

The Hon Anika Wells MP
Minister for Communications
Minister for Sport
PO Box 6022
House of Representatives
Parliament House
Canberra ACT

Thursday, 28 May 2026

Dear Minister,

RE: Modernising and Harmonising Classification Standards

National and State Libraries Australasia (NSLA) Inc. welcomes the opportunity to contribute to public consultation on the recommended changes to the classification guidelines.

National and State Libraries Australasia (NSLA) is an alliance of the national, state and territory libraries of Australia and Aotearoa New Zealand. Our ten member libraries hold rich collections that serve the education, research, innovation, and cultural needs of our diverse communities.

NSLA welcomes the considered and evidence-based approach to modernising and harmonising classification guidelines, and in particular the focus on maintaining public trust while modernising the current system for a digital-first environment. The emphasis on harmonisation across media, clearer consumer advice, and improved accessibility through digital tools reflects the realities of contemporary content consumption and aligns with the library sector's commitment to ensuring Australians can navigate an increasingly complex information landscape with confidence.

Classification at scale

Commonwealth, state and territory legal deposit legislation¹ means that our national, state, and territory libraries are mandated to collect copies of everything published in their jurisdictions. As legal deposit libraries, NSLA member libraries collect and preserve thousands of publications annually, spanning the full breadth of Australian publishing, from major commercial outputs to self-published and community-produced works. The rise in digital has democratised publishing and made it more accessible for anyone—including community groups, historical societies, schools, clubs, churches, and a growing number of self-publishers—to record and publish their stories and ideas.

Libraries further provide access to these publications in their physical and digital formats via large-scale discovery and access platforms, including our libraries' digital catalogues and Trove, and the National edeposit (NED) service, which encompasses a vibrant independent and small press publishing community, as well as government publishers at Commonwealth, State and Local Government levels. It is relevant to note that NSLA libraries not only manage access to publications, but also to platforms and providers. Furthermore, NSLA Libraries must also consider application of any changes to the classification guidelines where they may digitise hardcopy publications and make them available through online digital platforms such as Trove.

We note that any changes to classification frameworks will need to be implemented at scale within these collection, description, and access systems. As such, we note the importance of ensuring that proposed reforms are practical, consistent, and capable of integration across large-scale collections, and within both commercial and self-publisher

¹ i.e., *Copyright Act 1968* (Cth), *Library Act 1939* (NSW), *Libraries Act 1988* (VIC), *Libraries Act 1988* (QLD), *Libraries Act 1982* (SA), *Legal Deposit Act 2012* (WA), *Libraries Act 1984* (TAS), *Publications (Legal Deposit) Act 2004* (NT).

communities. We look forward to continued engagement as the proposals are refined, including important considerations around whether any changes would be retrospective. Additionally, challenges around identifying existing applicable material within large-scale digital platforms would also need to be fully considered, particularly in the context of resourcing and capacity constraints.

NSLA notes the recommendation to extend automated classification and self-classification tools and would seek clarification on how this would apply to publications, which have, to date, only been classified by the Classification Board. With the diversity of the publisher community, including self-publishers and community groups, the need for a public education campaign to enable accurate self-classification would be essential.

Harmonisation of publications with other media

One of the key changes in the recommendations is to align the classification of publications to match other media. In general, publications have not routinely undergone a classification process. Any changes to the system should ensure the sustainability of small publishers and self-publishing. This means continuing to classify publications by exception and ensuring that classification does not become a barrier for Australian works to reach audiences.

NSLA would seek to clarify whether age verification will legally be required for publications that would be classified as MA16+ in the recommended changes. Currently, publications that are classified Unrestricted Mature do not require age verification for access. This question is particularly pertinent in the management and delivery of digital platforms and services, including integration into existing digital platform infrastructure and potentially within collection descriptions and catalogue records.

Compliance and notification

Libraries must comply with decisions of the Australian Classification Board, including removing restricted publications. All libraries therefore have a legal responsibility to ensure prohibited publications are not on display or available for distribution; in Queensland, the Office of Fair Trading regulates restricted publications² and it is an offence to display or distribute publications classified as prohibited in that jurisdiction. Ensuring compliance with any classification of publications while maintaining access to unrestricted material requires clear, efficient processes and systematic communication on classification decisions would assist libraries in complying with the framework. We recommend that a more efficient and effective process to notify libraries and all stakeholders about classification decisions is imperative for managing collections and meeting legislative responsibilities.

Summary

The opportunity to modernise Australia's classification framework is timely and warranted, and NSLA looks forward to ongoing consultation with the library sector as a key stakeholder in the progression of these recommendations.

For more information, contact

Dr Simon Polson
Executive Director, National and State Libraries Australasia (NSLA) Inc.

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² Via the *Classifications of Publications Act 1991* (Qld).