



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

Submission to the House of Commons Canadian Heritage Committee for their Study on Bill C-10, An Act to Amend the Broadcasting Act

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Regulations should continue to be flexible, and recognise a variety of needs and realities

Flexible approach

Bill C-10 should ensure that a flexible approach to regulation of non-profits/community broadcasters is maintained. The CRTC's flexible approach to the community radio sector has been helpful to us in ensuring that stations remain in compliance with regulations. Below are some ideas of content that we would like to see in the Broadcasting Act, along with additional ideas that could be shared with relevant parties around making their policies flexible.

Specific language in the Broadcasting Act

We acknowledge that the Broadcasting Act is broad legislation that will govern broadcasting and related areas. Below are suggestions for content that need additional research and consultation with other non-profit organizations, to meet the needs of the entire sector.

Broadcasting Act Definition of Community

Guarantee local news and information through community, non-profit ownership and governance as community content/media/broadcast cannot be privately purchased or controlled by a for-profit organization.

Non-profit media is an essential service for public safety and health designed to strengthen the democratic process and combat disinformation.

Funding

That flexible, stable and secure funding be available for non-profit media to generate local news/information and promote local artists, that is reflection of multicultural, geographic and specialty areas from Canadian producers.

Policy Review

Policies developed under the act should be flexible through ongoing feedback process, annual review by the department and have measures put in place for emergency circumstances.

Spotify, Facebook & similar

If the Broadcasting Act is going to regulate streaming services (Netflix, etc), we recommend that Spotify, Facebook, Twitch and other audio-based streaming apps be categorized in a way that requires them to financially support Canadian content production. This financial support could be allocated directly to the campus and community radio sector, or through some other non-profit mechanism, as long as it is substantial and provides enough resources to adequately support the campus and community radio sector. We note that campus and community radio stations are evolving with their use of new digital mediums and are offering multi-platform outputs, and as a result, are becoming more focused on "community media" rather than "radio" specifically and therefore any funding provided should take that into account.

Changes to how the sector is regulated

Significant changes to the regulation of the broadcasting sector are likely to have a disproportionate effect on our sector. This is because our regulatory work is done mainly by skilled volunteers since we lack the financial resources to hire legal experts. We have developed systems to work within the CRTC and government's current frameworks, but it would take time and resources to adapt to new systems and regulations. Below are suggestions that would be very helpful for the campus and community radio sector in relation to the Broadcasting Act, and the policies and processes that will be adopted under the Act.

NCRA Recommendations

- The Canadian Content Development (CCD) funding mechanism should be reviewed and opened up to provide operational funding instead of program-based funding, and it should be a priority to seek input from the non-profit sector regarding our identified needs, when doing this review.
- If licensing of broadcasters is going to continue, it should not be restricted to traditional AM/FM radio, and other non-profit organizations that fulfill similar objectives as community radio stations should also be eligible to obtain audio broadcasting licences as long as they meet certain criteria (e.g. non-profit community podcasters and online-only radio stations could be included in this group).
- If stations wish to move to a campus/community license, that the process be made quick and easy.
- If a campus or community station ceases broadcasting, that frequency be reserved for another community station for up to 18 months.
- The license renewal process is automated unless serious issues of regulatory non-compliance are found, so that the renewal process is reduced in time.
- CRTC and Innovation, Science and Economic Development Canada (ISED) offer community and non-profit services temporary access to regulatory advisors and a guaranteed spot in relevant and meaningful consultations.
- Funding for non-profit stakeholders to attend CRTC, ISED, Canadian Heritage or other government hearings where important changes are discussed, beyond the amounts offered through the Broadcast Participation Fund.
- Provide handbooks, webinars, or other special resources that explain the changes and new regulations (which are developed in consultation with the campus and community radio sector).
- A dedicated commissioner or key high-ranking figure in the CRTC, Canadian Heritage or possibly the Senate or House who is responsible for the non-profit viewpoint and sector.
- The CRTC should have an easier way to address when stations are non-compliant or struggling to meet minimums based on size.
- Dedicated, long-term access to news-related funding.
- Funding to maintain a free service for music distribution to campus and community radio stations for all Canadian artists (which includes automatic submissions to Library and Archives Canada, and integration with the CBC music library database and access for commercially licensed broadcasters).
- When new requirements are put into place, provide additional funding to support campus and community stations (eg. Emergency Broadcasting in 2015, Safety Code 6 in 2018 and upcoming

new accessibility requirements) as compliance with these types of new requirements requires resources that go beyond stations' existing operating budgets.

- Including the term “guarantee local broadcasting through community ownership, because community stations cannot be privately purchased by a for-profit organization” as found in the CRTC Community Radio Policy
- Ensure a clear distinction between services that claim to be “community” or “community-oriented” but are actually for-profit or commercial/private vs. true community broadcasters that are incorporated as non-profit entities and are governed by volunteer boards of directors.
- This means groups like “Canadaland” cannot be included in mechanisms that are created to support the campus and community radio sector.



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