DOCUMENTARY ORGANIZATION OF CANADA
DOCUMENTARISTES DU CANADA

Public Hearing on *The Path Forward – Defining "Canadian program" and supporting the creation and distribution of Canadian programming in the audiovisual sector*
(Broadcasting Notice of Consultation CRTC 2024-288

Statement by the Documentary Organization of Canada - May 27, 2025

A. Introduction

1. Good morning Madam Chair, Vice-Chair(s), members of the Commission, and Commission staff. Thank you for the invitation to speak to you today. My name is Min Sook Lee. I have worked in documentary production for 25 years, and I am the chair of the national board of the Documentary Organization of Canada (DOC).

2. DOC is the collective voice of Canada's independent documentary creators. Founded over 40 years ago, DOC has grown to 1,400 members across six chapters from coast to coast to coast. DOC's mandate is to advocate for an equitable and sustainable environment for documentary production and to strengthen the sector within the broader cultural ecosystem.

3. Today, our remarks focus on three key regulatory priorities:

    i) First, the need to apply Canadian programming expenditure obligations to foreign online services and Canadian broadcasters with targeted support for long-form documentaries;

ii) Second, the importance of modernizing the Canadian programming certification scale used for long-form documentaries;

iii) And third, the need for an updated, forward-looking definition for long-form documentary programs.

4. I'll speak to each of these in turn but will first emphasize the importance of documentary content to the Canadian broadcasting system.

B. The Importance of Documentaries

5. Documentaries are one of the most powerful tools that Canadians can use to tell their stories. They offer a means to share unique experiences, histories, and perspectives. Documentaries also fulfill an important role in public discourse, which has never been more important than it is today. In 2024 and 2025, DOC conducted a cross-country consultation with hundreds of its members. We have filed a draft copy of the findings of that study, '**What We Heard**' with the CRTC.

6. Our consultation showed that filmmaking is a vital cultural medium that defines Canadian national identity, preserves collective memory, and provides an irreplaceable platform for diverse voices

7. Canada is a recognized leader in documentary filmmaking, with our films consistently earning international acclaim. Most recently, *To Kill a Tiger* and *Sugarcane* are Canadian documentaries that received Oscar

nominations in 2024 and 2025 respectively.

8. The documentary genre accomplishes several key policy objectives set out in the *Broadcasting Act*. For instance, long-form documentaries amplify diverse voices, create entry points for creators facing systemic barriers, and serves as a powerful tool for reconciliation with Indigenous peoples. This was affirmed by the ISO and BSO, and others, during this hearing.

9. Documentary is also often the first entry point for filmmakers into the independent production sector. The creators of *North-of-North* began their careers in documentary production.

C. Documentaries are At-Risk Content

10. Despite their importance, documentaries are at-risk content. We have heard throughout the past few weeks from various intervenors (TVO, TFO, Observatoire du documentaire, the National Film Board and Telefilm Canada) who have also underscored the challenges that documentary programming faces and the need for continued regulatory support for this programming genre. DOC submitted 22 letters from Canadian documentary filmmakers as part of its intervention, highlighting the financial challenges of documentary production and noting that it typically takes 5 to 7 years to complete a film.

11. DOC commissioned a study by Nordicity, '**Getting Real 2025'**, which we have filed with the Commission which shows that between 2013 and 2023 spending on

long-form documentaries in Canada decreased by 38%. This decline represents a loss of $60 million in real dollars on long-form documentary productions. The CRTC's own data also show significant declines in broadcaster spending on documentary productions.

D. Canadian Programming Expenditures and Programs of National Interest

12. Despite these challenges, our sector has endured. The CRTC's Programs of National Interest rules have been instrumental to this.

13. DOC is, therefore, deeply concerned about the discussion to eliminate Program of National Interest (PNI) rules for at-risk content such as Canadian and Indigenous Long-form Documentaries. CPE obligations without specific PNI measures to support at-risk documentaries will surely result in a sharp – and devastating - decline in broadcaster support for this genre of programming.

14. Moreover, foreign streamers should not be the gatekeepers of Canadian stories and Canadian documentary productions. To date, they have provided very little to any support for Canadian long-form documentaries. Canadian broadcasters also continue to have an important role to play in supporting the long-form documentary genre.

15. DOC, therefore, proposes that the Commission establish an overall CPE obligation for Canadian broadcasters and foreign streamers. We also propose

that the Commission maintain its Programs of National Interest rule, and include minimum requirements for Canadian long-form documentary productions.

16. We also support the ISO's proposal that 10% of CPE and PNI obligations should be earmarked for Indigenous productions.

E. Canadian Program Certification Requirements

17. With respect to Canadian certification, DOC recommends that the Commission create a distinct points system for documentary content, reflecting the manner in which documentary productions are made today.

18. Long-form documentaries are often led by small teams, and do not use many of the points listed in the Commission's live-action creative scale. DOC therefore proposes a 7-points framework for documentary content, with a minimum of 6 points required in order to be certified as Canadian. The positions would include:

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

F. Revised definition of long-form documentary

19. Over the course of this proceeding, the Commission has asked various intervenors about whether there should be distinctions made within the category

of documentaries. DOC believes that the definition of long-form documentaries must 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 subgenres under category 7.

20. Revising the definition of long-form documentary categories and sub-genres would enable the Commission to focus on challenging, long-form, and at-risk documentaries.

G. Conclusion

21. Thank you for the opportunity to speak today. We look forward to working with the Commission and hope that together we can ensure that documentary continues to serve as a vital platform for telling Canadian and Indigenous stories.

I look forward to your questions.