



20 May 2022

[REDACTED]
New Zealand Taxpayers' Union

By email: [REDACTED]

Tēnā koe [REDACTED]

Official Information request and response

Thank you for your request under the Official Information Act ("OIA") dated 26 April 2022.

You have requested:

1. *All information considered in making the decision to provide up to \$199,999 in funding for the documentary 'Being Chlöe' announced in the December 2021 Funding Decisions.*

For information on our funding delegation procedures please refer to [information](#) available on our website. Please find attached

- a copy of an extract of the 15 November 2021 paper presented to the Staff Investment Committee, that approved funding for this project, Pg 1 – Pg 3.
- Extract of the 15 November 2021 minutes pertaining to this decision, Pg 4 – Pg 5.
- Extract of Overview paper presented at the 30 November – 01 December 2021 NZ On Air Board Meeting for noting of Staff Investment Committee decision made since the previous Board meeting, Pg 6 – Pg 9.

The following redactions in these documents have been made:

- where information is out of scope
- section 9(2)(a) of the OIA to protect the privacy of natural persons
- section 9(2)(b) of the OIA to protect information where the making available of the information—
 - (i) would disclose a trade secret; or
 - (ii) would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information.

2. *A copy of the application for funding.*

Due to the nature of the production community and the commercially sensitive information pertaining to the budget, IP, execution and delivery of the project, we decline to release this information under the following sections of the Official Information Act

- section 9(2)(a) of the OIA to protect the privacy of natural persons
- section 9(2)(b) of the OIA to protect information where the making available of the information
 - (i) would disclose a trade secret; or
 - (ii) would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information.

However please see the extract of the 15 November 2021 paper presented to the Staff Investment Committee, that approved funding for this project as it includes a summary of the proposal.

3. *Details of any past projects providing funding for projects about or containing Chloe Swarbrick and the value of the funding.*

NZ On Air has previously approved strand funding for a project called *Loading Docs Revolution*. Chlöe Swarbrick was featured in an episode from the seventh season - called [Ok Chlöe](#). She also features in the *Frame 2* series for The Spinoff.

We funded the entire project of *Loading Docs Revolution*, which ended up producing 10 documentaries, and *Frame 2*. The funding decision for the strand funding of *Loading Docs* is recorded on our website [here](#). The funding decision for the strand funding of *Frame 2* is recorded on our website [here](#). Note both funding amounts relate to the entire project and not the individual episode.

Also note, NZ On Air does not have any influence over the stories chosen for strand projects – they are chosen after funding is confirmed, and that would be editorial interference which is prohibited in our act.

For transparency purposes we have included the funding paper for *Loading Docs Revolution* 6 September 2019, Pg 10 – Pg 13, and *Frame 2* 28 June 2019, Pg 14 – Pg 17.

The following redactions in this document have been made:

- where information is out of scope
- section 9(2)(a) of the OIA to protect the privacy of natural persons
- section 9(2)(b) of the OIA to protect information where the making available of the information—
 - (i) would disclose a trade secret; or
 - (ii) would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information.

Once the project *Being Chlöe* has been broadcast/released we will be happy to reconsider your request for the application itself and may be in a position to release some of the information we have redacted or withheld. Please contact us again at that time with a new request.

There are no other projects where Ms Swarbrick is the specific focus of the programme. However, this is not to say Ms Swarbrick doesn't appear in other funded content, for example an upcoming episode of *Queer and Here* on Māori Television contains Ms Swarbrick as one subject, among others. We do not have editorial control of content. Ms Swarbrick was listed as one of 17 potential subjects within the proposal, but ultimate choice of subject matter rests with the producers.

For your information, funding provided by NZ On Air for all successful projects is [searchable](#) on our website. You can also [sign up](#) to receive our regular industry newsletter via our website.

You have the right to refer this response to the Ombudsman if you are dissatisfied with it. More information on how to do this is [here](#). NZ On Air proactively releases information in accordance with the Government's commitment to the Open Government Partnership National Action Plan. This includes publishing responses to requests for information under the OIA. Please note that this response (with your name removed) will be published on the NZ On Air website shortly and will remain on our website for 12 months.

Thank you for your interest in our work.

Yours sincerely

A handwritten signature in black ink, consisting of a series of fluid, connected loops and strokes, representing the name Sharon Kerry.

Sharon Kerry
HEAD OF CORPORATE SERVICES

AGENDA ITEM 2.6

FACTUAL < \$200k

FUNDING DECISIONS

RECOMMENDATION

That the Staff Investment Committee **approves** funding of up to:

- \$131,606 to Screentime for *ANZAC 2022*, 2 x 45' for TVNZ 1 subject to 9(2)(b)
- \$199,999 to Razor Films for *Being Chlöe*, 1 x 90' for Three subject to the full production budget being raised
- \$36,900 to Stuff for *State of the Union*, 7 x 4' and 1 x 40' for Stuff subject to 9(2)(b)

and **declines** funding of:

Out of scope

3 applications recommended for total funding of up to \$368,505

9(2)(b) applications recommended decline seeking total funding of \$9(2)(b)

OVERVIEW

1. Please refer to the Funding Overview paper ([Agenda item 2.1](#)) for an overview of all applications in this round.

GENERAL ASSESSMENT & STAFF OPINION

Being Chlöe		Razor Films	Requested \$199,999
Key Personnel	Title/s	Relevant Past Work	
9(2)(a)			

Synopsis

8. This is an application from Razor Films for a 1 x 90' feature documentary *Being Chlöe* for cinematic distribution, Three and Three Now.
9. *Being Chlöe* follows New Zealand's youngest MP Chlöe Swarbrick through to the next general election - exploring both her political and personal life.

General Assessment

10. This film is an expansion of the 2020 *Loading Docs* short documentary [OK Chlöe](#) which was funded in part by NZ On Air. *OK Chlöe* received critical acclaim and featured on [The New Yorker](#), [The Guardian](#) and was selected for numerous film festivals.
11. *Being Chlöe* is set to be released after the 2023 General election with the team envisioning the election result as the logical conclusion to the film's story arc.
12. The proposal positions the film as an observational documentary that chronicles 'the highs, lows and difficulties of being an openly gay, polarising, but immensely popular, millennial politician' as opposed to a hagiography.
13. The team aspires to capture a broad audience beyond the demographics of millennials, women and LGBTQI+ that Chlöe embodies. The proposal quotes Judith Collins' publicly expressed admiration for Chlöe as an example of her appeal across political lines.
14. This proposal requests \$199,999 from NZ On Air (9(2)(b) % of the \$9(2)(b)k total budget). The finance plan includes a \$9(2)(b)k platform contribution from 9(2)(b) and a further \$9(2)(b)k distribution deal for NZ theatrical rights. The production aims to cover the remaining \$9(2)(b)k with 9(2)(b).
15. Should this production be funded the team is requesting a name change for any press release stating that, 'we'd prefer that any media attention from the documentary announcement doesn't focus on Chlöe or get in the way of her normal political or private life. Such attention would also make it harder for us to film'.

Staff Opinion

16. Staff discussed at length the risk profile of this production, as NZ On Air support may be perceived as an endorsement of a politician and/or political agenda. However, given the success of this team's previous work on this subject, the quality of the proposal, and the significant amount of interest expressed both nationally and internationally about Chlöe Swarbrick, staff is of the opinion that the application's merits outweigh the perceived risk. Staff is reassured that as the narrative concludes with the election result, the film will be released after the 2023 election and will not be perceived to influence the result.
17. NZ On Air is a minority funder in this project, and the film's viability relies on other funding partners coming on board. 9(2)(b) the Commission has granted the project development funding.
18. This is an extension of a critically acclaimed production with unique access to one of the world's youngest politicians. **Funding is recommended subject to the full production budget being raised.**

ATTACHMENTS

[Annex A: Comparative Projects Table](#)

ANNEX A - COMPARATIVE PROJECTS TABLE

Project	Duration	Platform	NZOA % Total Budget	NZOA Cost Per Minute	Platform Cost Per Minute	Total Cost per minute
Out of scope						
<i>Being Chlöe</i>	90	Three	9(2)(b)			
Out of scope						

MINUTES



NZ ON AIR STAFF INVESTMENT COMMITTEE (SIC) MEETING

15 November 2021 (2.00pm – 3.40pm)

NZ On Air Boardroom and via Microsoft TEAMS due to COVID-19 Lockdown

Present: Cameron Harland (Chair), Allanah Kalafatelis, Amie Mills, Clare Helm, David Ridler, Raewyn Rasch

In Attendance: Abbi Maidment, Anna Currie, Cat Goodwin, Conall Aird, Fairouz Samy, Gabriel Thomas, Glenn Usmar, Grace Waddington, Heperi Mita, Hui-Ping Wu, Lucy Corry, Luke Campbell, Nick Sodergard, Nicole Rex, Sophie Howard, Steven Gannaway, Sylvia Betham

Apologies: Ruth Harley (in attendance only)

Minutes: Hilaire Carmody

Note: Due to late papers, a separate meeting will be held on Wednesday 17 November 2021 to assess SIC decisions not covered in this meeting.

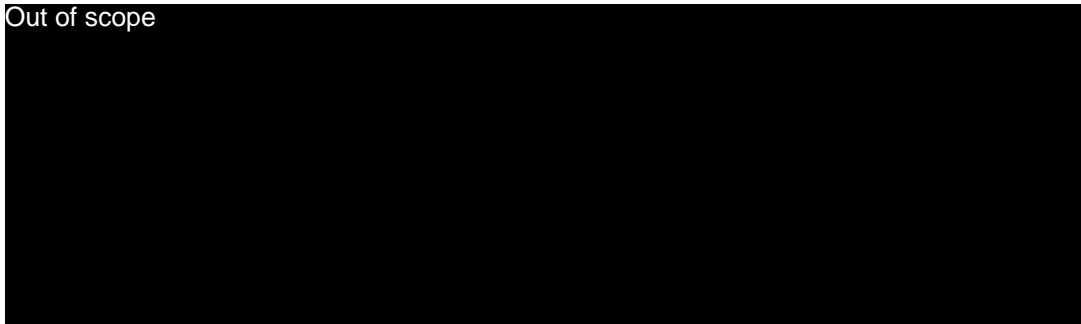
2.0 FUNDING DECISIONS

2.1 FUNDING OVERVIEW

The Committee;

- a) noted and received a verbal update on the current round;
- b) discussed the tracked expenditure to date, the recommendations and impact on spread of funding and expected spend to end of financial year;
- c) noted that seven applications were declined full assessment as they did not meet our criteria;

Out of scope

A large black rectangular redaction box covering the content of item c) and the subsequent text.

1.1 FACTUAL <\$200k

The Committee;

- a) noted and discussed the paper;
- b) discussed the project *Being Chlöe* and that for transparency purposes funding of the project would not have a name change in the announcements pertaining to this funding round, as requested by the producer;
- c) approved and declined Production Factual funding applications - **see appendix 3.**

The meeting closed at 3.40pm

APPROVED: _____
CAMERON HARLAND (CHAIR)

DATE: _____

Approved Production Factual

FUNDING APPROVED UNDER STAFF DELEGATION								
Contract Type	Genre	Title	Platform	Producer	No of Eps	Length of Eps	Amt Approved	Note
FACTUAL	GENERAL FACTUAL	ANZAC DAY SERVICES 2022	TVNZ 1	SCREENTIME NEW ZEALAND	2	45	up to 131,606	9(2)(b)
FACTUAL	DOCUMENTARY	ARO_	MAORI TELEVISION	TE AMOKURA PRODUCTIONS	8	10	up to 207,552	
FACTUAL	DOCUMENTARY	BEING CHLOE	THREE	RAZOR FILMS	1	90	up to 199,999	subject to the full production budget being raised
FACTUAL	DOCUMENTARY	I AM...4	TVNZ 1	SCREENTIME NEW ZEALAND	6	44	up to 781,402	9(2)(b)
FACTUAL	DOCUMENTARY	LOADING DOCS: THE POWER OF EMOTION	LOADINGDOCS.NET	NOTABLE PICTURES	8	10	up to 215,507	
FACTUAL	GENERAL FACTUAL	SOUL SESSIONS 2	TP+	SARA-JANE (T/A ELIKA CONSULTING GROUP)	10	23	up to 395886	
FACTUAL	DOCUMENTARY	STATE OF THE UNION	STUFF.CO.NZ	STUFF	7	4	up to 36,900	
FACTUAL	DOCUMENTARY	THE MALE GAYZ: GOING DEEP	THE SPINOFF	HEXWORK PRODUCTIONS	6	15	up to 370,041	
FACTUAL	DOCUMENTARY	THE SPINOFF DOCUMENTARY ANTHOLOGY	THE SPINOFF	HEX WORK T/A THE SPINOFF	4	20	up to 368,072	
FACTUAL	DOCUMENTARY	TRANS & PREGNANT	TVNZ 1	JACK MEDIA	1	44	up to 237,573	
Totals							up to 2,798,652	

AGENDA ITEM 5.8

STAFF INVESTMENT COMMITTEE / DELEGATED

NZ MEDIA FUND

RECOMMENDATION

That the Board **notes** funding decisions made under the **Staff Investment Committee** and under **delegated authority** from September - December 2021.

STAFF INVESTMENT COMMITTEE

Meetings and Decisions

1. Since the delegated decisions noted at the 21-22 September 2021 Board meeting there has been 2 Staff Investment Committee meetings. One held on 15 November 2021 and another on 17 November 2022. There were also 7 out of time meetings held on:
 - 15 September 2021
 - 5 October 2021
 - 12 October 2021
 - 13 October 2021
 - 26 October 2021
 - 01 November 2021
 - 26 November 2021
2. A schedule of the staff delegated funding decisions from September – December 2021 has been recorded and is attached as [Annex A](#).
3. Most funding decisions are 'up to' amounts to allow staff to undertake a budget assessment before confirming the amount to be contracted.

DELEGATED

Industry Development Fund / Cultural Sector Capability Fund


4. 9 applications were received for the December 2021 round, by the normal deadline.
5. There were also 4 out of time meetings held on:
 - 5 October 2021
 - 7 October 2021
 - 26 October 2021
 - 17 November 2021
6. IDF funding decisions are usually made by the Chief Executive (CE) under staff delegation on the recommendation of the Head of Funding. In this instance, as there was another application staff is recommending be supported by the Capability Fund, the CE has referred this paper to SIC for consideration and approval.
7. A schedule of the funding decisions has been recorded and is attached as [Annex B](#).

PROJECTS TO NOTE

8. Staff would like to bring the Board's attention to the following projects that have been funded, to highlight the diversity of the content and projects which particularly deliver to our s36(c) priorities:

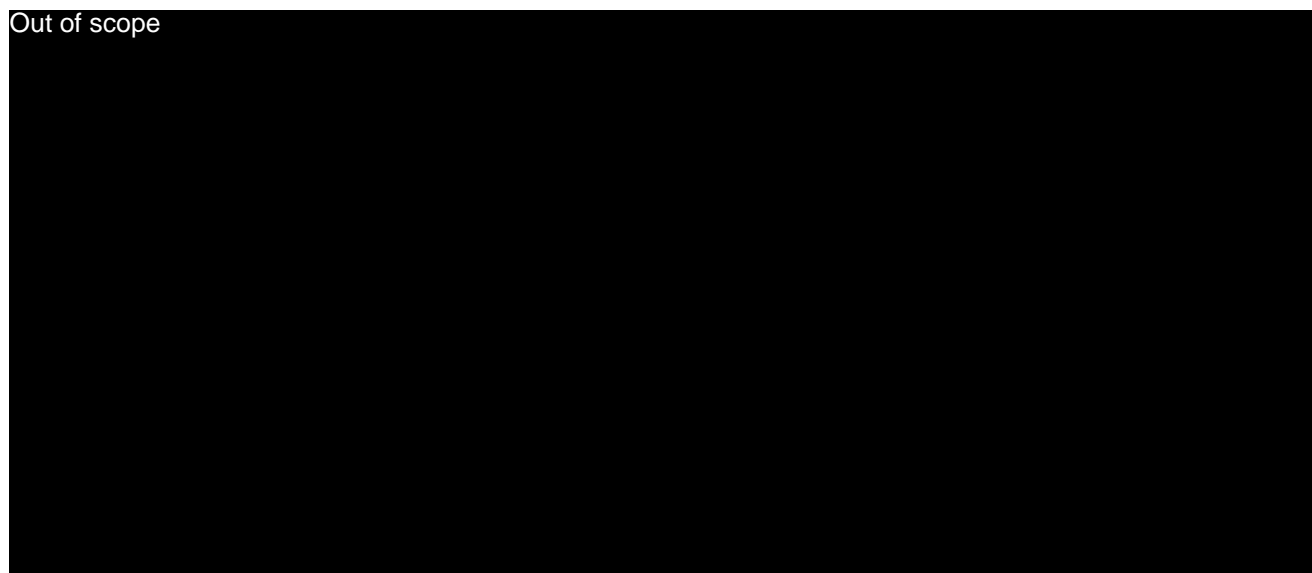
9. Scripted

Out of scope



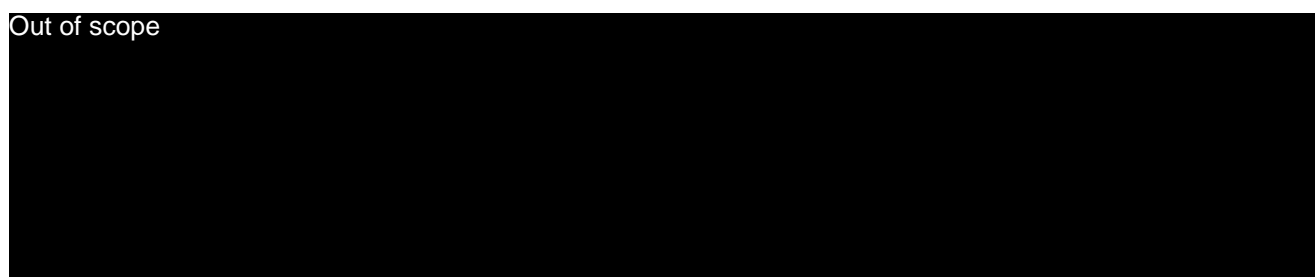
10. Factual

Out of scope



- e. The new Three documentary, to screen after the next election, *Being Chlöe* will explore the political and personal life of New Zealand's youngest MP Chlöe Swarbrick;

Out of scope



Out of scope

11. Public Interest Journalism

Out of scope


12. Music

The latest round for New Music Project saw support for a wide array of 13 multi-single projects from artists including:

Out of scope

Our recent Music Features round to promote new local music across a range of broadcast and online platforms includes some exciting features:

Out of scope



ATTACHMENTS

[Annex A: SIC Funding decisions under **staff delegated authority**](#)

[Annex B: IDF Funding decisions under **delegated authority**](#)

NOTE – Annexes have been removed as either out of scope, or provided with SIC minutes for meeting dated 17 November 2021

AGENDA ITEM 2.6

FACTUAL \$100k - \$200k

FUNDING DECISIONS

RECOMMENDATION

That the Staff Investment Committee **approves** funding of up to:

- \$175,176 to Aotearoa Media Collective for *Coastwatchers*, 1 x 45' for TVNZ 1, **subject to** 9(2)(b)
- \$171,745 to Notable Pictures Limited for *Loading Docs: Revolution*, 8 x 6' for Stuff, Māori Television OnDemand, NZ Herald, RNZ and TVNZ OnDemand
- \$170,333 to Magnetic Pictures for *K'Road Chronicles 2*, 6 x 12' for Stuff, **subject to** 9(2)(b)
- \$155,246 to Showdown Productions Ltd for *Rural Delivery 2020*, 10 x 23' for TVNZ 1 9(2)(b)
- \$136,000 to Treehut Ltd for *Suzy and Friends – Radio and Screen*, 53 x 45' for Access Radio, **subject to** 9(2)(b)
- \$133,348 to Tikilounge Productions for *Multi Nesians*, 8 x 5' for TheCoconet.TV, **subject to** 9(2)(b)
- \$125,000 to Scottie Douglas Productions Ltd for *Whitiki!*, 1 x 52' for Māori Television

and **defers** funding for:

- Out of scope

and **declines** funding for:

- Out of scope

Seven applications recommended for total funding of \$1,066,848

One deferred application for funding of 9(2)(b)

Four applications recommended for decline seeking a total funding of 9(2)(b)

OVERVIEW

Background

1. The September round is the second funding round of the current financial year. It is primarily for production applications intended to reflect and/or appeal to targeted audiences including Children, Youth, Pacific audiences, ethnic populations and community minorities of reasonable size, and people with disabilities. Factual genres for this round include Children's, Documentary, Information, and Events.

Applications

2. We received 43 Factual applications seeking over \$15m. In addition, 21 Children's Factual applications (including content exclusively for the children's media platform [HEIHEI](#)) were received seeking over \$10.9m. These applications are assessed in a separate Children's Content paper at Agenda Item 2.9.

3. Three Factual applications were declined because they did not meet the funding criteria: Out of scope
[REDACTED]
[REDACTED] This leaves 40 applications to be assessed.
4. Two General Factual applications were accepted into this Targeted Audiences round at the approval of the Head of Funding due to significant production timing requirements. Out of scope
[REDACTED]
5. Three Factual applications seek funding over \$1m and are to be assessed by the Board. Out of scope
[REDACTED]
6. The 37 remaining Factual applications to be assessed by the Staff Investment Committee are divided into four papers: Factual up to \$100k, Factual \$100-\$200k, Factual \$200-\$500k, and Factual \$500k-\$1m.
7. The current expenditure to date in FY19-20 for Factual production is just over \$9.1m (25%) from a total annual budget of circa \$37.7m. The 29 Factual applications staff are recommending for approval in this round (including Children's) total over \$17.4m (46%).
8. This paper assesses the 12 targeted Factual production applications which met the funding criteria and are seeking funding between \$100k and \$200k.
9. Comparable Programmes Previously Funded are attached as [Annex A](#)

GENERAL ASSESSMENT & STAFF OPINION

Loading Docs: Revolution

Notable Pictures Limited

\$9(2)(b)

Synopsis

19. This is an application for a seventh edition of the *Loading Docs* initiative that provides a springboard for the creation of short documentary stories as well as supporting documentary makers' careers. The content will be distributed over a range of platforms including TVNZ OnDemand, Loading Docs.net, Air New Zealand in-flight, Stuff, RNZ, Māori Television and NZ On Screen.
20. This year they plan to deliver eight short documentaries (comprising 3 x 8', 3 x 6' and 2 x 4').
21. The series will include:
 - One film entirely in Te Reo Māori.
 - At least one Māori Director
 - At least one Māori Producer
 - At least one Pasifika Director and/or Producer
 - 50% female Directors
 - An Asian Director and/or Producer (dependent on applications)

General Assessment

22. This initiative has been supported in collaboration with the New Zealand Film Commission (NZFC) and Te Māngai Pāho (TMP) and has included an element of crowdsourcing. The amount sought this year from NZ On Air is \$9(2)(b), with \$9(2)(b)k from NZFC and \$9(2)(b)k from TMP. NZ On Air's contribution goes directly to the production of the documentaries, the NZFC contribution goes towards the organisation and support of the talent involved and the TMP contribution goes towards the 100% Te Reo Māori documentary.

23. Each of the team selected by this initiative are required to crowdsource an additional \$^{b(2)(b)} k for their project. Support and guidance on this is a part of the initiative. Over \$^{b(2)(b)} k has been raised through crowdsourcing by the Loading Docs initiative since it started.
24. The distribution of the documentaries created is diverse and has resulted in 526,635 views of Loading Docs shorts by New Zealanders and 5.82 million worldwide. 31 have had film festival screenings here and around the world including NZ International Film Festival, SXSW, Sheffield Doc/Fest and Clermont-Ferrand Short Film Festival.
25. The initiative is run by Julia Parnell (*Dive, Friday Tigers, Hitch Hike*) and Juliette Veber, both of whom have extensive experience in running this initiative.

Staff Opinion

26. This initiative provides valuable support and development and exposure for new and emerging documentary makers and provides a clear path and support for new directors to create quality content.
27. They have worked hard to increase the audience each year and this is a successful cross-funding agency collaboration that NZ On Air should continue to support. **Funding is recommended.**

ATTACHMENTS

[Annex A: Comparable Programmes Previously Funded](#)

ANNEX A: COMPARABLE PROGRAMMES PREVIOUSLY FUNDED

Comparable Programmes Previously Funded							
Programme	Total min. Mins	Year	Platform	NZOA % Total Budget	NZOA Cost Per Minute	Platform Cost Per Minute	Total Cost Per Minute
Out of scope							

Current Applications

Out of scope

<i>Loading Docs: Revolution</i>	50	2019/20	Loadingdocs.net	9(2)(b)
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Out of scope

Recommended for funding

AGENDA ITEM 2.9

PRODUCTION FACTUAL \$200k to \$500k

FUNDING DECISIONS

RECOMMENDATION

That the Staff Investment Committee **approves** funding of up to;

- up to \$462,001 to Kevin & Co for *The Male Gayz 2*, for 8 x 15' for The Spinoff **subject to** 9(2)(b)
[REDACTED]
- up to \$319,150 to Broadcastmedia Ltd for *Demolition NZ Series 2*, 10 x 22' for Prime
- up to \$295,000 to Awa Films Limited for *The Lost Children of Aotearoa*, 3 x 60' for Māori Television **subject to** 9(2)(b)
[REDACTED]
- up to \$283,000 to Wrestler for *Frame 2*, 6 x 15' for The Spinoff **subject to either Extended Platform Rights or a platform contribution towards budget items approved by NZ On Air making up at least 5% of the total budget.**
- up to \$217,585 to Magnetic Pictures for *Hurting*, 8 x 10' for Fairfax *Stuff*, **subject to** 9(2)(b)
[REDACTED]

and **declines**

Out of scope
[REDACTED]

Five applications recommended for total funding of \$1,576,736

Eleven applications recommended decline seeking total funding of \$9(2)(b)

OVERVIEW

Conflict of Interest

1. Out of scope
[REDACTED]

Applications

2. This is the first meeting of the new financial year. We received 58 general Factual applications for the July funding round collectively seeking over \$18 million. In addition, 10 Regional Media applications were received seeking \$2.8m; these are assessed in a separate paper at agenda item 2.3.

3. Two applications were declined because they did not meet the funding criteria: Out of scope
This leaves 56 general Factual applications to be assessed.
4. Four of these with funding requests over \$1 million are to be considered by the Board. Out of scope
[REDACTED]
5. The 52 remaining general Factual applications to be assessed by the Staff Investment Committee are divided into four papers: Factual up to \$100K, Factual \$100K - \$200K, Factual \$200K - \$500K, Factual \$500K - \$1 million.
6. This paper assesses the 16 Factual production applications seeking funding requests between \$200K and \$500K.

GENERAL ASSESSMENT & STAFF OPINION

Frame 2

Wrestler

\$9(2)(b)

Synopsis

32. A returning series, *Frame 2* is a filmmaker-driven short documentary series examining current affairs and contemporary life in New Zealand.
33. Requesting \$9(2)(b) with a platform contribution of \$9(2)(b) for 6 x 15' mini documentaries.

General Assessment

34. The first series of Frame was funded for \$150,000 for The Spinoff in 2017. The series delivered 6 x 7' mini documentaries on a diverse range of stories, ranging from an exploration of small-town brothels to a detailed account of the first women to receive Government approval for a medicinal cannabis co-op in Ruatoria.
35. For the second series, each episode is guided by a different factual filmmaker who is given the creative freedom to produce a documentary in their particular style. The subject matter is wide and varied; social, cultural or environmental issues through a Kiwi lens. Wrestler plan to pair up a Spinoff writer with a film crew in order to produce an accompanying in-depth feature story to be released before the documentary.
36. The first series had 9(2)(b) collective views (self –reported) from social media as well as from The Spinoff, website and statistics were provided for each episode in the application. The episode 'Silent Lambs' which investigated child sexual abuse in the Jehovah's Witnesses Community in Christchurch received a nomination for best video feature in the NZ media awards. The Spinoff are currently building a video hub on their website for all their video content and the *Frame 2* series will be housed there.
37. The tone, style and thematic approach will be set by the filmmaker and/or writer in consultation with Wrestler and The Spinoff. Wrestler will work with filmmakers from groups without a dominant presence in the mainstream news media such as Māori, South East Asian, LGBTQIA+, Polynesian and rural voices in order to tell stories that often don't receive in-depth coverage in the mainstream news cycle. The series will consist of 6 episodes released on a ten-week cycle.

Staff Opinion

38. Requesting \$9(2)(b) more than the last series due to an increase in content output and the additional accompanying pieces from The Spinoff. The \$9(2)(b) contribution is still unclear. 9(2)(b)
[REDACTED]
39. Wrestler produces content that is similar in style and theme to that of Vice NZ's productions (the content is also targeted at a similar millennial audience). With the closure of Vice NZ, there are few platforms that exist

40. Staff believe that this is one of the stronger applications for The Spinoff and Wrestler are clear in the application about the content partnership between them. As this is a Spinoff-supported application, the same caveats will be in place as with **Out of scope** application - **funding is recommended subject to either Extended Platform Rights or a platform contribution towards budget items approved by NZ On Air making up at least 5% of the total budget.**

Annex A: list of comparable programmes

COMPARABLE PROGRAMMES: FACTUAL – \$200K to \$500K

Out of scope

Out of scope

Frame Series 2	72	2019/20	The Spinoff	9(2)(b)				
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