Dear Chair & Board Members,

We write to you in regard to the recently released draft documentary guidelines as a group of experienced and award-winning practitioners with collectively over 100 years experience and responsible for well over 300 hours of production.

We wish to express our grave concern that the draft guidelines, if implemented, will result in Screen Australia assuming a direct curatorial role regarding the assessment and funding of documentaries as opposed to the commercially based criteria that have applied previously.

We believe that such a shift in policy is contrary to the 2008 Act that governs Screen Australia, which states its functions. The first and primary function being; "to support and promote the development of a highly creative, innovative and commercially sustainable Australian screen production industry".

Instead, a secondary directive under "*Considerations governing the performance of functions*", notably without the qualifying prefix "as far as is practicable", has been used at the head to set the agenda for the draft guidelines; "ensure the development of a diverse range of Australian programs that deal with matters of national interest or importance to Australians, or that illustrate or interpret aspects of Australia or the life and activities of Australian people."

The result is that each funding program in the draft guidelines appears designed to increase the curatorial role of Screen Australia and considerably lessen the significance of market factors in the decision making process. It is disturbing to note that nowhere in the draft guidelines is the promotion of commercial sustainability acknowledged, except for a peripheral reference in relation to diversity on page 7.

From the perspective of the independent documentary producer this approach is likely to create a funding environment very similar to Film Australia, a funding model which was rejected by the large majority of the documentary community and which was expressly set aside with the formation of Screen Australia. Moreover it is at variance with Screen Australia's Enterprise Schemes and similar initiatives which have sought to encourage the development of a commercially sustainable and creatively vibrant documentary production sector. Several of the signatories have received, and are grateful for, such support. However, the effect of this move towards curatorial control of the documentary program will not only reduce the significance of market forces, but also will stifle entrepreneurship. It is ironic that these draft guidelines were circulated almost simultaneously as Screen Australia's CEO was speaking at the Currency House Arts and Public Life Breakfast and commenting that:

"there is a big difference between the screen sector and pure arts practice. Our sector is big business....But as I said too often the business community tends to see us still as fluffy creatives, too caught up in 'making art' to be commercially savvy let alone business focused. We need to better present ourselves to this end of town and clearly show the business acumen our sector has and the benefits and upside that are possible....I'm here today to tell you we are both: artists and entrepreneurs and that one does not exclude the other."

Television broadcasters still reach the large majority of viewers of audio-visual materials worldwide. As such they are equipped to judge what people want to watch. While productions of cultural/artistic significance should be supported, we believe that the wider audience's needs and interests should remain the key concern in determining funding priorities and as such that marketplace commitment to productions should remain a primary factor in determining what Screen Australia funds.

To conclude, we commend Screen Australia for being prepared to make this a consultative process. But we believe that the proposed guidelines will have a negative impact on a large number of Australian documentary producers and, ultimately, on the audiences we serve and seek to inform and entertain, We urge the Board to ask Management to "go back to the drawing board" and engage in a new dialogue/consultation with the independent production sector to come up with guidelines that genuinely reflect both Screen Australia's charter and set out a better way forward for the industry.

We request an urgent meeting with the Board to discuss in detail our concerns.

Kind regards

Screen Producers of Western Australian (SPWA)

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Jodie De Barros	Leighton De Barros
Aidan O'Byrne	Andrew Ogilvie
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