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**Australian Broadcasting Corporation**

Submission to

**Screen Australia**

**Documentary Funding: Stories that Matter**

April 2014



## **Screen Australia's Discussion Paper** ***Documentary Funding: Stories that Matter***

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### **Introduction**

The Australian Broadcasting Corporation (ABC) welcomes the opportunity to comment on Screen Australia's Discussion Paper - Documentary Funding: Stories that Matter (the "Discussion Paper").

ABC Television, which is accessible to nearly all Australians, maximises cultural returns to its audiences through its diverse and award winning slate of documentary programming and makes a significant investment in the independent documentary production sector.

The ABC plays a vital role in contributing to Australia's screen documentary industry. The ABC develops, produces, commissions and broadcasts high-quality and diverse content that might otherwise not be available to the Australian public in keeping with its public broadcasting and Charter responsibilities.

The ABC is strongly supportive of Screen Australia and its support of the independent production sector, the ABC also welcomes Screen Australia's review of its funding arrangements.

The ABC believes that changes to the nominal funding allocations to broadcasters will have a detrimental effect on the number of documentaries that will be produced by the ABC, and will contribute to uncertainty and instability in the documentary production industry.

Some of the suggested changes indicate there may be scope for the introduction of an additional level of editorial decision making by Screen Australia over and above the editorial decisions made by broadcasters. A system of fully contested funding which involves Screen Australia making editorial decisions on aspects of productions such as format, form, talent, scripting or themes will put the ABC in an untenable position. Broadcasters are best placed to understand their audiences and, in the case of the ABC, to best understand what content will serve cultural and charter goals. The ABC Act and ABC

Editorial Policies apply high standards including to maintain the independence of the ABC and it is unclear to what extent that independence may be compromised if editorial decision making (even in part) was vested in a third party.

The ABC accepts and agrees that Screen Australia needs to have firm and clear guidelines. However the Corporation believes such outcomes can be achieved without undermining the editorial decision making process commissioners of content have over elements such as form, format, style, talent, scripting and themes.

As the organisation ultimately responsible and accountable to the public, regulators and the Government for the content it broadcasts, the ABC should retain control over commissioning decisions.

## **Screen Australia's Funding Programs**

The ABC welcomes an industry discussion about whether the production investment programs of the General Documentary Programs (GDP), the National Documentary Program (NDP), the Signature Fund and the International Documentary Program are the most effective way to create industry support for documentaries.

As Screen Australia acknowledges in its Discussion Paper, broadcasters play a vital role in Australia's documentary ecosystem through their expertise in reaching audiences<sup>1</sup>.

A number of options exist to modify the range of investment programs. One is to consolidate these four separate programs into a single documentary fund where a certain amount of funding is quarantined for the public broadcasters. Such an arrangement would simplify arrangements and acknowledge the growth of the documentary sector and changing technology and audience characteristics of the market while preserving the focus on culturally important and relevant content created out of the NDP.

In addition, in order to address some of the issues raised by the aggregation and timing of funding rounds (see below) Screen Australia could consider establishing an "Emergency or Discretionary Fund" that could be used to finance out of round or time critical projects.

The ABC suggests a project collectively investigating whether a single Screen Australia administered documentary "door", open to all parties, would yield a better net result of documentary production and distribution in Australia.

## **Marketplace Attachment**

Screen Australia's Program Guideline for Documentary Programs prescribes that a marketplace attachment be evidenced prior to a funding match being granted<sup>2</sup>. This is because a broadcaster licence fee is the strongest indication of a market assessment. The

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<sup>1</sup> Screen Australia, "Discussion Paper: Documentary Funding: Stories that Matter, p. 12.

<sup>2</sup> [http://www.screenaustralia.gov.au/getmedia/44f18a22-59b3-4740-b831-0b03863564dd/Glines\\_Documentary.pdf](http://www.screenaustralia.gov.au/getmedia/44f18a22-59b3-4740-b831-0b03863564dd/Glines_Documentary.pdf)

ABC would seek to retain the marketplace attachment as a requirement for funding as the most effective test for measuring audience reach.

## Audience reach

Free-to-air television remains the primary content viewing platform for Australian audiences. ABC Television's reach remains strong with its average weekly metropolitan reach in 2012-13 was 9.4 million people, or 60% of the five-city metropolitan population<sup>3</sup>. ABC Television's regional average weekly reach in 2012-13 was 4.5 million people or 60% of the regional population<sup>4</sup>.

The ABC agrees with Screen Australia's analysis that it should seek to fund content that resonates with audiences and has cultural value.<sup>5</sup> The ABC submits the "eligibility test" (outlined in Screen Australia's Guidelines for the General Documentary Program<sup>6</sup>) should be applied to any new overarching fund to support documentary funding by Screen Australia. This test places a heavy emphasis on audience reach, equating to cultural return.

There should be a place for new and emerging distribution platforms and Screen Australia has a role in encouraging innovation both in form and distribution. Clearly the cultural return indicated via audience reach needs to inform investment decisions but guidelines should also overtly include new and different ways to reach audience.

## Quarantined and Contestable Funding

The ABC's high quality documentary slate and resulting audience success is evidence that guaranteed minimum funding allocations from Screen Australia are the best way of delivering on key outcomes. These include: cultural relevance and impacts, industry investment, certainty for producers and efficient economic returns on investment.

Over the last six years, ABC Television has commissioned 437 hours of documentary programming across a breadth of genres including history, science, the arts, Indigenous, natural history, religion and ethics.

Despite audience fragmentation across platforms and devices, free to air television and in particular the ABC remains the single most effective way of reaching the largest numbers of Australian viewers for documentary programs. As the Discussion Paper outlines, five of the top ten rating documentaries in 2013 were broadcast on ABC1. All of these were Screen

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<sup>3</sup> OzTAM Metropolitan Consolidated data 2012-13

<sup>4</sup> Regional TAM Consolidated data 2012-13

<sup>5</sup> Screen Australia, "Discussion Paper: Documentary Funding: Stories that Matter, p. 12.

<sup>6</sup> [http://www.screenaustralia.gov.au/getmedia/44f18a22-59b3-4740-b831-0b03863564dd/Glines\\_Documentary.pdf](http://www.screenaustralia.gov.au/getmedia/44f18a22-59b3-4740-b831-0b03863564dd/Glines_Documentary.pdf)

Australia supported titles<sup>7</sup>. The public broadcasters gain most benefit from Screen Australia funding and rightly they also broadcast the lion's share of documentaries<sup>8</sup>.

The existing notional broadcaster funding allocation for the ABC should be retained because:

- It reflects the reality of the documentary production marketplace including the reach of the ABC for documentary programming and the levels of commissioning activity
- The cultural goals of the of the ABC and Screen Australia are closely aligned and the allocations reflect the intended outcomes
- It provides certainty for producers and clarity for broadcasters

In combination, the notional funding allocations promote industry and cultural outcomes and reduce uncertainty. Changing the allocations or removing them is unlikely to improve cultural outcomes by increasing competition in what is already a highly competitive market. Instead removing notional allocations will reduce certainty for producers and broadcasters, reduce the reach of documentary programming and hence the cultural return on investment.

The ABC acknowledges that a 50% notional allocation is in the best interests of its documentary slate however the ABC also submits that this outcome is aligned with Screen Australia's cultural goals, while retaining an investment in diversity across broadcasters.

A variation on notional percentage allocations is the concept of funding envelopes. As the ABC has previously suggested Screen Australia could investigate the option of allocating set minimum guarantees or "envelopes" of funding to broadcasters.

Broadcasters would be notionally allocated an upfront amount of funding against which they would undertake to deliver on set outcomes defined by genre and cultural goals. Failure by the broadcasters to deliver on agreed outcomes would result in a re-allocation of the funding split in the following cycle.

### **Role of Screen Australia and Project Assessment**

The ABC submits that an increase in the levels of editorial oversight by Screen Australia (beyond that required by clear guidance and program governance) will undermine the well-established commissioning procedures of the Corporation.

Introducing a second level of assessment will also increase uncertainty for producers who have already been through a sometimes prolonged development process with broadcasters.

The ABC acknowledges Screen Australia must have a method for prioritising projects when demand for support outstrips the available funding. However the ABC does not support an increase in the levels of editorial assessment for documentaries. Questions of format, form, themes, talent and scripting should be left to the creative interaction between broadcasters and producers. Introducing additional levels of editorial oversight will make the process

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<sup>7</sup> Screen Australia, "Discussion Paper: Documentary Funding: Stories that Matter", p. 11.

<sup>8</sup> Screen Australia, "Discussion Paper: Documentary Funding: Stories that Matter", p. 23.

less certain for producers and compromise the ABC's ability to successfully curate a slate tailored for its audience.

As stated above, one option might be to explore establishing a set of agreed outcomes and allocating broadcasters up front envelopes of funding.

The ABC agrees it is important for Screen Australia to publicly define its strategic direction in relation to documentary funding. The ABC and Screen Australia have a common interest in ensuring that Australian audiences have access to high-quality, cultural relevant and innovative documentaries. The ABC would welcome an opportunity to work with Screen Australia and other stakeholders to develop a shared set of goals and priorities..

### **Low-budget documentaries**

To encourage the creation of low-budget documentaries, the ABC submits that Screen Australia continue its support of the partnership that has delivered ABC's *Opening Shot* series.

The ABC's innovative *Opening Shot* series holds a unique place in the Australian television documentary landscape. The *Opening Shot* initiative is designed to give young documentary filmmakers firsthand experience working with a broadcaster and develop their long-form storytelling skills. It is the only initiative on prime-time national television designed to specifically encourage, nurture and develop a new generation of documentary filmmakers.

Titles commissioned in the 2013 *Opening Shot* season included *Growing Up Gayby*, *The Vagina Diaries* and *Suicide and Me*. The ABC is highly supportive of this initiative and looks to continue its partnership with Screen Australia, as this is already opening doors for the filmmakers who have participated.

### **Funding rounds**

The ABC recognises there are both positives and negatives in Screen Australia establishing "rounds" for applications for funding as opposed to accepting applications at any time. The positives of established rounds are that it creates certainty and provides timing for funding projects as well as transparency in decision-making. On the other hand, having set dates to apply for funding can create an artificial backlog, delay productions and even stymie innovation.

A proposal that sits between these two positions is the possible establishment of an "emergency" or discretionary fund.. This would enable Screen Australia to quickly fund a project that is topical and current, such as the ABC's recently commissioned documentary exploring Australia's drinking and party culture: *Dead Drunk: A Night in the Cross*. An emergency documentary fund would stem the collectively missed opportunities by being caught in a bureaucratic tangle of funding applications, whilst simultaneously allowing for the certainty that regular funding rounds provide.

## **Conclusion**

The ABC supports Screen Australia reviewing its programs to ensure the efficient and effective allocation of funds. The ABC supports the idea of a review into creating a single “door” for documentary funds that are assessed in accordance with projects that will deliver the greatest cultural return. The ABC is concerned, however, that any change to the nominal funding structure will not resolve the problems it seeks to address, will create uncertainty in the industry and may ultimately threaten the existing high level of documentary output on the ABC. The ABC is concerned to ensure that editorial assessment of content remains with commissioners of content in partnership with producers.