



TELLING CANADIAN STORIES

Review of the Feature Film Policy
By the Standing Committee
On Canadian Heritage

Submission by

The Canadian Conference of the Arts

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Executive Summary

1. The Canadian Conference of the Arts (CCA) is Canada's oldest and largest arts advocacy organization. Canada's national cinema must reflect Canadian views, values and experiences with meaningful access to Canadian audiences. Exposure of our films to foreign audiences is also important to project Canada internationally, as well as providing revenues to film producers.
2. The ecology of the film industry includes many federal institutions, including the CBC, the National Film Board, the Canada Council for the Arts, the Department of Canadian Heritage, the Department of Finance and the CRTC. Private broadcasters and cable companies also play an important role. The CCA believes that it would be a mistake to integrate federal programs in support of film. Each has an important role to play and diversity of support is important.
3. The 2000 Feature Film Policy set out four principal objectives. Any review of the policy must look at the attainment of all four goals and not only whether the goal of 5% of the domestic box office has been attained.
4. Assessing if the goal of increasing audiences for Canadian films has been attained must include consideration of documentary, animation and other long form programs, as well as fiction. With the growing interest in documentaries and Canadians' international reputation in this area, the audiences to such films should figure in the review. The Committee should examine not only the box office but also the many other ways Canadians access films - DVD direct release, Pay per view, Video on Demand and Pay television windows, film festivals, rentals and specialty and conventional television.
5. Canadian films have a number of major obstacles to box office success. The first is a lack of screen time. Canadian films received less than 5% of screen time in Canada in 2003. The picture was more attractive in Québec with a higher percentage of screen time, and consequently, of the domestic box office. It is difficult for Canadians to purchase tickets for Canadian films if they are not available in their local theatre. In some cases, Canadian films that have been successful in attracting audiences have been replaced for a new foreign "blockbuster". While we believe that rules to increase screen time would help, we are not convinced that there is political will to do so. Nonetheless, the 5% goal was met in 2004. The CCA recommends that the Fund be renewed with additional funds accorded.
6. Another major hurdle is the lack of money available to finance feature films. While Telefilm has succeeded in increasing the budgets of Canadian films, their budgets are minimal compared to foreign films considered to be "low budget" and are dwarfed by the blockbusters' budgets. This problem is exacerbated by the delays and timing problems caused by the current ways that federal government supports are released to producers.
7. This requires measures to increase investment and to release investment in a timely fashion. First, in an era of significant budget surpluses, the Government should follow the advice of the Standing Committee on Finance and provide long term stable financing to Telefilm and other federal cultural institutions. Second, measures to increase investment from the private sector, including incentives for broadcasters to provide early investment and commitments for licence fees are necessary.
8. The CBC must play a bigger role in Canadian film, both by including Canadian films in its schedule and by investing earlier in the process. Stable and adequate funding for the Corporation is essential in this regard.



Introduction

1. The Canadian Conference of the Arts (CCA) is Canada's oldest and largest national arts advocacy organization. Our goals are to promote the encouragement and the advancement of the arts and culture in Canada; to serve the interests of Canadian artists; to gather and disseminate information concerning the arts in Canada; and to cooperate with governments, public bodies, institutions, societies, corporations and individuals in Canada and abroad. Founded in 1945, the CCA was created to impress upon governments and the general public the importance of the arts and cultural industries in Canada. The CCA is an independent, non-partisan organization and is designated as a national arts service organization under the Income Tax Act.
2. For 60 years, the CCA has been dedicated to the growth and vitality of the arts and cultural industries in Canada. Our current membership comprises 250,000 artists and cultural supporters represented either as individuals or through their organizations, from all regions of Canada and drawn from the full range of Canada's arts sectors and cultural industries.
3. The CCA believes that:
 - Canadian arts and culture are intrinsically important and should be supported because they enrich the lives of Canadians and Canadian society and create distinctively Canadian content in an increasingly globalized environment.
 - All Canadians deserve the opportunity to experience, participate in, and appreciate the arts and culture wherever they live and whatever their personal circumstances.
 - Canadian governments at all levels have the lead responsibility for supporting the arts and culture and creating conditions for a dynamic, diverse and sustainable artistic life in Canada. Public policies and programs should recognize and accommodate the wide diversity of identities, traditions and forms of expression which characterize contemporary Canada, reflect the full spectrum of cultural activities (creation, production, performance, exhibition, publication, presentation, dissemination, consumption, preservation and conservation) and encourage active participation in the arts by citizens of all ages.
 - By virtue of its national responsibilities, the federal government should play a leadership role in arts and cultural support; adopt a comprehensive policy to govern all federal activities that have an impact on the arts and culture, and work in cooperation with governments at other levels of jurisdiction. Federal cultural policy should promote and enhance those aspects of our national life that are distinctly Canadian; the artistic and cultural practices and cultural identities of the two official language groups, the Aboriginal peoples, our culturally diverse populations, and our geo-political regions.
4. Film and television have become the dominant purveyors of culture in Canada, with more leisure time spent on these activities than attending plays and concerts or going to art galleries and museums. Canadians also spend a significant amount of time listening to recorded music and radio.
5. Despite years of provincial and federal government investment, fiscal and other stimuli and other policy supports, the feature film industry in Canada still lags far behind those of other major countries. According to Telefilm Canada's 2003-04 Annual Report Canadian films represented approximately 3.6% of the total box office in Canada in 2003. More recently, a January 3rd 2005 article in the magazine Playback indicated that the percentage had reached 4.6% by November 2004. However, these figures are misleading, since Canadian French-language films received 20% of the French domestic box in 2003 office while English-language films received 1% of the English market. The CFTPA indicates that the goal of 5% was met by the end of 2004.



6. On the other hand, we have seen greater success in broadcast television. Canadians devote a high percentage of their viewing time to Canadian programs. According to the CRTC's 2004 Broadcast Monitoring Report, English Canadians devoted 34% of all of their viewing to Canadian content programs, while for French Canadians, the figure was 66%. This success is mitigated by the problem in drawing English-language audiences to domestic drama - in 2001 viewing for Canadian drama and comedy represented 14% of all viewing by anglophones in this category. For francophones, the picture was more promising at 32%. The situation may even be more alarming - in its Public Notice 2004-32, the Commission stated: "Viewing to Canadian drama, as a percentage of all drama viewing on English-language services, has been very low. It stands at only 5% of all viewing to drama on Canadian English-language private conventional television stations, according to Fall 2002 BBM".

7. There are a number of differences between television and feature film production, including the costs of production. However, one clear difference is the requirement for the airing or screening of Canadian content. The television environment is governed by a complex regulatory system with the broadcast of Canadian content programs at the heart of the Broadcasting Act. The CRTC has put in place a number of regulations and policies as well as licensing practices aimed at giving Canadian programs pride of place.

8. This is certainly not the case in the feature film industry. In fact, the only place where Canadian film gets a fair share of screen time is in television where the Pay Per View, VOD and Pay Television broadcasters have requirements for the screening of Canadian films. In addition, some broadcasters, and in particular, the CHUM group, have strong commitments to airing Canadian film. Regrettably, few of the major national broadcasters, including the CBC, have made a similar commitment to Canadian film.

Approach to the Review of the Policy

9. "From Script to Screen: New Policy Directions for Canadian Feature Film", introduced at the Vancouver Film Festival in October 2000, had four major policy objectives:

- To develop and retain talented creators;
- To foster the quality and diversity of Canadian feature films;
- To build larger audiences at home and abroad for Canadian feature films; and
- To preserve and disseminate our collection of Canadian feature films for audiences today and tomorrow.

10. The CCA agrees that these are appropriate goals. However, we believe that the review of the policy should not become fixated on the goal of assuring that Canadian films reach a goal of capturing 5% of the domestic box office in 5 years, and more specifically 4% of the English-language and 12% of the French-language markets. For this reason, we applaud the Standing Committee's broadening of the review of the policy to include a look at cultural institutions other than Telefilm, including the Canadian Television Fund (CTF), the National Film Board (NFB) and the CBC. We would also suggest that the Committee not ignore the important role that the Canada Council for the Arts also plays in the ecology of the Canadian film industry.

11. CCA also believes that the other objectives of the policy should be closely examined. In particular, the objectives of developing and retaining creative talent and ensuring film output that reflects the diversity of our country are important aspects of the policy. In other words, achieving 5% of the domestic box office by producing generic films directed at large domestic and international audiences should not, in itself, be considered a success. While we agree that reaching large audiences is important, we believe that the input of Canadian creators, the telling of Canadian stories, and the presentation of Canadian diversity should not be sacrificed. Nor should the



cinematic viewpoint be strictly from Toronto or Montreal.

Measuring success in reaching Canadians

12. Despite the foregoing comments, CCA does fundamentally agree that it is important to reach Canadians with our own films. There are two key points that we would like to make here:

○ The definition of which films to include in measuring success should not be limited to fiction released for cinema only.

○ The measurement of how many Canadians watch our own films should not be limited to first run theatres.

13. While the biggest box office successes continue to be drama, comedy and action films, there is a growing interest in the theatre-going public in feature-length documentaries. To give but a few examples, Michael Moore's films *Fahrenheit 9/11* and *Bowling for Columbine*, or Morgan Spurlock's *Supersize Me* have been box office successes. Interestingly *Bowling for Columbine* is a Canadian content film.

14. Documentary production has long been a Canadian success. There are multiple second and third window possibilities for feature length documentaries. The recent interest in the Peter Raymont's film, *Shake Hands with the Devil*, is instructive. While the film has been critically well received at film festivals, including the prestigious Sundance Festival, the way most Canadians will see it is on television, as it does not have a wide theatrical release here. Nonetheless, this important story of a Canadian hero will be seen by many English- and French-speaking Canadians on the CBC and Radio-Canada and subsequently on documentary specialty services. We do not believe that the Feature Film Fund should not be diluted by broadening the existing fund to include documentaries - rather, new money to better support feature length documentaries should be provided.

15. Efforts to ensure that more Canadians see more Canadian films should not ignore either documentary production or another traditional Canadian strength, animation. Feature length animation films have also had considerable box office strength, witness the success of *Les Triplets de Belleville*.

16. Our second point in this area is that measuring the success of the objective of increasing audiences at home and abroad for Canadian films should not be limited to considering whether the film industry has reached Telefilm's goal of 5% of domestic box office. This being said, the industry did meet this goal in 2004 according to CFTPA.

17. There are many ways that Canadians have access to Canadian films. A feature film has a long life with many "windows". In fact, the production industry is built on what has been termed "the orderly marketplace". Generally, this follows the order of theatrical release, release on DVD for sale, release on Video on Demand (VOD) and Near Video on Demand (NVOD), Pay per View (PPV), Pay television, release on DVD and tape for rental, Network television, analogue specialty television, syndication on local conventional television, digital specialty channels and then various windows on late night or afternoon local television.

18. There are other avenues to public audiences as well. The National Film Board sometimes makes releases available for public purchase or rental through store front operations. In addition, many Canadians have their first (and often only) opportunity to see Canadian films at film festivals. In addition to the major international festivals in Toronto, Montreal and Vancouver, festivals in smaller centres across the country, whether Yorkton, Saskatchewan, or Kingston, Ontario provide Canadians access to their own national cinema. It is worth noting



that both the Canada Council for the Arts and the Department of Canadian Heritage provide financial support to such festivals.

19. In the Canadian market place it is also common that new films become essentially made-for-TV movies, rather than theatrical releases. This may combine a PPV window with a conventional TV window or the order may be reversed. While this is often the case for lower budget productions, some higher budget films have also followed this route due to lack of access to Canadian theatrical screens or because of the nature of the financing structure.

20. In other cases, films are released directly to DVD. The 2001 Canadian film *Picture Claire* (alternately known as *Claire's Hat*) is an instructive example. Unable to attain screen time in theatres, the producer released it directly to video and DVD. Another interesting example is the aforementioned film on Romeo Dallaire by White Pine Pictures - while achieving fame and critical success at film festivals, its first real exposure to the Canadian public was through TV.

21. CCA does not mean to say that increasing the box office is not an important goal. It is essential to establishing a strong national cinema. Box office success is the key to success in the other arenas of exhibition. Movie critics generally only review theatrical releases and the annual Top 10 lists tend to focus attention on theatrically released films. Such "buzz" is important in attracting audiences to DVD and tape rentals and to television audiences. Nonetheless, with the limited screen time available to Canadian films in theatres, Canadian filmmakers have had to develop other routes to their audiences.

22. While looking at whether the 5% goal has been met may seem the best shorthand as to whether the goal of expanding audiences has been achieved, a thorough analysis of the various ways audiences get to Canadian film should also be undertaken.

23. One last note on audience success. We would like to point out that international success does not just have to mean success in the United States, England or France. With Canada's multicultural population, we have the opportunity to reach into other cultures with our films as well outside of "traditional" export markets.

Major Impediments to Meeting Film Policy Objectives

24. There are a number of impediments to Canadian films developing a greater market share. Many of them relate to getting the initial success at the box office but there are additional problems at other levels of the distribution chain as well. We noted earlier that Canadian television production has been more successful in attaining a reasonable share of Canadian audiences while Canadian feature films have been less successful in getting a reasonable share of the box office.

25. A primary difference between the two is the Canadian content requirement in television. No such "pull" mechanism exists for the feature film world. Canadians cannot purchase tickets for Canadian films at the box office if the films are not shown. In addition, there is not the same star-maker machinery for Canadian film as there is for foreign films. According to Telefilm, in 2003 Canadian films only captured 5% of screen time in Canadian theatres, while non-American foreign films accounted for 6% and U.S. films took up 89%. The domestic market share of the box office of 0.9% for English-language Canadian films in the same year seems to follow naturally from the lack of exposure. A notable exception is in Québec, where domestic films receive significant



exposure and consequently, a healthy portion of the domestic box office. In 2003, the Québec market share for French-language films was 19.1%.

26. The Government decided that it would not impose a quota system on Canadian theatres for a variety of reasons. However, the absence of such a system creates a major uphill battle for Canadian films en route to Canadian audiences. B.C. filmmaker Carl Bessai recently recounted somewhat of a cautionary tale about the reality of the domestic market, particularly in English Canada. His recent Genie-nominated feature *Emile* was pushed out of a Vancouver multiplex by a new Hollywood release after a modest one-week run, even though it had out-grossed many of the non-Canadian films playing there.

27. Some argue that if Canadian films are attractive enough, theatre exhibitors will program them, although the case of *Emile* would appear to indicate the contrary. There is a vicious circle here, of course. Absent screen time, Canadian films cannot build popularity. As a result, Canadians deem them inferior and don't go to see them, providing theatre owners with ample reason not to program them.

28. CCA believes that one of the major problems in developing a popular Canadian cinema is money, or more specifically, the absence thereof.

29. The Feature Film Policy tried to address this problem with an increase in the monies available for feature film and posited a goal of doubling the average budget of a Canadian film from \$2.5 million to \$ 5 million. This resulted in a wide range of budgets for features in the subsequent years, from an estimated \$8 million for *Foolproof* to \$2 million for *Flower & Garnet*. If we compare this with some of the foreign films released in Canada in the same period, the problem becomes clear - most Canadian films are still grossly underfinanced. A recent example of a "low budget" American film is the critically acclaimed *Sideways*, which has been very successful at the box office and received several Oscar nominations. Its budget was in the neighbourhood of \$16 million U.S. - more than triple the goal for the average Canadian feature film.

30. This lack of sufficient production budgets creates a range of problems. For example, lower budgets limit the number of shooting days. This means that there is no room for mistakes; it means more shooting in studios, since one cannot always rely on the weather, and location shooting increases costs. It can also mean not waiting for the right cast, but taking those who happen to be available. It can limit post-production time. In short, financing has a direct impact on all aspects of creativity and artistry.

31. These problems are exacerbated by the nature of public funding. Approvals and money releases from Telefilm march to the government's fiscal year timing. Tax credits, while an important part of the financing picture, take up to two and half years to be released to the producers and this part of the financial structure must be financed by borrowing. The interest must be paid in the interim. Canadian shooting is usually limited to late Spring to early Fall, a relatively short window. So if approvals come too late, everything must be done in a rush. We would note that it seems that the delays in tax credit payouts have been cut in half recently - producers are receiving their credits more quickly.

32. Canadian producers often have to scout quickly for locales and decide on them in a day. While foreign productions allow an actor the luxury of having time to research a role, for example, by riding around in a police cruiser to study their language and behaviour, time and financial pressures on most Canadian shoots do not permit this.

33. Often there is not enough money for script and screenwriting. A good script is a sine qua non for a good movie. You can't make a good movie with a bad script. The Canadian film industry needs more scripts, better



scripts, and it must focus more closely on screenwriting as a craft. In Hollywood, there are scriptwriters who have never had a script become a movie and yet make a living by selling "treatments" for "development deals", i.e. general script ideas which can be further developed. In Canada, a good scriptwriter must often supplement his or her living with other work or consider leaving for the U.S. This reality runs counter to the 2000 film policy's stated goal "To develop and retain talented creators" and should be corrected.

Some Possible Solutions

34. The single most important goal should be to get more money into the system. Given ongoing federal budget surpluses, the money is there to top up film funding and increase average film budgets. The CCA would like to point out that in its December 2004 report, "Moving Forward: Balancing Priorities and Making Choices for the Economy of the 21st Century", the Standing Committee on Finance recommended that:

"The federal government provide stable, long-term funding to the following elements of federal support for arts and culture: the Tomorrow Starts Today program; the Canada Council for the Arts; Telefilm Canada; the Museums Assistance Program; the Community Access Program; the Canadian Television Fund and initiatives designed to promote Canadian culture internationally."

35. Given the success of the industry in reaching the 2000 goal for box office share, CCA believes that the Fund should be renewed. For Canadian film to have a bigger impact given the major impediments facing it, we further recommend that additional funds be made available.

36. But reliance on public funding will not be enough. We need a means of getting additional investment, i.e. private money, into production and marketing budgets. Ideally, a "pull" mechanism requiring screen time quotas would guarantee a certain amount of money into the system. However, this may not be politically acceptable and we may need to look for additional means.

37. One way would be to get Canadian conventional and specialty broadcasters involved earlier in the funding process. While some broadcasters, notably CHUM TV and the Pay TV broadcasters, do have a commitment to Canadian film, there do not seem to be sufficient incentives for others to make a greater commitment. If more broadcasters were to be involved earlier in the financing of feature films, this could increase the amount of money in the system, and this could also have a beneficial effect on the amount of Canadian drama in the system. Broadcasters could increase their involvement by direct equity investments or by guaranteeing a licence fee and exposure for a film. A guaranteed licence fee could then be used to seek out additional funding.

38. There are two ways to approach this concern - through regulation and through incentives. These are not mutually exclusive.

39. The regulation method would be to require that broadcasters airing a significant amount of feature film reach a Canadian content percentage of the feature films broadcast. They could also have a requirement for spending on Canadian features.

40. Canadian content requirements should start with our national public broadcaster. Without Saturday night hockey, the CBC has focused on Movie Night in Canada, usually playing two classic Hollywood blockbusters. Our taxpayer funded broadcaster should be required to broadcast a significant proportion of Canadian features in prime time and in the overall schedule. It would also be appropriate for the Corporation to find a way to be directly involved in the financing of Canadian features. After all it is the Canadian Broadcasting Corporation.



While the CBC is trying to make up for lost hockey revenues, it seems ironic that the Corporation has replaced Canadian hockey with foreign films. This underscores the need for additional incentives and additional Parliamentary funding for the Corporation.

41. The incentive approach could be considered as an add-on to regulation. Tax and regulatory incentives could be provided for those broadcasters who increase their licensing and financing of Canadian films. The CRTC has already introduced an incentive structure to increase the amount of drama in prime time. While it remains to be seen if this will be successful, it could provide a model for how to increase financing and on-air exposure of Canadian film. Fiscal and other measures should be considered to encourage broadcasters and other investors to become part of the funding, and the earlier in the process someone invests, the stronger the incentive should be.

42. We also need ways of getting money to producers in a timely manner so that most of the money is actually spent on production costs. Producers often spend far too much money on legal, accounting and consulting services in order to prepare applications for tax credits and public and private production funding (from Telefilm, CTF, etc). Interest costs further reduce the value of publicly invested monies. Typically interest costs and other charges can represent between 5 and 10% of a film's total costs.

43. The current system creates disincentives for producers to continue to produce. Producers are expected to defer their fees (read never receive them). Concerns over past abuses or the misperception that producers don't do much mean everyone else is paid before they are. Why would a talented entrepreneur remain in the industry if he or she cannot make a decent living?

Ensuring that our national cinema reflects Canada

44. First and foremost Canada's Film Policy must be a cultural policy. While industrial goals such as job creation and industry building are important tools in ensuring that we have a national cinema that reflects Canadian realities, values, and stories, they should not be ends in themselves. The Review of the Film Policy must examine whether we are reaching our cultural goals of ensuring reflection of Canada here and abroad, and of providing Canadian creators (directors, writers, actors, editors, etc.) with opportunities to reach broad and diverse audiences. This has become more difficult as our society becomes more diverse, though it is a challenge the government should not back away from.

45. There are many aspects of Canadian culture which should be reflected over the full range of our feature films: our two official languages, our Aboriginal people, our regions, our ethnic diversity, and the different realities of men, women, and children. At the same time we must do this efficiently and with a view to making attractive and interesting films within budget. We would note that some federal programs do provide regional, linguistic and other envelopes. Indeed, the Canada Council has an envelope specifically for Aboriginal filmmakers through its "Grants to Aboriginal Media Arts" program.

46. CCA is definitely not suggesting quotas by region, gender or other distinguishing features. But the record should be examined to see if there are gaps in who has access to making films and who does not. Public funders must keep their eyes open to the possibilities raised by diversity. The success of the American film, *The Shipping News*, set in Newfoundland, shows that international audiences will pay to see movies set in "exotic" locales. The first Canadian Inuit feature film, *Atanarjuat: the Fast Runner*, told a traditional Inuit story and did it so well that it won the Golden Camera award at the Cannes Film Festival. The international success of Deepa Mehta's *Fire* or Nia Vardalos' *My Big Fat Greek Wedding* show that audiences react well to stories coming from non-English, non-



French backgrounds. Films like *Monsoon Wedding* or *Bollywood Hollywood* show that Canadians with origins in the India can find audiences both here and abroad. With an increasingly multicultural population, it is not unreasonable for Canadians of diverse backgrounds to see their experience reflected in film.

47. The CCA is not suggesting that successful films can or should come only from the regions or from Aboriginal cultures or from ethnic cultures. On the contrary, we are recommending a broader and more inclusive approach which funds Canadian films in languages other than English and French with subtitles provided.

Telefilm Not the Only Federal Support

48. The Feature Film Policy review, like the Policy itself, focuses on the role of Telefilm. However, the Committee wisely indicated that it would look at the role of other federally funded bodies including the Canadian Television Fund, the National Film Board and the CBC. The CCA agrees with this approach and urges the Committee to resist any attempts to centralize support for film in one body, such as Telefilm. In the past few years, there have been discussions that the functions of the National Film Board should be centralized with Telefilm. There have also been suggestions that the CBC should be granted a portion of the CTF budget to use as it wishes. While we believe that both these large institutions play important roles and that they each could use additional funding, we also believe that there should be several institutions that play a role in the support of Canadian feature film.

49. Each of these institutions has a different role and a different mandate in its approach, which is healthy and ensures that policy is implemented based upon public needs, rather than empire building. The NFB plays an important role as a trainer, as a developer and as a partner with independent film-makers. It has a particular emphasis on film by women, Aboriginal people, official language minorities and cultural groups. This approach has had critical success, at home and abroad, with the NFB receiving multiple Academy Award nominations almost every year.

50. The Committee should not overlook the role of the Canada Council for the Arts. The vital "niche" that the Council has created is the support of cinema and video productions conceived, controlled and produced exclusively by the artist/director. Indeed, the support of the Council has allowed outstanding Canadian directors such as David Cronenberg, Atom Egoyan, Francois Girard, Guy Maddin and Patricia Rozema to move from art films to commercial films and back again, enriching all aspects of their work in the process. The Council funds film and video co-operatives across the country, giving established and emerging filmmakers access to affordable professional equipment and skills training. It provides direct funding to individuals in the form of research and creation grants, as well as scriptwriting grants. CCA believes that the Canada Council's role in stimulating the development of cinematic stories should be enhanced.

51. In addition to the various public and quasi-public initiatives, the Committee should also consider the role of private funding agencies. Both Astral Communications in the East and Corus Entertainment in the West have played important sustaining roles in supporting Canadian film. Funds that arise from broadcast transactions have often been important in stimulating regional and national production. Unfortunately, these funds usually expire after 5 to 7 years. They do have significant impact on the development of local television productions, including longer form, made for television movies. They could be encouraged to take a role in feature film.

52. CCA believes that it is healthy for our system to have multiple funding sources and different institutions with different roles. We urge the Committee not to yield to pressures to integrate various federal institutions. However, CCA believes that it would be appropriate that these organizations be harmonized and cooperate to reach public policy goals. Incentives should be developed which would encourage them to take an enhanced role



in feature film investment.

53. CCA believes that diversity of funding sources is healthy for feature film production - there should be multiple sources from a range of institutions with a variety of mandates. We urge the Committee not to yield to the siren song of "efficiency" and attempt to integrate the various federal film funding institutions. However, CCA believes that it would be entirely appropriate for these organizations to be harmonized and to cooperate to reach public policy goals. In addition, harmonization of processes and forms could reduce the complexity of the system for producers.

Conclusions

54. CCA welcomes this review of Film Policy. We believe that the policy must be, at its heart, animated by cultural goals and must recognize that industrial goals, while important, are means to the end of ensuring that we have a national cinema. This cinema must reflect Canadian values, tell our stories, provide an opportunity for our creators to reach Canadians and provide entertainment, enlightenment and information about Canadians to ourselves and the world we live in.

55. We believe that we must be both realistic and demanding. If we do not have the resolve to impose Canadian content requirements on our film distributors and theatre owners, then we must provide incentives so they will choose to show a healthy proportion of Canadian films. We also have to ensure that broadcast television makes a maximum effort to nurture and showcase Canadian films. As our lead public broadcaster, the CBC must play an important role in this area, as should all broadcasters who make significant use of film during their broadcast day.

56. While we must strive for efficiency and accountability on the part of all players, these must be seen as means to an end and not ends in themselves. Diversity and risk-taking, not caution and accounting, are fundamental to attaining creative goals. While we wholeheartedly support effective and efficient use of public funds, this must not serve to bog down film production in so much paper work that scarce public resources are diverted to meeting bureaucratic needs.

57. Finally, we reiterate our strong recommendation that the Committee resist attempts to merge the NFB, Telefilm and/or the CBC into one super-agency.