



To: Broadcasting and Telecommunications Legislative Review Panel

Date: January 11, 2019

Re: Responding to the New Environment: Call for Comments, September 24, 2018.

Women in Film + TV Vancouver (WIFT-V) is pleased to provide these comments in relation to the Review Panel's mandate and the call for comments as noted above.

WIFT-V is a member-driven organization representing women in the film, TV and digital media sectors in Vancouver and advocates at the provincial, national and international levels to eliminate gender discrimination and promote equitable opportunities for women working in these Canadian screen-based industries.

### Part 1. WIFT-V Comments

Our comments are primarily focussed on the identified theme: ***“Supporting creation, production and discoverability of Canadian content”***

First of all, we are dismayed to note that **there is not one reference to gender equity in the Call for Comments.** We therefore resorted to the Panel's **Terms of Reference** which are also very problematic in the lack of clarity on gender issues.

### BROADCASTING POLICY OBJECTIVES

Under the Broadcasting Policy Objectives section in the Terms of Reference, it states:

#### ***Broadcasting Policy Objectives***

*The current Broadcasting Act] set out some twenty discrete policy objectives and twenty-eight sub-objectives focussed on ensuring the creation and presentation of Canadian programming that would reflect the needs and aspirations of Canadians in all their diversity. This includes official language minority communities, Indigenous Peoples, and persons with disabilities.*

Gender equality and equal opportunity for employment in the government-subsidized Canadian broadcasting system are not mentioned as on-going priorities in updating the Acts.



This is problematic, to say the least, in our opinion. It is easy to forget, in assessing the challenges of the new online world and the creation of high quality Canadian programming, that the funding support of these lofty goals comes from all taxpayers. And Canadian women are being seriously under-served as the largest single audience segment for film and TV, the largest group of consumer entertainment products, and taxpayers/ voters.

This was reflected in the wording of the current **Broadcasting Act**, which states unequivocal support for issues of gender equity.

Within the Act, it is formally “*declared as the broadcasting policy for Canada that the Canadian broadcasting system should:*

*(iii) through its programming and the employment opportunities arising out of its operations, serve the needs and interests, and reflect the circumstances and aspirations, of Canadian men, women and children, including equal rights, the linguistic duality and multicultural and multiracial nature of Canadian society and the special place of aboriginal peoples within that society” [section 3(1)(d)(iii)]*

And in the current **Telecommunications Act**, it states

*...that Canadian telecommunications policy has as its objectives:*  
*(h) to respond to the economic and social requirements of users of telecommunications services; [Part One, 7(h)]*

Perhaps what is most disturbing about the Terms of Reference is that women’s rights seem to once again be down-graded into the social and cultural section, lumped in with ‘minority’ issues in relation to diversity of cultural expression.

So let’s be clear. **Women are not a minority** in this country. We do not have a “women’s” cultural expression distinct from other racialized groups. Women are part of all minorities and Indigenous peoples in numbers.

Women as a whole are in fact ever so slightly the majority of the population. According to StatsCan, women are **50.4%** of the total Canadian population and a female majority is expected to prevail for the next 50 years.



It is on this basis that WIFT-V was part of the CRTC's Steering Committee on Women in Production which held a meeting with the large private broadcasters in December of 2018. Based on industry-wide research, it has been clearly demonstrated that women working in Canadian-content production are not benefiting from the programming being commissioned and produced by Canadian broadcasters. (See Women in View statistics in Appendix 1)

At the same time, it has been proven that women-led projects and ones with female leads are simply good business. They compete very favourably for audiences in television and in theatres. In our opinion, this reflects the fact that women are more than 50% of audiences as well as being even higher percentages of entertainment decision-makers in families. We by no means wish to downplay the importance of inclusion and opportunities for under-served voices in the Canadian system, but at the highest level to start, women are the largest under-served audience segment in the Canadian population.

And yet, it seems we are still stuck at the stage of proving there is a problem with gender equity in the Canadian screen-based industries, and continue to spend further energy to educate panels, commissions and Canadian private broadcasters of the seriousness of the systemic gender bias that exists in the Canadian system.

Much of Canadian content production is commissioned by Canadian broadcasters and funded to a large degree through taxpayer dollars via various mechanisms at the federal and provincial levels. To date, Canadian English-language broadcasters are required to spend set percentages on Canadian programming (CPEs).

Within that overall CPE regulatory obligation is the requirement to commit 5 to 7.5% of revenues to Programs of National Interest (PNI), which encompasses high-end drama, documentary, children's and variety and performing arts programming.

Canadian broadcasters are assisted in this endeavor by being able to trigger funding envelopes from the Canada Media Fund (CMF) which has an annual budget of over \$300 million per year. Of that amount, \$100 million is provided annually by the federal Department of Canadian Heritage.



Women working in the Canadian production industry deserve to have equal opportunity to benefit from the system, which to date has blocked their progress. WIFT-V submitted to the CRTC that broadcasters be required to reach gender parity in their PNI programming within 3 years. PNI programming is at the full discretion of the broadcasters as commissioners and funding gatekeepers and they should be held accountable for the programs they are licensing. Under the current Broadcasting Act, that is their legislated responsibility.

**We submit without that clause, or an updated version thereof, being embedded once again in the Acts, women in the industry will continue to face barriers to opportunities they have a right to expect as taxpayers and citizens.**

The Call for Comments states:

*In this new environment, the global demand for high-quality film and television programming has never been greater...  
For Canadian content programming to succeed both domestically and in the international marketplace, there must be clear policies that support quality creation, production and discoverability.*

This 'new environment' demands that content be made from a range of unique sources and voices, including programs made by women in key creative roles where their absence has for too long been tolerated.

## **CULTURAL DIVERSITY**

The only reference to gender equality is, as previously noted, subsumed into the Cultural Diversity section of the Terms of Reference.

*Cultural diversity is about ensuring that Canadians of all backgrounds and experiences can create and access content that speaks to them; this means protecting, supporting, and promoting Canadian content as technology evolves and changes. ... **By enabling diversity of cultural expression, the online environment should also respect and have room for linguistic duality, Indigenous cultural expression, and gender equality.***



What does that last sentence even mean? We have great difficulty with this section.

## **Part 2. Questions in Call for Comments**

It appears the questions in the Call for Comments are not intended to be assessed from a gendered lens, but we provide our input as these areas are very important from a gender equity perspective.

### **Broadcasting Act**

#### **9. Broadcasting Policy Objectives**

**9.1** How can the objectives of the *Broadcasting Act* be adapted to ensure that they are relevant in today's more open, global, and competitive environment?

**WIFT-V Response:** Any new legislative objectives must include a focus on gender equity in Canadian programming and equal opportunity for women in the Canadian system, as well as for minority language, disabled and Indigenous peoples.

#### **10. Support for Canadian Content and Creative Industries**

**10.2** How can the CRTC be empowered to implement and regulate according to a modernized *Broadcasting Act* in order to protect, support, and promote our culture in both official languages?

**WIFT-V Response:** The CRTC should be granted further legal powers and regulatory tools to enforce its decisions and to implement the objectives of the Act, including enforcing gender equity requirements for broadcasters and Canadian programming.

#### **11. Democracy, News and Citizenship**

**WIFT-V Response:** There is no reference in this section to gender, but as half the population, women's democratic and citizenship rights include having our voices heard, our stories told, our faces seen.



## 12. Cultural Diversity

12.1 How can the principle of cultural diversity be addressed in a modern legislative context?

**WIFT-V Response:** We strongly support the principle of cultural diversity and inclusion of voices in the Canadian broadcasting system, as we as women are half of these groups as well.

Thank you for the opportunity to present our views and we would be happy to provide further research or input to the Panel. We look forward to gender equity being reflected in your deliberations.

Sincerely,

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cc: Hon. Pablo Roderiquez, Minister of Canadian Heritage and Multiculturalism