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April 28, 2021

Mr. Claude Doucet

Secretary General

Canadian Radio-television and Telecommunications Commission (CRTC)

Ottawa, Ontario K1A 0N2

Re: Commercial radio policy framework review: ensuring Canadian creators not at risk of losing their livelihoods

Music Nova Scotia is a non-profit organization that has worked since 1989 with a mandate to encourage the creation, development, growth and promotion of Nova Scotia's music industry. Music Nova Scotia exists to grow and nurture the Nova Scotia music industry, to retain our own natural resource and promote investment, by providing education, information and resources to our membership; acting as the advocate for the industry to all levels of government and private enterprise; and supporting membership in the promotion of the export of Nova Scotia music regionally, nationally and internationally. Membership is mainly made up of Nova Scotians but some join us from other regions of the East Coast as well as across Canada. We are songwriters, musicians, agents, managers, promoters, distributors, photographers, associations, lawyers, accountants and other industry professionals.

Music Nova Scotia is proud to have participated in the Commercial radio policy framework review through a joint submission along with our key industry stakeholders at ADVANCE, Canadian Council of Music Industry Associations (including Alberta Music, Cultural Industries Ontario North, Manitoba Music, Music BC, Manitoba Music, Music NWT, Music PEI, Music Yukon, Music/Musique NB, MusicNL, MusicOntario, SaskMusic), Canadian Independent Music Association (CIMA), Indigenous Music Alliance, Music Managers Forum Canada, and the Songwriters Association of Canada. We also applaud submissions made by colleagues from across the music industry reflecting their unique perspectives, including submissions from Music Canada and ADISQ.

As highlighted in our submission, for every dollar in royalties collected on commercial radio in 2020 by SOCAN, 36.7 cents goes to SOCAN's songwriter and composer members, the majority of whom are Canadian creators. Commercial radio is clearly important to all stakeholders in Canada's music industry, but most certainly, the situation is critical to Canada's songwriter and music publisher community. We wish to reiterate that it is critical that the commercial radio policy be updated in a number of ways.

First, as suggested in our joint proposal (CIMA et al.), a modernized version of MAPL to better reflect modern songwriting is necessary to better meet the goals of the Broadcasting Act. We believe that the proposal put forth in our initial joint submission with our music industry colleagues is a stronger solution.

Second, we vehemently disagree with CAB's assertion that fewer regulatory obligations for radio will result in better outcomes. Maintaining the 35% Canadian content exhibition requirement is critical and any reduction in exhibition requirements would have a significant (and direct) negative impact on the royalties received by songwriters and music publishers and on the discoverability of Canadian songs and artists by the public.

Finally, there should be no reduction in Canadian content development obligations from commercial broadcasters. While we believe that there are changes that should be made to discretionary allocations (as noted in our joint submission), CCD funding has and can continue to make a significant contribution to the development of Canadian artists. We do not believe that reductions in CCD contributions from broadcasters are warranted at this time and that the current formula for calculating CCD allows for sufficient flexibility to account for financial fluctuations.

As the Commission considers the submissions received throughout this process, we urge the Commission to consider the key role that radio plays for Canada's music industry, including its creator community and MPC members.

Sincerely,



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