



DOCUMENTARY  
ORGANIZATION OF CANADA  
DOCUMENTARISTES  
DU CANADA

## ***Submitted Electronically***

July 11, 2023

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

Dear Mr. Doucet:

**Re: Intervention of the Documentary Organization of Canada - Broadcasting Notice of Consultation  
CRTC 2023-138: The Path Forward – Working towards a modernized regulatory framework regarding  
contributions to support Canadian and Indigenous content**

### **Executive Summary**

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. These long-form (Category 2b) documentaries are an important form of Canadian and Indigenous content within our broadcasting system.

A strong, independent documentary sector leads to Canadian and Indigenous filmmakers being able to grow their talents and their body of work. Not only is the form important, so are the makers. For many creators, documentary is their first point of entry into the broadcast sector. Documentary is also doorway for people from lower socio-economic backgrounds. Communities who face historic barriers rooted in systemic racism, colonialism, and other forms of oppression are highly represented among documentary makers. And because many documentaries feature our own communities, documentaries showcase an evolving Canadian identity.

Documentaries are key to Canada's reconciliation with our history of genocide against Indigenous peoples. Indigenous filmmakers have made seminal documentaries that are fundamental to our collective process of reconciliation. Without a strong independent documentary sector, we would lose this key sense-making of our own history.

Broadcaster support for Canadian and Indigenous long-form documentaries that serve our cultural autonomy is decreasing. This is due in large part to flexibility within their Programs of National Interest (PNI) obligations to a specific genre, as well as the growth of more reality-based content that is being designated as category 2b documentary. Despite their importance and mainstay, due to these two persistent issues, Canadian and Indigenous documentaries have not been adequately served by the existing regulatory framework.

DOC submits that in order to meet the objectives of the current *Broadcasting Act*, the new framework will require mandatory contributions beyond the current PNI regime for independently produced original one-off and feature length documentaries, Indigenous creators, and equity seeking groups, with an appropriate balance of Francophone and Anglophone content.

## A. Introduction

1. This submission is the intervention of the Documentary Organization of Canada in relation to Broadcasting Notice of Consultation CRTC 2023-138 (BNC 2023-138). The Canadian Radio-television and Telecommunications Commission (CRTC or Commission) issued three notices of consultation on May 12th, 2023, namely Broadcasting Notices of Consultation CRTC 2023-138, 2023-139 and 2023-140. These are the Commission's initial public proceedings launched following the recent and important revisions made to the *Broadcasting Act*.
2. The Documentary Organization of Canada (DOC) is the collective voice of Canada's independent documentary creators. Founded in 1983, DOC has grown to 1,200 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. DOC respectfully requests the opportunity to appear at the public hearing scheduled to start November 20, 2023 in Gatineau, Quebec to elaborate upon our written submissions from the perspective of documentary creators.
3. This is an historic moment in our sector. Although documentaries have never been more popular, they have historically been vulnerable within the broadcasting sector. DOC is compelled to participate in these proceedings, and intends to participate at every stage, in order to speak for one of the most socio-economically, culturally and racially diverse creative communities in Canada.
4. In this submission, DOC addresses a number of the issues raised in BNC 2023-138 as well as provides background on our concerns with the current regulatory framework. We believe that a new approach to supporting Canadian and Indigenous long-form documentaries is needed for a strong broadcasting



sector for Canada, and for key public policy objectives of the *Broadcasting Act* to be met. We look forward to reviewing the submissions of other interveners in this proceeding, and providing further comments in relation to any or all of the issues raised in BNC 2023-138 in the reply phase of this proceeding.

## B. The importance of documentaries for Canadians

5. Long-form documentaries (Category 2b) are an important genre of Canadian and Indigenous content within our broadcasting system. The Commission has rightly recognized this form of content as nationally important for many years. Despite structural issues with the ways in which documentaries have been regulated, which we discuss further below, the creation and presentation of Canadian documentaries have persisted in large part due to the sweat equity of our documentary community.
6. Nearly every time a Canadian documentary has soared to international acclaim, had a powerful impact on social and political discourse, or become an artistic point of reference, an independent filmmaker has typically spent years, often unpaid, not only making the film but getting it out into the world. This hard work leads to career-making success stories. Last year, not only did Canadian filmmaker Daniel Roher's "Navalny" take home the Academy Award for best documentary film, but two of the five nominated documentaries were made by Canadians.
7. Canada has a long history of outstanding documentaries that have both defined and redefined the genre. Before Sarah Polley made "Women Talking" she took the documentary world by storm with "Stories We Tell." Nisha Pahuja's "The World Before Her" won the top documentary award at New York's Tribeca Film Festival and was nominated for an Emmy. Tasha Hubbard's "nîpawistamâsowin: We Will Stand Up" not only opened the 2019 Hot Docs International Documentary Film Festival, the film took home their top prize and won the Canadian Screen Award for best feature documentary. Miryam Charles' genre-bending reflection on Haitian-Quebecois notions of home "Cette Maison (This House)" was one of the most celebrated indies last year.
8. Documentary is often a first entry point into the independent production sector. Eleven of the thirty-one outstanding filmmakers highlighted by CBC in a recent list of our greatest films started out making documentaries. Some notable names 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.<sup>1</sup>

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<sup>1</sup> <https://www.cbc.ca/artsprojects/50greatestfilms>.



9. A strong, independent documentary sector leads to Canadian and Indigenous filmmakers being able to grow their talents and their body of work. Before making “Bones of Crows”, the largest-scale Indigenous-led production in Canada<sup>2</sup>, 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. Denis Villeneuve began his career on a Quebecois television show called “La Course Destination Monde,” a flagship program on Radio-Canada (1988-1999) that launched the careers of some of Quebec’s most celebrated filmmakers in which they travelled the world making short documentary films.
10. Documentary is a gateway into the sector for those who face historic barriers rooted in systemic racism, colonialism, and other forms of oppression. In 2021, DOC created a free, introductory membership category for documentary creators who are Indigenous, Black or racialized. This led to a 25% increase in our membership and today, documentary filmmakers from these communities make up 50% of DOC’s 1,200 members across the country.
11. In the most recent reckoning that our industry has been undergoing about our own systemic racism, new funding avenues have been created to begin to correct generations of inequity. Many of the Indigenous, Black and racialized creators who are accessing these new funds 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.<sup>3</sup>
12. Historically, Canadian television has reinforced a perception of a more homogenous country. But Canadian documentaries often present a more accurate portrayal of who we are. In a recent survey of DOC members, 43% of respondents had made a film about themselves, their family or their community<sup>4</sup> thereby reflecting our evolving Canadian identity.
13. Documentary is also a doorway into our sector for people from lower socio-economic backgrounds, as documentaries generally require less financial risk than drama series or feature films. Documentaries make it possible for those without the privilege of property, wealth, or established relationships with banking institutions to enter into the screen sector, thus setting them up to grow their slate of projects and their career.

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<sup>2</sup> <https://playbackonline.ca/2022/10/19/mipcom-22-building-bones-of-crows-hybrid-model/>.

<sup>3</sup> <https://cmf-fmc.ca/funded-projects/>

<sup>4</sup> Nordicity estimates based on data from CAVCO, CRTC and Telefilm Canada. Note: Preliminary statistics subject to change where underlying data is revised



14. That said, documentary producers need to access bank loans to pay for their up-front production costs, often 90% of the overall budget. This results in the structural barrier that unless one has access to personal or inherited wealth, owns property, or has a proven track record in filmmaking, it is extremely difficult to get a film made. This inequity disproportionately impacts Indigenous, Black and racialized filmmakers and disabled filmmakers: according to the most recent census conducted by Statistics Canada, Indigenous People and Racialized groups as well as Persons with a Disability are more likely to experience poverty.<sup>5</sup>
15. Documentaries are key to Canada's reconciliation with our history of genocide against Indigenous peoples. Talented, groundbreaking Indigenous filmmakers are bringing Canadians our history in ways that public education and mainstream media have not been able to do. 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. Documentaries by filmmakers such as (to name just a few) 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.
16. As filmmaker and academic Jules Arita Koostachin states, "We are the authorities in decolonizing documentary... Indigenous documentarians are actively producing alternative platforms for first-hand accounts, while establishing new approaches to documentary."<sup>6</sup>
17. John Grierson, who founded the National Film Board, spoke of documentaries as a key tool to "wake the heart and the will" - to enable Canadians to understand the world around them, and more importantly, to care about the changes that are transforming our society. Spoken sixty years ago, Grierson's words ring truer today than ever. Without a strong independent Canadian documentary sector, we would lose this fundamental sense-making of our own history, to delve into the stories behind the news, and to artfully explore our own humanity. Documentaries serve a public cause; they help Canada understand itself.

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<sup>5</sup> Canadian Income Survey, Statistics Canada, <https://www150.statcan.gc.ca/n1/daily-quotidien/230502/dq230502a-eng.htm>

Among Indigenous people aged 16 and older, 13.9% were below the poverty line in 2021, which was nearly double that of the corresponding non-Indigenous population (7.4%). In 2021, the poverty rate of those who belonged to racialized groups increased to 9.5%, up 1.5 percentage points from 2020. Historically, persons with a disability have been more likely to live below the poverty line. In 2021, approximately 979,000 (10.6%) of persons aged 16 and older with a disability lived below the poverty line. This was a 2.1 percentage point increase from the 2020 poverty rate of 8.5%, but 3.1 percentage points less than the 2019 pre-pandemic rate of 13.7%.

<sup>6</sup> Koostachin, Jules Arita, 'Indigenous Documentary Methodologies - ChiPaChiMoWin: Telling Stories' in Claxton, Dana & Winton, Ezra (ed) Indigenous Media Arts in Canada (Wilfred Laurier University Press, 2023) p.233.

### C. Regulatory support for Documentary Production is essential to sustaining the genre

18. Despite their importance and mainstay, Canadian and Indigenous documentaries have not been adequately served by the existing regulatory framework (and support structures). As such, documentary productions require specific protections beyond the current programs of national interest (PNI) regime. The new framework will require regulations specific to Canadian and Indigenous long-form documentaries, and a stricter adherence to the CRTC's definition of documentary, which reads as follows:

**Definition Long-form documentary:** “Original works of non-fiction, primarily designed to inform but may also educate and entertain, providing an in-depth critical analysis of a specific subject or point of view over the course of at least 22 minutes. These programs shall not be used as commercial vehicles. Further, programs that fall under the category 11(b) Reality television do not qualify as 2(b) programming.”<sup>7</sup>

19. Broadcaster support for documentaries that serve our cultural autonomy is decreasing. This is due in large part to flexibility within their PNI obligations to a specific genre, as well as the growth of more reality-based, lower cost, content that is being designated as category 2b documentary.<sup>8</sup> The downward trend in broadcaster support for long-form documentaries has been taking place for some time. Contributing to this trend was the Commission's 1999-97 Television Policy which put in place exhibition obligations and no expenditure obligations for long-form documentaries. The Commission's 2015 Let's Talk TV policy decisions also contributed to the broadcasting industry moving away from long-form documentaries as a result of the removal of broadcaster genre protection obligations.


20. The following table shows a dramatic decrease in support for long form documentary production within overall PNI spend at CBC/Radio-Canada, Bell Media Inc. (Bell), Corus Entertainment Inc. (Corus), Rogers Communications Inc. (Rogers) and Shaw Communications Inc. (Shaw) between 2015 and 2021:<sup>9</sup>

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<sup>7</sup> Broadcasting Regulatory Policy CRTC 2010-167.

<sup>8</sup> The reduction in broadcaster support may also be a result of the Let's Talk TV policy decisions.

<sup>9</sup> PNI expenditures by CBC/SRC and large private ownership groups, by program category (\$ millions), 2015-2021.





**Table 1: Long form documentary program support within PNI expenditures by CBC/SRC and large private ownership groups, by program category (\$ millions), 2015-2021**

2015	2016	2017	2018	2019	2020	2021
\$148.9M	\$139.2	\$146.8M	\$128.1M	\$117.9M	\$92.6M	\$88.3M

**Source: CRTC data TV-T36**

21. Declining broadcaster support for documentaries has resulted in decreased support for the genre at the Canada Media Fund, which is accessed by producers via a broadcast license. Between 2015 and 2021, the Canada Media Fund’s support for English-language one-off (television hour) documentaries dropped from 62 down to 43 while support for French-language one-off documentaries at the Canada Media Fund decreased from 75 down to 68.<sup>10</sup> According to Nordicity, the feature documentary genre saw a dramatic 51% drop from 60 projects in 2016/2017 to 31 projects in 2021/2022, and the province of Quebec saw a 57% decrease in documentary production over the five-year period from 2016/17 to 2020/21.<sup>11</sup>
22. As stated, broadcaster support for one-off and feature documentaries is decreasing in favour of more low-cost reality-based content that is being designated as documentary series.
23. As far back as 2009, DOC noted with concern that shows like “Canadian Idol” and “The Week the Women Went” had been categorised as 2(b) documentaries.<sup>12</sup> In February 2022, the CRTC accepted an appeal that the series “Big Rig Warriors” should be re-categorized as a documentary, reversing the Commission’s earlier decision that “Big Rig Warriors” is category 11(a) General entertainment and human interest, or what we generally refer to as reality television.
24. With the designations of more reality-based content as documentary series, this low-cost genre has seen massive increases across the broadcasting sector. Production volume for these types of documentary series has increased 157% since 2017/2018.

<sup>10</sup> CMF data provided to DOC

<sup>11</sup> Nordicity estimates based on data from CAVCO, CRTC and Telefilm Canada. Note: Preliminary statistics subject to change where underlying data is revised

<sup>12</sup> DOC BNC 2009-411.



**Table 2: Total Volume of English-language Canadian Independent Documentary Production, by Format, 2017/18 to 2020/21**

	2017/18	2018/19	2019/20	2020/21
Series*	176	217		453
Single episode	68	76	59	39
Feature length (film or tv)	29	37	24	17

**\*2019/20 and 2020/21 series were combined by CAVCO**

**Source: Nordicity estimates based on data from CAVCO, CRTC and Telefilm Canada. Note: Preliminary statistics subject to change where underlying data is revised**

25. Further, at this time, Corus, Rogers, Bell, Quebecor and Cogeco are all seeking a reduction to their Canadian programming expenditures (CPE) and their obligations to PNI. Bell is seeking a reduction from 30 percent of previous year’s revenues to 20 per cent, a reduction from 7.5 per cent to 5 percent of revenues for PNI, and an expansion of the PNI categories to reality television, music and general entertainment in exchange for increasing their obligation from 75 per cent to 100 percent of PNI expenditures made to independent productions.<sup>13</sup> This points to the lack of broadcaster support and interest in supporting Canadian and Indigenous content deemed of national interest.
26. With alarming rapidity, we are losing precisely the type of independent Canadian documentaries that have a lasting impact on our national dialogue. Nik Sheehan’s landmark 1985 documentary “No Sad Songs” was the first documentary about the HIV/AIDS crisis, bringing audiences inside the epidemic through an LGBTQ+ lens. The film continues to be re-released, most recently on the curated film platform MUBI. Although produced with a micro budget over many years, Baljit Sangra’s 2019 documentary about women’s rights, “Because We Are Girls” produced over 18 million viewing minutes on Amazon’s Prime Video.<sup>14</sup> In 2023, Quebecois documentary “Essentiels” conducted a rigorous outreach campaign to educate the public and politicians about the rights of temporary foreign healthcare workers. Four months later, the provincial government announced a new more accessible pathway to permanent residency for this community.<sup>15</sup>

<sup>13</sup> Cartt <https://cartt.ca/bell-joins-others-in-requesting-reductions-in-cancon-obligations/>.

<sup>14</sup> <https://povmagazine.com/nfb-strategic-plan-interview-joli-coeur-roy-dufour/>

<sup>15</sup> Picbois Productions Impact Report, 2023





27. A modernized 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;”<sup>16</sup>

28. A fully flexible, outcomes-based approach to documentary productions will not ensure a diversity of programming. This has an impact on the diversity of content available to Canadian audiences and in turn, what audiences are watching – or not watching. As explained in the Black Screen Office’s “Being Seen” report:

“What impact does poor or missing representation have on an audience? They stop watching or engaging. We heard repeatedly that participants do not watch mainstream film or television because they do not see themselves.”<sup>17</sup>

#### **D. Key Issues for this proceeding**

29. While DOC is not prepared at this time to pronounce on every question posed by the Commission, in light of the points made above, DOC is pleased to offer suggestions for the new regulatory framework.

- **Application of Overall Framework:**

30. In our view, the new regulatory framework in support of Canadian and Indigenous content should apply to all of the online undertakings making a material contribution to the Canadian broadcasting system. For traditional services, the framework should apply to all currently regulated traditional broadcasting undertakings. Note that section 3(1)(e) of the *Broadcasting Act* says that “each element of the Canadian broadcasting system shall contribute in an appropriate manner to the creation and presentation of Canadian programming.”

- **Mandatory Contributions for One-off and Feature Length Canadian and Indigenous Documentaries:**

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<sup>16</sup> *Broadcasting Act*.

<sup>17</sup> Black Screen Office, *Being Seen*, 2022



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31. Within the Commission's proposed base contribution element of the framework, whether funding is destined for the Canada Media Fund or CRTC Certified Independent Production Funds, DOC respectfully submits that there should be mandatory contributions for independently produced original one-off and feature length documentaries, Indigenous creators, equity seeking groups, and with an appropriate balance of Francophone and Anglophone content. These contributions should be for content that serves the public interest, and measured by its long-term contribution to our Canadian cultural autonomy and Indigenous narrative sovereignty.

- **Minimum Requirements for Third party Funds to Support Documentary Creators from Equity Deserving Groups:**

32. DOC generally supports contributions to third party production funds. However, the existing funds have not adequately supported Canadian and Indigenous content or documentary content. New regulations and perhaps new funds are needed in order to correct the sector in the public interest. Indigenous, Black and racialized voices are essential to Canadian culture and the projection of our values at home and abroad. We, therefore, submit that a clearly set minimum percentage of any base contributions be directed to funds that are run for and by Indigenous, Black and racialized groups to better support Canada's racial diversity, inclusion, and accessibility, as they relate to representation in creators.

- **Stronger Reporting Requirements for CIPFs:**

33. Measurements for the Fund's success should involve each fund's support for equity and accessibility and CIPFs will need to adhere to reporting requirements that provide the necessary data to demonstrate their support for Indigenous and equity deserving groups. Existing and new funds should be certified and must report to the Commission.

- **Intangible Contributions:**

34. Intangible requirements should include commitments to the promotion, discoverability, or prominence of documentary films, and core funding support for BIPOC-led organisations in the screen-based sector with specific mandates to improve racial equity in the industry.

- **Broadcast Participation Funds:**

35. DOC notes that an accessible Broadcast Participation Fund (BPF) that provides support as well as reimbursements ensures a more democratic and accessible engagement with the sector during proceedings such as these. Although DOC generally supports the approach of a base contribution to

the BPF, with respect to a portion of base contribution funds directed DOC, would require a better sense of what about would be directed to the BPF to provide further comments on this point.

## E. Questions and Answers

36. DOC offers the following comments on some of the questions posed by the Commission within this proceeding.

**Q9: In the current system a variety of funds exist to support the creation and promotion of Canadian content. In what ways are the existing funds successful in their support of Canadian content generally, and in what ways could they be improved? Similarly, do the existing funds sufficiently support the objectives of the current *Broadcasting Act*, including those relating to OLMCs, diversity, inclusion and accessibility? How can they be improved? For example, should the Commission consider amending the CIPF criteria?**

37. **A9:** The existing funds are not adequately supporting the long-form documentary genre, nor the attainment of the current *Broadcasting Act's* objectives to support OLMCs, diversity, inclusion and accessibility. The funds could be improved by regulated support for documentaries, Indigenous content, and regulations to ensure support for diversity, inclusion and accessibility. Greater transparency and CRTC oversight of the independent production funds would also be required.

**Q10: The current *Broadcasting Act* sets out that the Commission “may make regulations respecting expenditures to be made by persons carrying on broadcasting undertakings for the purposes of [...] supporting participation by persons, groups of persons or organizations representing the public interest in proceedings before the Commission under this Act.” Should the Commission direct a portion of initial base contributions to the BPF or other funds with similar objectives?**

38. **A10:** DOC generally supports the idea that the Commission should direct a portion of initial base contributions to the BPF or other well-monitored funds with similar objectives in order to ensure a more inclusive consultation.

**Q11. Should base contributions flow only to existing funds or could they be directed to newly created independent funds? Should online entities be permitted to create their own independent production funds, to which their contributions would flow? If yes, what criteria should they be required to meet? For any proposal, please describe the initiative, including the level of funding that would be required to support it.**



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39. **A11:** Base contributions should flow both to existing funds and newly created independent funds that support genres such as documentary and priority communities as described in the current *Broadcasting Act*.

**Q12: How can production funds better support Canada's diversity, inclusion and accessibility, as they relate to representation in programming, creators, or a combination of both? Should contributions or a portion of the contributions be directed towards the funds specifically dedicated to supporting diversity, inclusion and accessibility in the broadcasting system? If yes, which organizations and funds? Should new funds be created? In addition, please comment on the selection process, eligibility criteria, and reporting requirements that would be necessary to support this objective.**

40. **A12:** DOC supports the idea that a portion of the base contributions should be directed to funds dedicated to supporting Indigenous content, diversity, inclusion and accessibility, that are governed, managed and accountable to the communities they serve, and to the CRTC.

**Q13: Comment on the possibility of a certain percentage or envelope of production funds being dedicated to Indigenous video productions and audio projects. What percentage would be appropriate and what entities should be required to contribute to such a fund? How could/should such a requirement be implemented and who should administer and be responsible for such a fund? What other considerations are relevant to the creation and management of such a fund?**

41. **A13:** While DOC is not prepared at this time to comment on what percentage or envelope of production funds should be dedicated to Indigenous video productions and audio projects, DOC fully supports the work of the Indigenous Screen Office (ISO) and defers to the ISO on how to best support Indigenous creators within the new framework.

**Q14: Are there new funds that should be created? If so, what entities should be required to contribute to such a fund? Who should administer and be responsible for the fund?**

42. **A14:** New funds are needed in order to ensure that the objectives of the *Broadcasting Act* are met. These funds should be administered by the communities they serve, and monitored by the CRTC.

**Q15: Should the Commission require that a certain percentage or proportion of an undertaking's or ownership group's base contribution be directed to a particular fund or type of fund?**



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43. **A:** Yes. A fixed percentage or proportion of an undertaking's or ownership group's base contribution should be directed to support documentaries, Indigenous creators, and equity deserving groups.

**Q16. Would an outcomes-based approach and customized contribution framework ensure that the broadcasting system as a whole (including online undertakings) contributes to the achievement of the Commission's above-noted objectives? What other outcomes or objectives, other than those set out in the above list, may be required to ensure that Canada's broadcasting system can thrive now and in the future? Is the above list of objectives complete, accurate, fair and representative of the objectives set out in the current Broadcasting Act?**

44. **A:** DOC generally disagrees with an outcomes-based approach without firm regulatory requirements that will achieve the desired outcomes.

## F. Conclusion

45. 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.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sarah Spring', written in a cursive style.

Sarah Spring  
Executive Director, Documentary Organization of Canada

\* \* \* End of Document \* \* \*

