal story, caring deeply about subject, right person to tell the story

Access to Subjects and Community Support: Access to people and community; access to the subject; support of team and community; transparency and honesty between subject, filmmaker and producers

Funding and Financial Support: Public arts funding, passion funding from the NFB, broadcaster recommendation, funding support from family of the filmmaker

Industry Connections and Support: Connection in the industry, broadcaster recommendation, commissioning editor who believed in the story

Factors that were mentioned frequently:

Team Dedication and Personal Drive: Personal dedication, belief in the project, being stubborn

Creative and Innovative Approach: Creative, original approach; inventive strategies; pushing the boundaries of typical/traditional documentary forms; resourcefulness of MB filmmakers

Factors that were mentioned once:

Chance and Opportunity: Finding the right opportunity, being given a chance to work on the project

Key elements that connected the above films to its audience

Factors that were mentioned most frequently:

Authenticity and Real Stories: Authenticity of a story; real people, stories and voices that otherwise would go unheard; storytelling style; exciting story

Emotional Impact and Relatability

Relevant and Important Topics: Relevant topic; important topic; topic and storytelling; deepens understanding of reality and helps find meaning

Local Appeal and Community Connection: Appealing to local audience, connecting with them; stories that fit well with the community; having a local story

Factors that were mentioned frequently:

Effective Distribution and Promotion: Local distribution, broadcast, film festivals, DVD release, promotion via NFB, film group efforts, media attention

Educational and Informative Value: Informative; asks the right questions; deepens understanding of reality and helps find meaning

Challenges faced by filmmakers in Manitoba

This part of the discussion centered around the challenges faced by filmmakers in Manitoba, particularly in terms of funding, distribution, and the overall sustainability of their work. Key points included:

Challenges in Filmmaking: Filmmakers struggle with a lack of producing skills, overwhelmed producers, and limited opportunities to create multiple films annually. There is also concern about the disruption in funding, such as the discontinuation of the ***MTS Stories from Home program***, and how this impacted the documentary community in Manitoba.

Distribution Strategies: One speaker emphasized the importance of utilizing local distribution channels, such as screening films at the Winnipeg Film Group, organizing private screenings, and submitting films to targeted film festivals. This strategy helped to make films more accessible to specific communities in Manitoba and gain wider recognition and awards.

Sustainability and Funding: Filmmakers face difficulties finding sustainable funding models, with some turning to Arts Council funding, which doesn’t provide adequate compensation. The group

noted that filmmakers are often forced to choose between making low-budget films or high-budget ones, neither of which guarantee financial success.

Community-Oriented Projects: Despite having community-focused films that build pride and explore local history or language, filmmakers struggle to secure backing from major broadcasters like CBC, who are more interested in commercial content. This forces filmmakers to seek alternative funding sources.

Adapting to the Landscape: Inspired by filmmaker Guy Madden's approach, some filmmakers have adopted a flexible, nimble approach to their work, balancing larger projects with smaller, more frequent productions to maintain creative momentum and supplement their income with part-time jobs.

Concerns about the State of Film: One participant expressed concern that the current funding environment prioritizes commercially-driven projects over artistically ambitious ones, leading to a lack of meaningful, deep films. This trend threatens the future of film as an art form, particularly for filmmakers with visionary ideas.

Re-evaluating Success Metrics: There is a call for the industry to rethink how it measures the success of films, moving beyond box office revenue and awards to include the broader societal and artistic impact of a film. This includes evaluating projects for their creative experimentation and contribution to community development, which may not fit the traditional commercial model.

Systemic Barriers: Filmmakers face a treacherous and bureaucratic system that makes it difficult to sustain a career, particularly for newcomers. The risk of losing funding due to administrative errors, and the lack of support for creative risk-taking, are seen as significant obstacles to innovation and growth in the industry.

Overall, the group calls for reforming the funding and evaluation systems to better support creativity, innovation, and community-driven filmmaking, and to create a more sustainable environment for independent filmmakers.

Discoverability in filmmaking

Participants were asked about the type of ‘discoverability’ or marketing support they need to connect audiences to their films on online platforms or other exhibition windows. Key takeaways from here included digital (YouTube) approaches as well as grassroot approaches for community screenings. A major case was made for YouTube vs. all other streaming platforms.

Support and Resources for Audience Development and Discoverability

Need for Dedicated Marketing Support: Emphasis on the importance of having professionals to handle marketing and audience development, as filmmakers find the discoverability challenge overwhelming.

Pooling Resources and Audience Data: Suggestions to pool audience data and networks across similar films (e.g., environmental, arts-focused) to expand reach and leverage shared audiences more effectively.

Government-Supported Touring Program: Interest in a government-funded program, similar to “Home Routes” for musicians, that would fund filmmakers to tour their films across communities and develop local audiences.

DOC Support for YouTube Monetization: Desire for DOC (Documentary Organization of Canada) to offer support in building YouTube followings to help filmmakers monetize their content directly.

Flexible, Multi-Faceted Distribution Strategies

Digital vs. Grassroots Approaches: Recognition of the need for modern, multi-faceted approaches that combine digital platforms with grassroots marketing, including local screenings and partnerships with organizations.

Global Streaming Platforms vs. YouTube: Debate over the control and transparency benefits of YouTube versus the reach of global streaming services, with some favoring YouTube for its data access and flexibility.

Targeted Festival Strategy: Strategic submission to specific film festivals that align with target communities to maximize relevance, visibility, and engagement with the represented audience.

Local and Community-Centric Screening Strategies

Local Screening Channels: Utilizing local distribution channels like the Winnipeg Film Group and Bell MTS's channel, as well as arranging private screenings, proved effective for building a community audience.

Community Partnerships: Working with community organizations and networks to help distribute and promote films at the grassroots level, which strengthens discoverability and engagement.

Fresh Perspectives and Emerging Filmmaker Involvement

New Generation of Filmmakers: Recognizing that younger filmmakers could bring innovative ideas to audience engagement and distribution challenges, potentially revitalizing approaches within the documentary community.

Systemic Changes

Participants discussed systemic changes needed in the industry. Systemic change in leadership, mandate for diverse representation and narrative sovereignty were some key issues that the participants wish to see more and more in industry organizations. They also spoke of creation of targeted programs and funds and building cross-community connection and collaboration.

Out of the many support programs and initiatives that are available in the country, participants brought up the following as success stories

Curated Industry Access for Underrepresented Groups:
Events like TIFF's Black Women Film programming, which curate industry events specifically for BIPOC filmmakers, are effective. They provide crucial industry access, networking opportunities, and visibility, helping open doors that are typically closed to underrepresented filmmakers. This model demonstrates how targeted programming can have a meaningful impact on access and inclusion.

Dedicated Funding for Diverse Storytellers:
The establishment of funds or support programs, such as the Black Screen Office and initiatives to fund Indigenous and Black storytellers,

are working to address financial barriers. By earmarking resources for diverse creators, these programs support underrepresented voices and encourage storytelling that reflects a broader range of perspectives.

Narrative Sovereignty:
Emphasizing narrative sovereignty, particularly for Indigenous creators, is resonating as a positive change. Recognizing the importance of allowing creators control over their stories fosters respect for their perspectives and encourages authentic storytelling. This principle, when upheld, helps combat cultural appropriation and misrepresentation.

Local Champions:
Cam Bennett and Kim Bell, who were instrumental in the MTS Stories from Home program, are praised for their understanding of local filmmakers and their commitment to supporting diverse styles of work despite limited resources.

Participants also discussed factors in systemic change that need improvement:

Lack of Diverse Representation in Leadership:
Despite some progress, there is a recurring theme that decision-making positions lack diverse representation. Many in leadership are still unrepresentative of the communities they serve, which often results in a lack of understanding or respect for underrepresented perspectives. This creates barriers to real systemic change, as these leaders may not fully grasp the needs or challenges faced by marginalized communities.

Failure to Break Down Silos:
Efforts to foster cross-community connection are still lacking. The film industry remains siloed, with minimal crossover between different communities, especially for BIPOC creators. The conversation suggests that more could be done through festivals, events, and collaborative initiatives to bridge these divides and foster a more inclusive and connected industry.

Misinterpretation or Dismissal of Feedback:
Engagement efforts within organizations are sometimes superficial or misguided. When feedback from Indigenous or marginalized groups is not fully understood, or when certain perspectives are

dismissed by those in power, the intended positive impact is lost. This lack of genuine engagement perpetuates existing issues and limits the effectiveness of initiatives meant to include diverse voices.

Lack of Accountability for Streaming Services:
There's a notable gap in holding streaming services accountable for contributing to systemic inequities. Current regulatory frameworks do not mandate streaming platforms to prioritize diversity or address systemic issues, meaning these powerful platforms can perpetuate exclusion without facing repercussions. There is a call for legal mechanisms to ensure that streaming services abide by standards that promote equity and representation.





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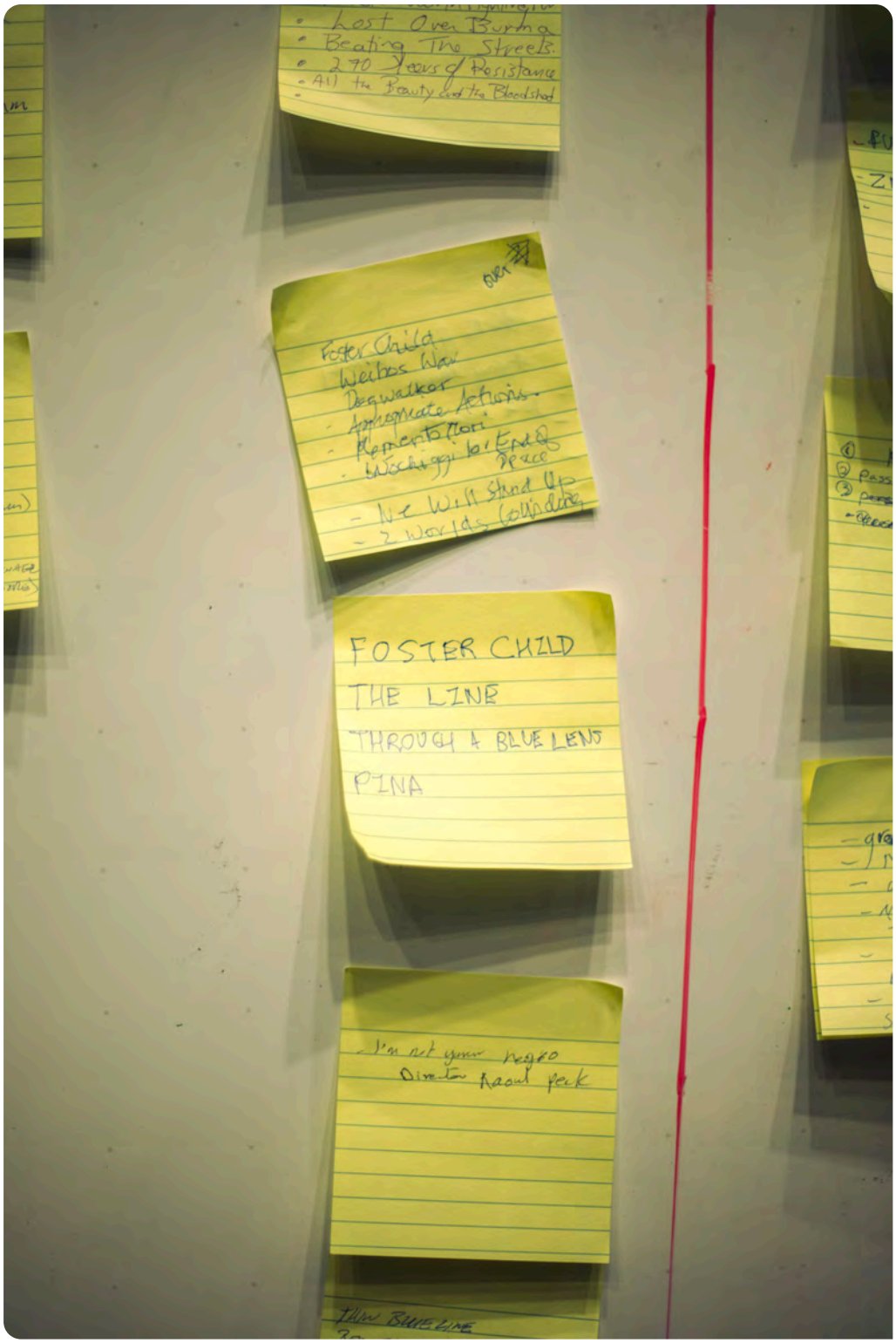
DOC ALBERTA

Influential Films in Canada:

Participants in the discussion highlighted a range of documentaries that were praised for their storytelling, emotional connection, and relevance to contemporary issues. Films were noted by the number of times they were mentioned:

- Foster Child
- Flashback
- CKUA: Radio Worth Fighting For
- Dogwalker
- Kanehsatake: 270 Years of Resistance
- Navalny
- Singing Back the Buffalo
- The Line



Key factors for the above films to be made

Participants identified several critical elements that helped bring these documentaries to completion:

1. **Compelling, Fresh Stories**
   The central factor for success was having a great story with fresh,

engaging content. Unique perspectives, underrepresented voices, or previously untold stories were pivotal.

2. **Funding and Institutional Support**
   Funding from established organizations was essential. Institutions like the National Film Board, Telefilm, and Alberta Media Fund were frequently credited. Government tax credits and initiatives such as the Gil Cardinal Legacy Fund also played a role.
3. **Passionate Filmmakers**
   Filmmakers' drive and perseverance were key. Many pushed beyond standard efforts to secure funding, access subjects, and realize their creative vision.
4. **Access to Unique Subjects and Locations**
   Authentic storytelling depended on direct connections to people, communities, and events. The ability to gain trust and capture genuine narratives distinguished successful films.
5. **Collaborative Teams**
   Strong partnerships with skilled editors, cinematographers, and production teams contributed significantly. A collaborative approach often elevated technical quality and storytelling impact.
6. **Focus on Social and Political Issues**
   Many films were motivated by a desire to highlight pressing social concerns, historical injustices, or human rights issues. Advocacy-driven content often provided compelling, urgent narratives.

Examples:

'Kanehsatake: 270 Years of Resistance' benefited from strong institutional support, including backing from the National Film Board.

'Navalny' gained traction due to its relevance to global political movements and timely storytelling.

Key Elements Connecting Films to Audiences

Factors that were mentioned most frequently:

1. **Emotional Impact**
   Films that evoked strong emotional responses were most effective. Personal stories reflecting universal experiences like

love, justice, perseverance, and struggle created deep connections.

2. **Timeliness and Political Relevance**
   Documentaries addressing contemporary social or political issues felt urgent and necessary. Timely content often increased a film's resonance with viewers.
3. **Universal Themes**
   Stories exploring broad human conditions—poverty, inequality, belonging—transcended cultural boundaries, making them relatable to a wide audience.
4. **Authenticity**
   Grounded, real-world depictions of human experiences enhanced credibility and audience engagement. Films like My Octopus Teacher and The Angry Inuk were praised for authenticity.
5. **Community and Local Impact**
   Many films, such as Singing Back the Buffalo, connected deeply with specific communities by telling stories of cultural or historical significance.
6. **Effective Distribution and Promotion**
   Visibility was a recurring theme. Participants noted that partnerships with broadcasters, commissioning editors, and promotional strategies, including social media, were crucial. Award recognition and high-profile events (e.g., the Oscars) could greatly amplify a film's reach.

Examples:

Free Solo succeeded due to its universal theme of human ambition paired with breathtaking cinematography.

Fire of Love merged scientific exploration with human drama, blending imagination with factual storytelling.

Insights and Takeaways

1. **Strong Stories with Unique Access**
   Films with exclusive access to subjects, communities, or significant events were more impactful. Documentaries that revealed hidden stories or perspectives stood out.

2. **Institutional and Financial Support**
   Leveraging funding sources was essential, but networking with key industry players also made a difference. Filmmakers highlighted the importance of having well-connected mentors or collaborators.
3. **Emotional and Social Connection**
   Emotional resonance combined with socially relevant themes created lasting impressions.
4. **Authenticity and Local Relevance**
   Grounded, genuine narratives—especially those rooted in marginalized or lesser-known communities—drove engagement.
5. **Promotion and Visibility**
   Even the best films struggle without proper marketing. Early consideration of target audiences and promotional strategies was recommended.

Challenges Identified:

1. Lack of funding for marketing and promotion was a common issue in Canada. While production funding was often available, filmmakers found it harder to secure resources for visibility and audience outreach.
2. Filmmakers stressed the importance of broadcaster support and incorporating promotional strategies early in production.

Conclusion

The discussion highlighted several factors that contribute to a documentary's success, including the importance of a great story, funding, passionate filmmaking, and effective promotion. Films resonated most with audiences when they captured universal themes, were timely, and provided authentic, emotionally engaging narratives. Institutional support, strategic distribution, and leveraging awards and social media further enhanced a documentary's impact.

Challenges Faced by Alberta Filmmakers in Documentary Production

This part of the discussion centered around the challenges faced by filmmakers in Alberta, particularly in terms of funding, distribution, and the overall sustainability of their work. Key points included:

1. **Lack of Local Broadcasters:**
   The absence of major local broadcasters (CTV, City TV) for the past 15-20 years forces filmmakers to travel to hubs like Toronto, incurring high costs.
2. **Funding Challenges:**
   Emerging and diverse filmmakers struggle to secure funding due to limited local options, jury bias, and difficulty accessing national grants.
3. **Limited Distribution Channels:**
   Without local broadcasters, filmmakers face challenges meeting with distributors and sales agents, with fragmented access through platforms like CBC Gem.
4. **Emerging Filmmakers' Barriers:**
   New creators lack mentorship, resources, and access to larger markets. Programs like Story Hive offer small budgets but are insufficient for major projects.
5. **Networking and Resource Gaps:**
   Alberta's film community is small, with limited local networking and insufficient support for filmmakers of color and diverse stories.
6. **Disconnect Between Production and Marketing:**
   Funding for marketing is scarce, making it difficult for well-made films to reach audiences.
7. **Complex Funding Requirements:**
   Programs like the TELUS Fund require filmmakers to demonstrate large audiences or community engagement, adding to access barriers.
8. **Tax Credits and Local Grants:**
   Alberta tax credits and grants are complex to navigate, particularly for smaller-budget films.
9. **Diversity and Authenticity:**
   TELUS Originals supports diversity-focused, community-driven stories but provides smaller budgets and limited marketing support.

10. **Reduced NFB Support:**
    The National Film Board's diminished role has left a gap in regional documentary production support.
11. **Audience and Impact:**
    Successful films must balance timeliness, impact, and budget constraints, focusing on clear audiences and authentic storytelling.
12. **Fiscal Sponsorship Restrictions:**
    Unlike the U.S., Canada's laws restrict charities from acting as fiscal sponsors, limiting access to private funding with tax receipts.
13. **Limited Foundation Culture:**
    Canada lacks robust private foundation support for independent films, making filmmakers reliant on broadcast licenses for government funding.

Conclusion:

Alberta filmmakers face significant systemic challenges, including funding gaps, lack of local infrastructure, and regional biases. Despite opportunities from TELUS Originals, creative freedom comes with budget and distribution limitations. Authentic, community-driven storytelling remains impactful, but navigating fragmented support systems requires resilience and innovation.

Discoverability and Marketing Support for Alberta Filmmakers

Participants were asked about the type of 'discoverability' or marketing support they need to connect audiences to their films on online platforms or other exhibition windows.

1. **Audience Targeting**
    Filmmakers stressed the importance of focusing on niche audiences rather than broad appeal, as targeting specific, passionate viewers leads to more effective marketing. Audience research, ideally supported by technical expertise, was highlighted as a critical step to identify interested viewers.

2. **Marketing Funding Gaps**
   A major challenge is the lack of financial support for marketing once a film is completed. Existing local funds are often insufficient, and filmmakers must often self-fund marketing efforts. Early-stage funding for audience research could help secure larger production budgets and refine marketing strategies.
3. **Role of Streaming Platforms**
   Streaming platforms prioritize high-profile projects, leaving independent films with little promotional support. Filmmakers proposed that platforms offer free advertising space to highlight indie content, improving discoverability amidst vast content libraries.
4. **Social Media and Digital Strategy**
   Funders increasingly require social media campaigns, but filmmakers lack the necessary financial support. Many face burnout from handling digital marketing on their own, often without compensation.
5. **Alternative Platforms**
   Platforms like YouTube offer filmmakers more control over content and marketing. Some filmmakers already benefit from passive income and expressed interest in learning from creators with large online followings.

Ownership of Intellectual Property (IP)

Participants were asked about their thoughts on ownership of their intellectual property. Key points included:

1. **Owning IP**: Filmmakers strongly value retaining IP to generate passive income and maintain control. Educational distributors and digital platforms like Amazon provide long-term financial stability.
2. **Non-Exclusive Licensing**: This model allows broader distribution without sacrificing ownership, enabling multiple licensing deals for the same content.
3. **Ethical IP Challenges**: In community-based or Indigenous filmmaking, ethical concerns about story ownership arise. Clear agreements and potential returns of IP to communities were discussed as potential solutions.

4. **Broadcast Deals vs. Independent Ownership**: While some filmmakers may accept funding in exchange for relinquishing IP, many prefer independent ownership due to the long-term benefits of retaining distribution control and revenue potential.

Conclusion

Filmmakers need stronger funding for marketing and audience research to boost discoverability. Retaining IP, using non-exclusive licenses, and leveraging alternative platforms provide sustainable ways to monetize and control content while balancing ethical considerations in sensitive projects.

Systemic Change in Alberta's Documentary Industry

Here's a summary of what is working and what is not working in bringing systemic change towards equality in the documentary industry in Alberta, based on the discussion.

What's Working:

1. **Increased Programs and Opportunities**
   Expansion of fellowships, mentorships, and training programs for BIPOC filmmakers provides valuable market access.

   Free memberships for BIPOC filmmakers through organizations like DOC have improved accessibility.
2. **Representation of Diverse Stories**
   More diverse voices and stories are being told, with filmmakers from various racial and cultural backgrounds involved in production.
3. **Organizational Support**
   Organizations like Doc Alberta and FAVA offer dedicated spaces and support for BIPOC filmmakers.
4. **Efforts at Building Capacity**
   Initiatives such as the "Elevate" program help emerging producers advance within the industry.

   Recognition of the need to build institutional capacity in production companies to support diversity.

What's Not Working:

Overtraining and "Forever Emerging" Model

Excessive focus on training keeps BIPOC filmmakers in a cycle of being considered "emerging" despite experience.

Many feel undervalued, facing lower pay and limited career advancement despite proven expertise.

Box-Ticking Without Real Change

Programs are perceived as fulfilling diversity quotas rather than driving meaningful systemic shifts.

Tokenism occurs, where BIPOC filmmakers contribute to stories about their communities without fair compensation or creative control.

Systemic Barriers in Funding and Decision-Making

Oversubscribed funding bodies like Telefilm limit access to resources for BIPOC filmmakers.

Funding streams with restrictive criteria reduce storytelling freedom for underrepresented voices.

Eurocentric leadership in decision-making perpetuates biases.

Limited Impact on Larger Structures

Policy changes in arts organizations have had little influence on corporate or major funding bodies, maintaining structural inequalities.

Geographical and Community-Specific Challenges

Alberta's filmmakers face fewer resources and opportunities compared to larger cities.

Arab filmmakers, in particular, report greater difficulty accessing training and funding compared to Black or Indigenous filmmakers.

Exclusion from Political Conversations

Funding systems often categorize political or human rights stories, especially from Arab filmmakers, as “political,” restricting support.






ADVOCACY

DOC Community Consultations

NOVEMBER 25, 2024

DOC is inviting documentary makers across the country to participate in DOC's Community Consultations. These cross-country consultations are taking place in collaboration with all six DOC Chapters over the course of this Fall and Winter, to help guide DOC's advocacy efforts during this crucial period of the CRTC's implementing the Online Streaming Act (Bill C-11). The regulatory decisions and frameworks that come out of the CRTC's consultations will shape Canada's audiovisual sector for the foreseeable future.

DOC's consultations reflect on a series of key questions:

- What enduring, successful documentaries have come out of the region
- What factors contributed to these projects' success
- What challenges does each region face in creating documentary content
- What types of support are needed in order to facilitate discoverability of our documentary content
- What have been effective mechanisms of systemic and sectoral change towards an equitable documentary industry

These vital grassroot conversations are made possible by the generous support of the Canada Media Fund.

DOC MANITOBA

DOC NORTHWEST

Influential Films in Canada:

Participants were asked to identify influential Canadian films that they think remain timeless and relevant, appealing to audiences across generations. Below are the list of films that came out of the Northwest session. The participants were also asked what they think are the key factors for these films to be made and what connected the films to their audience.

Documentaries Cited by Filmmakers

1. **Most Frequently Mentioned Films:**

   Because We Are Girls – A personal, socially charged story focusing on sexual abuse within an immigrant family.

   Fix: The Story of an Addicted City – Addresses addiction and harm reduction in Vancouver.

   Not Your Butter Chicken – A documentary on South Asian LGBTQ+ experiences.

   Mighty Jerome – Chronicles the rise and fall of Black Canadian sprinter Harry Jerome.

   Society Page – A look at diverse social narratives.

   Yintah – Explores Indigenous land sovereignty. ***Carts of Darkness*** – Combines homelessness, bottle collecting, and downhill racing.

2. **Common Themes Across Documentaries:**

   Social justice and political activism.

   Community-based storytelling and representation of marginalized voices.

   Indigenous perspectives and sovereignty.

   Personal and vulnerable storytelling.

Key Factors That Enabled Film Production

1. **Funding and Financial Support**
   Access to funding agencies (CMF, NFB, CBC, Canada Council).

   Partnerships with organizations like the National Film Board, a frequent enabler of impactful documentaries.

   Grants and government financial support critical to completing projects.

2. **Perseverance and Drive**
   Grit, determination, and relentless effort were often cited as non-negotiable qualities.

   Passion and commitment to the story helped overcome production hurdles.

   Filmmakers emphasized the necessity of being persistent through financial, logistical, and personal obstacles.

3. **Access and Relationships**
   Trusted relationships with subjects provided deeper insights and richer narratives.

   Strong community ties allowed for authentic representation and cooperative storytelling.

   Effective collaboration within the community and filmmaking team was vital.

4. **Authenticity and Representation**
   Films reflecting lived experiences and cultural connections felt more genuine.

   Indigenous sovereignty, where applicable, empowered Indigenous-led storytelling.

   Authentic narratives strengthened the film’s impact and integrity.

5. **Creative Vision and Timing**
   A unique creative vision distinguished successful projects.

   Timing—waiting for the right cultural or social moment—enhanced relevance and reception.

   Patience and innovation in storytelling were pivotal.

Key Elements That Created Audience Connection

1. **Authenticity and Emotional Connection**
   Raw, honest, and vulnerable storytelling resonated deeply with viewers.

   Emotional depth allowed audiences to empathize with subjects and stories.

   The authenticity of filmmakers' perspectives enhanced credibility.

2. **Relatable, Universal Themes**
   Themes of identity, resilience, and social justice echoed shared human experiences.

   Stories addressing universal struggles, such as addiction, marginalization, or personal triumph, were especially engaging.

3. **Strong Characters and Community Connection**
   Compelling, multidimensional characters captivated audiences.

   Community-driven stories created a shared sense of belonging and relevance.

   Films portraying real-world struggles reinforced relatability and impact.

4. **Unique Perspective and Innovation**
   Innovative narrative techniques (e.g., candid interviews, striking visuals) stood out.

   Unique story angles provided fresh takes on familiar issues.

   Creative risk-taking in storytelling methods enhanced memorability.

5. **Social Impact and Representation**
   Films with political and social advocacy drew strong emotional and intellectual engagement.

   Representation of underrepresented communities (BIPOC, LGBTQ+, Indigenous) amplified voices and broadened perspectives.

6. **Relatability, Hope, and Feel-Good Elements**
   Stories with hopeful resolutions or uplifting themes created lasting positive impressions.

   Emotional arcs involving struggle and triumph provided a satisfying narrative experience.

Conclusion

Filmmakers' favorite documentaries are characterized by strong social commentary, authenticity, and community engagement. Funding, perseverance, and relationship-building are critical to getting films made. Audience impact is strongest when films offer authentic, relatable stories with strong emotional connections, diverse representation, and social relevance.

Documentary Filmmaking in the Northwest: Key Points

Diverse Funding Models

Variety of funding sources: Filmmakers use a mix of self-funding, government grants, broadcast licenses, and community-driven projects.

Traditional vs. Independent Funding: Some documentaries rely on traditional funding routes (e.g., government, broadcasters), while others are independently financed.

Ownership vs. Funding

Trade-off: Filmmakers often face the decision of maintaining full ownership and creative control versus accepting external funding that may provide more resources but limit creative freedom.

Roles in Documentary Filmmaking

Multiple roles for small crews: Emerging filmmakers tend to take on multiple roles such as director, producer, editor, and director of photography (DP) within smaller teams.

Challenges with Canadian Content Regulations

CRTC and content restrictions: Canadian content regulations (e.g., CRTC) create difficulties for international co-productions and projects that require expertise not always available in Canada.

Impact on Indigenous filmmakers: Borderless storytelling for Indigenous filmmakers is hindered by strict Canadian content rules, which can limit collaboration with international talent.

Cultural Sensitivity and Indigenous Concerns

Collaboration barriers: The Canadian content system may impede international collaborations, particularly for Indigenous filmmakers whose stories often transcend national borders.

Cultural sensitivity: Filmmakers stress the importance of understanding local cultures, particularly when creating stories with Indigenous or culturally sensitive content.

Emerging Filmmakers

Challenges for new filmmakers: Emerging and underrepresented filmmakers, including those from immigrant communities, face challenges navigating tax credits and securing funding.

International Collaborations and Local Sensitivity

Hiring local talent: Filmmakers emphasize the importance of working with local crews when filming abroad, especially in culturally sensitive regions, to ensure the authenticity and integrity of the work.

Discoverability of Films: Key Points

Frustration with Traditional Gatekeepers

Dissatisfaction with distributors: Filmmakers express frustration with broadcasters and platforms that hold distribution rights but fail to promote films effectively, limiting their visibility.

Self-Promotion and Advocacy

Filmmakers as promoters: Many filmmakers are increasingly taking responsibility for promoting their own work, believing they have a better understanding of their target audience than traditional distributors.

Direct-to-Audience Models

Success of alternative distribution: Filmmakers are bypassing traditional channels by releasing films on platforms like YouTube, which allows them to directly connect with audiences and achieve significant reach.

Strategic Partnerships

Leveraging educational and community partnerships: Filmmakers are forming partnerships with educational institutions, community organizations, and impact-focused funds to build their audience and create sustainable distribution channels.

Post-Production Support

Need for post-production resources: There is a demand for more resources, infrastructure, and guidance in post-production and distribution, areas often under-supported compared to the production phase.

Ownership and Control

Desire for control: Filmmakers increasingly want to maintain ownership and control over their content, even if it means taking on additional responsibilities rather than relinquishing control to larger distributors or platforms.

Key Trends

Agency and control: Filmmakers are increasingly seeking greater agency and control over how their films reach audiences.

Alternative distribution: Models such as YouTube and educational partnerships are gaining interest as alternatives to traditional broadcast channels.

Post-production infrastructure: There is a growing need for better support and infrastructure in the post-production and distribution phases of filmmaking.

Systemic Changes in the Canadian Film Industry: Key Points

Exclusion of Asian Creators

Underrepresentation of South Asian and East Asian filmmakers: Despite being significant minority groups in Canada, these filmmakers are often excluded from initiatives.

Call for more inclusive policies: Filmmakers advocate for policies that do not prioritize one marginalized group over another, ensuring equal representation for all underrepresented communities.

Gatekeeper Issues

Barriers created by gatekeepers: Funding and distribution decisions are largely controlled by gatekeepers who tend to favor established white male producers, limiting access for marginalized filmmakers.

Systemic exclusion: Marginalized filmmakers face systemic exclusion from critical opportunities due to the bias of those in power.

Lack of Continuity in Mentorship Programs

Limited mentorship support: Many mentorship programs end after a film is completed, providing no long-term support for filmmakers beyond production.

Call for sustained mentorship: Filmmakers advocate for continuous mentorship that extends through all stages of filmmaking, beyond just the production phase.

Breaking into Industry Spaces

Challenges accessing high-profile events: Filmmakers from marginalized backgrounds face financial barriers and an exclusionary atmosphere at major industry events, such as film festivals.

Overwhelmingly white industry spaces: These events often lack diversity, making it difficult for marginalized filmmakers to network and gain visibility.

Collaboration Within Marginalized Communities

E**mpowering BIPOC filmmakers**: There is a push for greater collaboration within BIPOC communities, encouraging filmmakers to co-produce films within their own communities rather than relying on white producers.

Building community-led narratives: Empowering marginalized voices through community collaboration is seen as a way to ensure more authentic and equitable storytelling.

Frustration with Limited Progress

Slow systemic change: Despite the introduction of various initiatives, filmmakers express frustration with the slow pace of real change.

Need for addressing structural issues: Filmmakers believe that until gatekeepers and broader structural issues are addressed, change will remain superficial.

Desire for Systemic Change

Call for a fundamental shift: Filmmakers stress the need for a deep, systemic change in the industry.

Inclusive, sustainable approaches: There is a strong push for long-term, inclusive policies that tackle the root causes of exclusion and ensure equitable representation in the industry.

Conclusion

Challenges in Northwest documentary filmmaking: Filmmakers in the Northwest face significant challenges around funding, creative control, and Canadian content regulations.

Advocacy for greater agency: Filmmakers are pushing for more control over their work through self-promotion and alternative distribution models to bypass traditional gatekeepers.

Call for systemic change in Canada's film industry: There is a strong emphasis on the need for racial equity, ongoing mentorship, and greater inclusivity, particularly for marginalized communities such as BIPOC and Indigenous filmmakers.

CRTC Canadian Content Points System: Key Points

Overview of the Points System

Points Allocation: The CRTC's proposed points system allocates points to specific creative roles (e.g., director, producer, editor, DP) on a project to determine Canadian content (CanCon) eligibility.

Example: A project might need to accumulate 13 points across different roles to qualify.

Challenges for Documentaries: Documentaries, which often lack certain roles (e.g., hair and makeup, art directors), face difficulty in filling all required points, especially for projects with minimal crew.

Pros of the Points System

Support for Canadian Content

Promotes Canadian filmmakers: Ensures Canadian talent is supported and maintains Canadian identity within a competitive international market, especially dominated by U.S. content.

Encourages Canadian hiring: Incentivizes Canadian projects to hire local talent, protecting the domestic industry.

Funding Access

Gateway to financial resources: The system facilitates access to key funding bodies like Telefilm, Canada Media Fund, and tax credits (e.g., CAVCO).

Crucial for emerging filmmakers: Provides independent filmmakers, especially those in early stages, with essential production and development funding.

Diversity of Filmmakers

Opportunities for underrepresented groups: The system can support BIPOC, emerging, and marginalized filmmakers, ensuring they have access to funding and industry opportunities.

Cons and Challenges of the Points System

Difficulty in Fulfilling All Points

Challenges for international co-productions: Projects with global themes or specific language/technical needs (e.g., hiring a DP who speaks Spanish or Fulani) may struggle to meet the points criteria.

Creative compromises: Filmmakers may be forced to choose team members to meet point requirements, potentially diluting the authenticity or artistic vision of the project.

Frustration for emerging filmmakers: New filmmakers or those without established networks may find the system complex, potentially stifling innovation and unique storytelling.

Exclusion of Collaborative International Work

Barriers to working with international talent: The points system limits filmmakers from working with renowned international professionals (e.g., American composer) without risking CanCon certification.

Cultural challenges: Filmmakers working abroad, particularly in countries like Senegal or the Dominican Republic, face challenges in hiring local talent due to the points system, which could be culturally insensitive and disrupt the collaborative process.

Compromising Artistic Integrity

Restrictions on talent hiring: Filmmakers may be forced to prioritize the points system over the needs of the project, such as hiring a Canadian over a more suitable international talent.

> Example: A documentary about immigrant stories might require a bilingual DP (English and Spanish), but the points system may restrict hiring the best candidate if they are not Canadian.

Impact on Indigenous filmmakers: Indigenous filmmakers argue that the system fails to account for the transnational and borderless nature of many Indigenous stories, overlooking their cultural and historical context.

Exclusion of diaspora stories: The system may also limit the ability to tell stories that cross national borders, especially for filmmakers from diaspora communities.

Impact on Small Producers

Financial burden on independent producers: Small-scale producers may struggle to meet the point requirements due to financial constraints, especially on low-budget projects.

Challenges with student filmmakers: Emerging filmmakers who may not yet hold Canadian status (e.g., students or young filmmakers) may face tax credit restrictions, limiting their ability to pursue important projects.

Restricting Creativity

Limited storytelling opportunities: The rigid criteria can result in stories being underrepresented or untold. For example, a filmmaker from a non-Canadian background may face difficulties hiring non-Canadian talent who is key to telling their story authentically.

Conclusion: Finding Balance and Flexibility

Balancing CanCon support with creative flexibility: While the points system supports Canadian content and talent, it poses significant challenges for documentary filmmakers, especially those working on international or culturally-specific projects.

Need for flexibility in the system: Filmmakers argue for flexibility in the points system, especially for documentary films, which may not require traditional roles (e.g., actors, art directors).

Encouraging global collaboration: To foster creativity and global collaboration, the system should be more adaptable, especially in the context of international co-productions, cultural exchange, and emerging filmmakers' needs.

Ownership of Content: Key Points

Filmmaker Control vs. External Funding

Ownership dilemma: Filmmakers often choose between retaining ownership of their work or accepting external funding from platforms like Netflix or CBC Gem, which may require giving up rights.

Frustration with platforms: Filmmakers express frustration when platforms fail to promote their films effectively, leading them to believe they could have allocated promotional funds more wisely.

Lack of engagement: Even when films are available on streaming platforms, filmmakers note low viewer engagement and poor discoverability, despite having high-quality content.

Indigenous Ownership

Cultural sovereignty: Indigenous filmmakers, such as those working with the Sultan First Nation and Jessica Helen Back, emphasize the importance of communities retaining ownership of their stories.

Community-led projects: The decision to have Indigenous communities own the content reflects a commitment to cultural sovereignty and honoring the voices of the people involved.

Education as a Path for Impact: Key Points

Educational Outreach

Films as teaching tools: Filmmakers are exploring how their films can be used in educational settings. One filmmaker noted a university using their film to develop a curriculum, while another's film was shown in 500+ schools, inspiring students to take action.

Social impact: Educational outreach allows films to have a long-lasting impact beyond commercial gain, fostering learning and social change.

Financial and Impact Convergence

Merging impact and financial outcomes: Filmmakers prioritize educational partnerships as a way to keep films relevant and visible, especially among younger generations, even if it doesn't lead directly to financial profits.

Vimeo for educational access: One filmmaker shared their success using Vimeo to make their film accessible to educators, bridging the gap between traditional distribution and impact-focused goals.

Discoverability and Platforms: Key Points

Struggles with Public Broadcasting Platforms

Frustration with platforms like CBC Gem and NFB: Filmmakers criticize public broadcasters and free streaming platforms for failing to effectively promote films, leading to low engagement from viewers, even with free access.

Alternative Distribution Models

Direct distribution: Filmmakers seek more control over distribution, using platforms like YouTube to connect directly with their audiences. One filmmaker found success through organic reach and partnerships with health organizations.

Audience connection: Filmmakers believe they know their audience better than distributors and are increasingly bypassing traditional channels for direct engagement.

Funding and Resource Sharing: Key Points

Self-Funding vs. External Investment

Burnout from self-management: Filmmakers express stress and burnout from handling every aspect of production, marketing, and distribution on their own, often without sufficient resources for festival submissions or audience engagement.

Concerns about poor distribution: There is a general lack of confidence in distributors' ability to promote films effectively, leading filmmakers to prefer maintaining control over their work.

Alternate Funding Models

Grassroots, community-based funding: Filmmakers call for funding models that prioritize community-driven distribution, such as educational grants and marketing funds for theatrical releases.

Telefilm Canada program: Some filmmakers were unaware of Telefilm's theatrical marketing assistance program, which provides funds for films suitable for indie theater screenings.

Advocating for Your Own Project: Key Points

Filmmakers as their own advocates

Self-promotion: Filmmakers increasingly take charge of promoting their films, believing they know their work best and can allocate resources more effectively than larger distributors.

Networking and learning: Filmmakers emphasize the importance of learning from others in the industry, particularly regarding post-production, distribution, and audience engagement.

Building support networks

Post-production support: There is a call for creating resources and communities to support filmmakers through the post-production phase, particularly with distribution and audience outreach.

What's Working with Systemic Changes in Diversity and Equity Policies:

1. **Funding and Mentorship Programs**

   Access to Resources: Programs aimed at marginalized communities help emerging BIPOC filmmakers access funding, mentorship, and networking opportunities that would otherwise be out of reach.

   Career Continuity: Some mentorship programs extend beyond production, supporting filmmakers' long-term careers and offering guidance after the completion of their first projects.

   Collaborative Co-Productions: BIPOC filmmakers are starting to collaborate within their communities, creating stronger

networks and more diverse content, especially through Indigenous and racialized partnerships.

2. **Representation and Gatekeeping Awareness**
   Industry Conversations: Growing awareness within the industry about the need to change who holds decision-making power (gatekeepers) and the need for more inclusive, racially diverse content.

   Targeted Programs: Some events and programs, such as the Whistler Film Festival, are making strides in creating targeted programming for underrepresented groups.

3. **Opportunities for Collaboration**
   Community Building: BIPOC creators are working together more frequently, sharing resources, and co-producing content to ensure diverse representation.

4. **Industry Events and Festivals**
   Delegations & Networking: Some initiatives are connecting BIPOC filmmakers with industry leaders, offering exposure and networking opportunities for future projects.

What's Not Working with Systemic Changes in Diversity and Equity Policies:

1. ***Short-Term Programs and Lack of Long-Term Support***
   Sustained Support Missing: Many mentorship and funding programs are short-term and do not provide long-term guidance or career continuity, leaving filmmakers without a clear path forward after their initial projects.

   Insufficient Support for Asian Communities: South Asian and East Asian communities feel overlooked, with these groups being notably underrepresented in Canadian media and excluded from many programs.

2. ***Exclusion from Gatekeeping Roles***
   Continued Power Imbalance: Systemic issues persist, with funding and decision-making still dominated by established, predominantly white male producers, leading to continued exclusion of diverse voices

   Tokenism vs. Real Change: Industry's focus on "diversity" is often seen as a checkbox exercise, rather than addressing

deeper systemic issues. BIPOC creators are still competing with each other for limited resources, instead of tackling the root causes of inequality.

3. ***Financial Barriers to Industry Participation***

   Festival Costs: The high costs associated with attending industry events (travel, accommodation) remain a major barrier for many emerging BIPOC filmmakers. Without financial support, they miss out on critical networking and career advancement opportunities.

4. ***Limited Impact of Industry Events***

   Superficial Diversity: Many marginalized filmmakers report feeling excluded from key industry events and spaces, where diversity initiatives are seen as superficial and not integrated into the broader industry culture.

Overall Takeaways:

What's Working: Mentorship programs, funding initiatives, and collaborative co-productions are helping BIPOC filmmakers access resources, build networks, and increase diverse representation. Some events are making strides in supporting underrepresented groups.

What's Not Working: The pace of change is slow, with systemic exclusion still prevalent due to the dominance of white male gatekeepers. Many programs fail to provide lasting support, and financial barriers prevent access to key industry events. Real systemic change requires dismantling privilege and changing who controls resources, narratives, and opportunities in the film and media industry.


DOC northwest
The collective voice of independent Canadian documentary creators.

APPENDIX C

STORYLINE

CRTC

January 14, 2025

Dear Reader,

I am an Emmy award winning documentary producer based in Toronto.

I would like the Commission to know that when I make a film, it takes an average of three to four years. On my last film, I spent 2 years in development before I found a broadcasting partner. It then took two more years to complete the film.

Currently I am producing a film without a broadcasting partner with the hope someone will acquire the film when it is completed. This is a risky endeavor, but we have a passionate team and feel we have an important story to tell.

I would like the Commission to know how important my films are to the region; our films keep several professional filmmakers employed and our success demonstrates that Canadians want to see these films.

Online platforms are risk-averse, shying away from the type of content I produce despite the artistic success evidenced by our awards and international exposure. The programming I see on online platforms don't reflect the unique work we do and Canadian documentaries are not part of their business models.

I urge you to maintain protections for documentary films.

Thank you,

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BARRI COHEN (she/her)
Cave Bear Creative Inc.
628 Clinton St
Toronto, Ontario
M6G 2Z7

JANUARY 20, 2025

RE: Programs of National Interest Policy & Bill C-11

Attn CRTC:

I am a documentary filmmaker based in Toronto. It's vital that the Commission try to understand that when I make a documentary film, it takes an average of five (5) years from initial conception to final release. In fact, my last film, (2022) *Unloved: Huronia's Forgotten Children*, took seven (7) years because the topic was deemed too challenging for most broadcasters, let alone a streamer who wouldn't touch it.

It went on to win multiple awards with many more nominations in Canada and internationally, and succeeded in being one of the highest engaged films (11 million) when promoted by the CBC on its social media. I spent 5 years in development before I secured a broadcasting partner. Sometimes I need to produce my films without a broadcasting partner *at all,* and hope that I can find a platform to exhibit my film once it's completed.

I expect with the potential ahead for radical change in our cultural sector caused by a new government in 2025 – 2026, we may see a vast, dramatic decline of one of the few Canadian public broadcasters in the CBC/SRC. This will prove catastrophic for documentary filmmakers (not to mention other genres) and the CRTC would do well to consider very carefully the broader implications of what they're considering with the sunsetting of PNI. To do so at this time would be beyond folly. To put it very bluntly, it would demonstrate gross misapprehension on the CRTC's part, of the true reality we are facing here.

Further, I would like the Commission to know how important my films are to my region, and to tell you that Canadians want to see these local stories. When my last film received 11 million engagements, it also included thousands of comments because the film – about children institutionalized with intellectual disability and harmed -- touched nearly everyone in Canada. I received comments from people sharing stories about their family members or themselves, and how they suffered in one institution or another in Canada – being locked up for being different.

In my experience, online platforms tend to be risk-averse, even more so now. Netflix, for instance, has been very clear that they don't want 'difficult' or 'politically challenging films'. I have to ask, what are we doing here? What is the point of doing stories if we can't offer up diverse forms that challenge the status quo in our lives? Regardless of

genre, most of us dedicated to telling stories want to do so meaningful. We cannot shy away from the types of content I make, for instance, despite how impactful and important my films are to Canadians and to international audiences.

I don't often see the types of documentaries I make or produce, reflected on major streaming platforms and I cannot agree that Canadian documentaries are part of their business models. On the contrary; all current evidence points out they are not. You must recognize this.

I thus urge you in the strongest possible terms, to maintain protections for documentary films.

Thank you,
BDC *Barri Cohen*

Barri Cohen (she/her) 416. 579.0516
Award-winning Producer, Filmmaker, Writer
Unloved: Huronia's Forgotten Children
https://unloveddoc.com/ - now on Documentary Channel & CBC GEM

Consulting Producer & Story Editor *Exclusion: Beyond the Silence* -
Telus & BC Knowledge, Omni & Yes TV, Cineplex theatres in May 2025
Producer, Emmy nominated *Toxic Beauty,* Documentary Channel *&* CBC GEM, Apple TV & Amazon

Gratefully living and working on the traditional territory covered by Treaty 13 with the Mississaugas of the Credit, and home to the Anishnabeg, the Chippewa, the Haudenosaunee and the Wendat peoples and home to many diverse First Nations, Inuit and Métis peoples.

[Ontario/Toronto Chapter
of The Documentary Organization of Canada

Wed Jan 15th / 2025

I am a documentary filmmaker based in Nova Scotia. I would like the Commission to know that when I make a documentary film, it takes an average of five years. On my last film, I started in development in 2019, and the documentary has taken me six years in development before I found a broadcasting partner. Even then, my take home pay for this documentary is approximately nine thousand dollars. Most times I need to develop and then produce my films without a broadcasting partner at all, and hope that I can find a platform to exhibit my film once it's completed.

I would like the Commission to know how important my films are to my region, and to tell you that Canadians want to see these local stories.

Documentaries are vital because they uncover extraordinary stories that might otherwise go unnoticed. My recent project, for example, highlighted a group of friends in their nineties who have been swimming in their local river for over 40 years—a testament to resilience, friendship, and the deep connection people share with nature, and social engagement. The overwhelming response, with over a million views on social media, shows how these stories resonate with audiences.

Currently, I'm finishing a series on the importance of oysters in the province of Nova Scotia, which reveals their crucial role in maintaining ecological balance. Documentaries like these are more than storytelling; they preserve history, foster empathy, and inspire action by bringing hidden narratives and critical issues to light.

In my experience, online platforms tend to be risk-averse, shying away from the types of content I make despite how impactful and important my films are to Canadians and to international audiences. I don't often see the types of documentaries I make reflected on major streaming platforms and I do not agree that Canadian documentaries are part of their business models.

I urge you to maintain protections for documentary films.

Thank you,

Rachel Bower
Doc Atlantic

Canadian Radio-television and Telecommunications Commission (CRTC)
Ottawa, Ontario
Canada, K1A 0N2

January 16, 2025

Dear CRTC,

I am a documentary filmmaker based in Toronto. I am writing to let the commission know that it takes an average of 3-5 years for me to make a documentary film, which can often include at least two years in development before I am able to attach a broadcasting partner. Sometimes I need to produce my films without a broadcasting partner at all, and hope that I can find a platform to exhibit my film once it's completed.

I would like the Commission to know how important my films are to my region, and to tell you that Canadians want to see these local stories. The last film I produced, BEETHOVEN'S NINE, documented the very personal experience of the director, Larry Weinstein, whose sister Judih was abducted by Hamas on October 7, 2023, while Larry was in the middle of making a film about music and conflict. We are now at work on another film about music, exploring the lives of young people as they study at the Royal Conservatory in Toronto.

In my experience, online platforms tend to be risk-averse, shying away from the types of content I make despite how impactful and important my films are to Canadians and to international audiences. I don't often see the types of documentaries I make reflected on major streaming platforms and I do not agree that Canadian documentaries are part of their business models.

I urge you to maintain protections for documentary films.

Thank you,

Jason Charters
DOC Ontario

RIDDLE FILMS INC.
229 Greenwood Avenue, Toronto ON M4L 2R4 Canada
T 416 778 4973 F 416 778 4974 E info@riddlefilms.com
www.riddlefilms.com

Jan. 18, 25

I am a documentary filmmaker based in Toronto. I would like the Commission to know that when I make a documentary film, it takes an average of three years. On my current film, I've spent two and half years in development before I found development funding. This film will be made without a Canadian broadcaster but hope that I can find a platform to exhibit my film once it's completed.

I would like the Commission to know how important my films are to my region, and to tell you that Canadians want to see these local stories.

I am currently in development on a documentary about climate change through the lens of a visual artist who lives in the fastest warming place on earth. This film would not be at the stage that it's at without the support of government funding.

In my experience, online platforms tend to be risk-averse, shying away from the types of content I make despite how impactful and important my films are to Canadians and to international audiences. I don't often see the types of documentaries I make reflected on major streaming platforms and I do not agree that Canadian documentaries are part of their business models.

I urge you to maintain protections for documentary films.

Thank you,

Aeyliya Husain
November Films Inc.
Producer/Director

January 17, 2025

I am a documentary filmmaker based in Toronto. I would like the Commission to know that when I make a documentary film, it takes an average of three years for a short film and eight years for a feature film. On my last film, I spent three years in development before I found a broadcasting partner. Sometimes I need to produce my films without a broadcasting partner at all, and hope that I can find a platform to exhibit my film once it's completed.

I would like the Commission to know how important my films are to my region, and to tell you that Canadians want to see these local stories.

I recently completed two short documentary films about the Jamaican-Canadian experience in Toronto and how people of Jamaican heritage are still connected to our roots "back home" even though we live in one of the most culturally diverse cities in the world. The footage was shot in various locations in Jamaica and throughout Toronto at key cultural events, like Caribana and the Afro-Caribbean Fest, for example. The films were selected for a group exhibition at the Museum of Toronto along with nine other filmmakers, to maximize exposure and connect with the local audience in the GTA.

You may learn more about the exhibition here: https://www.museumoftoronto.com/collection/black-diasporas-tkaronto-toronto/

I am now working to get the films circulated in film festivals and on online platforms.

In my experience, online platforms tend to be risk-averse, shying away from the types of content I make despite how impactful and important my films are to Canadians and to international audiences. I don't often see the types of documentaries I make reflected on major streaming platforms and I do not agree that Canadian documentaries are part of their business models.

I urge you to maintain protections for documentary films.

Thank you,

Chelsea Richards James
DOC Ontario

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Chelsea Nyomi
Filmmaker, Video Editor, Artist
www.chelsea-nyomi.com
www.instagram.com/chelsea.nyomi
https://www.imdb.com/name/nm14113633/

TMF Media

FAST CAT FILMS LTD

Office: 932 Poirier Street| Coquitlam| B.C. |V3J 6C4

9 January 2025

For the Attention of the CRTC

I am a documentary filmmaker now based in Vancouver, having worked in this field for over 30 years, mainly outside of Canada, at the BBC and as a freelance producer/director making films for most of the world's major broadcasters. In addition to the BBC this includes CBC, National Geographic, Discovery Channel, Animal Planet, Smithsonian Network, PBS, NHK, France TV, Canal+, ARTE, ITV, CH4, ZDF and NDR.

My experience working for this mixture of public service broadcasters and commercial broadcasters has given me first hand experience in learning about and appreciating the value and importance of public service broadcasting or Programs of National Interest.

I would like the Commission to know that when I make a documentary film, it takes an average of 2-3 years. On my last film, I spent 2 years in development before I found a broadcasting partner. Sometimes I need to produce my films without a broadcasting partner at all, and hope that I can find a platform to exhibit my film once it's completed.

I would like the Commission to know how important my films are to my region, and to tell you that Canadians want to see these local stories. They also want to see stories that are not considered "commercial". We have plenty of reality television, we have plenty of drama; what we don't have enough of in Canada is a broad range of documentary programming that speaks to all Canadians.

I am currently working on a local conservation/environment documentary, which I know will attract significant interest from my local community. With sufficient Canadian funding I can make this film's story address the concerns of local people. However, without Canadian funding, I will need to raise international funding and cut out the local angle in order to meet the story expectations of foreign broadcasters. The upshot will be that stories that matter here won't be told. Canadians will be short changed.

Regarding online platforms, in my experience, online platforms tend to be risk-averse, shying away from the types of content I make despite how impactful and important my films are to Canadians. I don't often see the types of documentaries I make reflected on major streaming platforms, and I do not agree that Canadian documentaries are part of their business models.

Registered Address: 3611 Petit Creek Road, Merritt BC, V1K 1NK, Canada Tel: +1 778 980 8412 Email: joe@tmfmedia.ca

I urge you to maintain protections for documentary films.

Thank you,

Joe Kennedy
DOC NorthWest Chapter
Owner/ Executive Producer
TMF Media / Fast Cat Films Ltd.

KENSINGTON
STORY FORWARD

13 January 2025

I am a documentary filmmaker based in Toronto and the founder/president of one of Canada's leading documentary production companies, Kensington Communications. I am concerned to hear that identification of Canadian documentary films as PNIs may be removed from CRTC protection. It appears that the CRTC believes there are enough documentaries being produced now without protecting the genre. From my experience, nothing could be further from the truth. Docs continue to need these protections.

While I continue to produce highly successful documentaries for broadcast, the number of commissions we get has seriously declined and certainly the advent of streaming services has not increased the possibilities as we anticipated. Most streamers have very limited slots for Canadian subject matter, focusing heavily on celebrity profiles and true crime programs. Even Canadian celebrities don't cut it for the most part, unless they have a large following and appeal outside Canada. In my experience, online platforms tend to be risk-averse, not open to the type of content I make despite how popular or impactful they are to Canadians and to international audiences.

It never has been easy, but now it's tougher than ever making documentary films in this country, especially ones that are of significant cultural interest to Canadians. We often are in development for a year or two and spend significant time and our own funds to research and create pitch materials to take to broadcasters/streamers. For example, a current production about Canadian musical legend Bruce Cockburn has been in development for well over a year and only recently, after unsuccessfully approaching several Canadian and international streamers and national broadcasters, have we had interest expressed by a smaller Canadian broadcast partner. Even then, it's touch and go

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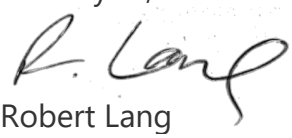
whether they will be able to commission it because their number of documentary slots have decreased by nearly 50% over the past few years.

All our award-winning documentaries have had wide appeal with audiences in Canada and internationally – conceived and developed in Canada, telling Canadian stories, most have gone on to see much success around the world. But that production model seems currently under threat, much as it was when Kensington started up in the early 1980s, during a time when American cultural imperialism was the norm and Canadian documentary stories were very hard to produce.

I urge you to maintain protections for documentary films.

Thank you,



Robert Lang
Kensington Communications
Toronto

January 17, 2025

I am a documentary filmmaker based in Toronto. I would like the Commission to know that when I make a documentary film, it takes an average of 2-7 years. I spent 3 years in development on my first feature film before I found a broadcasting partner. Sometimes, I need to produce my films without a broadcasting partner at all, and I hope that I can find a platform to exhibit my film once it's completed.

I would like the Commission to know how vital my films are to my region and our economy and to tell you that Canadians want to see these local stories. My last film, *How to Make a Hit Toy,* spent over $800,000 on the local economy hiring editors, sound designers, musicians to score, camera people, producers, researchers, etc., all were Toronto-based artists and filmmakers.

In my experience, online platforms tend to be risk-averse, shying away from the types of content I make despite how impactful and important my films are to Canadians and international audiences. My first film, *Sounds Like a Revolution,* about protest music is very political, and I don't often see these types of documentaries reflected on major streaming platforms. I do not agree that Canadian documentaries are part of their business models.

Further, we as filmmakers are finding that with the consolidation of the industry, many political or social issue documentaries are just not getting picked up by the streamers despite their incredible success in film festivals around the globe. I can cite an excellent documentary by Canadian filmmaker Brett Story called UNION, which has won audience awards everywhere but cannot find

distribution from any streamers and thus has to do it independently.

The CRTC must defend Canadian content and values, or they will be lost in a sea of corporate greed and algorithms.

I urge you to maintain protections for documentary films.

Thank you,

Summer Love Lazarou
Director / Producer
www.deltatime.ca

Toronto Chapter, Documentary Organization of Canada

Byron A. Martin Productions Inc.
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Toronto, ON M5P 1B8 Canada
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Tuesday, January 14, 2025

Canadian Radio-television and Telecommunications Commission (CRTC)
Ottawa, Ontario
K1A 0N2.

RE: Online Streaming Act (Bill C-11)

To Whom It May Concern:

I am a documentary filmmaker based in Toronto. I have produced films in over thirty countries and have been in the industry for over thirty-five. Most recently, my narrative feature, BEAUTIFUL EVENING, BEAUTIFUL DAY which was a co-production with Croatia, was selected for the 97th edition of the Academy Awards. The majority of my films have been celebrated at Festivals around the world garnering numerous honors and one was published into a book based on the feature documentary, THE CARBON RUSH. In addition to being a long-serving DOC member, I am a member of the CMPA, the DGC, the Academy and the current Hub of PRO.

Currently, the CRTC is requesting comments concerning Bill C-11 and the importance of PNI.

"in an "on-demand" system driven by online undertakings whose business models are based on the programs that underscore the current definition of PNI, such as drama and documentaries, the current approach to PNI is no longer needed"

I would like the Commission to know that when I make a documentary film, it takes an average of three to five years. On my last film, I spent two years in development before I found a broadcasting partner. Sometimes I need to produce my films without a broadcasting partner at all, and hope that I can find a platform to exhibit my film once it's completed. By doing this, I essentially have to forfeit any CMF funding as most streams require a broadcast commitment, which currently excludes recognition of a foreign license or a domestic streamer license.

I would like the Commission to know how important my films are to my region, and to tell you that Canadians want to see these local stories.

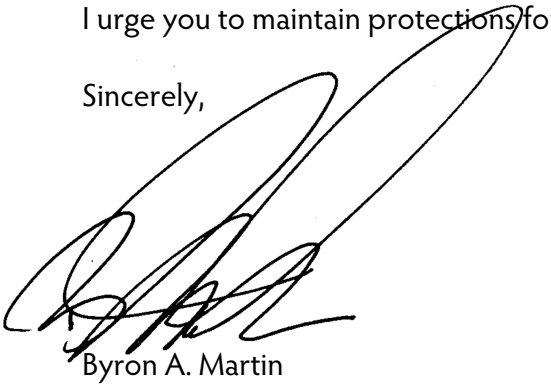
I recently completed a feature documentary UNTHINKABLE, based on the ongoing social issue of abortion in the USA. This project was financed through private equity. I am in post-production of 1001 CROWNS, a French-language feature film about the history of black hair. The project was financed by Telefilm Canada, the CMF and we secured a broadcast license from TFO.

In my experience, online platforms tend to be risk-averse, shying away from the types of content I make despite how impactful and important my films are to Canadians and to international audiences. I don't often see the types of documentaries I make reflected on major streaming platforms and I do not agree that Canadian documentaries are part of their current business models.

Given the tremendous impact of the pandemic, the SAG and WGA union strikes, and now, the ongoing fires in Los Angeles, when the industry remains in recovery mode and continues to reorganize priorities, I don't see Canadian documentaries a priority in American business models.

I urge you to maintain protections for documentary films.

Sincerely,



Byron A. Martin
Producer

DOC Ontario Chapter

January 14th, 2025

I am a documentary filmmaker based in Epekwitk, Prince Edward Island. I would like the Commission to know that when I make a documentary film, it takes an average of 5 years. On my current film, I spent 3 years in development and am still seeking a broadcasting partner. Sometimes I need to produce my films without a broadcasting partner at all, and hope that I can find a platform to exhibit my film once it's completed.

I would like the Commission to know how important my films are to my region, and to tell you that Canadians want to see these local stories.

Being a filmmaker from a small and rural province, means that I am one of a small group of voices that are able to reflect this community's collective experiences to the community itself, and the world at large. If we do not tell the stories of smaller communities, what we are left with is a homogeneity of perspectives and a watering down of national identity.

My films have won awards at festivals across Canada and internationally. Though I am telling stories from a small place, these stories resonate with audiences around the world. Upholding the work of documentarians from across Canada is absolutely essential if we are to maintain a vibrant cultural identity in this country.

In my experience, online platforms tend to be risk-averse, shying away from the types of content I make despite how impactful and important my films are to Canadians and to international audiences. I don't often see the types of documentaries I make reflected on major streaming platforms and I do not agree that Canadian documentaries are part of their business models. More and more I see only biographies of famous personalities or true crime docs, being supported by online platforms. If we rely on their business model, subtle, beautiful, nuanced, place-specific, and personal documentaries will entirely disappear.

I urge you to maintain protections for documentary films.

Thank you,

Millefiore Clarkes
www.onethousandflowers.tv
DOC Atlantic Chapter

January 20, 2025

I am a documentary filmmaker based in Halifax. I would like the Commission to know that when I make a documentary film, it takes an average of 5 years. On my last film, I spent 5 years in development before I found a broadcasting partner. Sometimes I need to produce my films without a broadcasting partner at all, and hope that I can find a platform to exhibit my film once it's completed.

I would like the Commission to know how important my films are to my region, and to tell you that Canadians want to see these local stories.

I am in post on a short doc which investigate how cultural perceptions of our names affect our lives, as well as a feature doc which outlines the challenges and rewards experienced by farmers across the country, including a Nova Scotia farmer being highlighted.

In my experience, online platforms tend to be risk-averse, shying away from the types of content I make despite how impactful and important my films are to Canadians and to international audiences. I don't often see the types of documentaries I make reflected on major streaming platforms and I do not agree that Canadian documentaries are part of their business models.

I urge you to maintain protections for documentary films.

Thank you,

Tanya Preyde
DOC Atlantic

Gorgeous Mistake Productions
Tanya Preyde
902-802-4814

January 20, 2024

I am a documentary filmmaker based in Toronto. I would like the Commission to know that when I make a documentary film, it takes an average of 3 years. On my last film, I spent 18 months in development before I found a broadcasting partner. Sometimes I need to produce my films without a broadcasting partner at all, and hope that I can find a platform to exhibit my film once it's completed. And every project requires its own investment in the development, which can range from a few weeks or research and a few written pages, to a full blown demo or sizzle reel.

I would like the Commission to know how important my films are to my region, and to tell you that Canadians want to see these local stories.

My latest film *Your Tomorrow* was made over the course of three years, chronicling the last year at Toronto's historic waterfront park, Ontario Place, before it was closed to be redeveloped into a private spa and waterpark. The story of the redevelopment has been one of the most talked about political stories in Ontario for the past two years, and while this thread works its way into the film, the documentary eschews the play by play narrative, and instead immerses the audience in the park and the experience of the people who visit and care for this public space. It does precisely what documentaries can do at their very best, bringing context to a story through emotional rather than didactic information. And it wasn't easy - spending nearly 100 days in the field and 9 months editing - observation films like this, often considered the gems of the genre, and very difficult to get funded, and to pull off. But the results speak for themself: *Your Tomorrow* premiered alongside the highest profile films of the year at the Toronto International Film Festival, and was a runner-up for the People's Choice Documentary Award. Its since gone on to screen at numerous film festivals and has had a robust theatrical release in Toronto, playing at the city's repertoire cinemas to packed houses. With crew and participant Q&As, we're establishing meaningful connections with the audiences at every screening, with the dialogue continuing online through dozens of reviews on the popular movie site, Letterboxd. This Spring, the film will be broadcast on TVO and streamed on their YouTube channel, making the documentary available to all Canadians. We're grateful to TVO for tasking a risk on your film, and for supporting the great tradition of documentary filmmaking that Canada is known for, particularly the art of the creative, feature documentary -which is dying on Canadian airwaves.

In my experience, online platforms tend to be risk-averse, shying away from the types of content I make despite how impactful and important my films are to Canadians and to international audiences. I don't often see the types of documentaries I make reflected on major streaming platforms and I do not agree that Canadian documentaries are part of their business models.

I urge you to maintain protections for documentary films.

Thank you,

Geoff Morrison
President, Big Cedar Films
DOC Ontario
-
BigCedarFilms.com | **416.997.6834** | @geoff_morrison | IG | FB

BigCedar Films

Watch Big Cedar Films on CBC Gem
Farm Crime | ***Above the Law*** | ***The Missing Tourist***

Saint-Alexandre de Kamouraska 15 janvier 2025

Objet : Consultations du CRTC en vue de la mise en œuvre de la Loi sur la diffusion continue en ligne (Loi C-11)

À qui de droit,

Je suis un documentariste vivant dans le Bas-Saint-Laurent, au Québec. Je voudrais faire savoir à la Commission que lorsque je réalise un film documentaire, il me faut en moyenne3 années. Sur mon dernier film, il m'a fallu plus de 5 années avant de trouver un télédiffuseur partenaire. Parfois, je dois produire mes films sans aucun télédiffuseur partenaire, avec l'espoir de trouver une plateforme pouvant diffuser mon film une fois terminé.

Je voudrais que la Commission sache que les films que je réalise constituent à la fois un espace de réflexion, d'existence pour les gens de ma région et des archives pour tous les Canadiens.nes. Ces récits ancrés localement demeurent cruciaux pour l'identité et l'appartenance d'un milieu, tout en touchant des enjeux bien souvent universels.

Le film « Malartic », que j'ai réalisé et produit en 2024, a déjà rencontré des publics nombreux dans plus de 40 villes au Canada, et il continue de circuler dans les écoles, les bibliothèques etc. Il a été visionné plus de 20 000 fois en ligne. Toutefois, aucun télédiffuseur n'a accepté le projet durant son développement, et c'est seulement une fois celui-ci terminé qu'un télédiffuseur a acheté une licence.

Selon mon expérience, les plateformes de diffusion en ligne ont plutôt tendance à être réticentes à prendre des risques et à esquiver les sujets que j'aborde dans mes films, malgré l'impact important qu'ils ont sur les Canadiens et sur les publics internationaux. Je ne vois pas souvent de documentaires semblables aux miens sur les principales plateformes de diffusion en ligne, et je ne crois pas que les documentaires canadiens fassent partie de leurs modèles d'affaires.

Il est primordial que le CRTC maintienne toutes les protections pour les films documentaires canadiens.

Merci,

Nicolas Paquet
DOC Québec

January 15, 2025

I am a documentary filmmaker based in Toronto, Ontario. I would like the Commission to know that when I make a documentary film, it takes between three to five years from development to release; and the cost of development is born either wholly or partially by my company.

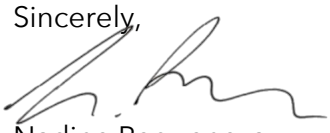
For the film I am about to start production on, Seeing Green, I spent three years in development before I found a broadcasting partner and closed financing. Another documentary feature that I have been working on since 2019 has no broadcast partner, and is funded entirely by foundations.

I always try to involve a broadcast partner in my films, but market forces often don't support what buyers call "educational" or "non-commercial" content. If we do not incentivize broadcasters and streamers in particular to create programs of national interest, they will not.

I would like the Commission to know how important my films are to my region, and that Canadians want to see stories about themselves and the world told from a Canadian perspective. I've made films about Canadians leading the disaster response in Haiti after the 2010 earthquake, Canadians grappling with the influx of illegal guns from the United States, our country's legalization of MAID in 2016 and the recent arrival of Afghan women leaders seeking refuge in Canada. These are vital stories about who we are as a nation. Given the unfolding situation wherein a US president is talking about annexing Canada, I can't imagine a worse time to remove protections for the continued creation of Canadian documentaries.

Netflix and other online platforms openly state their business strategy is to avoid controversial content and the risk of alienating any segment of their subscriber base. I don't see the types of documentaries I make on major streaming platforms. I urge you to maintain protections for documentary films.

Sincerely,



Nadine Pequeneza
DOC Ontario Chapter
President, HitPlay Productions

106 Russett Avenue Toronto, Ontario M6H 3M3 Tel 416.528.2315

January 14th, 2025

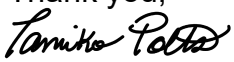
My name is Tamiko Potts, and I'm a Japanese Canadian documentary producer and director based in Toronto. I would like the Commission to know that on average the projects I have worked on take 4 years to complete. The last film I line produced was "Exclusion: Beyond The Silence" an important documentary sharing the personal story of how the Chinese Exclusion Act impacted the lives of two Chinese Canadian women. This project took two years in development before a broadcasting partner came on board and four years total to completion. Recently, I have finished my first documentary film and I produced it without a broadcasting partner, using a combination of grants and self-financing in hopes that I can find a platform to exhibit my film.

My film, "When The Blossoms Fade" is about my mother's experience in the Japanese Canadian internment camps, and how her trauma affected our relationship. Ontario has the second largest Japanese Canadian population in Canada, and stories like mine are incredibly important for fostering and connecting a community. A community that we are still rebuilding 80 years after of being dispersed and dispossessed.

The documentaries I have watched on major streaming platforms tend to be risk-averse, shying away from Asian Canadian content and stories that are impactful to Canadians and to international audiences. I don't often see the types of documentaries I make reflected on major streaming platforms and I do not agree that Canadian documentaries are part of their business models.

I urge you to maintain protections for documentary films.

Thank you,



Tamiko Potts
Toronto DOC Chapter

Free Spirit Films

Jan 15, 2025

Dear CRTC,

I am a documentary filmmaker based in Ontario and would like the Commission to understand how important documentary films are to Canada - and also how incredibly difficult it is in the for me and other filmmakers to make these impactful films.

My last film, *The Woman Who Loves Giraffes* (about Canadian scientist Anne Dagg who became known as 'the Jane Goodall of Giraffes') took 7 years to make. I spent 4 years doing self-financed development shoots of 'must capture' events before I found a broadcasting partner. When the film was released - it had a huge impact. Audiences and critics gave the film rave reviews and it is still rates 100% fresh on Rotten Tomatoes. Anne's accomplishments became widely recognized in Canada and around the world. She receive numerous awards, honorary doctorates and was awarded the Order of Canada. The government of Canada recently decided to make a Heritage Minute about Anne. None of this would have happened without our documentary shining a light on this unsung Canadian heroine.

I am currently in post production with a new feature documentary called *The Art of Adventure.* This one is about two more stellar, accomplished Canadians who had a huge impact - renowned wildlife artist Robert Bateman and his best friend biologist Bristol Foster (who, like Anne has huge accomplishments yet is largely unknown).

I'm hoping the film will premiere this spring and I expect that audiences will have an equally strong reaction to Bob and Bristol's compelling adventure and accomplishments. The truth is I didn't intend to make another documentary because of the years of all encompassing sacrifice it takes coupled with the difficulty in getting these films financed. I

In my experience, online platforms tend to be risk-averse, shying away from the types of content I make despite how impactful and important my films are to Canadians and to international audiences. I don't often see the types of documentaries I make reflected on major streaming platforms and I do not agree that Canadian documentaries are part of their business models.

Canada has a proud and iconic history of documentary filmmaking, and I strongly urge you to maintain protections for this vital art form, ensuring that our nation's most important stories continue to be shared and celebrated.

Thank you,

Alison Reid

Free Spirit Films Inc.
96 Joseph Duggan Road Toronto, Ontario Canada M4L 3Y2
phone: 647 895-8004 email:ali@freespiritfilms.ca

Jan 14, 2025

Dear CRTC,

I am a documentary filmmaker based in North Vancouver, BC. I know that the CRTC is asking for comments on its view that:

"in an "on-demand" system driven by online undertakings whose business models are based on the programs that underscore the current definition of PNI, such as drama and documentaries, the current approach to PNI is no longer needed".

I do not agree.

I would like the Commission to know that when I make a documentary film, it takes an average of three years. On my current film, we spent over a year in development before we found a broadcasting partner. It is already a barely sustainable business model, but making films is more than a job to those of us who produce them.

I would like the Commission to know how important my films are to my region, and to tell you that Canadians want to see these local stories. The majority of the films I make are about Canadian people with inspiring stories to share. Our production quality is high, and our stories resonate with the audiences who get to see them. Without exception my films have won awards at international festivals and had excellent viewership with our broadcasters.

My film *Just Eat It : A Food Waste Story* has literally changed lives and reached millions through broadcasts and community screenings, but that would not have been possible without local broadcaster commitment to supporting local documentary. Even my critically acclaimed docu-*series Search and Rescue: North Shore* which is so beloved by its core BC audience does not fit the mold of many online streamers. Documentary is not reality television; it is a specific art form that requires protection if our culture values a thoughtful and educational approach to storytelling.

In my experience, online platforms tend to be risk-averse, shying away from the types of content I make despite how impactful and important my films are to Canadians and to international audiences. It is a small selection of documentaries reflected on major streaming platforms, and I do not agree that Canadian documentaries are part of their intrinsic business models unless they include A-list celebrities or sensationalist mysteries.

I urge you to maintain protections for documentary films.

Sincerely,

Jenny Rustemeyer
DOC Northwest Member

January 15th, 2025

Susan Rynard
23 Elm Grove Ave.
Toronto, On. M6K 2H9

RE: Documentary Films

Dear CRTC Members,

I am a Toronto based documentary filmmaker. I would like the Commission to know that when I make a documentary film, it takes an average of four to five years. On my current film I spent three years in development before I found financial and broadcasting partners.

The development stage entails meticulous research and writing and creative work, traveling to meet potential participants, as well as attending events such as film festival forums where meetings with potential broadcast partners can occur. For my current film, this phase was supported by a small grant from the USA and a major withdrawal from my RSP savings. Despite multiple international awards, years of experience and an impressive list of credits, the phrase "on a wing and a prayer" applies to every film I make. Often I need to produce my films without a broadcasting partner at all, and hope that I can find a platform to exhibit my film once it's completed.

I would like the Commission to know how important my films are to my region, to Canada and to the world. Importantly, Canadians want to see these local stories.

In my experience, online platforms are driven by algorithms that push specific content to maximize eyeballs and revenue. These platforms tend to be risk-averse, shying away from the types of content I make despite how impactful and important my films are to Canadians and to international audiences. The films they do finance are broad based, generic and creatively banal. I don't see the types of documentaries I make, or ones I wish to watch, reflected on major streaming platforms. Canadian documentaries are NOT part of their vision, their metrics, or their business models.

I urge you to maintain protections for documentary films.

Thank you,

Susan Rynard
DOC TORONTO

FLOWER POWER PRODUCTION INC.

PO BOX 431, FREDERICTON, NEW BRUNSWICK, CANADA, E3B 4Z9

January 17, 2025

Marc Morin, Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario Canada, K1A 0N2

Re: Documentary Organization of Canada submission to the CRTC

Dear Mr. Morin,

I am a documentary filmmaker based in Fredericton, New Brunswick and would like the Commission to know how important documentary films are regionally and nationally, and to tell you that Canadians are interested in having their stories be told and seen.

Since 2003, I have produced over 10 documentary film projects that have told stories about people, places and issues related to New Brunswick and Canada. Some of these stories were about Indigenous culture and struggles (*Sitansisk, Our Heritage Our Future*, *A Beautiful Forest, Ring of Fire*); ensuring bio-diversity to address climate change (*Forbidden Forest*, *Every Living Thing – experiencing a biolblitz*); preserving local history (*Anthony Flower – The Life & Art of a Country Painter, Built to Last – The Life & Times of J.C Dumaresq*) and addressing the affects of globalization (*Schumacher Lives*).

It can be quite challenging to produce a documentary film in New Brunswick and Canada given the limited amount of funding available from Canadian broadcasters, streamers, provincial and national film funding agencies. Many online Canadian and International platforms have no interest in local stories and without a CRTC broadcast license its makes funding regional documentary films even more difficult.

Given this, I hope the CRTC will reinstate “Programs of National Interest” (PNI) to mandate support for genres that are challenging to produce but of critical importance to Canadians, that includes documentaries.

Thank you,

Lloyd Salomone
DOC Atlantic Chapter

January 15, 2025

CRTC consultations regarding:
the Canadian Radio-television and Telecommunications Commission (CRTC) defined "Programs of National Interest" (PNI) in order to mandate support for genres that are risky to make but are of critical importance to Canadians, including documentaries. Now, as part of the CRTC's consultations into the implementation of the Online Streaming Act (Bill C-11), the CRTC is asking for comments on its view that:

"in an "on-demand" system driven by online undertakings whose business models are based on the programs that underscore the current definition of PNI, such as drama and documentaries, the current approach to PNI is no longer needed"

To Whom It May Concern:

I am a documentary filmmaker based in London, Ontario. I would like the Commission to know that when I make a documentary film, it takes an average of 2 – 5 years, sometimes longer. On my last film, I spent 3 years in development before I found a broadcasting partner. As an independent producer, I rely on broadcasting partners to trigger government and private funding required before commencing film production. My livelihood comes from budget line items where I can pay myself as a Producer and hopefully recoup any development out-of-pocket monies spent prior to production. Making distribution sales from the project are hard to come by and is not my main source of income.

I would like the Commission to know how important my films are to my region, and to tell you that Canadians want to see these local stories. Small broadcasters such as, OUTtv Media and Access Media Inc. (AMI) are crucial to small, independent producers such as me. Large broadcasters such as CBC, Bell Media or Corus are only interested in US programming that garner high paying advertisers. Making them accountable to commission from Canadian producers to satisfy PNI requirements are integral to the survival of producing in Canada.

"Unusually Normal" is a feature length documentary that follows three generations of gay women in one family. Each generation had their own obstacles to live by as a lesbian due to homophobia not only from their community but within their own families. My second documentary, "Swing One Way or Another", is about gender assignment that follows three subjects in varying stages of gender transition. I currently have a TV-Series in development "Deafening Music" about deaf musicians and ASL music interpreters performing to mainstream audiences.

In my experience, online platforms tend to be risk-averse, shying away from the types of content I make despite how impactful and important my films are to Canadians and to international audiences. I don't often see the types of documentaries I make reflected on major streaming platforms and I do not agree that Canadian documentaries are part of their business models.

I urge you to maintain protections for documentary films.

Thank you,

Colette Johnson-Vosberg
Firestarter Productions
DOC Ontario Chapter

January 20th, 2025

I am a documentary filmmaker based in Toronto. I would like the Commission to know that when I make a documentary film, it takes an average of 3 years. On my last film, I spent 4 years in development before I found a broadcasting partner. Sometimes I need to produce my films without a broadcasting partner at all, and hope that I can find a platform to exhibit my film once it's completed.

I would like the Commission to know how important my films are to my region, and to tell you that Canadians want to see these local stories.

I am currently working on No. 14 Village, an ethnographic documentary project that explores the realities of a rural Chinese community facing systemic inequality, urban migration, and the erasure of traditional rural life. Through intimate interviews, sensory video installations, and a recreated domestic space, the project contrasts state propaganda and romanticized portrayals of rural prosperity with the villagers' authentic voices and lived experiences. Drawing on my personal connections to the village, I aim to evoke emotional resonance and encourage critical reflection, inviting audiences to reconsider assumptions about rural resilience, labor, and identity in a rapidly modernizing world.

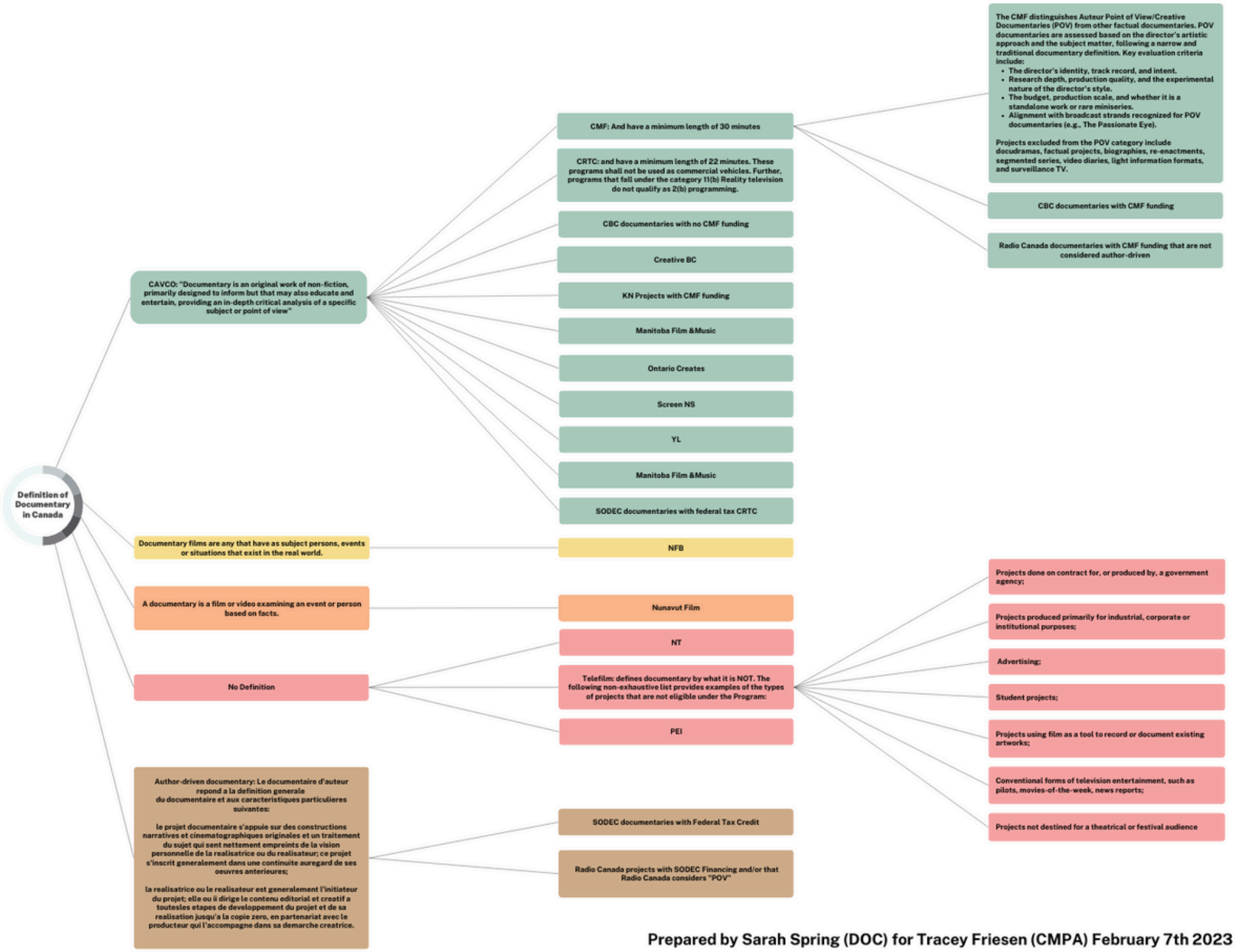
In my experience, online platforms tend to be risk-averse, shying away from the types of content I make despite how impactful and important my films are to Canadians and to international audiences. I don't often see the types of documentaries I make reflected on major streaming platforms and I do not agree that Canadian documentaries are part of their business models.

I urge you to maintain protections for documentary films.

Thank you,

Zhiqi Dorothy Wang
Member of DOC

APPENDIX D



Prepared by Sarah Spring (DOC) for Tracey Friesen (CMPA) February 7th 2023