Oral Presentation to the CRTC on Violence in Television Programming

October 11, 1995

Introduction
I am grateful for this opportunity to appear before you. The Evangelical Fellowship of Canada (EFC) is a national association of churches, church-related organizations, educational institutions, individuals and 28 denominations from across Canada. We are pleased that the CRTC is reviewing its approach to violence in television programming.

It is my privilege to present to you an open letter from a variety of Church Group leaders on the matter you are considering in these hearings. I will read the letter.

An Open Letter from Church Group Leaders to the Canadian Radio-television and Telecommunications Commission, October 6, 1995,

We, as representatives of a broad range of Canadian Church groups, welcome the initiative of the CRTC to review its approach to violence in television programming.

We commend you and your Chair for working with the industry and public representatives in seeking to discover ways of reducing violent programming which is particularly harmful to children.

We urge you to vigorously pursue the problem of violence in television programming. It is particularly disturbing when violent programming is produced as entertainment, especially when it is intended for children.

We support and encourage you in the continued development of media literacy programs.

We encourage you to develop for viewers, especially parents, information on the degree of violence in programming. This might be done through a classification system.

Our consensus is based on the following principles:

1. all human beings are created in the image of God.

2. all men, women and children are entitled to dignity and respect.

3. research has demonstrated a link between violent programming and aggressive, anti-social behaviour.

4. children are particularly vulnerable to the negative effects of exposure to the depiction of violence on television.

5. according to the Broadcasting Act, the Canadian broadcasting system should "serve to safeguard, enrich and strengthen the cultural, political, social and economic fabric of Canada."

6. the broadcasting system should not be a medium through which Canadians, and particularly children, are harmed.

7. the CRTC should, within the limits of its mandate, assist parents in their responsibility for the nurture and socialization of their children.

We think that the CRTC has taken important steps to address the problem of violence in television. We ask you to continue to fulfill your mandate to ensure that the broadcast system is used responsibly and in accordance with the Broadcasting Act. We hope that you will take our concerns into account during your deliberations.

The letter is signed by representatives of the Anglican Church, the Canadian Conference of Catholic Bishops, the Council of Christian Reformed Churches in Canada, the Evangelical Fellowship of Canada, the Mennonite Central Committee, the Presbyterian Church in Canada, the United Church of Canada and the Women's Inter-Church Council of Canada. As I have mentioned, the EFC
endorses this letter and in my remaining time, I will address in more detail some of the concerns it raises. I remind you that I am speaking on behalf of the EFC and not on behalf of the other signatories.

The EFC wishes to commend the CRTC commissioners and in particular its Chairman for their efforts to discourage violence through the promotion of a media literacy program; for affirming the link between media violence and its harmful effects; for recognizing the need to regulate depictions of violence in order to protect children; and for working with the industry and public representatives to discover ways of reducing violent programming.

**Problem of Violence**

We are deeply concerned about the portrayal of violence which objectifies the human person and distorts human dignity. The unlawful use of physical force, demonstrations of power intended to force submission or subjugation, the threatened use of violence to instill fear and to intimidate; these acts of violence dehumanize the victim as well as the offender. Violence reduces the victim to an object to be manipulated for one's own advantage or pleasure and thus debases the personhood of the victim. This objectification of the victim violates the dignity we all share by virtue of our being created in the image of God. This violation is at the heart of violence.

Exposure to such violence can desensitize a person and, in particular, a child to the effects of violence, and can foster a sense of hopelessness and fear.

We note that the CRTC's review of scientific studies finds television violence a risk factor for antisocial behaviour and aggressive tendencies. The CRTC survey also notes that most research finds a link between exposure to TV violence and aggressive behaviour. We commend you for undertaking these studies.

**Addressing the Problem of Violent Programming**

We recognize that many factors contribute towards violence in society, however it seems clear that TV violence is a significant risk factor; one that can be controlled and moderated. At the heart of these hearings is the issue of who is responsible for this task and by what means violent programming may be controlled and moderated.

We recognize that the control and moderation of violent programming is not wholly the responsibility of the state or governmental bodies such as the CRTC. One of the principles of your approach to this issue is that, "as far as possible, we should rely on co-operative and voluntary action from the industry itself." The EFC agrees that the industry must bear responsibility for the impact of their actions. While we prefer voluntary codes over government regulation, we question how effective these can be. The broadcast system, to the degree it is based on broadcasters who operate for profit, is structured to encourage the broadcasting of violent programming. Violence attracts viewers and thus the system encourages broadcasters to use violence to maximize their profits. Profit is necessary for broadcasters, but if this becomes the overriding or trumping factor, it distorts the other responsibilities that broadcasters have under the *Broadcasting Act*.

Parents are also responsible for the care and nurture of their children. The CRTC recognized this responsibility when it said that parents should be provided with "information and tools needed to choose suitable programming for their families." We are pleased that you are supportive of the development of media and literacy programs as well as the development of a national classification system and the development of technologies which will enable people to screen the programming available in their homes.

The government, and hence the CRTC, also shares in the responsibility. The CRTC's own review of studies indicates that violent programming has a detrimental effect on children and adults. While we understand and value the need for freedom of expression in Canadian society, the purpose of the Canadian broadcasting system is to positively strengthen the social fabric of Canada. It should not be a medium through which Canadians, and particularly children, are harmed.

The CRTC not only has the responsibility to regulate, but under the *Broadcasting Act* it has the authority to ensure that children are not harmed nor the fabric of society fragmented by violent programming. According to section 3.1 of the *Broadcasting Act*, the Canadian broadcasting system should "serve to safeguard, enrich and strengthen the cultural, political, social and economic fabric of Canada." The *Broadcasting Act* also states that the system should "serve the needs and interests, and reflect the
circumstances and aspirations, of Canadian men, women and children...."

One of your guiding principles on this issue is "that the primary focus should be protecting children from the harmful effects of television violence while respecting freedom of expression." We likewise place a high value on freedom of expression. However, we also recognize that there are appropriate limits to this freedom. When harm is being done, restrictions are warranted and limiting access to harmful programming is justified under the Charter of Rights and Freedoms. This is particularly true when the vulnerable (children) are being harmed and the motivation involves profit. It is your responsibility to ensure that the broadcast industry complies with the Broadcasting Act.

Current Policy on Violent Programming
The current approach to the regulation of violent programming is through voluntary codes established by the industry. The approved violence codes include a commitment not to air programming containing gratuitous violence or programming which sanctions, promotes or glamorizes violence. The codes also designate 9 PM as a "watershed hour" before which programs containing violence suitable only for adults may not be aired and agree to include a programming classification system when it is developed.

We urge the CRTC to become more pro-active in establishing binding regulations on all programming within the CRTC's control. While the CAB's code has some merit, it is not pro-active since it is only applied after a complaint is received and since a decision on a particular program is not binding on all broadcasters.

Public Concern about Violence
Though voluntary codes were implemented in 1994 by segments of the industry, concern about the prevalence of violence on television remains widespread. We conducted a survey of our members and supporters. In the past 10 days we have received over 3,000 responses. In the survey we posed the following questions:

1. Are you offended by scenes of crime and violence shown on Canada's TV programs?
2. Should gratuitously violent programming be banned from the airwaves?
3. Should extremely violent programming be banned or restricted to discretionary channels or be obtained only on a pay-per-view basis?
4. Should programs with depictions of violence unsuitable for children be broadcast only after a threshold hour?
5. If yes to the previous question, what should be the threshold hour? 9:00 PM, 10:00 PM, 11:00 PM.

Of the responses:
99.2% said that they were offended by scenes of crime and violence shown on Canada's TV programs, while 0.8% said they were not.
98.9% said gratuitously violent programming should be banned from the airwaves.
99% said that extremely violent programming should be banned or restricted to discretionary channels or obtained on a pay-per-view basis. 18.7% said such extremely violent programming should be banned. Only 0.98% said such programming should not be banned.
93% said that programs with depictions of violence unsuitable for children should be broadcast after a threshold hour. 21% said it should be banned, and only 6% said it should not be restricted.

Of those who said depictions of violence unsuitable for children should be restricted,
6.9% said the threshold hour should be 9:00 PM
21.4% said the threshold hour should be 10:00 PM
63.3% said the threshold hour should be 11:00 PM though it did not appear on our survey as an option, 1.8% said the threshold hour should be midnight.

We will communicate the final results to you when all the surveys are received.

Towards a National Classification System
We support the establishment of a national classification system to rate and label programming. A system could be developed which distinguishes between different types of violent programming. Based on the results of our survey, a classification system could distinguish between different degrees of violent programming in the following manner:
1) Programming containing gratuitous violence or which glamorizes violence,
2) Programming containing brutal violence (some movies shown in theatres have this warning),
3) Programming containing violence unsuitable for children due to a mature theme because no alternatives to violence are depicted,
4) Programming containing violent scenes which are arguably unsuitable for children thus where parental discretion is appropriate, and
5) Non-violent programming.

This classification system would allow for the thoughtful regulation of violent programming. For example, programming involving #1 could be banned from the broadcast system. We note that the CAB, the pay-TV and pay-per-view broadcasters agree that such programming should be banned and the Standing Committee on Communications and Culture recommended that extremely violent programming should be illegal in Canada.

A classification system would allow discretion to be used in determining on what basis other forms of violent programming could be aired, recognizing that some depictions of violence may be integral to the story. Regarding #2, programming containing brutal violence, this type of programming should be restricted to discretionary (pay-TV or pay-per-view) services, if not banned as with #1. Over the air and basic cable subscribers should not have to be confronted by such programming since its value is highly questionable. If it is carried on the broadcast system it should require a positive act of the viewer to obtain it.

In the case of #3, where there is a strong relationship between the violence depicted and the plot or character development, this could be restricted and broadcast only after the watershed hour. While the industry uses 9 pm, studies should be undertaken to determine the viewing patterns of minors. The study may indicate a need to move the watershed hour to after 10:30 pm as is the policy in France. Our survey would suggest that many prefer 11:00 PM.

The development of V-chip technology will not absolve the CRTC from regulating #2 or #3 above. First, in the case of this type of programming, the onus should be on the CRTC and not on parents to restrict access. It should take a positive act on the part of the parent to obtain this programming. Secondly, it will take time for before the technology is readily available so not all parents will be able to make use of the technology to block violent programs. Given the harmful effects of violent programming and the responsibility of the CRTC under the Broadcasting Act, the CRTC should ensure that the viewing of violent programming requires a conscious decision and positive act of viewers.

Given the above, parents could use the V-chip technology to distinguish between #4 and #5 during all hours, as well as block #3, even though the broadcasting of such programming is already restricted until after the watershed hour as recommended above.

**Conclusion**

We recommend that over the air broadcasting and programming carried on basic cable be free from excessively violent programming and that violent programming be restricted to after a watershed hour. A committee could be established to develop and apply a national classification system similar to provincial film boards. The committee should be comprised of parents, community leaders, media experts, experts on the effects of violence, as well as representatives from the broadcast industry. The classification system would serve as a basis for restricting the broadcasting of violent programming in Canada.