Supporting content production through targeted policy measures: international case studies

Annex 2: Review of Public Service Media

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Section

Introduction

The main report notes how fiscal policy measures such as tax reliefs, investment obligations and levies that are targeted towards certain parts of the production sector could be considered as options to support content creation in the UK. Several other countries have developed such measures in a variety of ways. The information in this Annex provides more detail on some of these to illustrate a range of different approaches that are being applied internationally.

Direct and indirect investment obligations on streaming services

This table includes examples of direct and indirect investment obligations that some countries have placed on streaming services to fund national cultural and production sector objectives.[1] They have been chosen to demonstrate a range of approaches, and to complement a similar set of examples that were included in Annex 4 of Small Screen: Big Debate statement. Some of the countries cited also have regulations in place that require national linear services to invest in certain areas of production, with amounts and target beneficiaries varying from country to country.[2]

Country (Region)	Measure	Applies to	Target beneficiaries	Description
Belgium (Flanders)	Direct or indirect investment obligation	Services established in another EU Member State or Belgian region, but targeting viewers in Flanders, with turnover of €2M in the region and reaching more than 0.5% of the Flanders population.[3]	Independent Flemish productions are expected to receive 60% of investments.	Services can choose to pay a lump sum of €7M to the Flanders Audiovisual Fund or a percentage of their annual revenue in the region depending on their size: 2% for revenues below €15M; 3% for revenues between €15M and €30M; 4% for revenues above €30M.

[1] The measures cited from European countries incorporate provisions of Article 13 of the European Union (EU)'s Audiovisual Media Services Directive (AVMSD). This allows EU Member States to require audiovisual media service providers to contribute financially to the production of European works as defined by the Directive, and not just national works.

[2] For a more complete overview of different investment measures that have been implemented by some EU Member States, see European Audiovisual Observatory, 2023. The promotion of European works.

[3] In January 2025 the obligation became applicable to Video Sharing Platforms (VSPs). This is being challenged by Google, Meta and TikTok in the Constitutional Court of Belgium.

Country (Region)	Measure	Applies to	Target beneficiaries	Description
Belgium (Wallonia)	Direct or indirect investment obligation	Services targeting audiences in the Wallonia-Brussels Federation with turnover above €700,000 in the region, and with an audience share of more than 1% in the French Community market.	Beneficiaries of direct investments are determined by cross sectoral committees comprising representatives of service providers, the government, and organisations representing independent producers in the French Community, as well as audiovisual authors.[4]	Services can choose to make direct investments in qualifying productions or pay a levy to the Audiovisual and Cinema Centre film fund. The levy amounts depend on services' turnover and are due to increase until 2027 on a sliding scale between 2% to 9.5%.[5]

[4] More detail is available at European Audiovisual Observatory, 2022. Investing in European works: the obligations on VOD providers.

[5] The levy increase is being challenged by Netflix and Disney in the Constitutional Court of Belgium.

Country (Region)	Measure	Applies to	Target beneficiaries	Description
Canada	Indirect investment obligation with scope for including direct investment obligations	Operators of streaming services with more than CA $25M in Canadian revenue and that are not affiliated with a Canadian broadcaster.	2% of the audio-visual contributions will go to the Canada Media Fund and/or direct expenditures towards certified Canadian content (see also note in next column). The remainder will be directed to areas of immediate need, such as local news on radio and television, French-language content, Indigenous content and content created by and for equity-deserving groups, official language minority communities and Canadians of diverse backgrounds.[6]	The Canadian approach mandates a 5% levy on a service's annual Canadian revenue, starting in 2024-2025 with payments to be made by the 31st of August 2025 and in each subsequent year. The requirement is expected to provide an estimated CA $200M (approx. £100M) annually to support audio and audiovisual Canadian content. 2% of the contributions from audiovisual online streaming services must be allocated by default to the Canada Media Fund. There is some flexibility in how the contribution counts towards a streamer's overall duty to support Indigenous Content and English and French-Canadian content under the measure, as they can invest up to 1.5% of their obligation in Canadian content directly. Other tools or forms of contribution are being considered as part of the following consultations and study: • Broadcasting Notice of consultation CRTC 2024-288, The Path Forward – Defining "Canadian program" and supporting the creation and distribution of Canadian programming in the audio-visual sector • Broadcasting Notice of Consultation CRTC 2025-2, The Path Forward – Working towards a sustainable Canadian broadcasting system • Broadcasting Notice of Consultation CRTC 2025-52, The Path Forward – Supporting Canadian and Indigenous audio content. • A third-party study, commissioned by the Canadian Radio-television and Telecommunications Commission, to examine how Canadians find and discover content on traditional and online platforms (to be published later this year).

Country (Region)	Measure	Applies to	Target beneficiaries	Description
Denmark	Direct and indirect investment obligation	Streaming services with more than DKK 15M in Danish revenue and more than 1% of the total Danish audience.	PSB productions are expected to receive 20% of funds raised. Danish film productions are expected to receive 80% of funds raised.	The Danish approach requires services to make a 5% contribution based on their Danish revenue. All services are expected to pay a base levy of 2%. Services investing less than 5% of their Danish revenue in Danish content pay an additional 3% levy (making 5% in total). Services investing more than 5% of their Danish revenue in Danish content pay the mandatory 2% levy only. Investments can include direct support for production, co-production, and/or the acquisition of rights to films, series.
France	Direct and investment obligation	Streaming services with more than €5M annual turnover in France and more than 0.5% of the total audience in France.[7]	For direct investments, at least 75% of expenses in cinematographic works and 66% of expenses in audiovisual works should be in independent productions, with exclusive rights respectively limited to 12 and 36 months.	Investment obligation: 20% of annual turnover. Levy: qualifying streaming services pay 5.15% of annual turnover, rising to 15% if they offer adult/violent content. This is collected by the French Public Finance Directorate General under the authority of the Ministry of Economy and Finance and transferred to the French National Centre of Cinema (CNC). A study by the French media regulator, Arcom, and the CNC found that €866M (approx. £746M) was invested in the European film and audiovisual sectors by Disney+, Netflix and Prime Video between the years 2021 – 2023, with the majority in works that originated in France.

[6] More detail on how certain media funds in Canada will be supported by the measure is available at Canadian Radio-television and Telecommunications Commission, 2024. The Path Forward – Supporting Canadian and Indigenous content through base contributions.

[7] Levies can also be applicable to online videogame providers and video-hosting services that meet the threshold criteria.

Country (Region)	Measure	Applies to	Target beneficiaries	Description
Italy	Direct investment obligation	Streaming services that have been active for at least one year and with more than €5M annual turnover in Italy. Exemptions can be made for services that meet certain criteria.[8]	Italian productions.	16% of net annual revenues should be invested in independent productions - 70% of which should be Italian. In 2024, the 16% figure was reduced from 20%, and the 70% requirement for Italian productions was increased from 50%.
Spain	Direct or indirect investment obligation	Streaming services with more than €10M annual turnover in Spain, and with a Spanish audience higher than 1%.	Spanish productions.	This model allows services to choose how they make their contributions. For example, those with annual Spanish turnover of €50M or more are expected to invest 5% of their revenues in Spain. They can do this by paying a 5% levy, by directly supporting productions or buying rights totalling 5% of their revenue. At least 70% of direct investments should be in independent productions in Spanish or one of the official languages of the autonomous Spanish communities. Services must also reserve at least 15% of investments for works in the official languages of the autonomous communities.

[8] Criteria includes: no profit made in each of the last two years; annual revenues below €10m; the nature of the service means the obligations are unpracticable or unjustified.

Fiscal incentives for production

Several countries offer fiscal incentives to attract high value productions to film within their borders. This table presents a comparative and non-exhaustive list of some of these schemes to illustrate how a range of different approaches are being applied internationally.[9]

Country	Incentive	Value	Details
Australia	Producer offset	40% tax credit for theatrical features. 30% tax credit for other productions.	Theatrically released features can include documentary, animation and Imax. Other productions can include drama and, since 2024, continuing drama such as soap operas if they [meet a minimum expenditure threshold]() of AUS $35M per season, as well as documentary features on TV or released on DVD or online.The producer offset can be used alongside other Australian state and territory government incentives. Producers can access only one federal government offset per project. There is a minimum qualifying expenditure of AUS $500,000 or $1M for series. Companies must be Australian resident or have permanent establishment in Australia and be able to lodge a tax return.
	Location offset	30% tax credit (increased from 16.5% in July 2024 and applicable to productions that commenced filming on or after 1 July 2023).	This can be combined with state, territory and local government incentives. Producers can access only one federal government offset per project. Productions must have minimum qualifying spend of AUS $20M, and television series must meet an additional spend requirement of AUS $1.5M per episode.
	Post, digital and visual effects offset	30% tax credit.	This can be combined with state and territory government incentives. Producers can access only one federal government offset per project. The incentive is calculated on qualifying expenditure of at least AUS $500,000.

[9] Olsberg SPI, 2025. Global Incentives Index 2025.

Country	Incentive	Value	Details
Canada	Tax credit	16%	This can be applied to 16% of qualified expenditure on Canadian labour, and it can be combined with Canada's provincial tax credit provisions.[10] The applicant must have a permanent establishment in Canada and its primary activity must be film or video production, or the provision of film or video production services. Minimum total budgets must exceed: CA $1M for feature films, CA $100,000 per episode for TV projects less than 30 minutes, and CA $200,000 for TV projects 30 minutes or more.
	Contestable funding	Varies depending on production.	The Indigenous Screen Office was launched in 2024 to support Indigenous-led storytelling with CA $65M over five years starting in 2024–25.
Colombia	Rebate	40% for filming services. 20% for logistics services.	There is a project cap equivalent to US $820,000, and an annual cap of US $1.5M. Minimum expenditure thresholds apply: approximately US $570,000 for films and series, and US $140,000 per episode.
	Tax credit	35%	No project cap applies, but there is an annual budget cap of US $52.3M.
Ireland	Tax credit	32%	Qualifying expenditure is capped at 80% of total production costs or €125M, whichever is lower. The applicant must be resident in Ireland or trading through an Irish branch or agency and must not be connected to a broadcaster. A minimum in-country spend of €125,000 and minimum total budget of €250,000 applies.
	Contestable funding	Varies depending on production.	Sound & Vision is a funding scheme for broadcasters and independent producers. It supports the creation of high-quality programming about Irish culture, heritage, experience, and content to improve adult literacy. Since 2020, it has provided assistance to over 900 projects.

[10] In addition to Canada's federal tax credit, the country also has a varied provincial model of incentives, ranging from tax credits, cash grants and rebates. For example, in Nova Scotia a rebate can be applied to 25 – 32% of costs incurred in the region; in Ontario, a 21.5% tax credit can be applied to qualified production expenditure; in New Brunswick a cash grant can be applied to 25 – 30% for all-spend incentive, or 40% for labour-based incentive.

Country	Incentive	Value	Details
Japan	Rebate	50%	Eligible projects need to meet one of the following conditions: direct production costs in Japan exceed ¥500M; total production costs exceed ¥1bn and direct production costs in Japan exceed ¥200M; projects are scheduled to be released, screened, broadcast or distributed in more than 10 countries or territories, with direct production costs in Japan exceeding ¥200M. There is a Project cap of ¥1bn. Projects must also have scenes shot in Japan, co-operate in promoting the location where filming took place, and support skills development for Japanese creative talent.
Spain	Rebate	30% tax rebate at the national level and 25% thereafter.	For Spanish productions and co-productions, at least 50% of the deduction must correspond to expenses incurred in Spain. For foreign productions, a €1M minimum expenditure in Spain is required for the tax rebate. For animation and post-production, the minimum expenditure required in Spain is €200,000.