

10/08/21

Committee Secretary  
Senate Standing Committees on Environment and Communications  
PO Box 6100  
Parliament House  
Canberra ACT 2600

I am writing in response to the legislation before the Senate regarding the Australian Screen Production Incentives proposed by the Federal Government.

I am a producer at Yarra Bank Films which has been both a Melbourne and Sydney based company since 1984. Since then, I have worked more or less continuously as a writer, director and producer of documentaries. I was briefly the Head of Documentary at the Australia Film Television and Radio School, followed by several years as a Commissioning Editor for Documentary at SBSTV and then also a Series Producer and Executive Producer at the ABC.

My company Yarra Bank Films has produced documentaries for SBS and the ABC. I have also produced documentaries commissioned by the BBC, Channel 4 (UK) Arte (France Germany) and as an Executive Producer and Producer I've directed and produced for PBS (US) and just about every European public broadcaster, too many to mention.

I am writing as I'm deeply concerned about the impact of the draft legislation on my company and my livelihood. In fact some of the proposed changes will completely kill the business model that my last three feature documentary productions have been based on.

Since 2012 I have produced three feature documentaries principally for the Melbourne International Film Festival, international festival release, the national cinema circuit and the international market. One of these films was an unofficial co-production with Germany and was commissioned for prime time by bi-national public broadcaster Arte. It was a very Australian story about refugee Australian artist Mirka Mora and her miraculous survival of the holocaust in France and resettlement in Australia post war. The film, *Monsieur Mayonnaise*, had its international release at the Berlin International Film Festival in 2017. It has screened at over 60 international film festivals and throughout Australia.

My most recent feature documentary was completed in 2020 but has been on hold because of the Covid pandemic. It will be released at the Melbourne International Film Festival in August. *Chef Antonio's Recipes for Revolution* is an official Australian/Italian co-production, produced under the Treaty of Rome 1992. It is only the second such co-production with Italy and the first ever documentary. It will be released in Italy later this year.

All of my productions have employed countless Australian crews and post production facilities over the 38 years I've been a film producer. The last three films have been crewed from both Melbourne and Sydney and involved post production facilities in both cities.

I am specifically concerned about the 3 following potential changes.

- Increasing the QAPE threshold for all feature films from \$500,000 to \$1M – meaning only feature films with budgets over \$1M will be eligible for the Producer Offset.
- Removing the Gallipoli Clause, which permits some costs (such as Australian crew wages) incurred outside of Australia to be claimed as QAPE.
- Removing the ability to count any expenditure on general business overheads towards QAPE.

These changes if implemented would mean that I would NOT be able to continue creating productions, such as the last three films I have produced and directed.

In 38 years of producing I have never managed to raise a budget over 1 million dollars. The average budget range would be \$600,000 to 1 million. But never over the million mark. I believe this to be true of most documentary production in Australia. The market generally is not big enough to produce million dollar+ budgets. There are occasionally some exceptions.

Many of my productions have had international story elements, if not completely shot internationally. They have always employed Australian crew to work with me in international contexts. So, killing off the Gallipoli clause is a disaster for all Australian producers. It means we simply can't engage with the rest of the world as story tellers. My last two films, both co-productions, would not have happened if there was not the international story elements and the QAPABLE expenditure elements provide by the Gallipoli clause. Bot of these production brought vital international cash into our budgets to be spent in Australia. Our co-producer were interested to work with us because of the international story elements and the perspective we were providing as Australian producer/story tellers.

Company overheads in my productions have nver been high – ever. But what currently can be claimed is a small but important part of a budget that helps sustain production companies. We tend to live on the smell of an oily rag – believe me - we are not getting rich making documentary in Australia.

Never-the-less documentary production is vital part of our industry and our broader cultural and social life – we take our stories to the nation and the world and the world comes back to the nationa through our productions too.

So, I submit, that the proposed changes will in effect kill my business model and company and I fear I am not alone. I'm sure this is not the intention of the proposed changes. But it will be the unfortunate consequence. I fear for the future of our Australia industry if these changes become legislation.

Trevor Graham

Yarra Bank Films Pty Ltd.