

Perspectives on Practice: Film preservation policy in Ireland—the politics of omission

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Abstract

Ireland is one of the few western nations without a state sanctioned archive or policy for moving image preservation. This lack of a formally authorised national moving image collection or policy to protect it is surprising given Ireland's membership of the European Union (EU), a supranational organisation that has stressed the importance of film heritage to society for decades and encourages member states to proactively preserve and disseminate their national film collections. Despite this, Ireland has neglected to implement EU film heritage recommendations and, whilst moving image preservation has been sporadically discussed at government level, it has never been deemed worthy of a specific policy, legislation or resultant safeguards. The absence of policy in this area has shaped official thinking and attitudes towards Irish moving image heritage, with support for preservation sporadic and ad hoc in nature. Policy and funding have concentrated on the production and distribution of new moving image works rather than the preservation and dissemination of heritage material. This paper utilises the author's experience as Head of the Irish Film Institute's (IFI) Irish Film Archive (IFI Archive) to explore this imbalance in Ireland's film related policy and the practical consequences of this omission. It looks at recent cultural policy and strategy documents for evidence of film heritage provision and frames the findings within recent academic discourse examining the neoliberal turn in Irish cultural policy. Finally, it suggests possible solutions to safeguard and heritage moving image collections.

Keywords: film preservation; film archive, Irish policy

Biographical statement:

Kasandra O'Connell is the head of the IFI Irish Film Archive which preserves Ireland's national moving image collection as part of the Irish Film Institute.

Perspectives on Practice: Film preservation policy in Ireland—the politics of omission

Introduction

Unlike most other Western nations where the importance of preserving and studying moving image heritage¹ has been recognised from the early to mid-twentieth century, Ireland still has no national cultural institution for film that is fully state funded and no official national policy for moving image preservation. Moving image heritage is extremely vulnerable to its environment, poor storage conditions and technological obsolescence, making a national policy and centralised funding, legislation and standards in this area all the more crucial.

The Irish government's lack of a formally authorised national moving image collection and a preservation policy to protect it is surprising given that as a member of the European Union (EU) Ireland is required to include film heritage and its preservation in national film related policy. Yet film heritage (for the purposes of this paper I will use the European Audiovisual Observatory's (2016, p. 9) definition of film heritage, works that are ten years after their theatrical release), whilst discussed periodically at government level, has never been deemed worthy of a specific policy, legislation or any of the accompanying safeguards. The absence of state policy in this area has shaped official thinking and attitudes towards moving image heritage, with strategy and funding concentrated on the production and distribution of new moving image works rather than the preservation and dissemination of material that is no longer in commercial distribution. Why is this the case and what does it mean for those working to safeguard and share heritage moving image collections? Utilising the author's experience as head of the Irish Film Institute's (IFI) Irish Film Archive (IFI Archive) over the past two decades this paper will explore the imbalance in Ireland's film related policy, seeking to identify factors that have led to this policy and funding oversight. Finally, it will outline the practical and financial consequences of this cultural omission and suggest possible solutions.

The predominant cultural policy discourse in academia over the past twenty years has critiqued the influence of neoliberalism and the commodification of creativity (Belfiore, 2020; Hesmondhalgh et al., 2015). Central to this critical thread is the denouncement of instrumentalism, where the arts are harnessed to deliver other objectives, and the requirement by policymakers that those engaging in cultural practices prioritise the economic value of their output, over other more intrinsic benefits such as the 'personal, social' and 'societal' (Klamer, 2017). Criticism of Irish cultural policy has also followed this trend with Rush (2019), O'Reilly (2013) and Barton et al. (2023) commenting on the development of instrumentalism within Irish arts policy. Analysis of Irish film policy (O'Brien, 2019; Hadley et al., 2020) makes similar observations regarding the increased need by arts practitioners to demonstrate the economic impact of the work they create at the expense of other less market driven benefits. This article will endeavour to determine whether this neoliberal policy turn has been a factor in the lack of consideration given to film heritage in Ireland.

Irish context

Ireland is unique within Europe in being the only country without a national film archive that is primarily funded by the state. Many European countries realised the need to have a centrally funded national cultural institution dedicated to the preservation of film output before the Second World War; with Britain, Germany, and France all founding such organisations in the 1930s and the International Federation of Film Archives (FIAF) established in 1938. However, despite articles as early as 1920 (Gaughan) suggesting that Ireland should establish a national film collection for cultural and educational purposes, and key members of the Irish Film Society², such as George Morrison and Liam O’Leary, unsuccessfully campaigning for the establishment of a national film archive from the 1950s, it was not until the 1980s that the IFI took the task upon itself. This was partly in response to the increased level of indigenous production that had resulted from the formation of the first Irish Film Board/Bord Scannán na hÉireann (now Screen Ireland/Fís Éireann) in 1980 and the need for that output to be centralised and preserved. As none of Ireland’s official National Cultural Institutions were allocated the task, in 1986 the IFI established the IFI Archive for the purpose of preserving Ireland’s film heritage, receiving modest state support to do so.

As a result, the Irish national moving image collection is currently held by the IFI Archive, which is a department of the IFI (a private company with charitable status) and as such receives less than 25% of its budget from the state via the Arts Council/An Chomhairle Ealaíon. The IFI does not come under the auspices of the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media/An Roinn Turasóireachta, Cultúir, Ealaíon, Gaeltachta, Spóirt agus Meán (DTCAGSM) and therefore, the IFI Archive has no official line of communication with state policy makers although attempts have been made to rectify this position. In 2014, the IFI set up and chaired the Film Heritage Advisory Group which included representatives from the Department of Arts, Heritage and the Gaeltacht/an Roinn Ealaíon, Oidhreacht agus Gealtachta, the National Library of Ireland/Leabharlann Náisiúnta na hÉireann, the Irish Film Board, the Arts Council Ireland, the Broadcasting Authority of Ireland/Údarás Craolacháin na hÉireann (BAI), the Digital Repository of Ireland/Taisclann Dhigiteach na hÉireann, Screen Ireland/Fís Éireann and the Heritage Council/An Chomhairle Oidhreacht. The group was brought together for the purpose of identifying and consolidating existing policy and provision in relation to moving image heritage in Ireland using the *Recommendation of the European Parliament and the Council (of 16 November 2005) on Film heritage and the competitiveness of related industrial industries*, as its reference point. The Film Heritage Advisory Group aimed to promote best practice and encourage cooperation between appropriate organisations. However, while some advances were made, including a national survey of moving image materials in 2018, the EU’s shift in focus to the online distribution of film heritage, the COVID19 pandemic and the absence of key personnel due to illness restricted its achievements.

The fact that the majority of Ireland’s film preservation activity is undertaken by an agency that sits outside the public service has resulted in a deficit of communication channels between the IFI and state policymakers. This lack of dialogue has been detrimental to the visibility of film heritage at government level and consequently this area has not been high on the agenda of official policymakers. It is therefore, conspicuous by its absence in official cultural policy documents.

EU context

Conversely, from a European perspective film heritage is considered important and several recommendations (EU, 2001; 2005; 2012; 2013; 2014) have been made regarding how this area of culture should be managed, preserved and made accessible for the benefit of individual member states and all Europeans. Indeed, the Irish government's lack of a formally authorised national moving image collection and a preservation policy to protect it seems particularly remiss given the EU's decades long emphasis on protecting and sharing film heritage, as evidenced by 1980 UNESCO *Recommendation for the Safeguarding and Preservation of Moving Images*, *European Convention for the Protection of the Audiovisual Heritage* (EU, 2001)—which Ireland has not yet signed up to—and the *EU Film Heritage Recommendation* (2005), all of which highlight the fundamental importance of film heritage within society and encourage members to proactively preserve and disseminate their national film collections.

Although some criticise EU film policy, particularly the 2005 recommendation, as instrumentalist in nature (Antoniazzi, 2019), despite its title (which suggests a market led approach), the 2005 recommendation places most of its emphasis on the historic, educational and cultural value of film, while acknowledging the economic value. Accordingly, it recommends that EU member states:

ensure that cinematographic works forming part of their audiovisual heritage are systematically collected, catalogued, preserved, restored and made accessible for educational, cultural, research or other non-commercial uses of a similar nature. (EU, 2005, p. 1)

It also outlines a series of actions designed to support film heritage institutions and ensure that the protection and dissemination of film heritage is fully embedded within national moving image policy.

Whether one considers EU policy to be instrumentalist or not, it undoubtedly recognises the importance of film heritage and the need for member states to proactively ensure this heritage is collected and preserved. In contrast Ireland remains sadly lacking in this area. While the Irish government has recently made welcome progress in developing policy related to heritage, culture and Ireland's audiovisual industry; film preservation is unfortunately absent from them all. This absence of film heritage from cultural policy and strategy creates what Carol Bacchi (2012) identifies as policy silences. Omissions such as these are in themselves very revealing, as they tell us much about the state's cultural priorities. Policy analysts such as Des Freedman (2010) contend that the creation of policy gaps is not a passive activity but one that requires consideration within decision-making structures.

Can the absence of Irish film heritage policy be explained by the instrumentalist nature of Irish cultural policy and the lack of economic opportunities associated with film heritage, or are there other factors at play? Examining current film preservation mechanisms, some recent Irish cultural policy and the strategy documents of relevant state agencies may help to answer these questions. While there is insufficient space to examine each film related policy or strategy in detail, I will briefly look at a selection of these documents to determine their provisions (or lack thereof) on film heritage, in order to establish how overlooked this area is in an Irish cultural context and to identify the factors contributing to this situation.

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Culture 2025

Culture 2025/Cultúr 2025 is a national cultural policy framework published by the then Department of Culture, Heritage and the Gaeltacht (DCHG) in January 2020. It sets out ‘an all-government approach’ (2020, p. 9) to:

defining the scope and setting the direction for Government policy in the whole cultural field’ aiming to ‘ensure a unified and coherent approach to government policy across government departments. (ibid, p. 4)

The principles, aims and values contained within *Culture 2025* articulate a holistic approach to Irish culture and arts policy, and as such it is the state’s first overarching framework in this area (Hadley et al, 2020). This inclusive approach is both welcome and overdue, as prior to this, arts policy — and consequently arts funding—has been fragmented in nature, leading to inconsistency and disjointedness within the sector. The ten aims of *Culture 2025* are largely a list of ‘detailed policies and implementation plans in specific areas’ (DCHG, 2020, p. 6). Of these supplementary documents those of most relevance to the audiovisual sector include *Creative Ireland* (2017), *Heritage 2030* (2022), *Culture, Language and Heritage 2018-2027* (2018), and the *Audiovisual Action Plan* (2018).

Culture 2025 is both national and international in its ambition, promising to make a contribution ‘to the development of EU and international cultural policy’ via the ‘EU Culture Council, EU commissions, the Creative Europe Programme and membership of key UNESCO cultural conventions and programmes’ (DCHG, 2020, aim 10, p. 5). This pledge reinforces the Irish government’s intention to act as a good European citizen within a cultural context. Yet, as we have seen, despite this commitment to EU policy, long existing EU recommendations relating to moving image heritage have been largely ignored, indicating a disparity between the government’s stated intention and practice, at least in relation to film preservation.

Culture 2025 avoids neoliberal language in its key principles, ‘Recognising the value of culture and creativity to the individual and society; Supporting creative practice and participation; Cherishing our cultural heritage’ (DCHG, 2020, p. 9) which focus on wellbeing and creativity rather than economic value. This emphasis is also apparent in the introduction by the Minister (at the time of the document’s publication) for Culture, Heritage and the Gaeltacht Josepha Madigan who states that ‘the fundamental premise’ of the document is ‘that culture is intrinsic to human living, as individuals, as communities of place or interest, and as a democratic society’ (DCHG, 2020, p. 2).

The inclusion of the phrase cultural heritage within *Culture 2025*’s principles is welcome, as it implies that the value of all forms of heritage, including film, is fundamentally recognised by government. However, while the document’s central principles avoid instrumentalist rhetoric, a section called *Culture and the Economy* makes the financial benefits of cultural activity crystal clear (ibid, p. 14). Additionally supports outlined for film are entirely market driven consisting of ‘financial and tax credit measures’ (ibid, p. 25). Hadley et al note the document’s concentration on the industrial potential of film in a globalised market despite its claim to recognise ‘the distinctive benefits of culture for both society and the economy’ (2020, p. 17). They suggest that where the cultural value of film is acknowledged within *Culture 2025* it has been co-opted to present a homogenised version of Irishness on a global stage. They consequently question whether the cultural value of film would be

recognised at all were it not so closely linked to economic potential. This instrumentalist policy approach points to the Irish government's difficulty in recognising the complex intrinsic benefits of film heritage, leading it to concentrate on the more easily defined industrial and marketing potential of the sector.

The difficulty of categorisation and definition within the Irish cultural/arts/heritage space is also evident within the document. The practical need to demarcate cultural activity for administrative purposes, so that it can be placed within the appropriate governmental department or funding agency is problematic, as arts, culture and heritage are fluid and nuanced sectors with many layers of overlap. *Culture 2025* attempts to address this difficulty in the section 'defining creativity and culture' offering 'a circumscribed but still wide-ranging definition of culture' (DCHG, 2020, p. 7). However, the breadth of definitions offered by the policymakers present little clarity on where film heritage would be placed within 'this unified and coherent approach to cultural policy' as there are few references to the audiovisual sector within its pages and none at all to film preservation. While there is a pledge to 'support cultural institutions in the digitisation and preservation of digital cultural content and develop a national digital preservation policy' (ibid, p. 25). it is unclear if this statement encompasses the digital moving image as there is no further detail offered.

Other policy documents

A lack of clarity on the place of film heritage within government policy is also evident in other recent policy documents related to *Culture 2025*, such as *Investing in our Culture, Language and Heritage 2018–2027*, (DCHG, 2018a), part of *Project 2040/Tionscadal Éireann 2040* (2018) (the government's overarching development and investment strategy). Divided into the headings of Culture, Heritage and Irish Language, with financial commitments detailed under subheadings within these categories, it is once again evident that film heritage falls between cultural stools. Although there are multiple areas within both *Culture 2025* and *Culture, Language and Heritage 2018–2027*, where film heritage might comfortably sit, it has not been explicitly included in any of them. This absence raises questions about the government's attitude to moving image preservation. Has it been deliberately excluded or is it a victim of its multifaceted nature, not easily filed under culture, heritage or arts policy, and consequently excluded from all of them? By examining additional documents and plans associated with *Culture 2025*, we may discover some concrete references to film heritage and give clarity about where it lies within a government policy framework.

Heritage Ireland 2030

Unlike the other implementation plans relating to *Culture 2025*, this document was published by the Department of Housing, Local Government and Heritage (DHLGH) rather than DCHG. Released in February 2022, some of its activities have been delayed due to complications of the COVID19 pandemic. However, it is still worth examining for intent.

Heritage Ireland 2030/Oidhreacht Éireann 2030 is a framework document; its objectives (or themes as they are called) are Communities and Heritage, Leadership and Heritage and Heritage Partnerships. While the economic benefits of a heritage sector are readily acknowledged within the

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document, neoliberal value statements are avoided, and the main focus is on the intrinsic cultural and social value of tangible and intangible heritage. The document not only avoids language relating to the economic exploitation of heritage, but it recognises the precarious and inconsistent nature of heritage funding and the voluntary nature of much of the heritage sector. Importantly, it aims to enhance 'recognition and support for owners of heritage assets' as well as for 'practitioners in preserving Ireland's heritage' (DHLGH, 2022, p. 43). It also recognises the key role of the Heritage Council as an independent statutory policy advisory agency in 'developing and implementing *Heritage Ireland 2030*' (ibid, p. 45) thus acknowledging the position of the Heritage Council as the most appropriate government agency to deal with heritage policy matters.

This positioning of the Heritage Council further confuses the place of film preservation from a strategic policy perspective. As Ireland's cultural organisation for film, the IFI sits comfortably under the auspices of the Arts Council rather than the Heritage Council, as an artform partner organisation. However, the heritage-based activities of the IFI Archive as part of the IFI introduces a level of complexity and anomaly that is difficult to address within existing Arts Council policies which do not reference heritage collections. Of the various policy documents and plans issued by government under the auspices of *Culture 2025*, *Heritage Ireland 2030* is the only one that specifically mentions museum, archives and heritage collections, suggesting that film heritage and its preservation might be better located within heritage instead of arts policy from both a strategic and practical standpoint. This situation where the delivery of an appropriate policy framework would require an arts organisation to be under the remit of more than one state body demonstrates what Hadley et al have identified as a lack of coherence within the sector. This 'diversity of actors' within the cultural policy space who often have 'very different goals' (2020, p. 150) is a key factor impeding the development of effective, consistent and comprehensive culture and arts policy in Ireland.

Audiovisual Action Plan

Splitting different aspects of film activity between heritage and arts policymakers would be administratively challenging, thus requiring the issue of policy categorisation to be solved in another manner. Including film heritage in the *Audiovisual Action Plan*, a document that seeks to translate *Culture 2025*'s ambitions for the film sector into concrete actions, would seem like a practical solution. In her introduction to the *Audiovisual Action Plan* Minister, Josepha Madigan states that the plan will be used as a mechanism to deliver commitments articulated within the document *Investing in Culture, Language and Heritage 2018-2027*. She holds that:

the plan recognises that investment is critical for a vibrant media production sector and that investment in our cultural heritage underpins social cohesion and supports strong, sustainable economic growth. The Plan is designed to help promote Ireland and celebrate Ireland as a centre of cultural excellence and a source of rich natural and built heritage (p. 20).

However, despite this encouraging introduction an examination of the subsequent plan reveals a distinctly neoliberal focus, with the production and commercial distribution of film supported at the expense of any heritage related activities. The *Audiovisual Action Plan* is divided into four sections with the main piece of text titled *Recommendations of Economic Analysis of Audiovisual Sector in Ireland* (DCHG, 2018, p. 12) reflecting Hadley et al.'s (2020, p. 152) argument that Irish government

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policy tends to position and evaluate creative activity, including audiovisual, in relation to the economic benefits it generates.

Unlike the other documents that come under the umbrella of *Culture 2025*, the *Audiovisual Action Plan* makes no real mention of the fundamental benefits of culture, or the audiovisual industry, apart from a sentence in the foreword by Josepha Madigan recognising ‘the importance of Irish cultural heritage in introducing Ireland on the world stage, and in expressing our cultural identity’ (DCHG, 2018, p. 7). This instrumentalist view of cultural heritage and specifically the audiovisual sector is problematic, not only because of its reductive nature (it suggests homogeneity within Irish cultural production) but it also fails to recognise the intrinsic benefits of this activity and ‘*the value of culture and creativity to the individual and society*’ (Principle 1, *Culture 2025*, p. 9). O’Brien describes this approach as the ‘commodification of the nation space and national culture’ (2019, p. 425). She also comments that:

The value placed on the audiovisual industries stresses the quantitative cost/benefit measurement in order to rationalise public support for audiovisual production (2019, p. 421).

She points out that this focus is predictable given that the plan was developed using information from reports (Crowe Horwath, 2017; Olsberg SPI with Nordicity, 2017) commissioned by government to ‘measure the current economic value of the Irish audiovisual industry and to propose policy changes to support its future growth’ (ibid, p. 423). It is therefore disappointing but unsurprising that the document fails to consider film heritage within its measures. This is no doubt due to the intrinsically cultural and educational nature of film heritage’s value, and the lack of potential opportunities to exploit it economically due to the complexity of rights clearance and the expense of undertaking film and digital preservation and dissemination.

The implementation of the *Audiovisual Action Plan* recommendations was overseen by a high-level steering group along with the relevant government departments and their agencies. Although the inclusion on the steering group of someone with an understanding of film preservation would have been beneficial, it is difficult to see how policies to safeguard and share film heritage could be shoehorned into the objectives of this economically focused plan.

Thus far we have seen that none of the government’s suite of policies and plans under the umbrella of *Culture 2025* fulfil the EU recommendation that film heritage is fully included in member states’ national film policy. However, it may be the case that the individual state agencies with responsibility for moving image, the Arts Council, Screen Ireland and Coimisiún na Meán (CNAM) (previously Broadcasting Authority of Ireland)³ have given this area more strategic consideration. Each of these agencies has partnered with the IFI to preserve the audiovisual material that they provide funding for and therefore appear to be better placed than government departments to develop archival and heritage policy relating to moving image.

Alternative Irish film preservation mechanisms

The lack of state policy on film preservation, or legislation to support it has resulted in the absence of a system of statutory deposit ‘where audio-visual productions receiving state aid are required to

lodge a copy of their production with appropriate bodies', as recommended by the EU (2005). In response to this gap, the IFI has developed alternative mechanisms to ensure that state funded production is centralised and preserved. It should be noted that these preservation arrangements are distinct from those stipulated under Section 481 film relief (Revenue, 2019) which provides tax breaks for film productions in Ireland. Although the Section 481 statutory instrument requires producers to deliver two copies of their film to the Minister for Culture in DVD format within six months of the film's completion, this can only be viewed as an administrative exercise as the quality of DVD is insufficient for exhibition or preservation and these copies are not passed on to a film heritage agency.

In Ireland central funding for commercial film and television production is primarily provided through Screen Ireland, and CNAM (CNAM also funds radio, but this article does not deal with that area). In 2009, the IFI negotiated a contract with Screen Ireland (then the Irish Film Board (IFB)) to take on the role of preserving materials funded by that agency, formalising what had until this point been a loose and often unenforced agreement between the organisations. The seeds for this arrangement were sown in 2001 when Rod Stoneman, the Head of the IFB at that time, agreed a grant of IR£150,000 to enable the IFI to undertake a large acquisition project to purchase film prints of Irish features that had not been previously deposited with the IFI Archive and therefore were at that time unpreserved within the state.

That project highlighted the consequences of not having a central national preservation policy for moving image, nor a preservation agreement between the IFI and the main funders of film production in Ireland. It also became apparent that the IFI, funded as it was, (receiving approximately a quarter of its budget from the Arts Council and securing the rest from commercial activities and other funding sources) did not have sufficient resources to preserve all state funded production. It was therefore necessary for the agencies funding film production to financially support the preservation of that output. To that end a preservation contract was negotiated with the IFB (and subsequently the BAI and Arts Council) obliging filmmakers to deposit work with the IFI for preservation purposes, with filmmakers required to submit preservation materials to the IFI in order to receive their final tranche of funding from IFB/Screen Ireland. In return IFB/Screen Ireland would pay the IFI an agreed amount to deploy their expertise and specialist equipment to acquire, catalogue and preserve completed IFB/Screen Ireland funded productions.

A similar agreement requiring producers to deposit material with the IFI for preservation was devised between the BAI (then Broadcasting Authority of Ireland) and the IFI. This preservation relationship was introduced on a trial basis in 2007 and enforced in full in 2012. It was prompted by the 2003 Broadcasting Act which established the BAI's *Sound and Vision* scheme as a measure to encourage the production of new programmes in the area of Irish culture, heritage and experience and adult literacy. One of the conditions stipulated by the BAI for those receiving funding under *Sound and Vision* is that their work is properly archived. With no place of deposit stipulated by the BAI, production companies approached the IFI Archive to hold the material produced with funding from the scheme so that they would be compliant with this archiving stipulation.

In the absence of another suitable organisation with the capacity to safeguard material funded under *Sound and Vision* and ensure that producers were complying with the archival requirements of the

scheme, a comprehensive preservation relationship was formulated between the BAI and IFI. Under this agreement the BAI pays the IFI to preserve physical and digital content, which also includes supplementary material such as images and production notes, via a contract that is renewed every five years. Similarly, the Arts Council requires film productions that receive funding from them to deposit material with the IFI, but it pays no specific fee for this work, with preservation incorporated into the IFI's ongoing activity which is supported by the Arts Council's yearly grant to the IFI. It is worth stressing that without these self-negotiated arrangements between the IFI and the Arts Council, BAI/CNAM and IFB/Screen Ireland there would be no central record of moving image productions that receive state aid.

These long-standing preservation agreements between these state agencies and the IFI indicate an awareness within these organisations of the importance of film heritage and a commitment to ensure it is properly preserved. Yet an examination of their strategy documents shows a gap between the practical supports they have put in place and their strategic statements in this area. The Arts Council's strategy document *Making Great Art Work* (2015) makes no reference to film heritage or its preservation; similarly, *Building for a Creative Future 2024* (2021), Screen Ireland's strategy document and BAI's *Strategy Statement 2021-2023* (2021) make no mention of the heritage value of film nor the need to preserve it, despite both having long-standing relationships with the IFI to do so. The BAI strategy also makes no mention of their wider role in preserving audiovisual material through their *Archiving Scheme* for audiovisual materials, the only competitive fund for such a purpose in the state which was introduced in 2013 and is funded via the television license fee. It is too early to gauge whether audiovisual preservation will be a strategic objective of CNAM as the successor to the BAI but it is hoped it will be considered under their expanded remit.

As outlined earlier all three organisations support audiovisual preservation financially, through ongoing multiannual agreements with the IFI and have developed mechanisms to ensure the material they fund is preserved and available in the long term, indicating a fundamental understanding of the importance of preserving audiovisual heritage and the challenges in doing so. Yet none of these organisations have chosen to include film heritage in their strategy documents, indicating that their strategic objectives do not align with their practical activities in the film heritage sector. These omissions reflect the silences around film preservation in central government policy. In this case the omission is likely to have resulted from the ad hoc nature of the practical support for film preservation by these agencies. Support emerged in order to address specific practical problems rather than developing from an overarching organisational commitment to preservation. Therefore, while film preservation may indeed be actively supported by all of these organisations the decision to do so has developed from the bottom up, and has therefore remained invisible to those drafting organisational strategy.

A legislative solution?

Despite the lack of Irish legislative mechanisms that have been implemented to protect film heritage, legislation does exist that could be utilised to this end. When taking steps to develop a national film industry by setting up the IFB in 1980 (Screen Ireland from 2019) the Irish government had a valuable opportunity to also create a national film archive to preserve the work it created. Indeed, archiving

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was evidently considered an important part of a national film industry in line with the EU recommendations we have been discussing as it is specifically mentioned in section four of the Irish Film Board Act, which states:

the Board shall assist and encourage by any means it considers appropriate the making of films in the State and the development of an industry in the State for the making of films, and may engage in any other activity (including the establishment of a national film archive) which it is empowered by this Act to engage in (Section 4 (1), 1980).

Yet despite this specific legislative reference to creating a state run film archive over four decades ago, no steps have been taken by the government nor IFB/Screen Ireland itself to establish one, and Screen Ireland has employed an arm's length approach to film preservation, providing occasional project funding to the IFI and relying on the organisation's willingness to undertake this activity. By activating this section of the Irish Film Board Act and amending the wording of the legislation to delegate responsibility for the running of a national film archive to the IFI, the Irish government could finally provide a legislative mechanism for film preservation activities and make significant progress in implementing the 2005 EU recommendation.

Doing so would acknowledge the work the IFI Archive has undertaken in the national interest for over thirty years and ensure that the importance of maintaining a national moving image collection is legally recognised and considered within national cultural policy. Using this existing legislation would allow these aims to be achieved without the requirement for the IFI to be designated a National Cultural Institution under the 1997 Act. This would allow the IFI to maintain its autonomy and prevent the government going through the laborious and costly process of adding the organisation to the public service.

Conclusion

Moving image heritage preservation is an activity that needs to be considered and supported at state level to ensure that the relevant policies, funding, legislation and standards are in place. The 2005 EU recommendation stresses the vital importance of placing film heritage at the core of state cultural policy. However, to date Ireland has not taken this approach and consequently, has no national film heritage policy or legislation, leaving it far behind EU counterparts in this regard. As we have seen the reasons for this omission within Irish cultural policy are varied and complex.

Irish film heritage appears to have suffered from the difficulty the Irish government has in categorising it for administrative and strategic purposes. Film heritage does not neatly come under the jurisdiction of any government agency or department, and as a non-government organisation, the IFI does not come under the umbrella of state policy makers and therefore has no formal route into the mechanisms of central policy creation, thus allowing the area of film heritage to be overlooked. This lack of visibility can be seen as a major factor in its omission from the *Culture 2025* suite of policy and implementation documents.

The lack of clarity around where film should be positioned from a policy perspective has been compounded by the neoliberal turn in cultural policy that has developed in Ireland alongside most of

the western world. While the fundamental benefit of participation and exposure to culture by citizens of the state is acknowledged within *Culture 2025* and its associated documents, film and the audiovisual industry are generally valued by the state in an overly simplistic way, with an emphasis placed on the economic and public relations potential of the medium rather than its intrinsic benefits. When considering the EU recommendations, it would seem logical for film to be included in Irish heritage policy; however, it is also a creative industry where official policy tends to focus on the economic benefits and industrial potential. Recent cultural policy documents indicate that Irish policymakers do not consider film heritage as either part of cultural heritage or as part of the audiovisual industry thus creating a situation where it has become invisible from a policy perspective.

As an all-government cultural framework, the development of *Culture 2025* and its related plans presented a valuable opportunity to create comprehensive national policy in relation to film heritage and to introduce meaningful support mechanisms. Yet thus far this opportunity has not been utilised. Film is a central part of our culture, with multiple routes of engagement, its multifaceted nature and immediacy makes it ideally placed to further the cultural aims highlighted within the *Culture 2025* framework. As the policy framework enters its final stages it is hoped a more cohesive and collaborative approach to government policy will emerge, one where cultural benefit takes precedent over economic imperative. It is also hoped that articles such as this will be a catalyst for meaningful discourse about the importance of protecting and sharing our national film heritage and that as a result this area will be fully recognised in *Culture 2025's* policy successors.

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Endnotes

¹ For the purposes of this paper moving image, film and audio-visual heritage will be used interchangeably.

² The Irish Film Society (1930 - 1990) aimed to promote European cinema and film culture.

³ The Broadcasting Authority of Ireland (BAI) became Coimisiún na Meán on 15 March 2023 but as the IFI's written contracts are still with the previous entity the BAI, I shall refer to the organisation by this name throughout the document.

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