

Response to 'Supporting Australian Stories
on Our Screens Options Paper' March 2020.

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All Abbreviations are defined in the 'Options Paper' Glossary of Terms.

Overview

My name is Maxine Dennett, I am a Freelancer Film Technician who has worked in the Australian Screen Industry my entire working life of 25 years. In just the last 5 years I have worked in NSW, WA, QLD and VIC on small Australian Feature Films and TV Productions, huge juggernaut Offshore TV Productions and 2 midlevel co-productions - all of which had scripted Australian content.

I am making this brief submission with expert insight into the complex manufacturing process required for Screen Content and as a motivated practitioner seeking to play an active part in the Industry that not only shapes my life, but also plays an integral role in the development and endurance of our national identity.

This submission could focus only on the cultural, political and economic importance of fostering a strong national identity and the fundamental role screen content plays in this, but from my reading of this paper (& others submitted that shaped the paper) this argument is well documented and undeniable. We can acknowledge that failure to protect & productively contribute to the development of an authentic Australian identity presents a potentially catastrophic failure in our duty of care to the nation.

Maintaining the Status Quo (Model 1) & Deregulation (Model 4) would undoubtedly result in cultural whitewashing and/or a complete collapse of the entire industry. These options need to be removed from the table. While 'Deregulation' could be the ultimate goal, we are not in a strong enough global position for this - perhaps we will be in the future.

Model 2 offers some good developments in terms of cohesively integrating the new digital frontiers - but provide little assurance that Australia's cultural assertion could be maintained.

The only way forward is proposed in Draft Model 3 (entitled 'Model 3+ - Significant and Proactive') and outlined below. Model 3+ encompasses additional policy inclusions & clarifications which I see as integral to a successful remodelling of the industry and which guarantees Australia's interest are protected and flourishing.

Model 3 + Significant and Proactive

Obligations

Reinstate current FTA Obligations for 2021 or sooner

- Given low Covid19 infection rates and the 'Australian Screen Production Industry Covid Safe Guidelines' in place, content can now be made.
- With unprecedented screen watching in a time when Australians are experiencing high levels of change and distress, sharing our own stories consolidates the message and community action of 'we are all in this together'.

Content quotas remain for FTA but are redefined & broadened to ABC/SBS & SVOD's

- Redefine 'transmission' to reflect the modern content landscape by acknowledging multiple channels and FTA on demand services (BVOD). The focus of the redefinition must be to:
 - Create flexibility and increased access to Australian content across all available FTA screens.
 - Aim at negating the issues experienced by commercial FTA broadcasters around children's television (more on this below).

This approach reflects 'a fair go' for all.

Seek market diversification for children's programming

- Whilst I think that the ABC/SBS (with proper funding) could assume the responsibility of being the sole producer and broadcaster of children's content, this approach is questionable.
 - No company - especially the FTA's should be allowed to compromise the opportunities of the next generation based solely on profit margins. The future must be our focus. I recommend a more thorough investigation into the FTA's assertion of the problem, as the evidence presented seems compromised, with a lot of counter arguments available warranting consideration. If the problem is indeed real, I suggest additional government support for the production of vulnerable content via enhanced investment (see below) and support through the ACTF.
 - Having a single voice for children feels akin to endorsing government owned airlines or energy suppliers. Diverse points of view must be offered and be accessible to children too.

Make "investment requirements" tailored & dynamic (in response to 'Option A & B' on p. 41)

- Regarding Option A, I have the following concerns:
 - All service providers should be subject to Australian content quotas regardless, as outlined above.
 - Service providers may simply add the 'Investment rate' to Australian consumers.
 - The establishment of an APF sounds very exciting, but could end up being heavy in administrative costs and void of any real display options. If this ends up being the way forward, please seek significant industry input.
- Option B, with its focus on more meaningful business investment would likely result in a stronger industry. This approach (if done in consultation with established industry workers/manufacturers), will foster wider collaboration between companies, governments, workers

and consumers. This approach could create real and enduring opportunities, that may even lead to deregulation. Here are some suggestions to enhance Option B:

- Service provider negotiations with ACMA will need to be at least 5 -7 years to allow for market investment, product development, physical production and return.
- Implement investment expectations over a defined period with consideration to industry stimulation and stability.
- Negotiations to include quantified variations within negotiation periods to capture market highs and offer providers some flexibility for market lows.
- If FTA Broadcasters still find that their businesses not viable due to final quota obligations (& revised incentives as detailed below), further schemes could be specifically tailored to enable FTA Broadcasters to find new markets and business models that support and align with Australian cultural values:
 - Specific tax incentives i.e. 110% tax refunds for vulnerable content.
 - Cross provider collaborations, for example: Ch 9 & Youtube or BBC.
 - Support to attain licenses to high rating cultural events.
- The NEDE scheme (which almost solely applies to Foxtel) appears to be suitable for Subscription Broadcasters and does not require adjustment at this stage.
- All 'investment requirements' must consider not just the final product and its display, but also the product's manufacture (see below under quality of incentive and investment).

Re-view all obligations to ensure stronger cultural protections

- Take decisive action by:
 - Closing any loopholes allowing NZ content to be counted as Australian
 - Publicly commit to excluding cultural sectors from future trade agreement.

This will ensure Australian cultural interests are protected and also reassures the people of Australia that our cultural identity is worth the effort. We could certainly do with a bit of this right now.

Incentives and Direct Investments

Set Offsets at globally competitive rates for all platforms & sustain for prolonged periods

- Set Producer, Location and PDV Offsets @ 30% for content on **all** platforms.
- Make an additional 10% available for projects:
 - with cultural uplift
 - classified as 'vulnerable' content.
- PDV Offset to be available in addition to Producer & Location Offsets to promote a 'nose to tail' approach to production.
- Scrap the '65 hr cap'. So many shows that were still rating well have been lost to this rule. We should always keep making the shows that people love. There must be a better way to qualify funding in a way that focuses on encouraging financial success by supporting longevity & better access to the opportunities of the new digital marketplace.
- As a practitioner with comprehensive and experienced knowledge of the ins and out of production I know that putting these measures in place quickly will kickstart the industry into full recovery & invigorate existing and new markets thereby stimulating real growth.

Increase Direct Investment

- Reinstate funding levels to National Broadcasters.

- Broaden funding offered by Screen Australia to tailor to real industry needs. (outline below)
- Expand co-production treaties to ensure better access to global markets (leading to potential deregulation)

Strengthen Quality of Incentives and Investment

- Access to investment and incentives must be clearly qualified to ensure:
 - Production (or manufacture) practices are ethical and meet the highest environmental and ohs standards including worker welfare.
 - Projects have a focus on real skill & industry development, sustaining careers and support to third party businesses.

Without these measures the industry will not be able to grow. Overview and implementation of these measures will require direct participation by Screen Australia, but must also be reflected in Location and PDV offset eligibility (perhaps via an enhancement of QAPE) and developed with input by actual practitioners. Below are a few specific suggestions:

- Ensure "Training Opportunities" actually exist on offshore productions. Recently a policy of 'no training roles' has emerged. This must be rectified, and may need government intervention to enable this roadblock to be overcome.
- Target support for Trainor" roles via enhanced to enable highly skilled & specialised practitioners to travel nationwide to bolster and train new talent where the skills set may not exist or be at a basic level. This could be supported further by State Governments.
- Enhance current tertiary education by ensuring far stronger integration from education into industry.
- Increase thresholds yearly in line with appropriate increases to crew wages.

Conclusion

Investing in the 8 directives detailed above offers Government a unique opportunity - as it is clear there are equally strong economic and cultural benefits, not many investments are able to claim such value.

Thank you for the opportunity to have my say on the highly informed. "Supporting Australian Stories on Our Screen Options Paper". It is an excellent articulation of the issue at hand. I am excited to see what may develop as a result of the submissions you receive and to play an active role when we get down to the nitty gritty.

Anecdotally, on the cultural need for Australian screen content I can relate that anyone I speak too if far more excited by learning my partner works on Wentworth or that I worked on Kath & Kim and Please Like Me more than they are by any of the Hollywood films I have worked on or movie stars whose paths I may have crossed. Our love and need for Australian Content is more fervent today than it was when I began my career. We are a country with national and international unrealised potential so... Let's go for it. Let's see what we can make of ourselves and bring Australia (& its stories) to the world. We always punch above our weight; no exceptions should be contemplated when it comes to protecting and cultivating our identity.

End of Submission