



January 20, 2025

Filed electronically

Mr. Marc Morin
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, ON K1A 0N2

Dear Mr. Morin:

RE: Broadcasting Notice of Consultation CRTC 2024-288: The Path Forward: Defining “Canadian program” and supporting the creation and distribution of Canadian programming in the audio-visual sector

1. Ontario Creates is pleased to submit written comments in response to Canadian Radio-television and Telecommunications Commission (CRTC) Broadcasting Notice of Consultation 2024-288. We appreciate the opportunity to engage with the CRTC and provide an Ontario-specific perspective as part of this important discussion about modernizing the definition of a Canadian program for the audio-visual sector. This submission reflects the perspective of Ontario Creates.
2. Ontario Creates is an agency of the Government of Ontario whose mandate is to be a catalyst for economic development, job creation, investment and collaboration in Ontario’s creative industries, which include the music, book, magazine, film, television and interactive digital media sectors, both domestically and internationally. Ontario is home to world-class publishing, screen and music industries. Collectively, these industries are a global success story, and contribute over \$3.6 billion annually to Ontario’s GDP and account for over 44,000 jobs.¹
3. Ontario Creates is committed to delivering high-impact support that creates opportunities for Ontarians and that contributes to an advantageous business environment for growth. Through our targeted programs and services, support for innovation, and by leveraging public and private partnerships, we build the capacity and competitiveness of Ontario’s creative companies and industries to deliver award-winning content that is enjoyed by audiences across Canada and around the world, while contributing to the economic prosperity of Ontario.
4. We expect that Ontario-based stakeholders, including companies and individuals, will make their own submissions to this consultation process. We look forward to reviewing and commenting on submissions made by others in this phase and to continuing this important dialogue to ensure that Ontario’s industry experience, perspective, and strengths are reflected in any new proposed regulatory framework.

¹ Ontario Creates analysis from Statistics Canada [2022 Culture Satellite Account data]

Ontario's Film and Television Industry

5. Ontario is one of the world's leading jurisdictions for film and television production, consistently hosting over 400 productions annually. Ontario's film and television industry contributed \$1.8 billion to Ontario's economy in 2023, creating over 25,000 high-value full-time equivalent direct and spin-off jobs for Ontarians. While the US labour disruptions affected production levels in 2023, domestic film and television production drove 52% of total spending in Ontario, representing \$947 million.²
6. According to the Canadian Media Producers Association's *Profile 2024*, Ontario maintained the largest share of Canadian content production in the country in 2023-24, accounting for 36% of the country's total volume. Ontario also represents the third-largest share of the volume of foreign service production at 27%, trailing Quebec (30%) and British Columbia (36%).³
7. Given Ontario's position as a hub for both Canadian content production as well as foreign service production, and our mandate to strengthen Ontario companies and grow the province's creative ecosystem, Ontario Creates is broadly supportive of the goal of modernizing the definition of Canadian content as it pertains to audio-visual content. Having a modernized definition of Canadian content that serves to stimulate new jobs and production in Ontario is critical to sustaining Canada's competitive advantage. It is our belief that a modernized definition that takes into account the wide range of key creative roles that play a part in bringing content to life could generate more opportunities for the Province's workforce.
8. Through Ontario Creates, Ontario offers three tax credits for film and television production – the Ontario Production Services Tax Credit (OPSTC), the Ontario Film and Television Tax Credit (OFTTC) and the Ontario Computer Animation and Special Effects Tax Credits (OCASE). These tax credits are co-administered with the Canada Revenue Agency. In 2023-24, each dollar spent by the Province through its suite of creative industry tax credits generated \$17.27 in investment in the economy.
9. Ontario's suite of creative media tax credits represent a major incentive in attracting business to Ontario. These incentives increase investment, employment and content creation by Ontario-based companies. Together with Ontario's diverse landscapes, wide range of locations, advanced technologies and facilities and skilled talent base, these financial tools are effective in attracting inward investment and international production, which ultimately strengthens the province's workforce capacity and industry infrastructure.
10. These competitive financial incentives, as well as the ongoing work of the Ontario Film Commission, are integral to achieving the Province's goal of increased production and international market share.⁴ A modernized definition of Canadian content, that reflects the evolving nature of content, platforms, and the creative roles involved, has the

² *ibid*

³ Canadian Media Producers Association, *Profile 2024*, pp. 14, 7

⁴ Kristin Rushowy, "Ontario's film industry takes a billion-dollar hit after two blockbuster years", *Toronto Star*, published on April 26, 2024

potential to be another asset; contributing to this vision positioning Canada as a leader and innovator.

11. With respect to the specifics of a modernized definition of Canadian content, Ontario Creates is not recommending which specific roles (new or otherwise) should ultimately be included in a modernized definition. However, it is important that the new definition reflects the changing nature of content and creators and continues to provide maximum opportunity for Ontarians to be employed across a range of key creative and key business roles.
12. Given that a robust film and television ecosystem is a shared goal, and the toolkit of incentives must work seamlessly together in order to be effective, this presents an opportunity for all parties to work in partnership with the federal government, and the Commission, to develop strategies to ensure that the implementation of any proposed changes to the definition of a Canadian program is coordinated, aligned and optimizes the impact of support for the film and television sector.
13. We appreciate the Commission's consideration of Ontario's deep experience, valuable perspectives and important role in Canada's creative ecosystem. On behalf of Ontario Creates, we hope that our comments contribute positively to this important broadcasting proceeding, and provide useful Ontario-specific context to support the modernization of the definition of Canadian content. We are not asking to appear at the public hearing, however we look forward to reviewing the submissions made by other interested parties, and continuing to contribute to this discussion as appropriate.

Sincerely,
[Filed Electronically]

A handwritten signature in black ink, appearing to read 'K. Thorne-Stone', with a stylized flourish at the end.

Karen Thorne-Stone
President and CEO

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