



**Special Broadcasting Service**

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11 April 2014

Graeme Mason  
CEO  
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Dear Graeme

**SBS Submission - Screen Australia Discussion Paper, Documentary Funding: Stories that Matter**

SBS welcomes the opportunity to comment on Screen Australia's Discussion Paper, Documentary Funding: Stories that Matter.

SBS acknowledges that it is essential for any administrator of public funds to review its policies and procedures at regular intervals to ensure that they are effectively and efficiently delivering on their objectives.

As one of the three major investors in Australian documentary programs, along with Screen Australia and the ABC, SBS is a critical voice in any review of the funding framework for documentaries.

In a converged media environment undergoing rapid change, an assessment of the current funding framework is appropriate and warranted. Nevertheless, SBS considers the current funding regime appropriate and relevant for the reasons outline in its submission.

Yours sincerely

A handwritten signature in dark ink, appearing to be 'TI' followed by a stylized flourish.

**Tony Iffland**  
Director of Television

**A story still growing:** We thought six billion was a lot of stories to tell... until the world population officially clocked seven billion, and we re-set our sights on a brand new number. Seven billion stories (and counting) might seem like a big ask, but if anyone's up to the task, it's SBS, the world's most multicultural broadcaster, attuned to the diverse needs of a growing nation.

*Seven Billion Stories and counting...*

## Executive Summary

- Documentary programming is one of Australia's most valuable cultural forms and fundamental to ensuring Australian culture, identity and viewpoints are presented on screen.
- SBS is at the forefront of documentary production in Australia and plays a key role in providing audiences with unique perspectives on multicultural and Indigenous Australia, as well as compelling ways for them to engage with contemporary issues and ideas through its Outreach initiatives. SBS is currently the only Australian broadcaster to offer Outreach initiatives around key documentary content.
- Screen Australia has been vital to SBS's success, providing a degree of certainty of funding through its documentary funding programs and, in turn, supporting the vibrancy and viability of Australia's independent production sector from whom SBS commissions the majority of its documentary programming.
- SBS supports Screen Australia's review of documentary funding in light of the changing media landscape and agrees the focus should be on how funding programs can 'best support a diverse range of Australian documentary content that delivers cultural objectives and that reaches, and resonates with, audiences'.
- However SBS does not consider there is enough evidence to support making any major changes to the current approach to documentary funding.
- Optimising the public value per cultural dollar spent requires recognition of the important role played by Australia's national public broadcasters, SBS and the ABC, who commission documentary programming with significant public value in line with their respective Charters.
- The best way for documentary programming to reach the broadest possible audience is through free-to-air television, as it remains the preferred method for viewing screen content despite new distribution platforms.
- The notional broadcaster funding allocations are essential as they provide certainty and allow SBS to forward plan its commissioning and scheduling strategy. The absence of ring fenced funding would negatively impact the independent documentary production sector as broadcasters would be unable to commit to potential projects without secure funding.
- Strong investment and slate management principles, consistent with broader government policy objectives for Australian content, are important when determining ways by which to support documentary content and navigate competing priorities in a converged media environment.
- Building on Screen Australia's support mechanisms and in accordance with its Charter, SBS has been able to commission high end documentary content from the independent production sector, consistently paying higher licence fees, guaranteeing quality and a national free-to-air television (and online) audience, and in turn contributing to the success of the Australian production sector.

## The role of SBS

SBS is Australia's multicultural, multilingual and Indigenous national broadcaster and holds a unique place in the Australian media landscape. As described in the *SBS Charter*, the principal function of SBS is to provide multilingual and multicultural media services that inform, educate and entertain all Australians and in doing so, reflect Australia's multicultural society.

SBS's carries out its functions through an ever-increasing number of distribution platforms, including: three free-to-air national television channels – SBS ONE, SBS 2 and the National Indigenous Television Service (NITV); eight analogue and digital radio channels; SBS ON DEMAND – online catch up television and on demand video; and, mobile device applications. The range of SBS services enables SBS to implement a cross-platform strategy for key content.

In meeting its role as a national public broadcasting service, SBS delivers public goods which the market alone will not support or provide, including:

- Australian content: strengthening Australian identity through the provision of programming that reflects and explores Australia's multicultural society, and promotes diversity and understanding of other cultures, with local employment impacts.
- Comprehensive and diverse programming: ensuring Australian audiences have access to a comprehensive range of content that caters for and is relevant to diverse interests and groups within society, building community and cultural awareness through multilingual and multicultural programming.
- Education: enhancing the intellectual and creative capacity of Australian society and supporting the development of Australia's human capital.
- Innovation and quality: providing informative and thought-provoking content that enriches society, and encouraging creative endeavour and the development of new talent.<sup>1</sup>

Further information relating to the SBS Charter can be found at Attachment A.

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<sup>1</sup> Department of Broadband, Communications and the Digital Economy, *Strengthening Our National Broadcasters*, May 2009.

## SBS and documentary programming

Bold, innovative and distinctive documentaries have always been the cornerstone of SBS programming.

SBS documentaries are inspired by its Charter and explore complex historical, social and political issues relating to multicultural and Indigenous Australia. Through SBS documentaries, audiences are given access to a range of unique viewpoints.

SBS's documentaries are as diverse as its audiences and SBS's multiple channel and screen platforms provide an opportunity for SBS to commission a breadth of documentary programs appealing to a wide range of audiences:

- SBS ONE and SBS 2 deliver a unique range of documentaries that push the boundaries of Australian television to provoke debate, as well as surprising and delighting viewers;
- NITV focuses on Indigenous documentaries, which empower Indigenous voices and safeguard Indigenous culture; and
- SBS Online commissions stand-alone interactive online documentaries, as well as developing major cross-platform sites to accompany SBS's documentary programs.

SBS's use of documentary content has been consistently innovative in the range and diversity of its sources, as well as in the way in which documentaries are used to experiment with new styles of television.<sup>2</sup>

SBS invests a significant proportion of its commissioning budget in documentary programs, making SBS, together with Screen Australia and the ABC, one of the major investors in the independent documentary production sector.

SBS documentaries resonate with audiences and are illustrative of how informative and educational documentary programs can also be entertaining and have mass appeal. For example, *Go Back to Where You Came From* series 2, a series in which six prominent Australians experienced a refugee journey in reverse, was watched by 1.06 million Australians. In addition, 130,000 people watched the series on SBS's catch up service, SBS ON DEMAND, and 68,000 people watched repeats on SBS 2.<sup>3</sup>

Not only was *Go Back to Where You Came From* popular with audiences but it stimulated debate on the issue of asylum seekers and refugees. The program website received 124,000 unique browser views, and, within a week of the broadcast there were over 52,000 Twitter mentions about the series.<sup>4</sup>

Beyond commissioning and broadcasting documentary programs, SBS is also the only Australian broadcaster to deepen audience engagement with its programs through its Outreach initiatives around key documentary content. Established in 2010, SBS Outreach creates innovative partnerships with organisations that have an affinity with the SBS Charter in order to maximise the public value of

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<sup>2</sup> Ien Ang, Hawkins and Dabboussy, *The SBS Story*, UNSW Press, 2008.

<sup>3</sup> OzTAM & RegTAM; SiteCensus; MPX; YouTube; Radian 6.

<sup>4</sup> OzTAM & RegTAM; SiteCensus; MPX; YouTube; Radian 6.

its key commissioned programs. Outreach enables SBS to provide a more ambitious and engaging offer to its audience, as well as enhancing the educative value of SBS documentaries beyond transmission.

SBS documentaries are consistently recognised the world over for their high-quality, diversity and innovation, and have been nominated and received numerous awards, including the 2012 Golden Rose and Rose D'Or for series 1 of *Go Back To Where You Came From*; an International Emmy and AACTA Award for series 2 of *Go Back To Where You Came From*; an Australian Teachers of Media award for *Jabbed*; a 2011 Walkley Award for *The Tall Man*; and, *First Australians* receiving the 2009 Prime Minister's Prize for Australian History. Further details of recent awards received can be found at Attachment B.

In the field of documentary, SBS has a tradition of exploring subjects that are not a focus of other broadcasters in the Australian free to air environment and is therefore a vital contributor to both the production of documentary in Australia and to the overall health of the domestic documentary sector.

## Questions for discussion

### **Are specific targeted programs such as the current suite of documentary programs efficient and effective?**

Targeted documentary funding programs represent the most efficient and effective means of supporting a diverse range of documentary programming that delivers cultural objectives and audiences in line with Screen Australia's responsibilities under the *Screen Australia Act 2008*, including supporting the development of the Australian screen production industry, ensuring access to Australian content, and promoting screen culture in Australia.

Screen Australia's funding programs compliment broader government objectives and initiatives that support the production and distribution of high quality Australian content, including the respective Charters of the national broadcasters, the ABC and SBS, and the Australian content quotas for the commercial free-to-air television broadcasters.

The Convergence Review Final Report 2012 found that continued government support is in the public interest in relation to the production and distribution of Australian content:

There are considerable social and cultural benefits from the availability of content that reflects Australian identity, character and diversity. If left to the market alone, some culturally significant forms of Australian content, such as drama, documentary and children's programs, would be under-produced.<sup>5</sup>

Screen Australia's documentary funding programs provide vital investment in documentaries with significant cultural value that may not otherwise be commercially viable or supported by the market.

Optimising the public value per cultural dollar spent requires recognition of the important role played by Australia's national public broadcasters, SBS and the ABC, which commission documentary programming with significant cultural importance in line with their respective Charters.

Through its innovative and distinctive documentary programming, SBS plays a key role in providing Australian and international audiences with a unique perspective on multicultural and Indigenous Australia, providing compelling ways for them to engage with contemporary issues and ideas.

SBS's highly successful strategy of outsourcing production to the independent production sector enhances access across the industry to the means of production, dissemination and distribution of important cultural information. This model also provides SBS with greater flexibility in commissioning content from a wide range of creative sources. The advantage of this model is that it leverages funding from other bodies, including Screen Australia and state screen funding agencies, to provide a level of resourcing for productions that SBS could not provide by itself.

Screen Australia's documentary funding programs, in particular the notional funding allocations for the ABC and the SBS, have been vital to SBS's success, providing certainty of funding to SBS which, in turn, supports the vibrancy and viability of Australia's independent production sector from which SBS commissions the majority of its documentary programming.

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<sup>5</sup> Convergence Review Final Report, 2012, viii.

There is no evidence to support changing the current approach to documentary funding. Rather, Screen Australia's own research into patterns of media consumption supports the continuing funding of documentaries both through targeted programs and also, importantly, through the notional allocations to the public broadcasters.<sup>6</sup>

It remains important to monitor developments in the media industry, particularly in relation to audience behaviour and viewing patterns, to ensure that significant Australian content remains available to the widest possible audience; however, until there are mechanisms to ensure this, it would not be appropriate to change the current approach. In this regard, SBS notes that the important role played by the national broadcasters will not be diminished in the digital environment, as evidenced by the roll out of SBS ON DEMAND across a wide range of platforms and devices.

### ***National Documentary Program***

SBS firmly believes in the values underpinning the NDP, in that they encourage the production of documentaries with themes of national and cultural significance, and heritage value. SBS is of the view that a documentary funding program that delivers documentaries with a sense of cultural ambition needs to remain available and separate in some form from other Screen Australia documentary funding programs.

The NDP, through its commissioning objectives, funding and structure, enables the documentary production sector to make courageous and pioneering decisions that extend the current limits of documentary making, resulting in ambitious projects and developing the industry as a whole.

The NDP has allowed SBS to commission high quality and high budget flagship documentary programs that explore issues of national importance relating to multicultural and Indigenous Australia. In order to support projects funded through the program, SBS has consistently paid above average licence fees and funded more than the minimum required 11 hours per year. The higher licence fees paid by SBS ensures that the value of certain projects funded under the NDP are extended through SBS's Outreach initiatives.

SBS has a proven track record of commissioning documentaries that deliver against its Charter obligation, connect and engage with audiences, and receive national and international critical acclaim. For example:

- *Once Upon a Time in Cabramatta* broke SBS documentary ratings records, trended second worldwide on Twitter during its first episode, and broke post-broadcast records for catch up viewing through SBS ON DEMAND.
- *The Tall Man* won the 2011 Walkley inaugural Award for Long-form Journalism Documentary, and was screened at the International Documentary Festival Amsterdam and Toronto International Film Festival, as well as the Brisbane and Adelaide international film festivals in 2011.
- *Immortal*, broadcast as part of SBS's Secrets of the Human Body season, earned an International News and Documentary Emmy Award in the Outstanding Science and

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<sup>6</sup> Screen Australia, *What to Watch: Audience motivation in a multi-screen world*, 2012; *Beyond the Box Office*, 2011

Technology Programming category. *Immortal* was retitled *Decoding Immortality* for the American audience and broadcast on the Smithsonian Channel in the States.

SBS continues to commission acclaimed documentaries of national cultural significance, such as *Immigration Nation*, *Jabbed: Love, Fear and Vaccines*, and recently *The Catch* and *The Great Australian Race Riot*.

Recognising the national cultural significance of NDP funded documentaries, SBS extends the public and educative value of many NDP documentaries beyond the broadcast through its Outreach initiatives. For example, to help bring the documentary, *Once Upon a Time in Cabramatta* to life, SBS partnered with local arts and cultural organisation, Information + Cultural Exchange (ICE), in a creative project designed to generate and facilitate discussion around the issues raised by the program, in Cabramatta and surrounding areas, culminating in a commemorative book that featured around 500 story cards in a legacy for the community, created by the community.

In the absence of a dedicated funding appropriation for documentaries of high cultural value, it is unlikely that the exceptional calibre and standard of NDP documentaries would be maintained. Without the certainty of ring-fenced funding for high quality and high budget documentaries, the sector would likely cease to cultivate ambitious ideas and projects, thereby adversely impacting the quality of the independent production sector, as well as the audio-visual record of Australia's heritage.

### **General Documentary Program**

SBS considers the concept of the GDP, namely a fund for investment in audience-engaging and culturally relevant documentary projects with lower budgets and broadcaster presale, to be important and should remain available in some form from other Screen Australia documentary funding programs.

The GDP allows SBS to commission documentaries that use new and innovative documentary methods with lower budgets while maintaining the high quality required for a broadcaster presale.

Illustrative of the power of audience-engaging and culturally relevant documentaries funded through the GDP, is the success of *Go Back to Where You Came From*. Over one million Australian viewers watched *Go Back to Where You Came From* series 2 on its first free-to-air transmission;<sup>7</sup> 130,000 people watched the series on SBS's catch up service, SBS ON DEMAND; and 68,000 people watched repeats on SBS 2.<sup>8</sup> Series 1 of the program received national and international acclaim, including receiving the Rose D'Or Golden Rose for 2012.

*Go Back to Where You Came From* was further supported by the SBS Outreach program, which in partnership with Amnesty International and the Refugee Council of Australia, delivered free education resources to all secondary schools in Australia aimed at assisting teachers and students to tackle issues relating to refugees in Australia. Following the broadcast of the program, 130 targeted community events were attended by over 4,000 people Australia-wide, and 400 audience members registered to be matched up with volunteering opportunities across the sector.

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<sup>7</sup> Screen Australia, *Annual Report 2012-13*.

<sup>8</sup> OzTAM & RegTAM; SiteCensus; MPX; YouTube; Radian 6.



### ***International Documentary program***

The IDP provides an important avenue for injecting international funds into the Australian documentary production sector, as well as encouraging international production partnerships.

The IDP and required international attachment encourages the production of documentary content with international appeal. SBS is of the view that international co-financing and international co-productions are vital for the growth of the Australian production sector – both economically and creatively. Further, having regard to the SBS Charter, documentary programs funded through the IDP foster an international view of cultural diversity and foster relationships with overseas broadcasters.

For example, with IDP funding, SBS was able to commission, *JFK: The Smoking Gun*. The documentary featured an Australian homicide detective who was the first qualified homicide detective to analyse the complete catalogue of evidence and testimony surrounding the JFK assassination. The documentary had international appeal, as it related to the assassination of United States President, John F. Kennedy, but also engaged Australian audiences and was second most popular documentary with SBS audiences from the IDP funded slate since 2008.<sup>9</sup>

Other SBS documentaries funded through the IDP include, *The Network*, *Murdoch*, *The Secret History of the Eurovision Song Contest*, *SAS: The Search for Warriors*, *Dr Mary Goes Bush*, *Firing the Magic Bullet* and *Skin Deep*.

A funding mechanism that recognises the place for documentaries with international appeal and permits international co-financing is a vital in the Australian landscape where there are limited sources of finance.

### ***Signature Documentary Program, Multi-platform Documentary Program and special initiatives***

The Signature Documentary Program, Multi-platform Documentary Program and Screen Australia's special initiatives provide for documentary projects that have no marketplace attachment.

SBS acknowledges that these funds are highly contested due to the absence of a marketplace attachment requirement. Despite the demand, SBS considers that the current level of funding is appropriate. Whilst these programs are important for the realisation of a diverse range of content, the risk remains that alternative avenues of distribution dictated by the programs may not be realised and projects may fail to reach audiences in a meaningful way.

As such, due to the lack of evidence to suggest that documentary programs without marketplace attachment will successfully reach audiences, SBS believes funding for the programs should be maintained at the current level.

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<sup>9</sup> Top-rating documentaries from Screen Australia's funded slate, broadcast 1 Jan 2008 – 31 Dec 2013, Screen Australia Discussion Paper, *Documentary Funding: Stories that Matter*, 2014.

## How can Screen Australia best support low-budget documentary making?

SBS is engaged with low-budget documentary making through SBS 2 and NITV.

With only a small commissioning fund, NITV offers presales that are significantly lower and are, therefore, unable to access funds with licence fee minimum requirements. NITV is aspiring to build the Indigenous production sector and has worked strategically in the low budget documentary space to enable Indigenous projects to be developed and broadcast.

SBS and NITV are of the view that a low budget documentary fund should be created with a portion of that fund requiring marketplace attachment with reduced licence fees. This would allow NITV and SBS 2 to plan a diverse slate of low-budget documentaries each year, providing benefits to the Australian production sector.

## How can high-end documentaries reach the broadest possible audience?

Screen Australia's research into audiences and viewing behaviours, including *What to Watch* and *Beyond the Box Office*, found that free-to-air television audience figures have remained stable and that, despite the converged media environment, free-to-air television is the preferred content-viewing platform.<sup>10</sup> As such, Screen Australia's own research supports free-to-air television as the best platform for high-end documentary programming to reach the broadest possible audience.

SBS is of the view that free-to-air television is essential for reaching audiences and agrees with Screen Australia that 'there is a continued impetus to ensure that diverse Australian documentary content is available on [free-to-air] channels.'<sup>11</sup>

Audience viewing behaviours in relation to free-to-air television have remained steady since 2011 with participation rates of 94 per cent. Screen Australia's, *Beyond the Box Office*, research found that in 2010, 96 per cent of people indicated that they had watched a television program in the preceding week, and that this rate was similar to the rate for the last five years.<sup>12</sup>

High levels of audience engagement for free-to-air television is corroborated by the *Australian Multi-Screen Report*, which found that in the third quarter of 2013, Australians watched an average 95 hours and 51 minutes of broadcast content each month on their televisions, compared to 5 hours and 18 minutes per month on a computer/laptop, 1 hour and 20 minutes per month on mobile phones, and just 50 minutes on tablets.<sup>13</sup> The report further found that total use of television is relatively steady year-on-year.

High rates of audience engagement are not confined to older demographics, contrary to popular opinion. Accenture's *Industry Report on Media and Entertainment*, found that young people are much more engaged with television, with 25-34 year olds watching on average, almost 140 hours a month of 'traditional' television programming – more than 20 times as many hours as they spend watching video on the internet or on their phones.<sup>14</sup>

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<sup>10</sup> Screen Australia, *What to Watch: Audience motivation in a multi-screen world*, 2012; *Beyond the Box Office*, 2011.

<sup>11</sup> Screen Australia, *Beyond the Box Office*, 2011.

<sup>12</sup> Screen Australia, *Beyond the Box Office*, 2011.

<sup>13</sup> *Australian Multi-Screen Report*, Nielsen, OzTAM and Regional TAM, Q3 2013.

<sup>14</sup> Accenture, *The Eyes Have It: Guess Who Controls the Future of TV*, <http://www.accenture.com/us-en/outlook/Pages/outlook-journal-2013-eyes-have-it-who-controls-future-of-television-media.aspx>, 2013.

There is no doubt that online content is changing the media landscape, however, there is no evidence to suggest that any other platform reaches greater or broader audiences than free-to-air television. Rather, Screen Australia's *What to Watch* report suggests that it may be more difficult to reach audiences online as the majority of online viewers (70 per cent) search for a specific title when watching content online.<sup>15</sup>

With viewer behaviour and preferences in mind, as well as the opportunities available through online avenues, SBS has created compelling, convergent services across multiple platforms, including television, online, ON DEMAND and through connected television. SBS's approach recognises that whilst free-to-air television is the dominant platform for viewing screen content, it can be complemented with online platforms that build audience awareness and create modes of access to documentary programming that best serves Australian audiences.

**Should Screen Australia continue to offer separate theatrical funding for documentaries or should it create one funding program for 'premium' documentaries, regardless of platform?**

SBS would prefer to reserve its view on the appropriateness of a 'premium' documentary fund, until more information about how the fund would operate, both at a cultural policy level and at a funding level, has been released.

**Could a requirement for marketplace commitment be met in ways other than a broadcaster presale?**

SBS firmly endorses the broadcaster presale as the best mechanism for meeting marketplace commitment as it ensures high quality outcomes for productions, provides financing assurances, and gives access to the broadest possible audiences.

While marketplace commitment may be met in ways other than a broadcaster presale, alternative commitments need to be considered in the context of patterns of screen media consumption and the impact on the industry as a whole.

As discussed above, free-to-air television is the preferred platform for viewing screen content. Audience figures remain strong and have not been significantly reduced by developments in alternative content consumption, including online video. In addition, audiences are now provided with a greater diversity of content on television with the number of digital free-to-air television channels increasing to 17 and catch up services now the norm.

Broadcaster licence fees are an important way of guaranteeing quality of content for viewers, and audience reach for documentary makers. To introduce alternatives will disrupt the industry in an adverse way by reducing quality and reach.

If alternative commitments were pursued, those commitments must attract the same minimum licence fee as broadcaster licence fees, regardless of platform. This would be essential to safeguard the broader government policy objectives for diverse Australian content on free-to-air television, and ensure the Australian television industry is not disadvantaged compared to alternative content providers.

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<sup>15</sup> Screen Australia, *What to Watch*, 2012.

Projects that do not attract marketplace attachment through broadcaster presale are adequately served by the Signature and Multi-platform Documentary programs which, together with Screen Australia's special initiatives such as Opening Shot, Think Big and Triple J TV Docs, provide alternative avenues for funding with investment levels appropriate given the higher risk of lower audience reach and engagement.

Having regard to audience viewing patterns and preferences, and in lieu of research that identifies a significant shift away from free-to-air television, SBS is of the view that the majority of Screen Australia funding should continue to be allocated through programs that require domestic broadcaster attachment.

**What are the impacts on the industry of the notional broadcaster funding allocations which currently apply to the NDP and GDP?**

To continue to deliver benefits to the Australian production sector and audiences alike, SBS requires funding certainty. While the mechanisms for providing funding may alter, funding certainty is vital for the continued investment by SBS in the documentary sector. Funding certainty allows SBS to forward plan its commissioning and scheduling strategy, commit to documentary projects from the production sector, and deliver a diverse and stimulating slate of documentary programming each year.

If the notional broadcaster funding allocations were decreased or revoked, it is highly likely that many documentary programs of the sort commissioned by SBS would never be made or broadcast.

Without certainty, the national broadcasters would rely more heavily on acquired content when securing and planning their forward schedules. Without the notional funding allocation, SBS may not be able to support documentary projects into development as the risk of not securing Screen Australia funding would be too high. This would have a negative impact on diversity and vibrancy of the independent production sector as broadcasters would not commit to potential projects without secure funding; and, in turn would be detrimental to the preservation of Australia's audio-visual heritage.

Further, without the notional broadcaster funding allocation, the decision to invest in documentary projects would rest entirely with Screen Australia. This would negatively impact collaboration in the screen industry as a funding and commissioning monopoly would exist. The allocation of funding recognises that documentary programs eligible for funding under Screen Australia's criteria are almost always commissioned by the public broadcasters. As noted by Screen Australia in the discussion paper, commercial and subscription broadcasters are unlikely to apply for documentary funding as their commercial business model is contrary to the types of documentary programming the NDP and GDP aim to support.

The national broadcasters, SBS and the ABC, commission a diverse range of documentaries that deliver cultural objectives, resonate with audiences and provide some of the highest rating, thought-provoking and educational material on Australian television. This can only remain the case if funding certainty for the national broadcasters is maintained by Screen Australia.

**In making decision about whether to invest in projects, what considerations should be prioritised?**

SBS supports Screen Australia's investment and slate management principles. SBS considers it important that Screen Australia's principles are balanced with broadcasters' autonomous commissioning decisions, which can only be maintained through the notional funding allocations.

SBS also supports the investment criteria for each documentary funding program which emphasises the necessity for cultural and national significance of a project, together with marketplace attachment, and in particular licence fees.

SBS considers that Screen Australia's investment criteria and slate management principles, together with broader government policy objectives for Australian screen content on free-to-air television, and the public interest in the national broadcasters commissioning and distributing Australian content, should be prioritised when determining ways by which to support documentary content and navigate competing priorities in a converged media environment.

**What are the advantages and disadvantages of Screen Australia accepting applications in rounds versus at any time?**

SBS considers Screen Australia's current approach to accepting applications in rounds to be the best approach as it allows for a consistent release of high quality documentary content over the course of the funding cycle.

The risk associated with accepting applications at any time is that funding will be exhausted early in the cycle on projects that are less worthwhile before more significant documentaries are ready for assessment.

To maintain an assessment regime that prioritises merit-based documentaries over readily available documentaries, SBS considers the Screen Australia should maintain its current approach to funding cycles.

### **SBS Charter and principal functions**

The SBS Charter, provided in the SBS Act, sets out the principal functions of SBS and a number of duties it has to fulfil. The Charter, contained in Section 6 of the *Special Broadcasting Services Act 1991*, states:

1. The principal function of SBS is to provide multilingual and multicultural radio, television and digital media services that inform, educate and entertain all Australians and, in doing so, reflect Australia's multicultural society.
2. SBS, in performing its principal function, must:
  - a. contribute to meeting the communications needs of Australia's multicultural society, including ethnic, Aboriginal and Torres Strait Islander communities;
  - b. increase awareness of the contribution of a diversity of cultures to the continuing development of Australian society;
  - c. promote understanding and acceptance of the cultural, linguistic and ethnic diversity of the Australian people;
  - d. contribute to the retention and continuing development of language and other cultural skills;
  - e. as far as practicable, inform, educate and entertain Australians in their preferred languages;
  - f. make use of Australia's diverse creative resources;
  - g. contribute to the overall diversity of Australian television and radio services; and
  - h. contribute to extending the range of Australian television and radio services, and reflect the changing nature of Australian society, by presenting many points of view and using innovative forms of expression.

## SBS documentaries and awards

Recent national and international awards received for SBS documentaries:

Documentary	Award
<i>Go Back to Where You Came From - Series 2</i>	2013 International Emmy Award - <i>Non-scripted Entertainment</i> 2013 AACTA Award - <i>Best Documentary Series</i> 2013 TV Week Logie Awards - <i>Most Outstanding Factual Program</i>
<i>Go Back to Where You Came From - Series 1</i>	2012 Rose D'Or - <i>Golden Rose for 2012; and, Best Factual Entertainment</i> 2012 Australian Teachers of Media - <i>Best Documentary History, Social &amp; Political Issues</i> 2012 Australian Directors' Guild - <i>Best Direction in a Documentary Series</i> 2012 BANFF TV Festival (Canada) - <i>Social &amp; Humanitarian Documentaries</i> 2011 UNAA United Nations Media Peace Award - <i>TV Major Award, Documentary; and, Promotion of Multicultural Issues</i>
<i>Once Upon a Time in Cabramatta</i>	2013 AACTA Award - <i>Best Editing in a Documentary</i> 2012 Australian Teachers of Media - <i>Best Factual Television Series</i>
<i>Immortal</i>	2010 International Emmy Award – <i>News and Documentary</i>
<i>Jabbed – Love, Fear and Vaccines</i>	Australian Teachers of Media - <i>Best Documentary Science, Technology &amp; Environment</i>
<i>The Tall Man</i>	2012 Australian Teachers of Media - <i>Best Documentary General</i> 2011 Walkley Awards for Excellence - <i>Excellence in Documentary</i> 2012 Australian Directors' Guild - <i>Best Direction in a Documentary Feature</i>
<i>First Australians</i>	2009 Prime Minister's Prize for Australian History 2009 Australian Film Institute - <i>Best Documentary Series</i> 2009 Australian Directors' Guild - <i>Outstanding Direction for a TV Documentary Series</i> 2009 AWGIE Awards – <i>Documentary series</i> 2009 Asia-Pacific Broadcasting Union - <i>Documentary, Special Commendation</i>