



DOCUMENTARY  
ORGANIZATION OF CANADA  
DOCUMENTARISTES  
DU CANADA

Montreal, August 3, 2022

*Transmitted electronically*

Mr. Claude Doucet  
Secretary General  
CRTC  
Ottawa, ON K1A 0N2

Object: Intervention by the Documentary Organization of Canada with regards to the Broadcasting Notice of Consultation CRTC 2022-182

Mr. Secretary General,

The Documentary Organization of Canada (DOC) is the collective voice of Canada's independent documentary creators, representing over 1,000 members across six chapters from coast to coast. DOC's mandate as a member-driven organization is to advocate for an equitable, sustainable environment for documentary production and to strengthen the sector within the broader cultural industry.

DOC spent two years urging CAVCO to modify its treatment of stock footage as these costs were often unavoidable foreign expenditures for documentary productions. Unfortunately, stock footage services are often difficult to source from Canadian suppliers and this has resulted in many difficulties for documentary productions. Fears of foreign stock footage costs have resulted in some productions never being made. The documentary community breathed a collective sigh of relief when CAVCO announced its modifications on April 22<sup>nd</sup>, 2022.

On July 6<sup>th</sup>, the CRTC published a notice of consultation regarding the treatment of stock footage costs as part of the Canadian program certification. **DOC strongly urges the CRTC to adopt the same modification to the treatment of stock footage costs as CAVCO. Specifically, that these costs be considered as "other" costs rather than "services" costs when calculating the breakdown of costs of a production.**

Sincerely,

A handwritten signature in black ink, appearing to read 'Sarah', with a stylized flourish at the end.

Sarah Spring  
Executive Director  
Documentary Organization of Canada