



National Campus and
Community Radio
Association/
l'Association nationale des
radios étudiantes et
communautaires



Alliance des radios
communautaires du
Canada



Association des
radiodiffuseurs
communautaires du
Québec

A brief regarding Bill C-11, the *Online Streaming Act*

Local news information, stories, and music are at the core of a strong democracy. Community broadcasters are the last line of defense and require appropriate recognition.

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Introduction

Between the Alliance des radios communautaires du Canada (ARCC), the Association des radios communautaires du Québec ARCQ, and National Community and Campus Radio Association (NCRA/ANREC), we represent more than 180 community radio stations across the country. We have stations in almost every province and territory and these stations broadcast in more than 65 languages.

Across the country there are more than 700 staff members and a network of more than 10 000 volunteers. All of our stations are not-for-profit and governed by a volunteer board of directors elected by and responsible to the communities they serve. As a result, ALL investments in community radio goes right back into the community they serve.

More than 1.5 million Canadians listen to community broadcasters on a regular basis, and the critical importance of community radio truly came into focus during the pandemic when we saw a 16% increase in listeners as Canadians sought out reliable local information.

With Facebook and Google increasingly becoming the only source of information for many Canadians, finding that reliable local information has never been more difficult. It is widely known that there are approximately a dozen social media profiles responsible for more than 90 per-cent of the COVID disinformation online. As the Facebook whistleblower proved, algorithms are prioritizing controversy over facts and promoting dangerous messaging in order to attract the almighty *click*.

We are seeing a trend of commercial, for profit, stations abandoning local communities including the gutting of major newsrooms, and an increased use of centralized national programming devoid of local content. In the ongoing CRTC review of commercial radio, commercial broadcasters are asking to reduce the requirements for Canadian content, French language programming (for Francophone stations) and a reduction of the number of new and emerging Canadian artists they have to play as per licensing requirements.

Meanwhile, CBC/Radio-Canada has moved to a “regional hub” model of broadcasting over the last decade. As a result, community radio has become the only home of Canadian music, and local content and information.

Unfortunately, in the current *Broadcasting Act*, community broadcasters are only acknowledged once in section 3 (1)(b) “the Canadian broadcasting system, operating primarily in the English and French languages and comprising public, private and **community** elements...”

We appreciate that in the previous iteration of the proposed amendments (C-10), an enhanced definition was included with the following modifications:

Clause 1, be amended by adding after line 15 on page 2 the following:

“community element means the participation of members of the community in the content production of community media in the language of their choice, as well as in the day-to-day operations and administration of community media; (*élément communautaire*)”

Clause 2, be amended by adding after line 27 on page 3 the following:

(iii.4) support community broadcasting that reflects both the diversity of the communities being served and the high engagement and involvement in community broadcasting by members of those communities, including with respect to the languages in use within those communities and to the ethnocultural and Indigenous composition of the communities,

Clause 2, be amended by replacing lines 41 and 42 on page 3 with the following:

“(5) Subparagraphs 3(1)(i)(i) and (ii) of the Act are replaced by the following:

(ii) be drawn from local, regional, national and international sources, including, at the local level, from community broadcasters who, through collaboration with local organizations and community members, are in the unique position of being able to provide varied programming to meet the needs of specific audiences

These modifications are a good start, but we can and must do better.

Important objectives.

The stated objective of C-11 is to support the production of Canadian music and stories because they are currently at risk. The intention is to do so by supporting creators and producers which would then generate social and economic benefits for Canadians. It aims to promote diversity within the Canadian broadcasting system to better reflect Indigenous peoples and languages, persons with disabilities, and Canada’s diversity, so that the system serves the needs and interests of all Canadians.

This will be done by ensuring greater investment for the benefit of linguistic and cultural minorities.

Community broadcasters are in a better position to help the government accomplish those goals than any other segment of the broadcasting system.

Community based broadcasters produce content in more than 65 languages which includes 11 Indigenous languages spoken by Canadians from coast to coast to coast. More than 35 stations serve Official Language Minority communities. Within these stations is the largest number of diverse broadcasters and programming in the country.

The challenge is that, while C-10 made improvements, the *Broadcasting Act* does not *yet* reflect the key role these stations play in accomplishing the objectives as set out by the current government.

Necessary amendments:

The following are the modifications we propose. We have identified the section where the proposals fit best :

1) Define Community Media

The single most important modification of the *Broadcasting Act* that is needed to support a robust community “element” is to adequately define “community element”.

We propose the following additions (in **bold**), to the amended definition as proposed:

Clause 1, be amended by adding after line 15 on page 2 the following:

*“community element means the participation of members of the community through **volunteers, and a community board elected by members**, in the content production of community media in the language of their choice, as well as in the day-to-day operations and administration of community media, **which are not-for-profit entities responding to the needs of the communities they serve**; (élément communautaire)”*

2) Describe the Role of Community Media (as expressed in the definition of CRTC approved community licenses).

In section 3(1)(d) there is a definition of the role of the public broadcaster. In section 3(1)(s) there is a similar definition of the role of private broadcasters, yet there is no section defining the third element of the broadcasting system, community broadcasting. There is, however, a robust definition of “alternative television broadcasting.”

We propose clause 3(1)(r) be amended to:

3(1)(r) the programming provided by the community element;

- i. Be produced by and for local Canadian communities;
- ii. Strengthens the democratic process and combats disinformation;
- iii. Supports the development of new and emerging Canadian creative talent and provides programming in a range of underserved genres including local news and information, culture, politics, history, and the arts;
- iv. Supports stations who stimulate the local economy;
- v. Reflects Canada’s cultural diversity by providing exposure to underserved groups, ethnocultural minorities, Indigenous peoples and persons with disabilities;
- vi. Provides third-language programming to the ethnocultural and immigrant communities resident within their service areas;
- vii. Is an essential information service for public safety and health;

*** Should a definition of “alternative television” still be required, the above could be included as an addition rather than a replacement.

Conclusion

Community radio is a critical part of the Canadian broadcasting environment. As we see all other broadcasters abandoning local news, information, stories, music and arts, community radio will always focus on supporting local voices.

The *Broadcasting Act* must reflect all elements of the broadcasting system with equal measure. The amendments proposed above will see community broadcasters recognized for their role in a healthy democracy.

Community broadcasters will benefit dramatically if the legislation does in fact ensure financial contributions to support Canadian music, stories, creators and producers. However, that support will only reach the smaller broadcasters in the community broadcasting sector if their role in the broadcasting system is acknowledged in the Act.



A handwritten signature in black ink, appearing to read 'Pierre Sicard'.

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A handwritten signature in black ink, appearing to read 'Barry Rooke'.

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