

Response to published draft documentary guidelines.

A submission by Joost den Hartog, Executive Director AIDC
July 18, 2014

In this document I outline my thoughts in response to the draft documentary guidelines as published by Screen Australia. This submission is made on personal title, and is therefore not to be confused with a submission from AIDC.

Thank you for the opportunity to respond. I hope this submission is conceived helpful.

Since the publication of the guidelines, there has been much debate within the industry. The views are, quite predictably, opposing, and the appreciation for the guidelines differs depending where people are positioned in regards to the recent fault lines within the documentary community.

I would like to offer a neutral view, as I have no association with any of the industry factions in particular, and can therefore comment on the proposed structure from a distanced and non political position.

I commend Screen Australia for starting a much needed debate, and fuelling this debate with high enough stakes to ensure the debate got the attention it deserves. I expect the draft guidelines will not be the final guidelines, but for the purpose of enhancing the rigour of the process, they have worked beautifully.

In this submission, I won't comment on the finer details included in the guidelines. I also haven't been able to assess if forcing producers to choose between using the Producer Offset or PEP is a fair ask. Instead I would like to stick to philosophy behind the guidelines, as I perceive it.

The guidelines express an ambition for more flexibility to enable a more diverse production industry to produce more diverse content. This is a commendable ambition, and something that should be expected from a cultural agency. The only issue is that this needs to be achieved with less funds available for production investment. Therefore, if a version of the draft guidelines comes into play, changes to, what is conceived as, the establishment are inevitable.

I would like to steer away from commenting on who should get which part of the pie. I do want to offer the observation that the draft guidelines facilitate both the industrial and artisan production models, terms I introduced in my response to the discussion paper, in equal measure. This is a great improvement compared to the existing guidelines.

In this submission, I am focussing on the demand side of the industry rather than the supply side to make my argument in favour of increased flexibility in the guidelines. The changes suggested in the draft guidelines are an important step towards future proofing the funding model. For many years, the independent production sector has been lectured about the need to adjust the business models in response to, and to be able to benefit from disruptive market forces brought on by the digital revolution. Until today, to my knowledge, there hasn't been a film or television production company in Australia that has found a sustainable alternative business model to produce high quality Australian screen content outside the traditional financing model which still relies on free to air broadcasters and conventional distributors. By opening the door to alternative distribution platforms, there is an opportunity to invite new players into existing business models, and by doing so, we extend the life of these, previously perceived vulnerable, business models.

I share the concerns SPA has in regards to letting go of the notional allocations entirely. Screen Australia's reply to SPA's concern has been that the expected outcomes of the budget allocation under the new guidelines will be more or less the same as under the existing guidelines. This might well be true, but it doesn't take into account the process of how we reach these outcomes. The

process might mirror previous guideline experiments under the late FFC, that resulted in very unpredictable funding circumstances, and can therefore have severe consequences for the running of, now, successful businesses.

To maintain and solidify the ambition to future proof the funding models, and at the same time not damage an established industry too much, I would like to recommend a phased implementation. This will give Screen Australia the opportunity to carefully monitor the performance of the amended guidelines, and will not provide chaos in an industry structure that was painstakingly achieved over the years.

The proposal to transfer the funding for theatrical docs from the feature film department's responsibility to the documentary department, I conceive as a straight funding cut to documentary funds, and I wonder if this measure is absolutely necessary.

The abolition of the international door leaves very little incentives for Australian broadcasters to engage in international co-productions. Despite the relaxed approach to acknowledge a wider range of international production investment as eligible market attachment, I would be interested to see how this evolves Australia as a desired co-production partner. This is a measure that requires some further modelling.

Thank you once more for the opportunity to engage in this process.