



WOMEN IN FILM
AND TELEVISION
VANCOUVER

February 13, 2020

****Filed Electronically****

Mr. Claude Doucet
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario K1A 0N2

Dear Mr. Doucet:

**Re: Broadcasting Notice of Consultation CRTC 2019-379: Renewal of CBC/ Radio
Canada Broadcasting Services**

1. Please find below the comments and concerns of **Women in Film +TV Vancouver (WIFTV)** in reference to the above-noted Notice of Consultation for CBC/Radio Canada national licence renewals. **We request to appear, by video-conference, at the CRTC's hearing commencing on May 25th, 2020 taking place in Gatineau, QC.**

Women in Film and Television Vancouver incorporated in 1989 as a not-for-profit society registered in British Columbia. We are a member driven organization committed to addressing the systemic barriers to women's equal participation in the production and dissemination of screen-based media, and to the creation of a more inclusive media for both creators and audiences.

2. Our main objective is to further the artistic and professional development of all women, regardless of ethnic origin or status, in Canada's screen-based media production industries. We define women as those individuals who identify themselves within the spectrum of the gender identity of woman including trans women and cisgender women.

We are located on the unceded traditional and ancestral homelands of the Musqueam, Squamish, and Tsleil-Waututh Nations.

3. WIFTV is a member of WIFT Canada and Women in Film & Television International (WIFTI). WIFTI represents 50 international chapters & partner chapters spanning 6 continents with almost 20,000 global members.
4. WIFTV participates in the CRTC's Women in Production Steering Committee and would like to acknowledge the valuable input of Catherine Tait, President and CEO of CBC/SRC, at the CRTC's Women in Production Summit held in December 2018.
5. **We support the CBC** as our national public broadcaster and encourage the Commission to renew its licenses and provide our public broadcaster with the necessary regulatory framework for it to thrive now and in the future.

Overview- CBC English-language audio-visual services – Application # 2019-0282-5

6. WIFTV is deeply concerned by persistent gender inequality and the lack of representation of indigenous, racialized and otherwise marginalized women in the production of Canadian film and television programming and the slow pace of change to rectify this long-standing deficiency in our industry.
7. While we appreciate the Commission's questions as they relate to women and diversity, we must point out that there is no CBC data here to analyze. Broadcaster Production Reports that contain this data are not yet available and severely restricts our ability to assess the CBC's performance over the last license period.
8. We appreciate that the CBC's applications were filed prior to September 30th, 2019 and thus were prior to the CRTC's new requirements for Production Reports. However, we respectfully request that the Commission allow us to update our submission once critical CBC production data is available after February 29th, 2020 and therefore, **we request to appear, by video-conference, at the CRTC's hearing on May 25th in Gatineau.** Otherwise we are unable to provide a much-needed and necessary assessment on the CBC's actual performance and its success measures in meeting its objectives.
9. Within that context, we wish to respond to the following questions put forward by the Commission in its Notice.

Reflection of Canadians, including diversity groups

10. Q1. Comment on the types, range and quality of the programming offered on the Corporation’s English-language platforms and services.

11. Response:

The CBC, as our national public broadcaster, is facing many challenges in light of rapid technological change. Most conventional broadcasters around the world are finding their linear content delivery platforms being challenged by internet SVOD offerings. We support the CBC’s move into expanding its digital offerings to Canadians, with the caveats as noted in Q22.

12. Q5. Does the programming offered on all of the Corporation’s platforms and services reflect the diversity of Canadians? Are the following groups adequately and appropriately reflected?

- **women**
- **Indigenous groups**
- **ethnic and multicultural groups**
- **OLMCs**
- **children and youth**
- **Canadians with disabilities**
- **LGBTQ2 Canadians**

13. Response:

To begin with, there is no available CBC data to assess and review in order to answer this question. See our response to Q10. Most importantly, we find the phrasing of this question problematic as women are once again lumped in with marginalized groups as an overall category labeled “diversity”. This is repeated in several paragraphs in the CRTC’s Call.

From the Commission’s Call CRTC 2019-379:

Para 11. the Commission considers that the Corporation’s activities should be regulated in the next licence term with a view to:

- ensuring that its programming:
 - reflects and meets the needs and interests of Canadians, *including diversity groups*, in both official languages;

Para 17. By virtue of its activities and important contributions to meeting the broader objectives of the Act, the Corporation should produce, commission and make available audio and audio-visual content on multiple platforms that **meets the needs of and reflects the diverse Canadian population, including those from the following groups: women**, Indigenous groups, ethnic and multicultural groups, official language minority communities (OLMCs), children and youth, Canadians with disabilities, and LGBTQ2 Canadians).

- 14.** We would like to point out that **women** are not a ‘diversity group’ but a **majority** of the Canadian population, and as a result the systemic gender bias in our industry thus affects the **majority** of Canadians working in the industry. We have applauded the Commission for establishing its Women in Production Steering group and the valuable and necessary measures the CRTC has since undertaken in ensuring gender equality and diversity in Canadian broadcaster offerings, including its Broadcasting Information Bulletin CRTC 2019-304 requiring detailed production reporting by broadcasters.
- 15.** Having representation on the CRTC’s Women in Production Steering Committee however, we at WIFTV are actually surprised and disappointed that the Commission’s tendency is now to once again lump women back into a ‘diversity group’ category with minority marginalized groups. We consider this a step backwards by the Commission.
- 16.** We do **encourage all actions** to support the remaining categories that the Commission lists above, because women make up 50% of those sub-categories. We emphasize the need to particularly address the serious challenges faced by Indigenous women and groups in our industry and encourage the Commission to address these issues in much more detail at the CBC renewal hearing.

Production of Canadian programming

- 17. Q10. How does the Corporation provide support to independent content creators? Emerging content creators? What value added does this support bring to the Corporation’s programming and to Canadians?**

18. Response:

CBC has had great success with their women director initiative in its prime time programming, and we applaud their actions. We would like to see CBC offering similar gender commitments for other key creative positions on their prime time new Canadian programming, not just in the director position.

As mentioned, we cannot analyze CBC’s programming by gender as data is not yet available from the CBC. We have only the following information from CBC in its application and website:

We surpassed our goal of gender parity across all independently produced original, scripted and unscripted Canadian television shows on our linear and digital platforms. During the 2018/19 broadcast year across all original French and English shows, we supported 62% female-led projects where the majority of the key creative roles of producer, director, writer and showrunner were held by women. (CBC Action Plan)

The Action Plans filed by the public and private Canadian broadcasters last September 30th, 2019 do not contain much action or any actual plans to address systemic discrimination. We have more faith that the CBC under the leadership of Catherine Tait will work to address systemic barriers for women.

19. Q11. Does the Corporation provide adequate support to ensure diversity in key production roles on all of its platforms and services? To what extent is this diversity reflected in its programming choices? What could the Corporation do to increase and improve such diversity in production?

20. Response:

As pointed out above, we do not feel able to answer this question in any great detail, given the lack of data on “diversity” in these key production positions in CBC programming. **We recommend the CRTC require the CBC to adhere, by Condition of Licence, to the same structured reporting requirements as the private broadcasters under Bulletin CRTC 2018-304.**

Ensuring gender equity and diversity requires a focused and multi-faceted long-term plan to deal with the underlying systemic biases in our industry, and without specific commitments by the CBC and data to assess their performance and success rates, we are severely hampered in our ability to comment on these critical issues.

Access to and distribution of Canadian programming

21. Q14. Taking into consideration the content that the Corporation has made available on multiple online platforms (for example, mobile applications and online streaming

services), what could it do to continue to serve and meet the needs of Canadians who cannot or do not consume content via online platforms? In other words, how could the Corporation ensure that Canadians are well served regardless of the platform they use or to which they have access?

22. Response:

We have noted in the CBC's audience report filed as part of its application, entitled *A Full Canadian Viewing Profile*, that the growing trend to digital platform viewing is currently skewing male. We believe it is imperative that the CBC ensure they don't simply feed into this demographic with their online content but actively work to bring women and diverse viewers into this trend. Any CBC actions relating to ensuring gender equality and diversity in its programming must apply to its online services before viewing profiles become even more entrenched.

Role of programming in democratic life

23. Q24. Taking into account the entirety of the Corporation's operations, how could including content on online platforms and services better allow the Commission to ensure that broadcasting policy objectives and outcomes are being achieved?

24. Response:

The CBC should be regulated and assessed across all their platforms and carefully scrutinized for viewership on all platforms to ensure that specific audiences (such as women or Indigenous viewers) are not being driven to lower budget fare, as is currently being evidenced in the CBC's viewership report.

25. Q33. What is the best way to measure or assess the reflection of and engagement with groups such as women, Indigenous peoples, ethnic and multicultural groups, OLMCs, children and youth, Canadians with disabilities, and LGBTQ2 Canadians in the production and broadcast of content on all of the Corporation's platforms and services (television, radio and online services)?

26. Response:

We recommend that one key way to carefully monitor fairness in CBC programming would be to provide program budgetary information per demographic group for its programs made for the various platforms.

Conclusion

27. We urge the Commission to carefully examine all CBC/SRC commitments to women and marginalized groups and seek clear data on its performance and success rates to date.

28. It is critical that the CBC's mandate incorporates gender and the necessity of serving all Canadians, and include reflection and engagement with the majority of Canadians, who are women. Further action is needed to achieve gender equality in our industry and the CBC is a vital player in this battle. We look to the CBC to continue to be a broadcast leader in gender equity across all its programming and platforms.

Sincerely,



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Advocacy Co-Chair



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