



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,

A handwritten signature in blue ink, appearing to read 'Ed Barreveld'. The signature is stylized and fluid.

Ed Barreveld
Producer
Member of DOC Ontario

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 sunset 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/>

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.

I urge you to maintain protections for documentary films.

Thank you,

A handwritten signature in black ink, appearing to read 'Joe Kennedy', with a stylized flourish at the end.

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

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.

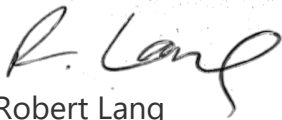
It never has been easy, but now it's tougher than ever making documentary films in this country, especially ones that are of significant cultural interest to Canadians. We often are in development for a year or two and spend significant time and our own funds to research and create pitch materials to 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

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,

A handwritten signature in black ink, appearing to read "R. Lang". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

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



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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.

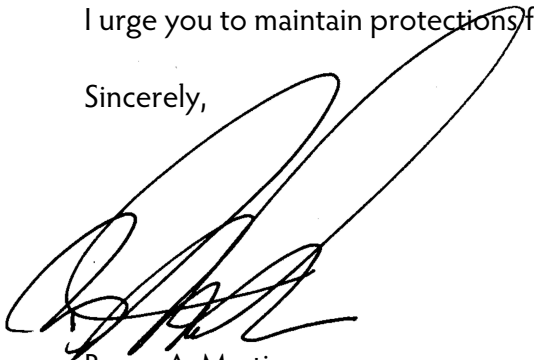
I recently completed a feature documentary UNTHINKABLE, based on the ongoing social issue of abortion in the USA. This project was financed through private equity. I am in post-production of 1001 CROWNS, a French-language feature film about the history of black hair. The project was financed by Telefilm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

A large, stylized handwritten signature in black ink, appearing to read 'B.A. Martin', written over the word '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 themselves: *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

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BigCedarFilms.com | 416.997.6834 | [@geoff_morrison](https://www.instagram.com/geoff_morrison) | [IG](https://www.facebook.com/geoff_morrison) | [FB](https://www.facebook.com/geoff_morrison)



Watch Big Cedar Films on CBC Gem
[Farm Crime](#) | [Above the Law](#) | [The Missing Tourist](#)

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 moyenne 3 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. 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 esquisser 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,

A handwritten signature in black ink, appearing to read "Nadine Pequenez", written over a light blue horizontal line.

Nadine Pequenez
DOC Ontario Chapter
President, HitPlay Productions

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 have 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



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

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 bioblitz*); 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