

To whom it may concern,

The following recommendations are a joint submission from Australian game development Summerfall Studios, and Meredith Hall, ex-VicScreen games & digital content coordinator.

<b>Legislative Reference</b>	<b>Proposal</b>	<b>Context</b>
378-30, 3	Director-employees should be included as eligible expenditure according to an appropriate market rate.	Director-employees not being included as eligible expenditure is a significant issue that needs to be resolved. Director-employees are often crucial to smaller teams where directors manage the majority of workloads. Additionally, in games, many founders actually underplay themselves in the process of spinning up and scaling a studio. By capping director-employee spend at market rate, we can ensure companies are eligible at an appropriate amount.
378-30, 3b	Allow expenditure on employees and contractors who are involved in marketing, public relations, community management, social media, and other critical distribution and awareness roles.	Marketing is an extremely important part of the development process, and one that is inextricable to remove from the commercial and critical success of a game. With social media and digital engagement being key to this process, upskilling in this space is critical to the success of our industry as a country separated from opportunity and visibility often by travel (especially now.)

		<p>State agencies such as those in South Australia actively include marketing as key to development spends (and acceptable state-based expenditure in many grant programs) and manage any abuse of this system with a percentage cap, as well as restrictions on marketing/PR-only entities (e.g. satellite offices for branding only) versus in-house development marketing support.</p>
378-20, 3c	<p>The porting certificate should have its minimum lowered.</p>	<p>The “porting” certificate should have its minimum lowered to \$250k. Arguably, most porting costs less than this amount (especially when excluding overheads and marketing professionals), so for this to be useful to game developers locally, it would require an amendment and should be lower than \$250k, but we understand the difficulty of doing so. Most porting houses are international, and in order to increase our technical capability as a country and remain competitive, allowing more teams to take advantage of local porting would have a huge benefit. Our recommendation would be closer to \$100,000AUD.</p>
378-20, 2	<p>Games that are not completed should be eligible, including games that have been canceled - not just released titles.</p>	<p>The development process of games is often a long-winded, multi-year endeavor.</p>

		<p>Additionally, it is critical to encourage studios to shut down projects as much as it is critical to encourage them to ship them. A bad project can ruin a studio's reputation, and tank a company's success over time. The current model in the legislature, enforcing "completion" of projects, encourages sub-standard releases.</p> <p>In order to allow developers to access the DGTO appropriately in the spirit it is intended, allowing access for games in-development would allow for increased likelihood of release, stronger outcomes for studios, and allow studios to close down projects when it is appropriate to do so without fear of losing the offset.</p>
		Inconsistency between state and federal eligibility for support & the need/impact on economic outcomes - link to skills development
378-20, 1	Inclusion of provisional certificates to ensure good faith.	For developers engaging in negotiations with international publishers or investors, supply of a provisional certificate is critical to de-risking and encouraging investment.
378-65	Provide clarity on certificate revocation in cases of disrepute, underspend, and bad faith behaviour.	On occasion, development studios and their staff can be viewed in the public eye critically due to poor behaviour or

		management. While unlikely, clarity on revocation processes, when and how revocations occur, and the process of these revocations/clawback would add clarity to the process.
378-100, b	Provide clarity on “the materials provided to the public in connection with each of those game”	With the huge amount of materials available digitally to a public audience, this requires clarification on what should be supplied to the National Film & Sound Archive. Simply providing a game is not going to be relevant long term, but supplying every piece of information of say, a store page, would be far too much to provide. This process is involved for developers in terms of delivery, so clarity on required materials (e.g. 3 screenshots, a trailer, an elevator pitch etc) would reduce time, and improve outcomes.

## About Us

### Summerfall Studios

Founded in 2018 in Melbourne, Australia by David Gaider, Liam Esler, and Elie Young, Summerfall Studios is an independent game development company with a focus on making premium narrative-led, character-driven games. The studio’s first title, *Stray Gods*, is one of the first of its genre and has garnered significant attention for its innovative vision of an interactive roleplaying musical.

### Meredith Hall

Meredith is ex-Vic Screen, cofounder of Accessibility Unlocked, Communications Director & Lead Producer with the Aconite and Strange Scaffold teams, and a frequent public speaker and advocate. She was named one of 50 under 50 in InGames 2019 Gender

Equality in Games list, was named Rising Star at the 2020 Australian Game Developer Awards, and is a multi-award winning producer and marketer. As an independent creative, Meredith supports the games industry locally and internationally working across production, business development, marketing, and accessibility.