

**Submission to the  
Australian and Children's  
Screen Content Review**

# Executive summary

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Create NSW appreciates the federal government's attention to this issue and the consultations that are taking place as part of the review. We support the policy objectives articulated in the discussion paper, namely securing quality content that promotes Australian identity and culture, securing quality Australian content for children, and driving more sustainable Australian content industries.

The NSW Government recognises that a sustainable and vibrant screen production sector in NSW is important for the health of the industry nationally. In 2016/17 Create NSW production finance and incentives leveraged \$315 million in NSW production expenditure and supported over 7,600 jobs in front of and behind the camera.

In recognition of this, and the potential for growth in new and traditional platforms, the Government recently allocated additional funding of \$20 million to Create NSW over two financial years (2016/17 and 2017/18) to support domestic TV drama production and to attract significant international productions.

The screen industry around the world is founded on government incentives, subsidy and local content regulation. However, it is not a failing industry but a dynamic and rapidly evolving one that brings significant economic and cultural benefits.

The broad set of federal policy settings – quotas, subsidy and tax incentives – have underpinned Australia's world class screen industry and ensured Australian audiences have access to Australian content, particularly in the vulnerable genres of feature film, TV drama, children's drama and documentary.

These genres continue to be the most likely to fail in the absence of government support. They remain by far the most costly to make and, despite their popularity with Australian audiences, are the most vulnerable to replacement by cheaper imported programming that has recovered all or most of its costs in its home market. Children's drama remains the most vulnerable because of limitations on the advertising revenue it can attract.

The current policy settings are under pressure due to changes in viewing patterns, an increase in online distribution and the entry of new players not subject to the same regulation as existing broadcasters. Even so, prime time scheduled viewing still has significant cultural impact. The free to air spectrum, as acknowledged in the discussion paper, remains a public good with Australian content obligations attached.

There are strong cultural and economic arguments for a continuing obligation on the commercial networks to commission Australian and children's content. There may be a case for shifting to an expenditure model, particularly for children's drama, with a contestable fund to which all players agree to contribute. Create NSW is mindful though of the ratchet provisions in the Australian-United States Free Trade Agreement and supports the retention of quotas until a clear alternative system is in place.

We would welcome the opportunity to engage with any specific alternative models of regulation. It would be helpful to see any detailed proposals, with economic modelling of the impacts on commissioning and production levels. The Government should closely monitor developments in other territories around regulation of streaming services and consider whether similar requirements could be imposed in Australia.

In the meantime, there are several reasons to increase the television rate for the Producer Offset to 40%. An increase would acknowledge the growing cultural impact of television content and would make the commissioning of Australian content more affordable for the networks, which are facing significant pressures due to competition from unregulated new entrants. It would also provide an incentive to the streaming services to produce original Australian content and would assist those features that are more suited to an online release.

While there is a strong case for equalisation of the offsets for feature films and television, a commitment to increasing any part of the support system should not entail a decrease in any other part.

International production remains an important part of the overall ecology, as local production alone cannot sustain a critical mass of infrastructure, facilities and crews. Yet Australia faces strong and increasing competition from other jurisdictions offering generous incentives. There is a compelling case for increasing the Location Offset to 30%. The practice of 'topping up' the federal incentives to 30% on a case by case basis further demonstrates the case for a permanent change. The ad hoc system acts as a disincentive to international producers because of the uncertainty and the time required for a decision.

The Post, Digital and Visual Effects (PDV) Offset has worked well but needs to be 'decoupled' from the Location Offset to encourage physical filming projects to also do the PDV work in Australia. The legislation should be amended to ensure streamed content is eligible for both the Location Offset and the PDV Offset.

# 1. Introduction

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Create NSW is a new integrated government agency bringing together Arts NSW and Screen NSW to support the arts, screen and culture sectors. The agency formally came into existence on 1 April 2017.

Create NSW welcomes this review of Australian and Children's Screen Content. The inquiry is very timely, given the transformations in the sector which offer unprecedented disruption, due to audience fragmentation and new market entrants, as well as significant opportunities.

We welcome the recognition in the discussion paper of the cultural and economic value of diverse Australian content and the importance of a strong domestic production sector.

## 2. Create NSW support for the screen industry

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Create NSW provides support to feature films, adult and children's drama and narrative comedy, including web series, factual and documentary television or web programs, and creative interactive screen projects. The agency's programs cover development, production, regional filming, market travel, industry and audience development and international production attraction.

NSW is the leading Australian state for film and television production. In 2015/16 expenditure on drama production (features and TV drama) in NSW reached \$463 million, representing 55% of all drama production expenditure in Australia, and NSW companies generated 71% of national production. NSW is particularly strong in the PDV sector accounting for 60% of national expenditure.

In recognition of the industry's economic and cultural benefits, the NSW Government allocated additional funding of \$20 million to Create NSW over two financial years (2016/17 and 2017/18) for the attraction of significant international production and domestic TV drama production. This includes a Made in NSW TV drama fund which supports production with the potential to travel internationally, reach new audiences by premiering on digital platforms, and play to large audiences via traditional media outlets. The focus is on event TV with a prime-time slot on Australian free to air, subscription and online platforms and the potential for returning series. The fund has supported new series of the top rating *Love Child*, *Janet King*, *Rake* and *Doctor Doctor*, along with the *Wake in Fight* mini-series and *The Fighting Season* from the producers of *Cleverman*.

The \$20 million fund also supports incentives for footloose international production and high value, standalone, post production and visual effects projects in recognition of the employment, skills and technology transfer provided by these types of projects. The fund has already supported 16 new local drama projects and large-scale international productions such as the Animal Logic/Sony movie *Peter Rabbit*.

In 2016/17 Create NSW production finance and incentives leveraged NSW production expenditure of \$315 million and supported over 7,600 NSW jobs in front of and behind the camera.

While support from state governments is a crucial part of the funding landscape, it is the federal system of interlinked quotas and subsidies that underpin the Australian production sector and enable Australian audiences to have access to quality local content.

### 3. Response to specific questions

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#### **Are the policy objectives and design principles articulated in the discussion paper appropriate?**

Create NSW welcomes the policy objectives articulated in the discussion paper, namely securing quality content that promotes Australian identity and culture, securing quality Australian content for children, and driving more sustainable Australian content industries. Create NSW also supports the design principle that, as far as possible, market solutions and competition should be harnessed to deliver these policy outcomes.

The policy goals of simplicity, platform agnosticism, flexibility and future proofing are appealing. In the short-term though a one size fits all approach may not be achievable. Further, it may not be possible to entirely future proof any revised system of regulation and subsidy in view of the rapidly changing environment and the still fluid evolution of regulation in other territories.

#### **What Australian content types or formats is the market likely to deliver and/or fail to deliver in the absence of Government support? What types of Australian screen content should be supported by Australian Government incentives and/or regulation?**

The screen industry around the world is founded on government incentives, subsidy and local content regulation. However, it is not a failing industry but a dynamic and rapidly evolving one that is constantly innovating and brings significant economic and cultural benefits.

The current broad policy settings of quotas, subsidy and tax incentives have been pivotal in building Australia's screen industry, with its world-class talent, companies and facilities. These interlinked support mechanisms have also ensured that Australian audiences have access to Australian content, particularly in the genres that have been recognised as most vulnerable: notably feature film, TV drama, children's drama and documentary.

However, tax incentives and subsidy have never been sufficient to guarantee that commissioning of these genres will occur. The quotas have been essential because of the high cost of those genres. According to the most recent ABS screen industry survey<sup>1</sup> the average cost per hour of drama, children's drama and documentary was \$645,700, \$476,100 and \$230,000 an hour respectively. By contrast, the average cost per hour for news and current affairs was \$11,900, with light entertainment and variety costing \$91,900. News and current affairs represented 57% of produced hours but only 23% of total costs, whereas drama represented 0.6% of hours but 13% of costs.

Prime time quality Australian drama can cost a commercial broadcaster close to \$1 million an hour because the broadcasters generally contribute substantial equity in addition to the minimum hourly licence fee of \$440,000 required by Screen Australia. This can be anywhere between four and ten times the cost of its imported equivalent, which has invariably recovered all or most of its costs in its home market.

#### **TV drama**

While Australian drama is popular with audiences and rates well, imported drama from other English speaking countries can be licensed at a fraction of its cost. The commercial networks' business imperative is to attract advertising revenue at the lowest possible cost. If they can secure the same advertising with much lower cost imported programs, then they are obliged by their business model to do so.

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<sup>1</sup> *Survey of film, television and digital games*, Australian Bureau of Statistics, Cat no 8679.0.

Quotas have therefore been instrumental in building a sustainable local drama industry. Compliance figures contained in the review consultation paper<sup>2</sup> show that the commercial networks do not exceed the sub-quotas for drama, scoring 1-3% above their three- year points requirement. This indicates that regulation underpins the current levels of commissioning.

In recent years the Australian industry has followed the international trend and begun to produce series and mini-series with much higher production values, and more complex and sophisticated stories, attracting our leading writers, directors and actors. Channel Ten's *Wake in Fright* attracted the formidable directing talent of Kriv Stenders. Our dramas are increasingly receiving international attention. The ABC series *Cleverman*, for example, sold to the Sundance Channel and was invited to premiere at the prestigious Berlin International Film Festival. *Glitch* is being distributed globally by Netflix. Foxtel's *The Kettering Incident* sold to Amazon and *Top of the Lake Season Two* was produced for BBC2 and a range of international partners.

Ironically, this success has occurred at a time when overall audiences for free to air television have been declining, albeit not as sharply as some had prophesised. Free to air television retains by far the major audience share and is still the largest contributor to the financing of Australian TV drama. These programs have the potential to travel internationally but are still competing with international projects such as *Game of Thrones* and *The Crown* with significantly higher budgets. This is an area with growing economic and cultural potential that will nevertheless not occur without continued government intervention.

The ABC is the leading commissioner of Australian drama and the sustainability of the sector is dependent on adequate funding for the national broadcaster and consistent levels of commissioning.

### Children's drama

Australian children's drama allows children to see themselves and the world in which they live reflected on screen. The genre has proven to be the most exportable, however it still requires a local broadcast commission as a base. It remains the most vulnerable because it is expensive to make and there are limitations on the advertising revenue it can attract. The ABC has played a critical role in commissioning and broadcasting Australian children's drama but its support is inconsistent and has declined in recent years. We note that all the commercial networks have made submissions to the *Parliamentary Inquiry into Film and Television*, calling for the abolition of children's quotas.

To further illustrate the genre's vulnerability, the UK government removed children's quotas in 2003, leading to a 93% fall in spending by commercial channels and a concentration of children's programming on the BBC children's channels. The British government has now given its communications regulator, Ofcom, the power to impose children's content requirements on broadcasters amid concerns a generation of children are growing up watching repeats and foreign imports.<sup>3</sup>

### Documentary

Successive Australian governments have supported Australian documentary through a mix of quotas and subsidy. This is in recognition of their cultural value coupled with market failure. The documentary sector faces similar challenges to the drama sector. Achieving a cinema release is challenging for theatrical documentaries. The bulk of the commissioning of television documentaries is by the national broadcasters and much of this is also supported by Screen Australia, making the genre vulnerable to reductions in funding.

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<sup>2</sup> *Australian and Children's Screen Content Review, Consultation Paper*, August 2017, p7.

<sup>3</sup> *Broadcasters to be forced to invest more in British-made children's TV programmes*, Telegraph, 17 April 2017.

## Australian feature films

Successive governments have also long recognised that for Australians to hear their own accents, see their own landscapes and tell their own stories on our cinema screens, government support is required.

It is no secret that the evolving distribution landscape poses challenges for Australian feature films. These were canvassed in Screen Australia's 2015 report *Issues in Feature Film Distribution*.<sup>4</sup> Audiences are more fragmented. The number of films released each year has increased, leading to a crowded marketplace. Studio films are exerting ever more dominance over exhibition screens. There is pressure for films to perform at the box office within the first week. And there is a diminishing appetite to pay for content with the subsequent rise of piracy and loss of revenue.

At the same time, the 40% Producer Offset for features has been instrumental in enabling internationally renowned Australian directors to produce large budget studio financed films at home, and recent Australian features, such as *Mad Max: Fury Road*, *Hacksaw Ridge*, *Lion* and *The Sapphires*, have performed exceptionally well at the box office and secured critical recognition internationally. Without the 40% Producer Offset, the large budget Australian features are unlikely to be financed by the US studios and we would expect to see a dramatic reduction in the overall features slate.

## International production

International production is an important part of the overall ecology, as local production alone cannot sustain a critical mass of infrastructure, facilities and crews. Australian companies such as Animal Logic, Rising Sun and Illoura are renowned for their cutting-edge work in the PDV area, around 60% of which is based in NSW. In view of the rise of incentives in other jurisdictions and the still relatively high Australian dollar this sector would not be sustained without continued government incentives.

## **The current system of support for screen content involves quotas, minimum expenditure requirements, tax incentives and funding. What are the strengths and weaknesses of the current system? What reforms would you suggest?**

The current system of Australian content regulation and subsidy (including the Australian Screen Production Incentive) has largely worked well but various elements are now under pressure due to the changing environment: changes in viewing patterns, an increasingly crowded marketplace, the entry of new players not subject to local content regulation, and more predictable and attractive incentives for footloose production from other jurisdictions.

## Australian content quotas

The system of Australian content quotas, particularly the sub-quotas for adult drama, children's drama and documentary, has worked, alongside subsidies of various kinds, to build a world-class industry.

One benefit of quotas is that they do not involve a direct cost to the taxpayer and are not subject to the vagaries of fiscal policy. They fulfil the cultural imperative insofar as they ensure that Australian content is screened in prime time. While the prime-time slot may be of decreasing relevance in the catch up and streaming environment, prime-time scheduled viewing still has significant cultural impact.

The structure of the adult drama quota provides a degree of flexibility insofar as the networks can choose whether to achieve compliance through long running serials or a smaller number

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<sup>4</sup> *Issues in Feature Film Distribution*, Screen Australia, 2015



of mini-series hours, with the networks screening between 104 and 165 hours last year depending on their chosen mix.<sup>5</sup>

The children's drama quota, being entirely volume based, has been more problematic in recent years as live action programming has been largely replaced by lower cost animation. Much of this content is produced as international co-productions with lower cultural relevance than live action and lower licence fees than the Screen Australia minimum. Animation also benefits from access to the 30% PDV Offset, whereas live action is only eligible for 20%, an anomaly that would be solved if the Producer Offset were increased to 40%.

Create NSW is sympathetic to the problem that the entry of exempt services reduces the protection for traditional broadcasters and hence the revenue pool available to continue commissioning and broadcasting Australian and children's content. However, there are strong cultural and economic arguments for a continuing obligation on the networks to commission this content. The abolition of broadcast licence fees should help to mitigate the financial pressures on the networks.

An expenditure model with a contestable fund to which all players agree to contribute may be worth considering. We note this is one option that has been raised for children's content and we believe this is preferable to the more limited diversity that may result from concentrating all children's commissioning with the ABC.

We would welcome the opportunity to engage with any specific alternative models of regulation. It would be helpful to see any detailed proposals, with economic modelling of the impacts on commissioning and production levels. Create NSW is mindful of the ratchet provisions in the Australia-United States Free Trade Agreement and supports the retention of quotas until a clear alternative system is in place.

We note that the European Parliament is proposing to increase the current local content requirement from 20 per cent to 30 per cent and to apply it to SVOD services such as Netflix, while also allowing member states to impose minimum expenditure requirements.<sup>6</sup> Create NSW suggests that the Government closely monitors regulatory developments in other territories and considers whether similar requirements could be imposed in Australia for streaming services of a certain size, perhaps coupled with a contestable fund.

In the meantime, close to 22% of the aggregate first release drama quota hours across the networks are being filled by New Zealand programming,<sup>7</sup> which counts as first run Australian content because of the Australia-New Zealand Closer Economic Relations treaty, even if it has already aired in NZ. An amendment to the Australian Content Standard to allow NZ programs to count only for their first run in Australasia would seem logical. However, any such change needs to be considered in the context of the continued viability of the commercial networks. Other measures such as an increase in the Producer Offset for television and increased funding for Screen Australia would assist the commercial networks to meet their obligations without resorting to low cost NZ imports.

### Producer Offset

Over the last five years, the Producer Offset has supported 84% of the total drama slate and 99% of the features slate<sup>8</sup>, figures that underscore its central importance in the current funding landscape. The Producer Offset has been an undoubted success, allowing producers to build capital in their businesses and, as noted above, allow our high-profile

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<sup>5</sup> *Compliance with Australian Content Standard and Children's Television Standards*, Australian Communications and Media Authority, March 2017, p2.

<sup>6</sup> *The Audiovisual Media Services Directive (EU)*, European Parliament, 2017.

<sup>7</sup> *ACMA Questions on Notice – Blue Sky Case*, Public Hearing Canberra 16 June 2017, Supplementary Submission

<sup>8</sup> Five year summaries contained in *Drama Report*, Screen Australia, 2015/16.



directors to produce large budget features at home. However, content made for streaming services was not contemplated when the offset was introduced a decade ago. There are now several reasons to increase the Producer Offset beyond the current 20% for non-theatrical projects

An increase would acknowledge the growing cultural impact of television content and would make the commissioning of Australian content more affordable for the networks, which are facing significant pressures due to competition from unregulated new entrants. It would provide an incentive to streaming services to commission original Australian content. It would also address the dilemma that some feature films, more suited to online distribution, must first have a theatrical release to secure the 40% Offset.

While there is a strong case for equalisation of the offsets for feature films and television, we would be concerned at any move to achieve this by reducing the level for feature films, given the current challenges facing the features sector.

### Location Offset

Australia faces strong competition from other jurisdictions offering generous incentives – notably Canada, the UK and individual American states. The Hollywood studios are the key to attracting large-scale productions to Australia. Their executives are well versed in the incentives available around the world and if a territory is uncompetitive it is no longer costed as a potential location.

The NSW Government has provided an estimated \$68 million in incentives over the past decade, supporting over \$1.4 billion in NSW production expenditure.<sup>9</sup> On occasions, the State has provided higher incentives to compensate for the exchange rate and international competition. But even when topped up by generous state incentives, the Location Offset at 16.5% of Qualifying Australian Production Expenditure is no longer internationally competitive, which is explicitly acknowledged in the ‘top ups’ provided by Treasury. Create NSW appreciates these ‘top ups’, which have been critical to securing productions such as *Alien-Covenant*, *Aquaman*, *Unbroken*, *Pirates of the Caribbean* and *Wolverine*. However, in our experience the arrangement does not make for certainty or a timely response in a situation where studios need to make decisions within a tight timeframe. NSW recently pitched for a substantial project that was lost to a US state with an automatic 30% offset on offer.

Given these circumstances, there is a compelling case for creating certainty by increasing the Location Offset to 30%. The federal government has accepted that there is an additional cost to revenue required by providing regular top ups over the past five years. There is scope to grow the sector by attracting a share of the growing volume of footloose television and streaming drama. However, given the limited number of facilities and A-list crew, there will still be a natural cap on the number of international productions which can be accommodated in any year, and hence a natural cap on revenue foregone. On balance, the benefits of investment for NSW far outweigh the costs. This includes the benefits of knowledge exchange and training for local practitioners.

If Treasury still has concerns about an unpredictable cost to revenue, a possible solution would be to continue to provide top-ups through a fund, with projects assessed for eligibility against explicit guidelines or to introduce a total cap on expenditure. Noting however that these mechanisms would limit the benefits of investment and continue to impose a level of uncertainty.

### PDV Offset

The PDV Offset at 30%, coupled with top up incentives from the states, has been very effective, attracting high profile projects to NSW such as the *Lego* movies. There are,

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<sup>9</sup> Create NSW, internal records of *Film and Television Industry Assistance Fund* and *Made in NSW*.

however, anomalies. If a production has a Location Offset certificate it is not eligible for the PDV Offset on the PDV portion of the budget, which creates obstacles for local companies bidding for this high value added PDV work on physical filming projects.

To resolve this, the Location and PDV Offsets need to be decoupled, though this issue would not arise if the Location Offset was raised to 30%. Further, we understand Ausfilm has received advice that, although streamed content is eligible for the Producer Offset, it is not eligible for the Location and PDV Offsets due to the current wording of the *Income Tax Assessment Act, 1997*.<sup>10</sup> Australia risks missing out on attracting this burgeoning area of production. Create NSW is keen to see this anomaly rectified so that both the Location and PDV Offset are available for streamed content.

### Direct funding

Equity investment and grants from Screen Australia and state agencies are generally still needed for many projects to complete financing. Given Screen Australia is a co-investor in most projects supported by Create NSW, a well-funded federal agency is very important to NSW.

One benefit of having screen agencies involved is that they can examine factors such as readiness of the script, quality of the financing deal, viability of budget and potential audience. They can also mandate minimum license fees in funding guidelines, as Screen Australia does, and support producers in other aspects of deal negotiations. This is significant, given declining licence fees and erosion of deal terms is a common complaint from producers. Direct funding remains an essential part of the funding landscape, it would be of concern if any improvements to indirect funding resulted in further reductions to Screen Australia funding. The agency's budget has been reduced significantly in recent years. This was initially accommodated by cuts to staffing and overheads but is now impacting on program funds. This makes it harder for the producers to complete financing in an environment where broadcast licence fees have also been reduced. Screen Australia funding needs to be at a level which is adequate to sustain and grow the industry.

### National broadcasters

Both the ABC and SBS are important partners for Create NSW. Recent collaborations with the ABC include co-financing of the latest series of *Rake*, *Doctor Doctor* and *Janet King* and the Arts Documentary Feature Fund, and with SBS, the new drama series *Dead Lucky*, and culturally significant documentaries such as *In My Own Words*.

The national broadcasters make an indispensable contribution to the investment pool for Australian and children's drama and documentary. Having a healthy and predictable allocation for commissioning is essential to the production of adequate levels of quality Australian content and a sustainable production sector. The ABC needs to increase its commitment to these genres and to do this it needs to be adequately funded. Given there is precedent for the government providing 'tied funding' for both drama and children's content, the review may wish to give consideration to this option.

### **What types and level of Australian Government support or regulation are appropriate for the different types of content and why?**

Subsidy, whether direct or indirect, provides the major support for feature films because the broadcasters now rarely contribute presales. For television drama and documentary, a mix of Australian content regulation and subsidy remains appropriate, and this mix could be considered for the SVOD services.

### **What factors constrain or encourage access by Australians and international audiences to Australian content?**

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<sup>10</sup> Ausfilm submission to *Parliamentary Inquiry into Film and Television*, P15.

Australian content faces constraints insofar as it is required to compete in an increasingly crowded marketplace. A common complaint is the short runs that local feature films receive in the multi-plex environment, which are often too brief for word of mouth to work. A large amount of English language product is competing for the attention of international audiences. Content distributed online faces some 'discoverability' challenges although audiences that regularly consume content online are practised at discovery.

The screen agencies already provide support for attending international festivals and markets, and where appropriate, engaging digital marketing experts. Finding the right strategy for each project is important as some that work in the domestic market do not have international appeal, and vice versa, while some that do not work theatrically take off online. The success of *The Dressmaker* in building a large Australian audience through a savvy marketing and release strategy is a useful case study that has been shared.<sup>11</sup> Other notable successes could be similarly documented. Screen Australia's online market intelligence has been an invaluable resource for the sector and is to be commended.

### **What would the Government need to consider in transitioning to new policy settings?**

The commercial networks' commissioning and production has largely underpinned the production sector. The content sub-quotas provide an important safety net for the production sector. Quotas effectively impose an artificial demand on commissions for local production. Relaxing the current regulations without an effective replacement is a high-risk strategy. The Government needs to consider continued industry viability during any transition period, being mindful of the ratchet provisions in free trade agreements, which may preclude reintroduction of mechanisms once they are reduced or phased out.

### **Is there anything else that you would like the Government to consider that has not been addressed in your responses already?**

We note that the Commonwealth's 2015 review of the Entertainment Visa remains unresolved. The current guidelines covering the employment of foreign actors in film and television are outdated and do not reflect the realities of the international marketplace. Distributors and sales agents increasingly look for high profile international actors. While Australia now has many actors with the required profile, they are frequently working in Hollywood and unavailable. Create NSW would support reforms that make it easier for our producers to raise international finance and for international producers to do business in Australia.

The Commonwealth announcement on 18 April 2017 that the Temporary Work (Skilled) (subclass 457) would be abolished and replaced with a new temporary skill shortage visa is of some concern. The changes are likely to impact on visual effects (vfx) companies, which need to bring in workers to supplement their workforces. These companies do invest a considerable amount in training. Animal Logic for instance has set up a graduate of Animation and Visualisation program with UTS. But significant skill shortages persist in certain categories.

There is uncertainty about the list of occupations that are eligible for the new visa and whether digital production is covered. The period has been reduced from four years to two years with one renewal, which reduces certainty. The mandatory labour market testing, details of which are yet to be announced, taken with mandatory police checks and English language testing, could cause delays and impact on the agility of the companies in bidding and securing high value work. Create NSW urges the Commonwealth Government to consult with the sector to ensure that the occupation list reflects current skills and demand and to explore appropriate alternatives to the above tests.

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<sup>11</sup> *Screen Forever 2016: the true story about financing The Dressmaker*, Screenhub, 26 November 2016