



Consultation on Modernising and Harmonising Classification Standards

Amazon welcomes the opportunity to respond to the Australian Government's consultation on potential reforms to the National Classification Scheme, drawing from our experience operating a streaming video on demand service. Over the last six years, Prime Video has commissioned 31 International Originals in Australia, demonstrating an unwavering commitment to producing quality Australian content. These titles include *The Test*, *The Lost Flowers of Alice Hart*, *The Narrow Road to the Deep North*, *Top End Bub* and *Deadloch*.

We recognise the value of periodically reviewing the National Classification Scheme to ensure it remains fit for purpose, and we offer the comments below on the proposals set out in the *Modernising and Harmonising Classification Standards* consultation paper.

Our experience with the classification system

Amazon has direct and practical experience with the Australian classification framework. In September 2024, the Australian Government approved Amazon's classification tool for use in classifying films, episodes and series made available to Australian consumers on Prime Video. The tool was developed with the assistance of the Australian Government to produce ratings and consumer advice consistent with Australian classification guidelines, and was tested to confirm its classifications are reliable and consistent with Australian community standards and decisions of the Australian Classification Board. The observations in this submission are informed by our hands-on experience developing and operating this tool.

Proposals that strengthen implementation

Several proposals under consideration would deliver practical improvements for industry. Proposal C07, which seeks to clarify ambiguous definitions, would help improve classification accuracy and support more consistent outcomes. Proposal C11, which would allow updates to classifications without requiring full reclassification, is a practical recommendation. Proposal C14, which would expand the use of automated classification tools, would assist industry in meeting its obligations more efficiently as catalogue volumes continue to grow. We are supportive of these proposals.

Reforms should simplify, not add complexity

The classification system is already complex, and we would encourage reforms that simplify the existing framework and deliver clear benefits for consumers rather than introduce additional layers of requirements. A number of the remaining proposals may not meet this threshold. Proposal C02, which would overhaul the "Themes" element by introducing sub-

elements such as sexual violence, suicide, discrimination and scariness, could add further complexity to an already detailed system, and it is not clear that this would meaningfully improve consumer understanding or classification accuracy. Proposal C05, which would replace the well-established MA15+ category with MA16+, could risk unsettling decades of consumer familiarity without a clearly demonstrated benefit. We would urge caution about both proposals.

Observations on the classification logic rules

Our experience applying the classification guidelines at scale suggests there is an opportunity to simplify the underlying logic rules. The current system relies on severity modifiers (i.e. "mild," "moderate," "strong") which can introduce a degree of subjectivity. A cleaner approach may be to state the content descriptor directly, such as "violence," "language," or "nudity," without qualifying intensity. There may also be value in consolidating the number of content descriptors; there are approximately 100 today, which can be difficult to implement consistently at scale. A ceiling of 10 to 15 descriptors could be more practical and effective.

The current scoring model, which applies mitigation (-1) and contributing factors (+1), can create complex calculations that are challenging to implement with consistency. A simpler model that states the conditions required for each rating, without arithmetic adjustments, may be more effective for industry to implement. Similarly, guidelines such as "it might disgust the viewer" can be difficult to operationalise, as viewer sensitivities naturally vary. We would welcome consideration of more objective, measurable criteria in place of language that is open to broad interpretation.

Conclusion

We are committed to working constructively with the Australian Government to modernise the classification system. We encourage reforms that simplify the existing framework, streamline the system's practical operation, and deliver clear benefits for Australian consumers.