

Submission to the Australian Government: National Cultural Policy

Department of Infrastructure, Transport, Regional Development and Communications
22 August 2022

Amazon welcomes the opportunity to provide the following comments on the Australian Government's National Cultural Policy Consultation. This submission should be read in conjunction with Prime Video's earlier submissions dated 3 July 2020 (the **Screen Content Submission**), 25 May 2021 (the **Green Paper Submission**), 6 May 2022 (the **Investment Scheme Submission**), and the industry report *Streaming for Australia*.¹

Amazon is proud to offer a range of digital content services that support Australian creatives, across various pillars of the 2013 Creative Australia National Cultural Policy.

Amazon's content services are committed to elevating and celebrating First Nations cultures, as an integral part of local Australian content. Prime Video's Local Original documentary, *Warriors on the Field*, was directed by award winning Eualeyai and Kamillaroi woman, Professor Larissa Behrendt, and provides a window into the lives of three Indigenous AFL players. Sydney Swans legend, Narungga, Ngarrindjeri and Kurna man Michael O'Loughlin, shares his story having retired from the game in 2015 after playing over 300 games. Alongside O'Loughlin is current Fremantle Dockers star Michael 'Sonny' Walters, a Noongar man, and up-and-coming North Melbourne Tarryn Thomas, a Kamillaroi and Lumaranaana man originally from Sydney. These warriors, all at different stages of their sporting careers, provide an insight into what the game represents to them, their families and the communities they are from. *Warriors On The Field* highlights and celebrates what makes Aboriginal and Torres Strait Islander players significant to the code and the histories they all share. *Warriors on the Field* was produced by the AFL, EQ Media and Amazon Studios, and launched exclusively on Prime Video in 2022 in Australia and over 240 countries and territories worldwide. Prime Video partnered with the Victorian NAIDOC Committee and hosted a premiere screening in Melbourne during NAIDOC week to celebrate the documentary's release. Prime Video is also a member of the Screen Diversity and Inclusion Network (SDIN), which is a network of broadcasters, screen funding agencies, business associations, guilds and industry-aligned education and training organisations who have committed to working together towards an inclusive and diverse screen industry.

Amazon Music was the proud headline supporter of the National Indigenous Music Awards in August 2022. Amazon sponsored the awards show in Darwin that featured First Nations talents such as Thelma Plum, King Stingray, Emma Donovan & the Putbacks, Birdz, and Fred Leone. Year round, Amazon offers special promotional placements for indigenous artists on Amazon Music the home screen, and provides owned-channel support including newsletter features.

¹ <https://www.streamingforaustralia.com.au/>

Amazon's content services are investing in local content, and empowering Australian creatives by providing new and innovative mediums through which their work can gain recognition. Since 2019, Prime Video has commissioned 15 Amazon Original series in Australia, investing over \$150 million in local productions, which has resulted in more than 2,500 jobs across Australia. This includes documentaries (*The Test: A New Era for Australia's Team*, *Luxe Listings Sydney S1-S3*, *Making Their Mark*, *Kick Like Tayla*, *Warriors on the Field* and *Burning*) and scripted drama (*Deadloch*, *Class of '07*, *The Lost Flowers of Alice Hart*, and *Back to the Rafters*) and the first scripted feature (*Five Blind Dates*). Prime Video also has a growing local team dedicated to developing and producing new Australian content.

Amazon Music is committed to supporting Australian musicians. When Australian artist Ruel's anticipated performance at Splendour in the Grass was cancelled last minute due to weather conditions, Amazon Music offered to host a special free show for Ruel's fans in his hometown. Ruel will perform a festival size production at the show, which takes place at the Enmore Theatre in Sydney on 23 August 2022. Ruel posted on Instagram that "thanks to @amazonmusic I've been able to make this gig FREE for all of u!".

Kindle Direct Publishing (KDP) is Amazon's self-publishing service which enables authors to self-publish in both print and digital formats. Authors that publish through KDP retain their copyright and can get to customers fast, distribute globally and earn royalties of up to 70 per cent. Thousands of Australian writers are self-publishing via Kindle Direct Publishing and seeing success, such as Matt Rogers, CJ Archer and Christopher Cartwright. In May 2021, Amazon opened its first 'Print on Demand' facility in Australia, the first for Amazon in the Southern Hemisphere. The state-of-the-art printing service enables authors and publishers to print paperback books at its Western Sydney Fulfilment Centre, making their selected catalogue of titles continuously available for fast delivery to Australian readers. Its launch will see customers have access to millions of books on amazon.com.au.

Amazon's content services connect Australian creatives to global audiences and opportunities.

Prime Video takes Australian content to the screen of 200 million Amazon Prime members in 240 countries and territories around the world. Prime Video's first Australian Original was released in 2019. *The Test: A New Era for Australia's Team*, gave an insight into the inner sanctum of the Australian Men's Cricket Team through the players own voices. *The Test* is produced by Cricket Australia Films in partnership with Australian production company Whooshka Media, involving a majority Australian cast and crew and directed by Australian Adrian Brown. Richard Ostroff, Head of Broadcast & Production at Cricket Australia, said that "*Amazon Prime Video were terrific partners and collaborators on the project, which employed over 60 Australian production specialists over an 18-month period. We are grateful for their support and investment from Prime Video, which enabled this vital story to be told and distributed to a vast global audience.*" *The Test* became an international success for Prime Video in cricket loving territories including India, New Zealand and the UK. Prime Video not only provides this reach to new Australian content but also a range of iconic Australian films and television shows. For example, we are licensing Australian classics such as *Red Dog* and *The Babadook*. This is part of our objective of promoting and celebrating Australian content among as wide an audience as possible. Prime Video's investments in Australian content are integral

to its ability to meet (and exceed) Australian members' expectations of being able to access compelling screen content.

Amazon Music is helping Australian artists reach a global audience. Amazon is filming a social editorial series that aims to promote local artists' new release singles and albums. Amazon Music is funding the production of this professional content, sharing the content with Amazon Music's global social media audiences, and boosting the artists' social media posts to expand their reach. Amazon Music is offering these Australian artists global visibility and the opportunity to reach new international audience by featuring on our global pages. The first episode with Alex the Astronaut will be live on 26 August 2022, and an episode with Meg Mac is under development. At home, Amazon Music is encouraging Australians to '[Re]discover' local music legends, most recently through an out of home advertising campaign in partnership with SONY to promote Gang of Youths whilst the band was in Sydney.

With Kindle Direct Publishing, an author or publisher can publish a new title in less than 5 minutes and the book will appear on Kindle stores worldwide (assuming the author has selected that option) within 72 hours.

When contemplating Australia's National Cultural Policy, Amazon recommends that the Government adopt:

- 1. A broad definition of culture:** Amazon is committed to supporting Australian culture, and we do so by investing in and amplifying a range of Australian content. Australian culture is dynamic and constantly evolving. Australian audiences are at the forefront of deciding what Australian culture is - how it is defined, consumed and represented - and they are seeking out a variety of mediums and genres (from scripted drama to animation, from documentaries to reality TV, and from interactive videos to audio entertainment). The National Cultural Policy should be designed to promote, support and develop the innovative ways that culture is being created and expressed by and for Australians, so that producers can continue to tell authentic Australian stories to different Australian audiences. The National Cultural Policy, and any subsequent Government policy in this space, should reflect this broad approach that Australian audiences adopt in determining what is relevant, valuable and 'Australian' content. The Government has indicated that it will consider streaming regulation as part of the cultural review process. It's important that any definition of Australian content is broad and flexible for the reasons outlined above. In particular, a narrow view of what content is considered to be of cultural value that is disconnected from the types of content that Australians are looking to consume, should be resisted. We look forward to working with the Government on this issue.
- 2. Evidence-based policy decisions:** Australia's content production sector is booming. The 2021 annual Drama Report² showed record-breaking levels of expenditure on drama production in

² <https://www.screenaustralia.gov.au/sa/media-centre/news/2021/12-08-aussie-drama-production-reaches-record>

Australia in 2020-21 of \$1.9 billion, almost half of which (\$874 million) was made up of Australian projects and \$1.04 billion of which was made up of foreign projects produced or post-produced in Australia. Further, as revealed through the Australian Communications and Media Authority (ACMA) voluntary annual reporting scheme for subscription video on demand (SVOD) service providers, to which Prime Video contributed, leading services invested \$628 million in Australian and Australian-related content in financial year 2021-22.³ This builds on the sector's \$268 million investment in the prior financial year.⁴ We respectfully request that the Government approach important policy decisions based on data and evidence, not anecdotes or hypothetical outcomes that have not come to pass.

3. **A focus on skills:** Sustaining the long-term health of Australia's content production sector requires investment across a range of areas including, but not limited to, local content production, production capacity and infrastructure and talent and skills. Rather than reaching for regulatory levers to drive more investment into an already booming and stretched sector, addressing the current skills and capacity shortages would be more effective in sustaining the Australian content production sector, and would avoid negative consequences. In fact, an Olsberg study suggests that "if Australia addresses constraints in its workforce and infrastructure capacity, there is the opportunity to increase levels of production 10 per cent year-on-year". We urge the Government to take a holistic view of the screen production ecosystem that accounts for these complexities, rather than imposing a narrow obligation to produce content, which runs the risk of exacerbating current trends.
4. **A holistic approach to sector reform:** All of the above needs to be considered within the broad view of the sector, and other changes such as those relating to the review of the anti-siphoning scheme should be considered together.

Amazon remains committed to investing in Australia's creative industries and showcasing talented local creatives in order to delight our customers, in Australia and around the world.

Sincerely



Michael Cooley
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Amazon Australia

³ <https://www.acma.gov.au/spending-subscription-video-demand-providers-2020-21>

⁴ <https://www.acma.gov.au/spending-subscription-video-demand-providers-2019-20>