



May 18, 2016

Filed Electronically

Johanne Mennie
Director
Canadian Audio-Visual Certification Office (CAVCO)
25 Eddy Street, 8th Floor
Gatineau, Quebec
K1A 0M5

Dear Ms. Mennie:

Re: CAVCO Public Notice 2016-03

**ELIGIBLE PLATFORMS WHICH CAN BE USED TO MEET THE “SHOWN IN CANADA”
REQUIREMENT OF THE CANADIAN FILM OR VIDEO PRODUCTION TAX CREDIT**

1. The Writers Guild of Canada (WGC) is the national association representing more than 2,200 professional screenwriters working in English-language film, television, radio, and digital media production in Canada. The WGC is actively involved in advocating for a strong and vibrant Canadian film and television industry producing high-quality Canadian audiovisual content.
2. The WGC is pleased to provide comments on CAVCO Public Notice 2016-03 (the Notice). The WGC **tentatively supports** the proposed policy in the Notice, namely, to allow audio-visual productions whose distribution is exclusively via online platforms to be eligible for the Canadian Film or Video Production Tax Credit (CPTC), and to do so by adapting CAVCO’s interpretation of the “two-year clause” to include online video services that meet the criteria presented in the Notice. The WGC agrees with CAVCO’s assessment of the current audio-visual landscape at set out in the Notice, in particular at paragraph 2, and supports the expansion of the CPTC’s eligibility to audiovisual productions destined for new online and mobile platforms, provided that the requirements supporting Canadian creative personnel remain in place.
3. While the Notice does not contemplate changes to the CPTC’s eligibility criteria other than the proposed interpretation of the “two-year clause”, the WGC would like to take this opportunity to note that the support for Canadian creative talent, as expressed in the 10-point CAVCO scale, remains just as essential in the digital and online realms as it is with respect to more traditional platforms. Canadian creative personnel are at the heart of Canadian production, and at the core of what the CPTC was designed to support. As new platforms emerge and expand, public policy and taxpayer-derived funding must continue to ensure that Canadian creative voices are available on those platforms. The WGC believes that the CAVCO and the CPTC must continue to perform this crucial role.

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4. As such, we are pleased that CAVCO intends to monitor the expanded policy's development and make changes to counteract any unintended consequences, as noted in paragraph 15 of the Notice. The WGC strongly believes that an increase in 6-point productions at the expense of 8- or 10-point productions, for instance, would constitute an adverse effect, serious enough to warrant the policy's cancellation.
5. Thank you for the opportunity to contribute to this important public consultation.

Yours very truly,

A handwritten signature in black ink, appearing to read 'Maureen Parker', with a stylized, cursive script.

Maureen Parker
Executive Director

c.c.: National Council, WGC

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