

ABC submission on proposals to modernise and harmonise classification guidelines

May 2026

1. Introduction

The Australian Broadcasting Corporation (ABC) welcomes the opportunity to provide comments on the paper “Update to modernise and harmonise classification guidelines 2025”, which was commissioned by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts.

The ABC is not subject to the National Classification Scheme. The ABC Code of Practice developed by the ABC Board under s 8(1)(e) of the *Australian Broadcasting Corporation Act 1983* (“ABC Act”) incorporates classification guidelines that the Corporation applies to content broadcast on ABC television services and streamed on ABC iview.¹

Nonetheless, the ABC seeks to ensure that its classification standard is broadly consistent with the national Scheme, including the classification guidelines and the categories from the National Classification Code. This helps ensure Australians have access to consistent information to assist their listening, viewing and participation choices.

Consequently, the ABC is interested in possible changes to the national classification system and has engaged with past consultations on classification reform, including making submissions in response to the 2020 Review of Australian Classification regulation (“2020 submission”) and on the 2024 Stage 2 reforms to the National Classification Scheme (“2024 submission”).

The Corporation has confined its comments to topics that touch on its services.

2. Principles

The paper proposes a number of changes that speak to the underlying approach to the development of classification guidelines. The ABC is generally supportive of the

¹ ABC. ‘Associated Standard on TV Program Classification’, <https://edpols.abc.net.au/associated-standard-on-tv-program-classification/>.

principles of grounding classification definitions in evidence, rather than morality (proposed change C03), and of removing ambiguity from the guidelines through the development of clear definitions (C07). However, in both cases, it is difficult to comment further on these in-principle proposals, as the paper does not provide any detail on the form of the proposed changes.

The Corporation is generally supportive of the principle of single-touch classification (C10). However, it should be noted that the ABC's obligation to preserve its independence means that it would continue to classify its own content independently, rather than automatically adopting classification decisions made by other bodies.

In the context of proposals to expand the use of automated classification tools (C14), the Corporation reiterates observations that it has previously made (e.g. 2020 submission) that such tools have been shown to lead to rigid and more conservative classification decision-making that is less accurate or mindful of audiences. This, in turn, has the propensity to change audience perceptions of what each classification means over time and effectively undermine established guidelines. As human classifiers are able to exercise judgment and tailor consumer advice in ways that AI tools cannot, the ABC would counsel caution in allowing automated tools to supplant human classifiers.

As the ABC has argued in previous submissions (see, e.g., 2020 submission, 2024 submission), it believes that the "impact test" that is used as the primary determinant of the classification of content under the guidelines is highly subjective, as the descriptions of classifiable elements are brief and imprecise. In contrast, the Corporation's approach, which sets out a detailed description for elements at each classification level, provides audiences with assurance that classifications have been applied in a consistent, accurate and objective manner. The ABC continues to strongly recommend that, in any revision to the guidelines, consideration be given to removing, or significantly reworking, the impact test concept.

3. Classification changes

A key strength of Australia's classification system is the high degree of public familiarity that exists. As a result, changes to classification categories or the introduction of new categories should only occur if there are particularly compelling reasons to do so. In the case of the two changes proposed in the paper — the introduction of a PG13 classification (C01) and the replacement of MA15+ with MA16+ (C05) — the ABC does not believe such compelling reasons have been advanced.

In the case of the proposed PG13 classification, the paper presents no evidence that a new category is required. Moreover, the ABC notes that the proposed category could cause confusion due to the existing "PG-13" rating in the US classification system.

The current PG, M and MA15+ classification levels all use the age of 15 as a consistent threshold for decisions. Introducing a PG13 category would unnecessarily create a new age threshold and require audiences to recalibrate their understanding of the

categories. In addition, inserting a new classification category between the existing PG and M categories would require an overhaul of those categories. The paper is silent on what that might entail, although it seems likely that the scope of the PG classification would be reduced, as might the M classification. It is unclear what, if any, benefit there would flow from overhauling these existing and well-understood categories.

In a similar fashion, the paper does not provide evidence to justify its proposal to replace the established MA15+, with which audiences are familiar, with a new MA16+ category. The ABC has not received any feedback from its audiences about the MA15+ category being problematic or that any particular MA15+ programs would be more suitable for people aged 16 rather than 15. As with the proposal for a PG13 category, this would undermine well-understood categories built around thresholds based on the age of 15 and would force a recalibration of those classifications.

The Corporation notes that the proposed shift would align the MA category age to the age threshold used in the *Online Safety Act 2021*. However, as the classification age thresholds perform an entirely different role from the age-based exclusion in that Act, there is no reason why such an alignment might be desirable, particularly if it will disrupt the established and well-understood classification scheme.

4. Elements and themes

The ABC would welcome a review of classifiable element “themes” (C02). The Corporation does not use genre descriptors in its classification of programs and would support their removal. However, the ABC opposes the “refocusing” of themes to the four proposed in the paper, which appear to reflect the specific concerns of particular respondent groups, rather than established practice. As previously noted, the predictability that flows from consistency is a key strength of Australia’s classification scheme. There is a risk that this may be undermined if the themes element becomes overly responsive to concerns expressed by particular community segments or advocacy organisations.

In relation to the four suggested themes, the ABC notes that suicide and discrimination are already treated as themes. Sexual violence has traditionally been assessed within violence and/or themes, depending on context and treatment. Finally, “scariness” is too subjective a concept to be adopted as a theme, particularly as different children find different things scary at different ages and/or developmental levels.

The ABC is sceptical of the proposal to replace word-based element descriptors with icons (C20). While acknowledging that it may be possible to design a set of icons that are immediately interpretable by audiences (the illustrative icons on p.13 of the paper do not satisfy that requirement), it is not clear that they would serve audiences better than words do. Where appropriate, the Corporation uses tailored warnings with specific wordings to better inform audiences. Moving to a rigid set of icons would make such viewer information harder to provide. In addition, the ABC

questions whether icons that visually indicate that a program contains sexual content or a theme such as suicide would be desirable.

In relation to the proposed reconsideration of sexual content (C08), the Corporation already treats sexual depictions the same regardless of the sexualities and genders of participants. It does not apply a moral lens to assessment of fetish or kink-related acts.

5. Advisory council

As the ABC indicated in its 2024 submission, it is broadly in favour of the establishment of a classification advisory body that is able to provide evidence-based advice on amendments to classification criteria. Such a body should include representation from industry, particularly professional classifiers with direct experience of the specificities and complexities of the classification process.

The Classification Advisory Council proposed in the paper (C09) would not satisfy this requirement, as it would comprise community voices and would explicitly exclude professional industry stakeholders. If such a body were to be formed, its role should be strictly advisory and any recommendations that it provides should be entirely non-binding. Industry representatives should be included in any discussion of the potential adoption of recommendations generated by such a community advisory group.

6. Informing the public

The ABC is in favour of ensuring the public is informed about the operations of the classification system. It would support a public education campaign to improve audience awareness of the classification system (C22), including any changes that result from the current review process.

The Corporation would support improvement of the classification database (C13) and its search functionality. It is likewise generally supportive of improvements to the level of detail and information available on the classification website (C15), although it is agnostic about whether that information should be presented as a matrix, and the unification of title listings on the site (C17).

However, the ABC does not believe the public would be well served by the website setting aside space for community and advocacy group perspectives on content and classifications (C19), as such an approach would effectively elevate such groups to a position of implied authority.

The Corporation can see potential advantages in providing audiences with quick links to classification listings (C21), although it notes that a QR code system, as proposed in the paper, is likely to work poorly in the broadcast environment.