



Development Programs
Screen Australia
GPO Box 3984
Sydney NSW 2001

To Whom It May Concern,

Thank you for the opportunity to comment on the Development and Production Financing Programs 2009 Draft Guidelines and to attend the ACT briefing session regarding the proposed guidelines.

In preparing this submission, artsACT consulted with the ACT Cultural Council's film sector representatives. The ACT Cultural Council is the ACT Government's ministerial advisory body on the arts.

artsACT supports the broad aims of the proposal. Screen Australia's objective to promote flexibility for funding processes, a more interactive and inclusive assessment process, providing feedback to applicants and a focus on professional practice would undoubtedly benefit the sector.

However, we are concerned about a number of areas, and these are detailed below.

Development Programs – the idea of 'cultural merit':

artsACT does not support the concept of 'cultural merit' and 'Australian cultural content' as indicators of excellence, quality or success within the context of Australian film. These concepts would limit the scope and production of work, instead they result in work that demonstrates a contrived and mandatory interpretation of Australian culture. Additionally, the self-conscious production of something that is distinctively Australian could potentially inhibit the production of interesting and innovative work. Work made by Australians is by definition part of Australian culture and should instead be supported on merit, based on quality or excellence. The inclusion of restrictive funding criteria encourages exclusion and subjectivity, and greater clarity and definition is needed for what is meant by 'cultural merit'.

Documentary development and financing:

artsACT also considers that the eligibility requirement of three broadcast documentary credits for the Documentary Development Category is restrictive for applicants who come from different film making backgrounds. This is particularly as broadcast credits do not necessarily equate to excellence, experience or audiences, in the field of academia. An example of this would be an internationally celebrated documentary filmmaker who has produced many quality works that have been distributed to a wide audience within the education system, but has not pursued the avenue of television broadcasting. Despite this experience the filmmaker would be ineligible for consideration within the proposed guidelines.

For this reason artsACT recommends greater flexibility and discretionary power for panels within the eligibility criteria and suggest that it is critical that significant equivalent experience and *track record* may also be taken into consideration. This would also better align the category with other program eligibility guidelines such as the Enterprise Program and the Short Animation Category which are more flexible in this respect.

The production financing guidelines propose that applicants applying for financing through both the National Documentary Program and the Domestic and International Documentary Program require television presale. Similarly, artsACT would encourage more flexibility around these criteria to include equivalent industry commitment to reflect the view that television broadcast may not equate to quality, success, or excellence.

Emerging and developing filmmakers:

Whilst artsACT supports the promotion of excellence in filmmaking (indeed in any arts sector), we are concerned that emerging and developing filmmakers may not receive the necessary funding and support that would enable them to become 'excellent'. Furthermore, there does not appear to be sufficient consideration of pathways from *emerging* to *professional*. This is particularly important in small jurisdictions such as the ACT, which cannot sustain a fully fledged film industry and has a predominance of emerging and developing film practitioners. The documents provided do not appear to acknowledge short filmmaking, which can launch the careers of innovative and committed filmmakers.

Should you require further information about the issues raised in this submission, please contact either myself on 6207 2381 or Robert Piani, Program Manager Key Arts Organisations, on 6207 2379.

Yours sincerely

A handwritten signature in black ink, appearing to read 'N. Featherstone', followed by a long, horizontal, wavy line extending to the right.

Nigel Featherstone
Manager- Arts Development
artsACT
ACT Chief Minister's Department

14 November 2008