

## Submission

# Modernisation of Australia's Classification Guidelines

## 1. Introduction

Books Create Australia welcomes the opportunity to respond to the consultation on proposed reforms to modernise and harmonise Australia's classification guidelines.

Books Create Australia is a coalition of national organisations representing authors, publishers, booksellers and libraries, including the **Australian Booksellers Association, the Australian Library and Information Association, the Australian Publishers Association and the Australian Society of Authors**. Together, these organisations represent the institutions and professionals through which Australian books are written, published, distributed, sold, lent, discovered, read and preserved.

**Books Create Australia supports a modern, accessible, evidence-based and harm-informed classification framework. However, reform affecting books and publications must be proportionate to the distinctive nature of reading, the scale of the book market, existing book-sector guidance systems, and the importance of free expression.**

The central principle should be **harmonisation without inappropriate uniformity**. A modern framework can use consistent language and shared principles across media, but it should not treat books as if they are consumed in the same way, present the same risks, or require the same regulatory response as film, games, online video or other screen-based media.

## 2. Summary of recommendations

Books Create Australia recommends that the Government:

- harmonise principles, language and restricted categories across media only where appropriate and proportionate for publications, but not apply the full screen-media classification ladder to ordinary books (Co1, Co5, Co6, Co7);
- replace the current Category 1 and Category 2 publication classifications with R18+ and X18+ only for genuinely restricted material (Co6);

- not introduce G, PG13 or MA16+ categories for books, whether mandatory or as a general advisory classification ladder for ordinary publications, noting in particular that MA16+ is not equivalent to any current classification for publications and would amount to an unwarranted restriction on access to books in Australia (Co1, Co5, Co6);
- ensure that, if the Government intends to carry forward the current capacity for publications to remain legally unrestricted while still being unsuitable for, or not recommended for, younger readers, any equivalent treatment is advisory only, does not become restrictive MA16+, and is not treated as sector support for a new advisory classification regime for ordinary books (Co5, Co6);
- recognise that authors, publishers, booksellers and libraries are at best neutral on advisory classification markers and that the Government should not expect wide sectoral take-up of such a mechanism (Co5, Co6);
- not require books to carry classification icons, content-warning icons or expanded thematic labels on covers, except required legal markings for restricted R18+ or X18+ material (C20, Co2);
- recognise that the sector's preferred approach to reader and parental guidance is to build on existing industry metadata, library classification systems, publisher descriptions, cover copy, bookseller expertise, library curation, school selection processes and direct advice to readers and families, rather than impose new publication-specific advisory markers (C13–C17, C20, C21);
- support clearer, evidence-based and harm-informed classification principles (Co3, Co7, Co8);
- use industry-led or co-regulatory approaches only where classification is required for restricted or higher-risk material, and not as a general compliance obligation for ordinary books (C12, C14); and
- ensure that any Classification Advisory Council or equivalent mechanism is complemented by structured publishing-sector consultation where reforms affect publications (Co9).

### **3. Publications, proportionality and the distinctiveness of books (Co6, Co1, Co5)**

Books Create Australia does not oppose aligning publication classifications more closely with the broader framework. However, any alignment must remain proportionate and medium-specific.

Books differ materially from film, games, online video and other screen-based content. Reading is active, self-directed and self-paced. Books are usually encountered through conscious selection, often mediated by parents, teachers, librarians, booksellers, schools or institutions. Literary, educational, scholarly and cultural works also address difficult material in contextual and

interpretive ways. The risks associated with immersive audio-visual or interactive media should not simply be transposed onto books.

TitlePage industry systems indicate that more than 1.7 million titles are available in the Australian market across print, digital and audio formats. The overwhelming majority do not present risks warranting direct classification intervention. A broad classification requirement for ordinary trade, educational, scholarly, literary or children's books would create substantial burden without clear public benefit.

Publication classification should therefore remain limited, targeted and risk-based: principally confined to genuinely restricted R18+ and X18+ material, and not extended into a general classification regime for ordinary books.

#### **4. Proposed classifications for books: no G, PG13 or MA16+ (Co1, Co5, Co6)**

Books Create Australia does not support proposals to introduce G, PG13 or MA16+ categories for books. These categories may have a logic in screen media or games, but would be disproportionate, impractical and inconsistent with how books are selected, mediated and read.

Books Create Australia supports harmonisation of genuinely restricted publication categories, but not the application of advisory or age-based screen-media categories to ordinary books.

Books Create Australia is particularly concerned that the consultation material appears to treat MA16+ as equivalent to the current capacity for publications to remain legally unrestricted while still being unsuitable for, or not recommended for, younger readers. **This would be a substantive change. MA16+ is not equivalent to any current classification for publications. If applied to books, it would amount to an unwarranted restriction on access to books in Australia.**

**A restrictive MA16+ category would create point-of-sale, lending, display and access obligations for booksellers, libraries and schools that do not currently apply to legally unrestricted publications. If the Government intends to carry forward the current capacity for publications to remain legally unrestricted while still being unsuitable for, or not recommended for, younger readers, any equivalent treatment should be advisory only and should not become restrictive MA16+.**

This fallback position should not be read as sector support for a new advisory classification regime for ordinary books. Authors, publishers, booksellers and libraries are at best neutral on advisory classification markers, and the Government should not expect wide sectoral take-up of such a mechanism.

## **5. Consumer information, metadata and digital access (C20, Co2, C13–C17, C21)**

Books Create Australia does not support mandatory classification icons, content-warning icons or expanded thematic labelling on book covers except where legally required for genuinely restricted R18+ or X18+ material (C20, Co2).

The book sector already provides practical reader guidance through metadata, subject codes, audience categories, descriptive copy, cover information, bookseller recommendation, library curation, school selection and guidance by parents, teachers, librarians and other intermediaries. These systems allow books to be selected according to age, context, purpose, reading level and individual maturity.

For ordinary trade, educational, scholarly, literary and children's books, mandatory cover icons or expanded content-warning requirements would be a blunt instrument. They risk oversimplifying literary, educational and cultural works that responsibly address themes such as racism, trauma, sexuality, grief, family violence, colonial history or mental health.

Where classification-related information is relevant beyond genuinely restricted material, digital systems and metadata are more proportionate tools than physical labelling. Books Create Australia supports improvements to classification databases, title-management systems, digital access, interoperability and links between relevant information sources (C13–C17, C21).

Classification matrices, QR-linked information, personalised website preferences and transparent decision records may be useful in relation to government classification information where they remain advisory, digital, clearly distinguished from legal restriction, and do not create new labelling, supply, access or compliance obligations for ordinary books (C15, C16, C18, C21).

Any additional community information linked to classification listings should be clearly distinguished from legal classification decisions and should not become a mechanism for suppressing lawful books (C19). Government should build on existing book-sector infrastructure, including TitlePage, rather than impose new cover-based labelling requirements.

## **6. Harm-informed principles, free expression and inclusive treatment (Co3, Co8, Co2, Co7)**

Books Create Australia supports clearer, evidence-based and harm-informed classification principles (Co3, Co7), including inclusive treatment of sexual content (Co8) and clearer, non-moralising treatment of themes (Co2).

Books Create Australia supports clearer identification of themes such as sexual violence, suicide and discrimination where this information is provided through proportionate digital and

metadata systems rather than mandatory cover labelling for ordinary books. Care should be taken with broad categories such as “scariness”, which may operate differently in children’s, young adult, literary and genre publishing.

This is important because books often address difficult subjects in nuanced ways. Classification principles must distinguish between harmful material and works that responsibly explore complex human experience.

The framework should avoid treating particular identities, histories, communities or themes as inherently problematic, including in relation to sexuality, gender, family diversity, First Nations content, cultural difference, colonial history, trauma, violence, discrimination and mental health.

Overextended classification requirements can chill the availability of serious literary, educational and cultural works. A classification framework should protect against genuine harm, but should not encourage publishers, booksellers, libraries or schools to avoid works simply because they are challenging, contested or unsuitable for some readers.

## **7. Proportionate implementation, self-classification and cross-format consistency (C10, C11, C12, C14)**

Books Create Australia supports industry-led self-classification only where classification is required for restricted or higher-risk material (C12, C14). Any model should be co-regulatory, risk-based, supported by clear standards and guidance, and should not impede the ordinary circulation of low-risk books.

Self-classification should not become a general compliance obligation for ordinary trade, educational, scholarly, literary or children’s books.

Books Create Australia also supports the “single-touch” principle (C10) and the ability to update classifications where appropriate (C11). A single work may appear in print, ebook, audiobook, large-print, accessible, educational and library formats. Where classification is required for the same underlying work, it should not be duplicated unnecessarily across formats or channels.

## **8. Governance, public education and ongoing engagement (C09, C22)**

Books Create Australia supports a Classification Advisory Council or equivalent advisory mechanism (C09). If the Council is community-led, it should be complemented by structured publishing-sector consultation or technical advice where reforms affect publications.

The book sector can provide practical expertise in editorial, literary and educational assessment; children's and young adult publishing; bookselling and library curation; metadata, discoverability and accessibility; and rights, distribution and supply-chain operations.

Books Create Australia also supports public education that clarifies the distinction between advisory classifications, restrictive classifications and reader guidance (C22). This distinction is especially important if the Government seeks to harmonise publication categories while preserving the current capacity for some publications to remain legally unrestricted even where they may be not recommended for younger readers.

## 9. Conclusion

Books Create Australia supports a modernised classification framework that is consistent at the level of principles, evidence-based, transparent, digitally enabled and proportionate.

For books and publications, reform must remain limited, medium-specific and focused on genuinely restricted material. It should not extend into general trade books, should not introduce G, PG13 or MA16+ categories for books, and should build on existing systems of content description, discoverability and professional mediation.

If the Government intends to carry forward the current capacity for publications to remain legally unrestricted while still being not recommended for younger readers, any equivalent treatment should be advisory only and should not become restrictive MA16+. This should not be read as sector support for a new advisory classification regime for ordinary books.

## 10. Contact and further information

For further information or to discuss this submission, please contact:

### **Dr Stuart Glover**

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For Books Create Australia (**Australian Booksellers Association**, the **Australian Library and Information Association**, the **Australian Publishers Association** and the **Australian Society of Authors**)