

**SUBMISSION OF COMMENTS RELATED TO THE RISK-BASED MODEL FOR ECONOMIC ACTIVITY ON BEHALF OF
THE SOUTH AFRICAN SCREEN SECTOR**

26th APRIL 2020

Note: as requested, responses in this submission focus primarily on issues relevant to Level 4. Further submissions will be made as advised in respect of Levels 3, 2 and 1.

Clause	Comment
Level 5 Economic Activity	
G:2	No film or TV production activity will take place during level 5, other than news and the production of important health messaging.
Level 4 Economic Activity	
G:2	<p>Terminology of Clause G:2: We request the change of the current description of “<i>Productions for local broadcast</i>” to “film and television <i>productions using local cast and crews.</i>”</p> <p>This is on the understanding that any such production undertaken during this period will <i>comply strictly with appropriate proposed health and safety protocols (see below and attached).</i></p> <p>This will include jobs throughout the value chain of production including those required for post-production such as editors, sound, special effects, animators who may work in specialised studios where the protocols will be equally enforced as applicable to those activities</p>
	<p>Protocols for the film and television industry under Covid-19 restrictions. (Addendum A)</p> <p>The sector has developed a comprehensive set of protocols, ready to be implemented from 1 May. These are based on the Government Covid-19 protocols but take into account the very specific needs and circumstances of each different role-player and aspect of the production value-chain, with contributions from all the member bodies that represent the sector. These will be finalised and revised</p>

		in need in consultation with the Department of Sport, Arts & Culture, the National Film & Video Foundation and the Department of Health.
		National vs regional or provincial levels: while the sector in the main falls into level 4 nationally, we understand certain areas, like major metros, might retain level 5 restrictions. The sector will consult with provincial and regional in this instance, with the intention of not exposing cast or crew to any risks.
		<p>Level 4 travel restrictions: while we acknowledge the need to minimise inter-provincial travel during level 4, there are instances where it may be unavoidable, and request appropriate special permissions. Such instances might include but not be limited to</p> <p>a) filming occurring in one region but requiring that specialised equipment be 'imported' from another district or province;</p> <p>b) an actor already established as a character in an ongoing production, or one or more cast on their particular suitability for a specific role, might reside outside the area or province where shooting takes place and would need to be brought to the site of shooting for the duration of filming. Would special travel permits be granted for lengthy road travel, or would intercity/interprovincial flights be available or, in special circumstances, permission be granted for special charter flights</p> <p>c) if scenes within a production require the move of principal photography to a specific location outside the immediate home-base area of the filming, would cast and crew be allowed to travel and be accommodated in those areas</p> <p>Accommodation restrictions: with hotels and BnB's only permitted to operate for quarantine and essential services, would special permissions be possible to accommodate cast and crew for however long they need to be 'away from home'.</p>
		<p>Special Permits for 20:00 05:00 curfew: Such a curfew will mean that no night scenes will be able to be filmed during level 4, which will require significant re-writes and rescheduling of productions adding major cost considerations.</p> <p>We ask that special permits be considered in the event that night-shoots are a necessity. Further, especially given the unpredictable time added to each working day needed to manage the health and safety protocols, shoots might overrun scheduled daily wrap times, requiring working into curfew hours.</p>

		We request that normal travel permits for cast and crew reflect the possibility of them needing to travel during curfew.
		Restrictions on critical suppliers: it may be that certain suppliers critical to our industry’s work have not been included in level 4 easing. These may include logistics (film and post production equipment and other) transport hire, equipment hire, specialised suppliers of make-up and prosthetic materials, to mention a few. Should the ability to continue filming be hampered by restrictions on such suppliers, we request that special permits be granted to them.
		Art & Construction departments: these require access to hardware stores, which may only be open to registered building companies and suppliers. Will Film/TV production companies will able to get permits to source materials from hardware stores.
		Wardrobe departments: the ability to purchase clothes for wardrobe use is essential but won’t be possible given clothing retail restrictions to baby and winter clothes only. Again, special permits are requested.
		Work space rentals: departments such as the art and wardrobe departments require spaces to be rented to productions. Given that Real Estate will only be allowed from level 3, will special permissions be granted for the rental of such office/work spaces
		Location scouting/management: finding locations for shooting specific scenes and the ability to contract with and film at those locations is vital to the continuation of much of the sector. We request special concessions for this.
		Insurance cover for Covid-19: the sector has been unable to secure insurance cover for this, locally or internationally. Can the DTI assist in underwriting Covid-19 incident-related cover for cast and/or productions that may have to pause for a quarantine period should a cast or crew member be suspected of having contracted the virus.
		Costs of implementing H&S Protocols: budgets for productions that have been postponed due to the lockdown did not incorporate the added costs of implementing H&S Protocols, rewriting fees to get scenes more manageable in terms of protocols, and delays caused by shooting in a different and slower way. It is requested that some consideration be required from broadcasters, DTI and/or Department of

		Communications to cover these additional expenses, including for new productions. Productions cannot restart until these additional cost considerations are resolved.
		International Servicing special considerations: the international servicing sub-sector of the film industry, which facilitates the filming and often post production of a host of international film, TV and commercials productions, acknowledges that current international travel restrictions put a hold on all such projects, with international required to enter the country in their numbers. However, this sub-sector requests clarity that it is included under the Level 4 classification, as this will enable the service companies to: (i) return to work in order to bid for (and hopefully win) future projects that could potentially come to South Africa once the current travel constraints are lifted; and (ii) continue with preliminary pre-production activities on existing projects that had previously been green-lit in South Africa but were subsequently put on hold following the lock-down. This sector is worth billions annually, contributing to thousands of jobs across the film and TV production value chain from highly-skilled technicians to unskilled labourers while supporting many hundreds of SMMEs within the supplier base to the sector and tourism and hospitality. It aims to be able to work during level 4 so that it might kick-start its operations as soon as further restrictions are lifted.
		PLEASE NOTE, WE HAVE FOCUSED ON LEVEL 4 FOR THIS DOCUMENT, BUT RAISE SOME – BUT NOT ALL - POINTS BELOW THAT WILL BECOME RELEVANT AS WE MOVE TO LEVELS 3, 2 AND 1.
	Level 3 Economic Activity	
2		<p>Current description of “<i>Productions for local broadcast</i>” should be changed to “<i>Productions using local crews and resources, supplemented by limited - and appropriately permissioned - non-local key personnel. All involved complying with appropriate protocols.</i>”</p> <p>This would be based on decision to admit into South Africa, for specifically defined project/s and duties and limited to non-local key personnel.</p> <p>This is in recognition that the screen sector is truly a manufacturer and is a key driver of <i>EXPORTS</i> – AND that it subsumes activity from/creates activity in a very wide variety of other sectors. It is, in fact, the only industry that reflects (and therefore hires and/or commissions services from) ALL major physical, service, technical and digital sectors.</p>

		Home Affairs assistance with facilitating permits for overseas actors or key crew attached to specific projects: we request that travel permits, subject to the necessary Covid-19 screening and testing measures similar to current TB and other testing, be permitted to enable internationals to continue as contracted to productions.
	Level 2 Economic Activity	
3		Current description of <i>“Productions for local broadcast”</i> should remain <i>“Productions using local crews and resources, supplemented by limited - and appropriately permissioned - non-local key personnel. All involved complying with appropriate protocols.”</i>
		Would proposed catering protocols be relaxed?
	Level 1 Economic Activity	Full Economic Activity

MOTIVATION, PREDOMINANTLY IN RELATION TO INTERNATIONAL SERVICE WORK

With recognition and some encouragement from Government, the South African Screen Sector can be a key component of South Africa’s economic and cultural recovery – i.e. “the future” (as soon as the country can open up in a major way). So it is important to take steps now to ensure that future can be realised.

- We need to let our local SMMEs and individual workers back to work ASAP – but to recognise that the **major** future benefits will come only when we can safely bring back previously committed (and invite MANY more NEW) projects that depend primarily on those same **local** resources but need also contribution from limited numbers of non-local resources.
- We consider the above steps an absolute requirement to protect existing sector workers (at all levels – including supply chain) **and** the already committed/already in process projects that can ensure ability to deliver that future;

- Non-local resources are an integral part of our industry and so we have motivated for special consent in instances where they need to be in the country for purposes of delivering a production– provided the process is managed and safe manner.
 - We cannot stress the importance of our international partnerships and productions in this sector. In addition to bringing in foreign direct investment and creating sustainable jobs across the spectrum, we already run the risk of losing many of these partnerships and the work (and Rands) they bring into the country because of the uncertainty of the regulatory and financial frameworks that undergird this industry.
 - South Africa deserves to have its chance of securing some of that international business – it’s a NEW chance, analogous to a “reset”. We have worked hard to take the BEST protocol practices and to design those that are uniquely South African to assure that the sector restarts with the best chance for that future success. We recognise that the current environment is evolving and to that end would be willing to make case adjustments to the initial protocols attached.
 - We need to lay that do groundwork now. While health and safety IS and MUST be paramount, delay in taking up the challenge/opportunity will undoubtedly lead to other destinations reaping the international relationships and work and getting big “wins”, given that Covid-19 is a global issue that will inevitably lead to further competition as markets are able to open again.

In conclusion, we are committed to the protection of existing and creation of new jobs.

We are committed to foreign direct investment, and its impact nationally (Exports/Tax) and locally (supply chains, spill-over to tourism/hospitality/construction etc.).

AND we are committed to the transformation of our industry in a meaningful way.