



EFC

The Evangelical Fellowship
of Canada

**Diversity of Voices:
Submission to the Canadian Radio-television and
Telecommunications Commission in response to
Broadcasting Notice of Public Hearing CRTC 2007-5**

July 2007

Request to Appear

The Evangelical Fellowship of Canada requests the opportunity to appear before the Commission at the scheduled public hearings. In addition to the qualifications more fully described in this written submission, the EFC is prepared to respond to questions from Commission members and to present additional information from affiliates and Christian broadcasters. The Commission's response may be forwarded to Don Hutchinson, General Legal Counsel, The Evangelical Fellowship of Canada at the address below.

The Evangelical Fellowship of Canada
1410-130 Albert Street
Ottawa, Ontario K1P 5G4
(613) 233-9868 Fax (613) 233-0301 www.evangelicalfellowship.ca

Introduction

1. The Evangelical Fellowship of Canada (“EFC”) is the national association of evangelical Christians. The EFC gathers Christians together to dialogue, to equip and to partner for greater effectiveness in ministry and public witness. Since 1964 the EFC has provided a national forum for evangelicals and a constructive voice for biblical principles in life and society.
2. EFC affiliates include 40 denominations, 35 post-secondary education institutions, 77 ministry organizations, and approximately 1000 evangelical congregations, who uphold a common statement of faith. The EFC is an active participant in the World Evangelical Alliance, an affiliation of 128 national evangelical alliances.
3. The EFC has participated in several CRTC hearings in regard to religious broadcasting, television violence, sexual content, and previous consideration of the question of diversity of voices / balance in broadcasting.
4. Religious broadcasters have added substantially to the diversity of voices in Canadian media. Given the experience the Canadian broadcasting system now has with religious broadcasters, this hearing is welcomed as an opportunity to participate in the reconsideration of the CRTC’s policies in regard to religious broadcasting and balance requirements in broadcasting.

Summary

5. What Canadians see and hear through the media shapes our attitudes and actions. Evidence of this is found in the billions of dollars spent annually on advertising.
6. The *Broadcasting Act*, section 3(1)(i)(iv), requires “balance” in “programming provided by the Canadian broadcasting system.” Under current CRTC requirements only single-faith religious broadcasters are required to provide balance in their programming by providing broadcasting time for other faiths as a condition of obtaining a broadcast licence. All other stations are permitted to have their programming balanced by the coverage of other stations in the broadcasting system.
7. This interpretation of the *Broadcasting Act*’s requirement for balance with respect to what the CRTC refers to as “religious” broadcasting has resulted in a discriminatory policy which is not required or stipulated by the Act. This policy results in an undue restriction on freedom of expression and is financially harmful to Christian broadcasters, both of these restrictions inhibiting the operation of single-faith broadcasters and the opportunity for a substantial number of Canadians to receive programming for which there is demand.
8. The CRTC should amend its interpretation of the requirements of section 3(1)(i)(iv) in a way that does not discriminate against religious broadcasters and eliminate special policy requirements that differentiate between religious broadcasters and all other broadcasters licensed by the CRTC.

Religion and Canadian Broadcasting

9. Religion is a significant part of the Canadian mosaic and indisputably a part of Canada's multi-cultural heritage and multi-racial nature. Religion is not simply about church services but encompasses the vision and primary philosophy for life of many Canadians.

10. Multiculturalism originated with the First Nations – note the “s” identifying the plurality of Canada's first peoples who also had a plurality of religious beliefs. When the French landed they brought their religious beliefs with them, predominately Roman Catholicism. The English arrived bringing Anglican expression. Later immigration from Great Britain and Europe saw an influx of cultures tied to religious expression: Presbyterians, Lutherans, Anabaptists, Reformed, Mennonites, Methodists, Judaism, etc. The Underground Railroad brought Southern Baptist expression to Canada. Immigration from eastern countries brought cultures that find spiritual foundation in Buddhism, Hinduism, Sikhism, Islam, etc. Each of these cultures/races arrived in Canada embracing their religious expression as a significant component of their identity.

11. Religion remains an integral part of Canadian society. A 2000 Ipsos-Reid poll indicates that 84% of Canadians believe in God and 67% stated their religious faith as being important to their day-to-day life. This data is confirmed in the *2001 Census: analysis series* “Report on Religions in Canada” which indicates that 84% of Canadians have religious affiliations, with 77% self-identifying as Christian, 2% as Muslim, and 1% each as Jewish, Hindu, Buddhist and Sikh.

12. In 2002, the EFC sent a survey to some 15,000 evangelical Christians in connection with submissions being made to the House of Commons Standing Committee on Canadian Heritage in regard to the *Broadcasting Act*. A return rate of over 20% (over 3,000 replies) revealed some interesting and relevant information in regard to religion in broadcasting.

13. The survey noted that Canada's public broadcaster, the Canadian Broadcasting Corporation (CBC) produces little religious broadcasting (and less in recent years with the cancellation of several Canadian produced religious programs). 75.5% of survey respondents were of the opinion that the CBC, a publicly funded broadcaster, does not carry a sufficient amount of religious programming. CBC Radio fared slightly better with 62.2% expressing they felt the level of religious broadcasting was insufficient. As Canada's publicly funded broadcaster, the CBC is falling short of the mark of providing representative broadcasting or balanced broadcasting in the area of religion.

14. Other individual stations in the broadcast system supplement the CBC's lack of balance in religious broadcasting or are required in order to supplement this large broadcaster's lack of balance on a matter “of public concern” as identified in the *Broadcasting Act* and defined by the CRTC. This situation is one example of existing interpretation of the *Broadcasting Act* on a system-wide or regional basis. Comparable illustration might be made using other stations and/or other subject matter categorized as being “of public concern.” Similarly, the *Broadcasting Act's* requirements for balance in all religious broadcasting should be interpreted on a system-wide or regional basis rather than a religious broadcaster by religious broadcaster basis.

Benefits of Religious Broadcasting

15. Since the CRTC began licensing single-faith broadcast stations, Christian media in Canada has contributed in a number of positive ways to the lives of Canadians. Christian radio and television are filling a very real market need. 95.1% of respondents to the 2002 EFC survey indicated that it is important or very important for them to have access to a Christian television or radio station.

16. Canadian Christian broadcasting fosters a unique sense of community and Canadian Christian identity. Many Canadians who previously tuned to American radio stations are now served by one of the growing number of Canadian single-faith stations. Christian radio and television connects Canadian Christians across cultural, ethnic, theological and linguistic lines. Interestingly, it is not only Christians who tune into Christian radio. CHIM fm in Timmins reported that in a survey nearly 30% of their listening audience self-identifies as non-Christian.

17. As a result of the internet, Canadian broadcasters (playing Canadian artists) are also enjoying international success. Ottawa's CHRI fm began real time audio streaming over the world wide web on August 26, 1999 and by early 2000 was ranked sixth most popular Christian station in the world according to a Musicforce.com poll covering over 180 stations.

18. There is also a direct connection between Christian radio and the burgeoning Canadian Christian music industry. Christian book and music stores across Canada indicate that sales of Christian music – particularly Canadian artists – have increased when a Christian radio station goes on the air in their community.

19. Similarly, Christian television in Canada serves as a venue by which many performers launch themselves into further work. Their productions and facilities are a means by which Canadian talent can be fostered and nurtured, regularly featuring guest performers on their programming. Crossroads Television System reports that for approximately 95% of their guest performers Crossroads is their first television experience.

20. History has shown that the CRTC decision to licence single-faith religious broadcasters has greatly benefited Canadians. Religious broadcasters are broadcasting an array of programs which align with Canadians expression of commitment in life and understanding of the world in which we live.

Conclusion and Summary of Recommendations

21. The EFC supports a policy of fair and balanced access to, and use of, the airwaves. Hence, the EFC supports the CRTC's intention to keep the public airwaves open to contributions from the diverse sectors of Canadian society and to prevent these airwaves from being monopolized by or being disproportionately controlled by any particular group or groups.

22. The EFC recognizes that the broadcasting system is intended to reflect Canadians to themselves and to serve their needs and interests in ways that benefit the whole of society. The EFC

contends that for Canada's broadcasting system to properly reflect the requirements of the *Broadcasting Act*, faith and the expression of religious beliefs should be treated with fairness.

23. The *Broadcasting Act* requires that the broadcasting system be balanced in the expression of matters of public concern. The Act does not require that an individual broadcaster provide this variety. While religion has been deemed by the CRTC to be a matter of public concern and is therefore treated differently than most other types of programming, it is evident that this should no longer be the case. Religious broadcasters should be free to operate in similar fashion to any other CRTC licensed Canadian broadcaster.

24. The CRTC requirement that each religious broadcaster is required to provide opportunity for a diversity of religions to express themselves through programming is an unjust and discriminatory practice that places a regulatory and financial burden on religious broadcasters that is not required of other CRTC licencees. Funding for alternate religious programming is often difficult to find. In order to accommodate CRTC requirements a number of licensed broadcasters have been required to provide free or low cost programming in time otherwise available for full cost paying programming. Additionally, religious broadcasters are required to bear the costs of meeting the regulatory requirements associated with the policy. This burden is not required of other broadcasters.

25. With the licensing of VISION TV in 1987 and the subsequent licensing of a variety of multi-cultural and specialty stations, the diversity requirement for television broadcasting are being met in substantial markets across the country.

26. The licensing of radio broadcasters on the basis of culture and language similarly fulfill the diversity requirements in radio.

27. The broadcast system is well-equipped to handle single-faith broadcasters who would not be required to comply with existing policies in regard to religious broadcasting. Accordingly, religious broadcasters should be placed on equal footing with other broadcasters in regard to licensing requirements.

Recommendations

28. Religious broadcasters should be treated equally with other broadcasters in regard to licensing requirements.

29. CRTC policies that distinguish between religious broadcasters and other broadcasters should be rescinded as they are discriminatory in nature. Particular reference is made to those policies found in Public Notice CRTC 1993-78 in regard to:

- a. The requirement for diversity of religions to be provided with air time by each religious broadcaster; and,
- b. The separate standard of ethics required of religious broadcasters. The standard should be consistent for all broadcasters.

*** End of Document ***