DOCUMENTARY ORGANIZATION OF CANADA
DOCUMENTARISTES DU CANADA

Public Hearing on *The Path Forward – Working towards a sustainable Canadian broadcasting system*
(Broadcasting Notice of Consultation CRTC 2025-2)

Hearing Presentation by the Documentary Organization of Canada – July 3, 2025

A. Introduction

1. Good morning/afternoon Madame Vice-chair, panel members, and Commission staff. My name is Julian Carrington and I am the Executive Director 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 over 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, my remarks will focus on two priorities:

    i. First, specific support for the production and distribution of documentary programming is essential to the Commission's goal of ensuring the diversity of the Canadian and Indigenous broadcasting system;

    ii. And second, existing regulatory tools must be adapted for online undertakings and supplemented by new mechanisms to support the discoverability of Canadian content, including targeted funds to support the discoverability of long-form documentaries.

B. Support for Documentary is Essential to Ensuring the Diversity of Canadian and Indigenous Content

4. As one of its key goals in this proceeding, the Commission has set out to develop a sustainable model for the delivery and discoverability of diverse Canadian and Indigenous content. We submit that documentaries constitute an essential component of this diversity.

5. Relative to popular entertainment programming, the non-fiction and primarily informative nature of documentaries provides and inherent diversity of form. But documentaries are themselves also highly diverse in content and point-of-view, reflecting the unique experiences of Canadians of varying socio-economic, cultural, regional, and racial backgrounds, and often foregrounding histories and

perspectives that are overlooked in mainstream media. Furthermore, documentaries are frequently a gateway into the sector for creators from historically excluded communities, including Indigenous, Black and racialized communities.

6. Despite this diversity, and despite documentary's broader value as a driver of civic engagement and as a means to preserve collective memory and reflect Canadian identity, the Commission has recognized that long-form documentaries constitute at-risk content in that they are unlikely to be adequately supported by market imperatives alone. As such, to foster a diverse broadcasting system, the Commission must pay special attention to ensuring that documentaries by and about Canadians continue to be readily accessible to Canadian viewers.

C. Existing Regulatory Tools Must be Adapted for Online Undertakings and New Supports Should be Introduced

7. As Canadians increasingly consume programming via on-demand online platforms, dedicated measures are required to support the discoverability of Canadian long-form documentaries. In general, documentaries face special challenges with respect to marketing and promotion in comparison to popular narrative content. Some of the very factors that make documentaries such apt vehicles to advance the aims of the *Broadcasting Act* can also place them at a disadvantage in terms of discoverability.

8. For instance, documentary participants are often ordinary Canadians, meaning documentaries are typically unable to rely on star names to attract potential audiences. And while documentaries commonly tackle topics of significant civic and cultural importance, they are also often non-commercial in nature, with the result that they are seldom allocated the kinds of marketing resources associated with higher profile drama content.

9. These challenges are exacerbated in an on-demand distribution environment, where viewers are presented with vast libraries of programs featuring world-renowned actors and based on popular media franchises. To ensure that Canadian documentaries remain discoverable, the Commission must maintain its existing regulatory mechanisms to support independent broadcasters, which are the primary distributors of Canadian long-form documentaries. The Commission must also replicate or adapt these mechanisms to the online environment and introduce new forms of regulatory support via funding contributions.

10. We concur with the Independent Broadcast Group (IBG) that connected devices are online undertakings that must be subject to CRTC mechanisms to ensure the availability, discoverability, and prominence of Canadian programming. We urge the Commission to follow the precedents of Australia, the United Kingdom, and EU territories in mandating availability and prominence measures for these devices, including the pre-loading of services by independent broadcasters.

11. We submit that connected devices must include and prominently feature public-interest services by entities like the CBC, APTN, and provincial educational services such as Knowledge Network, TVO, and Télé-Québec. In addition, we submit that connected devices should be mandated to pre-load and prominently feature the National Film Board's streaming app, which offers over 6,000 films, including a precious archive of documentaries by Canadian and Indigenous creators that too few Canadians realize is freely available to them. Along with connected devices, prominence requirements should also be applied to storefronts and program interfaces to facilitate the discoverability of under-represented genres, including Canadian documentaries. We concur with the IBG that the Commission should set out key principles via this proceeding and then require online distributors to detail how they will meet these principles when the Commission considers conditions of service.

12. We have also proposed that the Commission should introduce new mandates for monetary contributions by programming and broadcasting undertakings to support the marketing and promotion of Canadian programs. We submit that these contributions should be directed via two mechanisms:

    a) entities subject to Canadian Programming Expenditure (CPE) requirements should be mandated to contribute additional spending specifically to support the marketing and visibility of Canadian programming; and

    b) the Commission should establish a Discoverability Fund to support Canadian documentary producers in making targeted marketing, outreach, and audience engagement efforts.

13. During our recent cross-country consultations with independent documentary creators, producers underscored a chronic lack of resources devoted to the promotion of Canadian and Indigenous documentaries by broadcasters and streamers. The funding mechanisms we have proposed seek to ameliorate this deficit. While documentaries may face disadvantages in attracting mainstream mindshare, thanks to their engagement with pressing issues and their tendency to amplify underrepresented voices, they often resonate especially deeply for the audiences who do succeed in seeking them out. The proposed Discoverability Fund, in particular, would empower documentary producers to pursue the kinds of innovative, community-focused outreach efforts that capitalize on documentary's unique capacity to reflect real lives.

D. Conclusion

14. To conclude, we appreciate the Commission's commitment to facilitating a diversity of Canadian and Indigenous programming in the broadcasting system and believe that ensuring the discoverability of documentaries is critical to this aim. I thank you for the opportunity to contribute these comments and I look forward to your questions.