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**Australian Broadcasting Corporation**

Submission to

**Screen Australia**

**Round 2 Draft Guidelines for Comment:  
Documentary Programs**

October 2014



## **Screen Australia's Discussion Paper *Draft Guidelines for Comment: Documentary Programs***

October 2014

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### **Background**

The Australian Broadcasting Corporation (ABC) welcomes the opportunity to comment on Screen Australia's Documentary Funding: Draft Guidelines Round 2 ("the Guidelines") released on 19 September 2014.

The ABC appreciates Screen Australia taking into consideration comments on previous drafts of the Guidelines. The ABC supports Screen Australia's aims to provide certainty and flexibility to broadcasters and industry. The ABC also commends the decision by Screen Australia to reinstate editorial control over content receiving Screen Australia funding has been placed back in the hands of the broadcasters.

The ABC makes the following comments and seeks clarification on the implementation of some aspects of the Guidelines.

### **Allocated funding**

The ABC acknowledges the difficulty of Screen Australia's position in this tight fiscal environment and the need to make adjustments to funding programs. However, the ABC believes the brunt of the budget cuts are being borne by the ABC.

From its current allocation of \$5.25million, the amount guaranteed to the ABC is now \$4.05m. This is an overall reduction of 23 per cent. In addition to this, the ABC previously accessed up to \$2million per annum through the International Door. Under the Guidelines this has been reduced to \$1million (which is contestable). And the ABC's allocated amount is reduced by five per cent from 50 per cent.

In light of this, the ABC would like to confirm with Screen Australia that its earmarked funding of 45 per cent of the total amount is set, not just 'indicative' (as outlined on page 9 of

the draft Guidelines). To this end, the ABC submits the following wording be replaced in the Guidelines:

*These funds will be allocated across broadcasters, with 45 per cent available to projects made for the ABC, 40 per cent for SBS and 15 per cent for commercial broadcasters.*

The ABC believes this level of certainty will benefit documentary makers, broadcasters and, ultimately, audiences.

## **Licence fees**

Given this reduction in overall funding for ABC documentaries of more than \$1million per annum, the ABC believes the increase in the broadcast licence fee to unlock documentary funding by Screen Australia needs to be reviewed. The ABC requires some flexibility on licence fees in recognition that Australian documentary funding sources are generally experiencing reductions and the ABC needs to be able to determine, so as to maintain, appropriate budget levels.

By increasing the minimum licence fee to trigger Screen Australia funding, this runs the risk of increasing budgets across the documentary production sector. This, combined with the context of a climate where the ABC's budget is coming under increasing pressure, will result in an overall reduction in commissioned projects.

Additionally, while acknowledging that licence fees have not increased for some years, the ABC reserves the right to determine Licence Fees as part of its Terms of Trade.

Broadcasters require the ability to apply the agreed licence fee, increase the cash contribution with equity should projects need additional funding, and manage its own resources in commissioning projects. The ABC believes this contributes to the industry's collective effort to keep costs at a minimum which allows diminishing resources to be shared throughout the industry.

## **Funding decisions**

The draft Guidelines advocate funds to be allocated "and/or by a range of companies" (on page 11). The ABC prefers to retain the freedom to accept the best idea whoever it comes from and would ask that this be changed to "reflecting a range of viewpoints" rather than specifying production companies.

Also under 'Investment and slate management' (on page 3), it would be useful to articulate the process under this heading to ensure that it is clear and managed consistently across broadcasters. For example, if it is Screen Australia's intention to meet annually with each broadcaster to get an overview of their programming slate and identify which projects are most appropriate/likely to receive Screen Australia investment, then this process should be explained in the Guidelines.

## Clarification of terms

In addition to these specific comments, the ABC seeks clarification from Screen Australia on a number of elements of the Guidelines:

- The ABC understands that up to \$750,000 can be requested under the Producer program and seeks clarification as to whether any funding granted under the Producer Equity Program (PEP) forms part of the amount granted under the Producer program?
- The draft Guidelines state that documentaries granted funding under the Producer program cannot be an extension of a theatrical release. The ABC seeks clarification on whether this also applies to projects where the producer wishes to make a theatrical release simultaneously or after the broadcast of the project?
- If a project is not granted funding under the Broadcast program, can the same project then be submitted for funding under the Producer program? And vice versa? Can this occur in the same funding round?
- The Guidelines for the programs specifically state that projects that have been developed by a broadcaster and then sub-contracted at a later date to a producer will not be granted finance. The ABC asks for clarification from Screen Australia that this prohibition does not apply when a broadcaster has put a call out for projects on a specific theme, such as the ABC's recent family related projects, as well as *Mental As...*

## Conclusion

The ABC supports Screen Australia in reviewing its funding programs to ensure the best outcome for allocation of funds. It appreciates the essence of the Revised Guidelines and looks forward to Screen Australia clarifying aspects of the Guidelines to ensure the continued investment in quality Australian television documentaries.