Griffith Film School Submission to the Australian and Children's Screen Content Review

Preamble

This is a timely and necessary inquiry into Australian screen policy. As technology and surrounding cultural formations change, so do consumption habits, revealing the rigidity of current policy frameworks. In general, this submission argues that the policy review should consider: broadening the definition of screen content to encompass emerging platforms and formats; supporting screen content at the distribution and exhibition level to ensure greater visibility for Australian screen content; and providing targeted support to early career practitioners to ensure long-term sustainability for the industry.

It is important that existing support and quotas are maintained in future policy. Some current initiatives of particular value include:
- Interventions by public broadcasters into the online space, including iView and SBS On Demand, which make Australian content accessible to wide audiences
- Direct funding and tax incentives targeted across all stages of the production process, including development, production, post-production, and marketing
- Promotion of new talent on non-traditional platforms, such as in the Skip Ahead and Fresh Blood initiatives for Youtube and iView respectively
- Broadcast quotas for Australian children's content, documentary, and first-run drama
- A commitment to screen diversity in terms of audiences, content, and practitioners as seen in support for Indigenous filmmakers and the Gender Matters initiative

Are the policy objectives and design principles articulated in the discussion paper appropriate? Why do you say that?

The policy objectives and design principles articulated in the discussion paper are broadly appropriate. However, a lack of interrogation of some of these principles results in conceptual limitations that may impede the translation from principle to policy. For instance:

Platform agnosticism. Platform agnosticism is an important objective considering the rapid transformations taking place in how screen media is distributed and consumed. However, true platform agnosticism will take the significant differences between platforms into account, with different standards and values appropriate for different mediums. For instance, the producer offset currently privileges certain platforms in multiple ways:
- Providing a 40% rebate for feature films and only 20% for other formats
- Requiring that feature films receive cinema exhibition
- The $500,000 drama and $250,000 documentary per hour QAPE threshold

In particular, expenditure thresholds particularly represent an implicit way that policy focuses on traditional platforms at the expense of emerging ones. Furthermore, measuring expenditure per hour is inappropriate for interactive and non-linear screen works, which should be eligible for the same kinds of support if true platform agnosticism is to be achieved. A more appropriate mechanism would instead consider thresholds in terms of overall impact, which would take expenditure, potential audience reach, and the degree to which the work achieves cultural objectives into account.

Benefits that outweigh costs. "Public benefit" is a difficult term to quantify. Setting up a direct comparison between benefit and costs implies a monetary value can be applied to all

desirable benefits. The vast spectrum of opinion on different forms of cultural value makes this task insurmountable. A more useful approach would be to identify desirable benefits that screen policy ought to work towards, such as encouraging content aimed at audiences the market neglects, producing critically evocative work that contributes to Australia's international reputation for high-quality production, and encouraging innovative, experimental and unconventional stylistic and narrative approaches that expand the aesthetic breadth of Australian screen works. This would provide clarity to screen practitioners and ensure the more intangible benefits are not disadvantaged.

Sustainability. A sustainable industry should be central to Australian screen policy. It is therefore appropriate that it should be identified as a core policy objective in the discussion paper. However, there is no acknowledgement in the discussion paper of the role of nurturing emerging and early career talent has in ensuring a sustainable industry. This is a significant oversight, and any screen policy seriously intended to achieve sustainability must consider approaches to assisting early career practitioners become established. This has particular relevance as the generation that established many of the institutions and policy frameworks of the current Australian screen industry moves toward the end of their working life.

In general, it would be valuable to make these policy objectives and design principles more expansive, providing more strategies and scope for content creators to access financial and production support ad screening platforms for all types of screen media. The principles need to incorporate various forms of viewing content now available, such as interactive content, apps, etc., rather than just traditional television and linear formats. The principles also need to ensure that they are not limiting the potential for the work to be globally accessible.

What Australian content types or formats is the market likely to deliver and/or fail to deliver in the absence of Government support?

A lack of government support would be a major hindrance to numerous content types that offer important cultural and industry benefits. Children's content is an obvious example. It is essential that public policy support the production of a variety of children's content suitable for a range of ages and consumption platforms. Left to the market, content would be targeted to children as consumers, neglecting the important educational and cultural role content for that age group plays. To achieve this, the ABC must be adequately supported and able to commission and distribute high quality original Australian content for child audiences across its platforms, including online and subsidiary digital channels. The ABC charter should include a commitment to children's content to reinforce and protect this role.

Public support also plays an important role in ensuring diversity in screen content, providing a platform for practitioners of all backgrounds to reach audiences who may otherwise be neglected by the market. The thirty-year acknowledgement of the need to support Indigenous filmmaking demonstrates the long-term benefits that can come from this targeted approach. It has established an industry context in which practitioners such as Rachel Perkins, Warwick Thornton and Ivan Sen can overcome the many structural barriers that lead to a culturally homogeneous industry. In doing so they have demonstrated the capacity for their work to reach global audiences through festival and specialist cinema distribution networks. In television, similar global audiences are viewing *Cleverman*. These productions ensure diverse screen representation domestically as well as improving Australia's international reputation. They exist due partly to dedicated and consistent support for Indigenous screen production over a period of decades. Policy promoting diverse screen content and practitioners should

therefore consider long-term objectives, creating an industry environment where these works can thrive. Initiatives like Gender Matters and organisations like SBS are an important part of creating this environment and ensuring long-term viability of diverse screen works.

Content produced for online distribution faces different challenges requiring different policy approaches. Though it is easier than ever to produce and upload screen content, Australian works must compete for attention with the vast array of content produced internationally. For online content, policy should be targeted at creating greater visibility for Australian screen content.

Interactive storytelling is a problematic gap in current policy approaches. Screen convergence is a significant component of contemporary screen production, with different platforms, formats, and viewing practices being brought together through technological, cultural and social changes. Despite some initiatives at the state level supporting innovative interactive and non-linear screen works, there has been a notable lack of support at the national level following the disbandment of the Australian Interactive Games fund. Any contemporary screen policy framework that intends to support the industry through the current and future technological and social changes to viewing habits must have a less rigid definition of what constitutes a screen work, recognising the important role of user participation in digital content consumption.

Finally, early career practitioners face numerous structural barriers for entry to the industry. Resources targeted towards easing some of those challenges have greater potential for long-term benefit, as they improve the health and viability of the industry generally. Entry-level opportunities generate market viability for individual talents in their later careers, encouraging industry growth. Early career practitioners are also more willing to experiment, establishing new cultural conventions and driving important creative and artistic development. One important initiative that supports these practitioners is the decision to make any Screen Australia contribution of $500,000 or less a grant rather than an investment. Small grants requiring less oversight provide opportunities to experiment and establish exciting new directions for screen production in Australia.

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?

Many of the current support mechanisms for Australian screen content make valuable and important contributions to the industry. Market and tax incentives such as the producer offset provide flexibility for practitioners in terms of content, with broad, transparent criteria based on production circumstances. The producer offset should be made platform neutral, however, with equivalent rebates offered for online, television, and feature film. The expenditure threshold should also be lowered, since at its current level it implicitly excludes most online content, which tends to have a lower budget.

Quotas for television are useful, but with the increasing shift to video-on-demand services like Netflix, it is essential that new policy settings consider how similar objectives might be achieved on those platforms. Though there are precedents for quotas applied to streaming services, with European quotas set at 30% of the total available content, the non-linear, on-demand nature of these services results in a challenge to the effectiveness of such quotas.

Any quota must be further supported by legislation that ensures Australian content receives an appropriate degree of visibility on the platform.

Traditionally, the main gap in Australian screen policy has existed in distribution and marketing. The unique challenges posed in the transition to incorporate the online space into policy provide an opportunity to develop innovative policy frameworks responding to that gap in new ways. For instance, in developing appropriate quotas for online streaming platforms, consideration needs to be given to ensuring that Australian content is visible. To do so, Australian works need to be embedded naturally and prominently in the browse function of any streaming application. Rather than grouping all Australian content together, it needs to be threaded throughout the various categories the streaming services group their content into. Within these categories, Australian content should be prominently positioned and required to be so as part of securing government support or fulfilling quotas. In this way, audiences will discover Australian content through their normal browsing and viewing practices, rather than having to actively seek it.

Streaming also provides an opportunity to provide a platform for short films produced by early career filmmakers. These works typically struggle to reach wider audiences, focusing on narrow festival windows and, rarely, television broadcast. Nevertheless, many of these works deserve a wider platform. Online infrastructure offering an outlet for short, independently-produced films, including those produced in film schools, would both give these films visibility and provide a way for early career filmmakers to demonstrate their talents.

What factors constrain or encourage access by Australians and international audiences to Australian content? What evidence supports your answer?

When it comes to domestic audience access to Australian content, the most important criteria are choice and visibility. Australian content should be accessible across multiple platforms assuming its format is not platform-specific. Digital distribution infrastructure is an important part of making content available across digital devices such as smart TVs, smart phones, and computers. Young people and children are increasingly moving to these devices for consuming screen media, a migration that the BBC is responding to with an increase in funding for children's content explicitly targeted for consumption online[1]. Policy changes will need to consider the changing consumption habits, especially of young people.

Marketing is another factor that contributes to Australian audiences accessing Australian content. The prevalence given to Australian television drama due to quotas and minimum expenditure has been an important factor in ensuring Australian television drama maintains a competitive audience share. However, in choice-driven exhibition platforms such as cinemas and online, visibility is not a natural result of prime-time broadcast, instead relying on marketing and exposure. New screen policy that intervenes in this area, encouraging and promoting innovative marketing strategies or providing support for Australian content in other ways would contribute significantly to Australian content on these platforms reaching Australian audiences.

Although the new commercial video on demand service OzFlix provides a valuable online repository for Australian films, its pay-per-view fee structure and orientation toward pre-

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[1] http://www.bbc.co.uk/mediacentre/latestnews/2017/bbc-investment-childrens

existing fans of Australian cinema makes its use as a tool for accessing new markets limited. There is also a need for an expansion of screen culture and education online, a role that the website Australian Screen Online is well-positioned to fill. Making historically and culturally significant Australian films available for streaming through that service, accompanied by educational notes, would make an important contribution to establishing an accessible Australian screen culture online. This is important archival work that is unlikely to be supported solely by the commercial market.

One challenge Australian productions face reaching international audiences is the language barrier. This can be especially problematic for children's content. Animation is well-placed to circumnavigate some of these challenges due to the greater ease of dubbing. Screen policy should take advantage of the opportunity animation offers to overcome language barriers and reach a wider international market. However, this should not be to the detriment of the more expensive original high quality live action Australian drama for children. It is concerning that ACMA reports indicate a significant drop in live action children's drama being submitted for classification between 2015–16, as it suggests a drop in the diversity of children's content.

Also specific to international audiences, the practice of geo-blocking the viewing of Australian content on broadcasters' online On Demand sites such as ABC iView limits the material to only Australian audiences. The apparent benefits and commercial ramifications of this practice need to be considered against the cons of preventing international audiences from seeing this material.

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

Current policy settings encourage a geographic concentration of screen production in metropolitan areas, especially Sydney and Melbourne. This is especially true in broadcast, where studio production centralises most production opportunities. Improved communication infrastructure provides an opportunity to decentralise production and ensure regional and rural representation in the industry milieu.

The Enterprise funding initiative plays an important role in helping established screen production businesses develop sustainable practices and grow their operations. Their growth often results in opportunities to collaborate with international businesses. This is a desirable outcome, bringing Australian involvement to major international projects. However, the recent acquisition of Playmaker Media by Sony Pictures Television raises questions about how to ensure the long-term economic and cultural benefits of the Enterprise funding initiative remain in Australia. As local businesses grow, screen policy needs to ensure that this growth does not result in them becoming simply an Australian arm of an international company. Finding ways to retain the talent and business infrastructure, ensuring Enterprise funding goes to sustaining Australian businesses that collaborate on equal footing with international partners, but continue to be primarily marked by producing Australian content for local and international audiences.

Closing Remarks

Australia has a rich screen history and the potential to take advantage of future opportunities emerging from social, cultural and technological changes. It is important that policy is developed that is flexible enough to deal with changes to production processes, audience

demographics and viewing habits, and political developments. We would welcome the opportunity to address the committee during its deliberations.

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