Issue	Theme	Raised by	Detailed comments	Consideration status	Outcome (and why?)	Source	
CSP/ISP providers should be exempt from DDoC	Scope	s47C, s47G(1)(b)				Australian Telecommunications Alliance	
Compliance with BOSE, codes and standards to be sufficient for compliance with DDoC	Interaction with existing legislation and codes					Australian Telecommunications Alliance	
Minimum 12 month transition period	Transition					Australian Telecommunications Alliance	
Maintain 'disordered eating' as a harm category and capture AI and algorithms	Scope					Butterfly Submission	
Ensuring classification captures disordered eating content	Scope					Butterfly Submission	
Defining illegal and harmful materials	Scope					DIGI Submission	
Commissioner's enforcement powers should only be based on the risk of serious physical and mental harm	Compliance and enforcement					DIGI Submission	
Mandatory public consultation on regulator issued guidance	Consultation					DIGI Submission	
Reporting and requirements should be transparent and limited in frequency	Reporting					DIGI Submission	Interactive Games & Entertainment Association
Commissioner guidance to be treated as a disallowable instrument	Reporting					DIGI Submission	Interactive Games & Entertainment Association
Confidentiality protocols should be included	Privacy and confidentiality					DIGI Submission	Interactive Games & Entertainment Association
Mandatory independent audits should not be included or limited in scope	Reporting					DIGI Submission	
Onling gaming to be exlcuded from DDoC	Scope					Interactive Games & Entertainment Association	
A broad scope may capture unintended content and create uncertainty for industry	Scope					Interactive Games & Entertainment Association	
Safe harbour and clearly defined standards and expectations	Compliance and enforcement					Interactive Games & Entertainment Association	

Graduated approach to compliance and last resort measures	Compliance and enforcement	s47C, s47G(1)(b)	Interactive Games & Entertainment Association
Unclear rationale for additional audit powers for eSafety	Reporting		Interactive Games & Entertainment Association
Additional support or reduced requirements for small business	Reporting		Interactive Games & Entertainment Association
DDoC should be estbalished in reference to a risk-based approach	Scope		Interactive Games & Entertainment Association
Grandfathering arrangments for entities currently complying with the BOSE	Compliance and enforcement		Interactive Games & Entertainment Association
Extending definition to include both children as users of the service and children who are non-users	Scope		International Justice Mission Australia
Include livestreaming as a feature that may increase the risk of harm	Scope		International Justice Mission Australia
Strengthening of obligations on industry	Compliance and enforcement		International Justice Mission Australia
Ensure prevention is included as a clear obligation	Scope		International Justice Mission Australia
Ongoing monitoring and observation	Reporting		University of Melbourne
DDoC should provide for public interest exemption and protections	Scope		University of Melbourne
DDoC should only cover illegal content and content harmful to children	Scope		Email submission from TCA s47F on 1 July 2026.
Focus on services whose primary purpose is to socialise and share user content	Scope		Email submission from TCA
B2B services	Scope		Email submission from TCA
Recommender systems	Scope		Email submission from TCA
Private right of action	Scope		Email submission from TCA
Transition from BOSE, Codes and Standards	Scope		Email submission from TCA