

Submission to the
Department of Infrastructure,
Transport, Regional
Development,
Communications, Sport and
the Arts

Response to Modernising and Harmonising Classification Standards

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IGEA

interactive games & entertainment association

1. Overview

The Interactive Games & Entertainment Association (IGEA) welcomes the opportunity to provide a submission to the consultation on modernising and harmonising classification standards, led by the Department of Infrastructure, Transport, Regional Development, Communications, Sport & the Arts (Department). This consultation follows on from IGEA's previous submission to the Department's 2024 consultation on modernising Australia's National Classification Scheme (NCS) stage 2 reforms.¹

IGEA is the industry association representing and advocating for the video games industry in Australia, including developers, publishers and distributors, and the makers of the most popular game platforms, consoles and devices.

We understand that the Department is specifically seeking views on the report and recommendations developed by Mettlesome and the Social Research Centre. Ultimately, the intent is to improve the standards that guide classification decisions for films, computer games and certain publications.²

IGEA has been deeply engaged in classification reform for more than two decades, working closely with the Classification Board and Branch. This long-standing relationship has helped ensure industry compliance, supported the effective operation of the NCS, and contributed to evidence-based policy development.

While the commencement of Stage 1 reforms was an important milestone (particularly the expansion of industry self-classification and the integration of tools such as International Age Rating Coalition (IARC)), the underlying *Classification (Publications, Films and Computer Games) Act 1995* (Cth), Classification Code 2005 and all three classification guidelines remain largely unchanged since 1995. They continue to reflect policy centred around physical retail distribution, as well as outdated assumptions about video games and their audiences.

Many of the issues raised in the Stevens Review³ and in IGEA's past submissions remain unresolved. For this reason, we reiterate key points from our earlier submissions and provide updated commentary where relevant. This latest consultation represents a timely opportunity to modernise and harmonise the guidelines across media in a way that reflects contemporary technologies, community expectations and international best practice.

Video games are now a mainstream, diverse and complex medium enjoyed by Australians of all ages. The community is more digitally literate and better equipped to navigate content than at any point in the NCS's history, and industry continues to lead in implementing trust and safety, and parental control tools.

¹ See: <https://igea.net/2024/05/igea-submission-to-stage-2-classification-reforms-consultation-paper/>.

² While classification laws refer to the term 'computer games', in this submission we refer to the more commonly used term 'video games', except when directly quoting legislation.

³ Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 'Review of Australian classification regulation' (Report, May 2020) ('Stevens Review'), <https://www.infrastructure.gov.au/sites/default/files/documents/review-of-australian-classification-regulation--may2020.pdf>.

Modernising and harmonising the classification guidelines is therefore essential to ensuring the NCS is fit for purpose, future-proof and aligned with global standards.

As part of this broader modernisation agenda, we recommend the following:

- **In line with the independent reviewer’s recommendation for the Statutory Review of the *Online Safety Act 2021 (Cth) (OSA)*, the OSA (and subordinate instruments) should be expressly limited to illegal and unclassifiable online content, as well as its role in addressing currently defined categories of seriously harmful online conduct (e.g. cyber bullying, cyber abuse, image-based abuse, material that depicts abhorrent violent conduct). In contrast, the NCS should regulate classified and classifiable content, providing consumers with information to make informed choices - a distinction particularly relevant to video games, just as it is for film.**
- **Further, where gaps are identified in how games are regulated in the online environment, these should be addressed within the NCS in the first instance, rather than through the OSA or other regulatory frameworks (including any future Digital Duty of Care reforms).**

With that in mind, this submission sets out our recommendations and additional comments in response to several of the Mettlesome-Social Research Centre recommendations. For ease of reference, we summarise our key recommendations below.

Mettlesome-Social Research Centre recommendation	IGEA’s recommendation
C01 Introducing a new PG 13 rating	While a PG 13 category is not a priority for the video games industry, we remain open to considering this option should the Government view it as beneficial for improving clarity, consistency or harmonisation within the NCS. If the Government chooses to explore this further, industry engagement will be necessary to clarify its potential design, purpose, scope and interaction with existing categories, including for where games would fall within a revised framework.
C02 Overhauling classifiable element ‘Themes’	We do not support an overhaul of ‘Themes’. We support the existing treatment of ‘Themes’ in the Guidelines and only recommend changes to the definition of ‘Themes’ to ensure that it remains broadly scoped. We recommend that the Guidelines be amended so that the same level of treatment and classification of certain topical themes that is permitted in films is also permitted in video games.
C03 Improving reliance on evidence over morality	We support classification decisions that are based on empirical evidence of actual harm rather than moral panic or

Mettlesome-Social Research Centre recommendation	IGEA's recommendation
	outdated tolerances, and that better reflect contemporary societal norms regarding acceptable content.
C04 Focusing interactivity classifications on replication	We strongly support updating the Guidelines to remove the default harsher treatment of interactivity in video games, where equivalent content in films and games should be classified consistently.
C05 Replacing MA 15+ with MA 16+	We do not support replacing MA 15+ with MA 16+, as this would introduce an unnecessary and arbitrary threshold drawn from a different regulatory context, without resolving existing confusion or enforceability issues. We consider that merging MA 15+ with M into a single non-restricted advisory category would be a proportionate and evidence-based reform option. However, we acknowledge that this would represent a more significant structural change. Any consideration of this option should be subject to consultation on implementation impacts, transitional arrangements and how existing ratings would be treated under a revised structure. If MA 15+ is to be retained, the Government should prioritise targeted improvements within the NCS to address identified gaps in its operation, including through enhanced public education, clearer guidance on category distinctions, and consultation on proportionate mechanisms to improve its practical effectiveness. These issues should be addressed within the NCS in the first instance, rather than through other regulatory frameworks such as the OSA (e.g. Digital Duty of Care reforms).
C06 Adopting the rest of the classification system for publications	We recommend that any changes to the classification of publications be implemented in a way that avoids unintended consequences for the treatment or classification of video games.
C07 Clarifying definitions	Greater clarity on the scope of definitional revisions is required before moving toward increased industry self-certification, and only where industry is given a meaningful role in shaping those definitions.
C08 Reconsidering sexual content	We recommend that, except where content involves sexual violence or non-consensual acts, sexual content be classified consistently based on evidence of harm.
C09 Establishing Classification Advisory Council	We recommend establishing a balanced, multi-stakeholder advisory panel, consistent with the Stevens Review and

Mettlesome-Social Research Centre recommendation	IGEA's recommendation
	international models such as PEGI, and do not support a community-only body. Such an approach will help ensure guideline development remains evidence-based, practical and reflective of community standards.
C10 Introducing single touch classification	We recommend that titles be classified once, with that classification applying across all delivery formats (whether now known or later developed) unless the content itself materially changes.
C11 Permitting updates to classifications	We recommend that the classification system permit optional, industry-initiated updates to existing classifications, with prior classifications retained, to ensure content advisories remain current and consistent while avoiding mandatory or retroactive reclassification.
C12 Setting self-classification as default	With the expansion of industry self-classification and the established role of IARC, much of the Classification Board's workload has shifted. However, we continue to see an important role for the Board in providing regulator-made decisions in certain cases, as an opt-in pathway for publishers and distributors seeking official assessment or additional assurance. We maintain that the Classification Review Board should be replaced by an effective appeals mechanism provided by the regulator itself.
C14 Expanding use of automated classification tools	We recommend that expanded use of automated classification tools be supported, provided any associated updates are targeted, proportionate and take into account the significant time, effort and resources required to implement changes to approved tools.
C18 Classification website – transparent decisions	We recommend that efforts to improve transparency in classification decision-making focus on proportionate, general communication methods, with any publication of case-specific information carefully managing confidentiality and undertaken in consultation with applicants.
C21 Quick links to classification listings	We do not support the introduction of QR codes or similar mechanisms on classification materials, noting the lack of demonstrated consumer benefit, the operational burden on industry, and the significant space constraints already imposed by existing classification requirements.

Mettlesome-Social Research Centre recommendation	IGEA's recommendation
C22 Generational education campaigning	We recommend that the Government lead a public education campaign on the purpose and use of the classification system, developed in partnership with industry associations and supported by funding to enhance and extend the industry's ongoing efforts to educate parents and carers.

2. Background

2.1 The Australian video games industry

Before addressing the specific matters in this submission, it is important to acknowledge the cultural, economic and strategic value of the Australian video games industry. This provides essential context for understanding both the opportunities and regulatory challenges that need to be considered when shaping consumer protection reforms in the digital economy.

Video games are a central part of Australian life, enjoyed by over 80% of the population.⁴ The industry fosters creative expression, education and community building, while contributing significantly to the economy. The industry generated approximately \$3.8 billion in annual consumer sales,⁵ with Australian-made games accounting for \$608.5 million in export revenue in the 2024/25 financial year alone.⁶ As an innovative and high-growth sector at the intersection of entertainment, the arts and technology, video games also help to build Science, Technology, Engineering, the Arts and Mathematics (STEAM) skills and drive high-value, weightless digital exports.

With global demand rising and Australian-made games gaining international acclaim, the sector has strong potential to diversify the economy and support the Australian Government's goal of becoming a top 10 digital economy and society by 2030. This is a strong economic opportunity, with the global video games industry now valued at around \$300 billion,⁷ surpassing the combined value of the film and music industries. By 2040, video games could account for 44% of consumer entertainment spending, eclipsing both streaming and traditional video.⁸

Given the scale and strategic importance of the sector, it is essential that any regulatory reforms affecting it are grounded in evidence-based, best-practice principles.

⁴ IGEA, 'Australia Plays' (September 2025), <https://igea.net/2025/09/australian-parents-embrace-the-power-of-play/>.

⁵ IGEA, '2024 Australian Video Game Consumer Sales Results' (Media Release, July 2025), <https://igea.net/2025/07/2024-australian-video-game-consumer-sales-results/>.

⁶ IGEA, 'Australia's video game industry shows revenue of AU\$608.5 million' (Media Release, March 2026), <https://igea.net/2026/03/agds-2025/>.

⁷ Newzoo, 'Global games market to hit \$189 billion in 2025 as growth shifts to console' (September 2025), <https://newzoo.com/resources/blog/global-games-market-to-hit-189-billion-in-2025>.

⁸ McKinsey Global Institute, 'The next big arenas of competition' (October 2024, Report), <https://www.mckinsey.com/mgi/our-research/the-next-big-arenas-of-competition>.

2.2 Best practice regulation and good public policy design

As the Government considers reforms to modernise and harmonise Australia's classification standards, it is vital that the regulatory framework keeps pace with technological developments and reflects the unique nature of contemporary digital media, including video games. Poorly designed, outdated, or reactive regulation risks undermining the effectiveness of the NCS and creating unnecessary barriers for a globally competitive and innovative industry.

The pace of technological change in the video games industry, alongside cultural changes in society, continues to outstrip traditional regulatory processes. In the classification space, we have observed instances where the outdated classification guidelines do not reflect modern societal norms nor the narrative advancements we have seen in video games. This has created uncertainty, unnecessary complexity and unintended consequences, as well as an arbitrary distinction between how video games are treated in comparison to other entertainment mediums. These issues can diminish public confidence in classification decisions, imposing avoidable compliance burdens on industry and depriving consumers of content that is readily available in other forms of entertainment.

IGEA supports modern, practical and evidence-based policy settings that are compatible with the digital environment and aligned with global best practice. Classification regulation should be brought up-to-date, clearly defined, reasonable in scope, proportionate to risk, future-proofed, and supported by meaningful guidance to ensure clarity and certainty for all stakeholders. Where changes are proposed, they should follow good public policy design: identifying clear problems, considering alternative solutions, and avoiding duplication with existing regulatory frameworks such as online safety, privacy and consumer protection (and vice versa).

Given the increasing overlap between digital regulatory regimes, there is strong merit in the Australian Government taking a more coordinated and system-wide approach to reforms across interrelated areas such as AI, privacy, online safety, content classification and consumer protections. A more coherent regulatory landscape would reduce duplication, streamline compliance and deliver better outcomes for consumers and industry.

A well-governed, transparent and coordinated approach to classification reform is essential to maintaining public trust while enabling innovation. With the right policy settings in place, the video games industry can continue to grow as a high-value sector and contribute meaningfully to Australia's digital and creative economy.

Consistent with this approach, any issues relating to the classification, labelling or accessibility of online game content should remain within the remit of the NCS. The introduction of parallel or overlapping requirements through the OSA (or related reforms) would risk fragmenting responsibility for content regulation and undermining the integrity of the classification framework.

2.2.1 Interaction with the OSA and the case for decoupling

Although matters relating to the *Online Safety Act 2021* (Cth) (OSA) fall outside the scope of this consultation, it is important to acknowledge that several proposals put forward in the

Statutory Review of the OSA (including clarifying the scope of the online safety framework and revisiting governance arrangements) are directly relevant to how the Government ultimately implements the recommended decoupling of the OSA and the NCS. That recommendation, made by the independent reviewer, remains a significant structural reform with implications for classification policy.

As a general principle, where gaps are identified in how video games are regulated in the online environment, these should be addressed within the NCS in the first instance. The NCS is the purpose-built framework for regulating content and is best placed to evolve in response to technological change. Expanding or duplicating these functions within other frameworks, including the OSA, risks creating regulatory overlap, inconsistency and unnecessary compliance burden without improving safety outcomes.

Online game services currently sit under both the OSA and the NCS. By contrast, broadcaster video-on-demand (BVOD) services, for example, are not subject to the same OSA framework and instead operate primarily under separate classification arrangements. This results in services delivering comparable classified content to Australians being subject to different regulatory obligations. The outcome is an uneven regulatory landscape: some services are not subject to the same OSA obligations, while online game services face duplicated and disproportionate compliance requirements, despite already implementing extensive measures to provide safe and age-appropriate experiences for users.

For these reasons, IGEA has consistently supported decoupling the OSA and the NCS. As outlined in our previous submission to the OSA review, the Stevens Review clearly articulated the intended remit of eSafety:⁹ “The eSafety Commissioner would continue to have responsibility for responding to online content that is illegal, including content that would be Refused Classification under the National Classification Scheme. Further: ... the Office of the eSafety Commissioner would continue to focus on taking action on illegal and harmful content online, including websites and user-generated content.”

To avoid ambiguity and overlap with the NCS, we maintain that the OSA (and subordinate instruments) should be expressly limited to illegal and unclassifiable online content, as well as its role in addressing currently defined categories of seriously harmful online conduct (e.g. cyber bullying, cyber abuse, image-based abuse, material that depicts abhorrent violent conduct). In contrast, the NCS should regulate classified and classifiable content, providing consumers with information to make informed choices – a distinction particularly relevant to video games, just as it is for film.

Clarifying this functional separation would support a more coherent regulatory system in which:

- the NCS governs content standards and classification; and
- the OSA addresses illegal or unclassifiable online material, and seriously harmful online conduct (e.g. cyber bullying, cyber abuse, image-based abuse, material that depicts abhorrent violent conduct).

⁹ Stevens Review, pp. 39, 120.

Such an approach would reduce duplication, improve regulatory clarity, and ensure each framework operates within its core area of expertise.

Decoupling the two frameworks would remove duplication that does not improve safety outcomes, promote more consistent regulatory treatment, and allow both eSafety and the Classification Board to focus their efforts where they are most effective.

We understand the Government has been awaiting the outcomes of the Mettlesome-Social Research Centre review to inform its approach to decoupling. However, it is not clear how the proposals in the Mettlesome-Social Research Centre report relate to, or would materially influence, the implementation of decoupling. The OSA's reliance on Class 1 and Class 2 definitions stems from the Classification Act, whereas the proposals in the Mettlesome-Social Research Centre report concern ratings and guidelines that sit outside those definitions.

Given the apparent disconnect between the Mettlesome-Social Research Centre recommendations and the decoupling proposal arising from the OSA review, we encourage the Government to progress decoupling as a priority. Of course, the devil is in the detail, and any progress on these reforms will require genuine and thorough consultation with the video games industry.

Recommendations:

- In line with the independent reviewer's recommendation for the Statutory Review of the OSA, the OSA (and subordinate instruments) should be expressly limited to illegal and unclassifiable online content, as well as its role in addressing currently defined categories of seriously harmful online conduct (e.g. cyber bullying, cyber abuse, image-based abuse, material that depicts abhorrent violent conduct). In contrast, the NCS should regulate classified and classifiable content, providing consumers with information to make informed choices - a distinction particularly relevant to video games, just as it is for film.
- Further, where gaps are identified in how games are regulated in the online environment, these should be addressed within the NCS in the first instance, rather than through the OSA or other regulatory frameworks (including any future Digital Duty of Care reforms).

With these considerations in mind, we turn to the specific Mettlesome-Social Research Centre recommendations.

3. Specific comments on Mettlesome-Social Research Centre recommendations

3.1 Introducing a new PG 13 rating

Mettlesome-Social Research Centre recommendation #C01: The guidelines could be updated with a new classification rating - PG13.

We understand that some stakeholders have expressed support for the introduction of a new classification category between PG and M, such as PG 13. This is not a new issue and has been raised by stakeholders in past consultations.

While the creation of a PG 13 category is not a priority for the video games industry, we remain open to further consideration of this proposal should the Government determine that it would improve the clarity, consistency or harmonisation of the NCS.

A recurring concern with the current framework is that the three relevant categories (PG, M and MA 15+) all pivot around the (arbitrary) age of 15. This structure contributes to video games being treated more conservatively than films, and to games that sit on the borderline between PG and M being more likely to receive an M classification in Australia than in many comparable jurisdictions. A new intermediate PG 13 category may help address this issue and reduce unnecessary divergence between games and other media, but its introduction would need to be coupled with a rescoping of the existing PG classification to ensure that rating's continued utility. It would also be important for the Government to clearly articulate the purpose and scope of any new PG 13 category, including how it would interact with existing classifications (particularly whether it would sit alongside or displace aspects of the current M rating) and where games would be expected to fall within a revised framework.

Should the Government wish to explore a PG 13 category further, we would welcome the opportunity to engage constructively with the Department and with other industry sectors on its potential design, purpose, scope and interaction with existing classifications.

Recommendation: While a PG 13 category is not a priority for the video games industry, we remain open to considering this option should the Government view it as beneficial for improving clarity, consistency or harmonisation within the NCS. If the Government chooses to explore this further, industry engagement will be necessary to clarify its potential design, purpose, scope and interaction with existing categories, including for where games would fall within a revised framework.

3.2 Overhauling classifiable element 'Themes'

Mettlesome-Social Research Centre recommendation #C02: Themes could be re-worked to clearly classify, identify and communicate specific community needs so that the resultant classification truly reflects the content. Genre descriptors (e.g. science fiction, fantasy) could be removed from Themes. Themes would act as a collection of sub-elements for classification and reflect the most requested issues. These would be: sexual violence, suicide, discrimination and scariness. When a classification matrix for a title is shown, the sub-matrix of Themes would also be visible.

We support efforts to improve clarity and consistency in the Guidelines. However, we do not support narrowing the scope of the 'Themes' element to a fixed list of sub-elements such as sexual violence, suicide, discrimination and scariness.

The strength of the current 'Themes' category lies in its breadth and flexibility. As we noted in our previous submission, 'Themes' is one of the few classifiable elements that is applied in a mature, contextual and non-prescriptive manner. This flexibility enables the Classification Board to respond to the increasingly complex, narrative-driven and richly

contextual nature of contemporary video games, and to address emerging or evolving social issues without requiring constant amendment to the Guidelines.

Narrowing 'Themes' to a predetermined set of sub-elements risks creating a more rigid, "black and white" framework that may not fully reflect the diversity and nuance of issues explored in modern media. While a more constrained set of criteria may assist with the operation of automated or self-classification tools, such an approach should not replace the broader, contextual treatment of 'Themes' in the Guidelines. Retaining flexibility remains important to ensure that content falling outside a fixed lists (but which is nonetheless thematically significant or relevant to community expectations) can be appropriately considered, particularly in cases of review or appeal. In this context, a broader conception of 'Themes' may be especially valuable as a safeguard where a self-classification outcome is disputed or where automated tools produce an overly restrictive result.

We therefore recommend retaining a broad definition of 'Themes', supported by clear consumer advice where needed, rather than restricting the element to a closed set of sub-categories. This approach maintains flexibility, supports harmonisation across media, and avoids unnecessary prescriptiveness while still enabling the Board to highlight specific issues of concern to the community.

Recommendations:

- We do not support an overhaul of 'Themes'. We support the existing treatment of 'Themes' in the Guidelines and only recommend changes to the definition of 'Themes' to ensure that it remains broadly scoped.
- We recommend that the Guidelines be amended so that the same level of treatment and classification of certain topical themes that is permitted in films is also permitted in video games.

3.3 Improving reliance on evidence over morality

Mettlesome-Social Research Centre recommendation #C03: Guidelines would be updated to clearly define terms and thresholds to balance both community concern for certain content with any established evidence-based research of actual harms.

We strongly support the principle that classification standards should be grounded in evidence rather than outdated moral assumptions. As we have noted in previous submissions, the *Classification (Publications, Films and Computer Games) Act 1995* (Cth), Classification Code 2005 and all three Guidelines were drafted in the mid-1990s at a time when public debate about video games was heavily influenced by unfounded fears and misconceptions about their impact. These legacy concerns continue to shape aspects of the current NCS, despite decades of academic research demonstrating no causal link between video games and real-world harm, and despite the evolution of games into a mainstream, diverse and mature entertainment medium enjoyed by Australians of all ages.

Given the extensive body of research already cited in our comprehensive 2024 submission, we do not consider it necessary to revisit this topic further. However, for completeness and ease of reference, the relevant independent research is included in **Appendix A**. The

evidence base is clear: there is no credible link between video games and real-world harm, and classification standards should no longer be shaped by outdated moral assumptions. Future reforms should instead be grounded in contemporary evidence, community expectations and international best practice.

Where other international ratings regimes have evolved to reflect societal changes and technical advancements in the video games sector, the current classification guidelines in Australia have remained largely static and, as such, are now out-of-step with societal norms and the content that is acceptable in other media in Australia.

It is therefore essential that reforms move away from historically moralistic approaches and toward a modern, evidence-based framework that treats video games consistently with other media and reflects contemporary community standards. A classification system grounded in research, not outdated moral panic, will deliver clearer, more coherent and more credible outcomes for consumers and industry alike.

Recommendation: We support classification decisions that are based on empirical evidence of actual harm rather than moral panic or outdated tolerances, and that better reflect contemporary societal norms regarding acceptable content.

3.4 Focusing interactivity classifications on replication

Mettlesome-Social Research Centre recommendation #C04: Currently, classifications of elements in video games have a stricter benchmark when interactivity is involved. If a video game includes violence or nudity at the same level as a film, the game will be considered more extreme. The classification guidelines could be updated to remove the harsher judgement of video games' interactivity, except when it comes to real-world replication. E.g. violence in a video game is not the same as real world violence, but gambling in a video game for a reward or incentive is, in effect, the same as gambling in the real-world.

We support and welcome the recommendation to remove the longstanding, unfounded assumption that interactivity inherently increases the impact of content in video games. As we have consistently argued, the current Guidelines impose a harsher and more restrictive standard on games than on films across multiple classifiable elements, despite there being no evidence that interactivity, in and of itself, heightens impact or harm. These differences are a legacy of outdated political anxieties from the 1990s rather than contemporary community standards or empirical research.

The Stevens Review itself acknowledged that decades of academic literature have found no conclusive link between violent video games and aggression,¹⁰ and the Classification Board has previously advised that interactivity should not be treated as a standalone aggravating factor.¹¹

While the research to-date has largely been focussed on violence and aggression, as these have historically been the political focus, in many cases, interactivity may have little to no effect on impact, and **the Department's own research** has shown that interactivity can

¹⁰ Ibid, p. 101.

¹¹ Ibid.

even lessen impact due to players' sense of agency, focus on problem-solving, and the distancing effect of gameplay.¹²

The existing Guidelines already allow the Board to consider interactivity contextually, on a case-by-case basis, alongside tone, frequency, treatment and other impact accentuation factors. This is the appropriate and evidence-based approach.¹³ What is not appropriate is the rigid, prescriptive and discriminatory rules that currently apply only to games. Such rules have led to unjust outcomes that are inconsistent with the way in which content is treated in other media, and are increasingly incompatible with the nuanced, narrative-driven nature of modern games.

This issue is particularly acute in the treatment of several classifiable elements including violence, sex, drug use and nudity. The Guidelines impose a harsher standard for such elements in games than in films, regardless of interactivity, and include arbitrary rules that are highly unusual among comparable classification frameworks and have resulted in numerous Refused Classification decisions for video game content that is accommodated at the equivalent of MA 15+ or R 18+ in other jurisdictions. Even more frustratingly, this harsher standard for video games leads to similar, and oftentimes more graphic or realistic, content included in films being classified at MA 15+ when the equivalent video game content is either classified at R 18+ or Refused Classification. Such rules have produced classification outcomes that do not reflect community expectations or contemporary understandings of such themes in media.

We therefore support updating the Guidelines to remove the default harsher treatment of interactivity. Interactivity should not be treated as an automatic aggravating factor, and equivalent content in films and games should be classified consistently to reflect community expectations and ensure regulatory coherence.

Given the extensive evidence already provided in our comprehensive 2024 submission (including summaries of major independent studies and a review of literature on interactivity), we do not propose to revisit this topic in detail here. However, for completeness and ease of reference, the relevant independent research is included in **Appendix A**. The evidence base is clear, and reforms should now focus on aligning the treatment of games and films within a modern, evidence-based and future-proof classification framework.

Recommendation: We strongly support updating the Guidelines to remove the default harsher treatment of interactivity in video games, where equivalent content in films and games should be classified consistently.

¹² Department of Communications and the Arts, 'Community standards and media content: Research with the general public (Final Report, May 2017), p.10, <https://www.classification.gov.au/sites/default/files/2019-10/community-standards-and-media-content-research-with-the-general-public.pdf>.

¹³ Stevens Review, p. 101.

3.5 Replacing MA 15+ with MA 16+

Mettlesome-Social Research Centre recommendation #C05: The MA 15+ classification could be updated to MA 16+, reflecting the social benchmark of age sixteen, and other legislation such as the Online Safety Act that prohibits certain online environments for those under sixteen.

3.5.1 The proposed MA 16+

We do not support replacing MA 15+ with a new MA 16+ category. As we have consistently argued, the existing MA 15+ category is already poorly understood by the community, and shifting it to MA 16+ would not resolve this confusion. Instead, it would introduce a different numerical threshold without addressing the underlying structural issues, creating an outcome that is inconsistent with the broader classification framework.

We acknowledge that there have been considerations about age-based approaches to child protection, including a focus on experiences and risks for those under 16 as part of the online safety regulatory framework. We also acknowledge that some companies are already taking steps to better protect children under 16, including through default settings, content moderation tools, parental controls and age-appropriate design measures. These initiatives demonstrate that industry can, and in many cases does, respond to community expectations around child safety without relying on changes to statutory classification categories.

However, those considerations do not resolve the problem of an already poorly understood classification system, and we caution against importing age thresholds from unrelated legislation. The OSA's "under 16" provisions concern access to certain online environments (i.e. social media with unclassifiable content), not the classification of content itself. These frameworks serve different purposes and should not be conflated. Classification categories must be based on evidence about content impact, not on regulatory settings designed for different policy objectives. This distinction underpinned the Statutory Review of the OSA recommendation to decouple the NCS from the OSA – such overlapping requirements risk distorting the purpose of both regimes.¹⁴

3.5.2 The problems with MA 15+

Our research,¹⁵ as well as the Department's own studies,¹⁶ has repeatedly shown that the delineation between M and MA 15+ is one of the most misunderstood aspects of the current system. Introducing MA 16+ would not address this confusion – it would simply re-label it.

¹⁴ Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 'Statutory Review of the Online Safety Act 2021' (Report, October 2024), p. 16, <https://www.infrastructure.gov.au/sites/default/files/documents/report-of-the-statutory-review-of-the-online-safety-act-2021-february-2025.pdf>.

¹⁵ IGEA, 'Australia Plays 2023' (Final Report, August 2023), p. 26, https://igea.net/wp-content/uploads/2023/08/IGEA_AP2023_FINAL_REPORT.pdf; IGEA, 'Australia Plays 2025' (Final Report, August 2025), p. 14, https://igea.net/wp-content/uploads/2025/08/AP25-Report-28_08-WITH-LINKS.pdf.

¹⁶ Department of Infrastructure, Transport, Regional Development and Communications, 'Report on classification usage and attitudes research' (May 2022), pp. 26-27, https://www.classification.gov.au/sites/default/files/documents/5270_ditrdc_classification_usage_publication_report_finalv2.pdf.

The underlying issue is not the number attached to the category, but the existence of two adjacent mid-level categories whose differences are unclear to many consumers.

Our recommendation is also supported by the Australian Law Reform Commission (ALRC), which previously noted that preventing persons under 15 from accessing MA 15+ content is “problematic offline and near impossible online”, and that mandatory access restrictions at this level provide “little or no further practical benefit”.¹⁷ The Stevens Review similarly acknowledged the unenforceability of MA 15+ restrictions, the robustness of parental controls, and the strong community view that parents and carers (not legislation) should ultimately decide what is suitable for their children.¹⁸ These findings are reinforced by the widespread availability and increasing sophistication of parental control tools, which provide a more effective and proportionate mechanism for managing children’s access to content than mandatory access restrictions at the MA level.

The practical problems with MA 15+ are well-documented. Offline, the category relies on proof-of-age requirements that disadvantage young people who do not have a driver’s licence or passport, and places compliance responsibility on retail and cinema staff (often minors themselves) in settings where enforcement is inconsistent or non-existent. Online, MA 15+ restrictions are not only unenforceable but impossible to comply with in any meaningful way.

The contradictions extend further. While MA 15+ carries legal access restrictions under the NCS, MA 15+ content under broadcasting codes has no such restrictions and is routinely broadcast into homes (often earlier than in previous decades) and made available on catch-up services without time-zone controls.¹⁹ This inconsistency undermines the logic of maintaining MA 15+ as a restricted category for games.

Given these longstanding issues, we question whether MA 15+ remains necessary at all. Both M and MA 15+ state that content is not recommended for those under 15, and both legally permit access by those under 15. The distinction between the two is difficult even for practitioners, let alone the public. The Department’s research continues to show that MA 15+ is the least understood category, despite its long history.²⁰

For these reasons, we do not support replacing MA 15+ with MA 16+. Introducing a 16-based classification label would change the number, without resolving the fundamental problems of confusion, enforceability or coherence with the scheme.

3.5.3 Option 1: Replacing MA 15+ with M

We have previously recommended merging M and MA 15+ into a single non-restricted advisory category that includes the same content tolerances as are currently at the MA 15+

¹⁷ Australian Law Reform Commission, ‘Classification-Content regulation and convergent media’ (Final Report, ALRC Report 118, February 2012), p. 255, https://www.alrc.gov.au/wp-content/uploads/2019/08/final_report_118_for_web.pdf. (‘ALRC Report’)

¹⁸ Stevens Review, pp. 69-70.

¹⁹ While the content permissible at MA 15+ under the NCS and under the broadcasting codes may not be identical, they are very similar.

²⁰ Attorney-General’s Department, ‘Classification ratings: Stakeholder and practitioner consultation’ (2014), p. 9, <https://www.classification.gov.au/sites/default/files/2019-10/classification-ratings-stakeholder-and-practitioner-consultation.pdf>.

level. We considered this would simplify the system and better reflect how Australians actually use classification information.

We acknowledge that such a reform would have practical implications for the distribution of ratings across the catalogue of existing and future titles, and that industry would need greater clarity on how current MA 15+ and borderline M content would be treated in any merged category. Any proposal to merge these classifications would therefore require careful consideration of transitional arrangements, re-labelling impacts, and rating outcomes, developed in close consultation with classification practitioners and affected sectors.

3.5.4 Option 2: Retaining MA 15+

We note that Option 1 represents a different structural approach to that proposed by Mettlesome-Social Research Centre. Should there be limited support for Option 1, we consider it important that any identified issues with the operation of MA 15+ (including awareness and clarity or enforceability) are further investigated and addressed within the scope of the NCS reforms in the first instance, rather than through external regulatory frameworks such as future Digital Duty of Care reforms.

If concerns persist regarding the operation of MA 15+, these should be addressed through targeted reforms within the NCS framework. There are several practical options available that would improve the effectiveness of the category without introducing unnecessary structural change:

- Education and awareness: Expand government-led education campaigns (as discussed in section 3.16 below) to improve understanding of the distinction between M and MA 15+, including clearer messaging on advisory versus restricted categories.
- Improved consumer guidance: Enhance consumer advice to better explain why content falls within MA 15+, reducing confusion at the margin.
- Retail and platform alignment: Work with retailers and digital storefronts to improve consistency in how MA 15+ information and parental advice are presented and applied.

We would welcome further consultation through the NCS on how these or other measures could be implemented effectively.

Recommendations:

- We do not support replacing MA 15+ with MA 16+, as this would introduce an unnecessary and arbitrary threshold drawn from a different regulatory context, without resolving existing confusion or enforceability issues.
- We consider that merging MA 15+ with M into a single non-restricted advisory category would be a proportionate and evidence-based reform option. However, we acknowledge that this would represent a more significant structural change. Any consideration of this option should be subject to consultation on implementation

impacts, transitional arrangements and how existing ratings would be treated under a revised structure.

- If MA 15+ is to be retained, the Government should prioritise targeted improvements within the NCS to address identified gaps in its operation, including through enhanced public education, clearer guidance on category distinctions, and consultation on proportionate mechanisms to improve its practical effectiveness. These issues should be addressed within the NCS in the first instance, rather than through other regulatory frameworks such as the OSA (e.g. Digital Duty of Care reforms).

3.6 Adopting the rest of the classification system for publications

Mettlesome-Social Research Centre recommendation #C06: Publications currently have a unique classification system unlike other media – Unrestricted, Unrestricted Mature, Category 1 Restricted and Category 2 Restricted. To simplify, publications could adopt the same classification system, but only using the relevant levels: Unrestricted – General; Unrestricted Mature – MA 16+; Category 1 Restricted – R18+; Category 2 Restricted – X18+.

We do not oppose efforts to simplify the publication classification framework. However, we reiterate the position outlined in our previous submission that any changes to publication categories must not create unintended consequences for the treatment or classification of video games.

The Stevens Review recommended aligning publication categories with those used for films and computer games (Unrestricted → M, Category 1 → R 18+, Category 2 → X 18+),²¹ and we noted at the time that such alignment would require careful consideration to avoid flow-on effects for other media.

As we continue to advocate for greater harmonisation between the film and computer game Guidelines to reflect contemporary community expectations, we would be concerned if changes to publication classifications were implemented in a way that indirectly altered or complicated the classification of video games.

Recommendation: We recommend that any changes to the classification of publications be implemented in a way that avoids unintended consequences for the treatment or classification of video games.

3.7 Clarifying definitions

Mettlesome-Social Research Centre recommendation #C07: The current language in the guidelines is ambiguous, which can lead to broad interpretation and potential bias in classification decisions, depending on how instructions and definitions are understood. To address this, clear and well-informed definitions and instructions should be developed alongside updated evidence, ensuring the guidelines provide objective and understandable direction for classifying content.

²¹ Stevens Review, p. 11.

At this stage, it remains unclear what definitions would be within scope for revision, as raised by Mettlesome-Social Research Centre. Greater clarity would be required for industry to move towards increased self-certification. However, any such approach would depend on industry having a meaningful opportunity to help shape those definitions.

Recommendation: Greater clarity on the scope of definitional revisions is required before moving toward increased industry self-certification, and only where industry is given a meaningful role in shaping those definitions.

3.8 Reconsidering sexual content

Mettlesome-Social Research Centre recommendation #C08: Currently, sexual scenes involving participants that are non-heteronormative (a man and a woman) are often automatically considered higher impact, as are depictions that include fetish or kink-related acts typically judged through a moral lens rather than an evidence-based, harm-informed framework. Except in cases involving depictions of sexual violence or non-consensual acts, sexual content should be rated consistently, regardless of the artistic style or identities of those involved.

We agree with the principle that sexual content in games should be assessed using a consistent, evidence-based framework focused on demonstrable harm, rather than moral judgements or assumptions about non-heteronormative themes, artistic style or participant identity. This approach supports clearer, fairer and more predictable classification outcomes for industry and consumers alike.

Recommendation: We recommend that, except where content involves sexual violence or non-consensual acts, sexual content be classified consistently based on evidence of harm.

3.9 Establishing a Classification Advisory Council

Mettlesome-Social Research Centre recommendation #C09: A Classification Advisory Council, composed of community voices, not professional industry stakeholders, could be created to not only aid in this process, but also provide a productive method by which industry and government can gain feedback on decisions and ideas.

We appreciate the intent behind establishing a Classification Advisory Council to ensure that classification guidelines remain responsive to community expectations and emerging issues. We agree that regular evidence-based review of the Guidelines is essential to maintaining public confidence in the classification system. We have previously expressed in-principle support for the establishment of an advisory body to help ensure that guideline development is informed by robust evidence, community research and international best practice, though in practice this does not require a 'standing' advisory council.

However, we would not support any model in which the advisory body is composed solely of community representatives. A balanced and inclusive approach – one that incorporates community voices, subject-matter experts and industry stakeholders – is critical to ensuring that the Council's advice is both representative and practically grounded.

International best practice supports this position. Systems such as PEGI²² rely on advisory structures that include a mix of technical experts, academics, community representatives and industry participants. These models have proven effective in maintaining classification standards that are evidence-based, transparent and adaptable to technological change. We strongly encourage the Department to draw on these examples when designing any advisory mechanism.

Excluding industry from the Council risks undermining the practical effectiveness of the classification framework. Industry representatives bring essential operational knowledge about content creation, distribution and the real-world application of classification criteria. Their participation helps ensure that guidelines are not only reflective of community standards but also implementable, consistent and aligned with the scope and purpose of the NCS.

There are also important practical questions regarding how any new advisory body would operate effectively within the broader governance framework. This includes clarity around its scope of functions, its responsibilities, and how it would interact and coordinate with the Classification Board. The Board plays a critical and longstanding role in the system and should continue to do so. Any new advisory mechanism must complement, rather than duplicate or undermine, its statutory functions.

We therefore support the establishment of a Classification Advisory Panel as recommended by the Stevens Review, provided it is constituted with a balanced membership that includes community representatives, experts and industry stakeholders.²³ Such a structure would help safeguard against politicisation, ensure procedural fairness, and promote a robust evidence-based approach to guideline development.

Recommendation: We recommend establishing a balanced, multi-stakeholder advisory panel, consistent with the Stevens Review and international models such as PEGI, and do not support a community-only body. Such an approach will help ensure guideline development remains evidence-based, practical and reflective of community standards.

3.10 Introducing single touch classification

Mettlesome-Social Research Centre recommendation #C10: Titles could be classified once, only to be updated again if the content itself changes. This would mean if a film is classified for theatres, it automatically carries the same rating for streaming, etc. This would reduce the burden for industry and improve the experience for consumers.

We agree that the same content should not require multiple classifications simply because it is delivered through different platforms. As we outlined in our previous submission, the distinctions between films, games and other digital media (and between their respective distribution channels) are rapidly diminishing, and we continue to firmly support the adoption of a single set of classification guidelines for both video games and films as

²² See: <https://pegi.info/page/pegi-committees>.

²³ Stevens Review, p. 79.

recommended by the ALRC Inquiry.²⁴ A future-proof classification system must therefore apply consistent standards across delivery formats and ensure that classification outcomes follow the content itself.

Allowing a title to be classified once, with that classification carrying across platforms unless the content materially changes, would reduce duplication, improve regulatory efficiency and better reflect the converged media environment. This approach is consistent with our longstanding support for platform-neutral classification standards and a single, flexible set of guidelines capable of assessing a broad spectrum of content.

Recommendation: We recommend that titles be classified once, with that classification applying across all delivery formats (whether now known or later developed) unless the content itself materially changes.

3.11 Permitting updates to classifications

Mettlesome-Social Research Centre recommendation #C11: Currently, any change to a piece of media requires the entire content to be reclassified. Instead, the database could allow for classifications to be updated. A record of the previous classification would be retained on the listing - if the classification changes.

While acknowledging that the intent of this proposal is to ensure classifications reflect new information or context, we support the ability to update classifications primarily for practical reasons and in defined circumstances. Currently, published classifications cannot be amended, requiring industry to apply outdated and inconsistent advisories that no longer reflect contemporary community standards (e.g. depictions of surgical procedures or animal attacks). Allowing updates to past classifications would enable industry to align older content advisories with current standards and improve consistency for audiences.

Support for this proposal is conditional on reclassification remaining optional for publishers and platforms. Any update mechanism should operate as an option and not enable the Australian Classification Board to mandate the retroactive application of newer guidelines.

Recommendation: We recommend that the classification system permit optional, industry-initiated updates to existing classifications, with prior classifications retained, to ensure content advisories remain current and consistent while avoiding mandatory or retroactive reclassification.

²⁴ For example, in the ALRC Inquiry, Recommendation 5-2 states that "The National Classification Scheme should be based on a new Act, the Classification of Media Content Act. The Act should provide, among other things, for: ... a single set of statutory classification categories and criteria applicable to all media content". Also, Recommendation 9-1: "The Classification of Media Content Act should provide that one set of classification categories applies to all classified media content as follows: G, PG, M, MA 15+, R 18+, X 18+ and Prohibited. Each item of media content classified under the National Classification Scheme should be assigned one of these statutory classification categories." See: ALRC Report, pp.103, 208, https://www.alrc.gov.au/wp-content/uploads/2019/08/final_report_118_for_web.pdf.

3.12 Setting self-classification as default

Mettlesome-Social Research Centre recommendation #C12: A significant proportion of content is still classified by the Classification Board – a process that is both time-consuming and costly. There is also concern from industry – whether factual or not – that outcomes can be influenced by individual biases, depending on the composition of the Board. Rather than relying on Board classification, self-classification could become the industry standard, supported by evidence-based tools – with Board classification only in rare circumstances.

We agree that the expansion of industry self-classification and the successful integration of IARC have already demonstrated that a more efficient, technology-supported approach to classification is both workable and appropriate for the vast majority of content. As we noted in our previous submission, these reforms remove a significant portion of the Classification Board’s current workload and create an opportunity to reconsider the most effective role for the Board within a modernised NCS.

While we support self-classification becoming the default pathway for most content, we continue to see an important and ongoing role for a regulator-based classification function via the Classification Board. Some publishers and distributors will continue to prefer regulator-made decisions in certain cases, including for high-profile, sensitive or borderline-rating content, or where there is a risk of differing interpretations between industry assessors and official classifiers, and there must be a trusted mechanism available for these assessments. Maintaining access to Board classification provides confidence and certainty for industry participants and reduces the risk of subsequent dispute, review or re-rating. A regulator also plays an important role in setting expectations for how classification tools should be applied, ensuring decisions remain aligned with contemporary community standards.

Similarly, while it is essential that there always remain an effective appeals mechanism, in line with the Stevens Review,²⁵ we also maintain our view that the current Classification Review Board should be replaced by a more efficient review mechanism given its cost and infrequency of use. Under a reformed NCS, any necessary reviews could be undertaken by different assessors within the regulator, consistent with the approach recommended by the ALRC Inquiry.²⁶ This would provide an accessible, expert-based review pathway without duplicating structures.

In a co-regulatory model supported by evidence-based tools, trained industry assessors and strong oversight, we expect regulator-made classifications to be required only in limited circumstances. Trust in industry decisions can be maintained through safeguards such as training requirements, audits, reporting, complaints-handling and sanctions, alongside the continued availability of regulator-made classifications where industry participants seek additional assurance – similar to the post-broadcast compliance model used in the television sector.

²⁵ Stevens Review, p. 29.

²⁶ ALRC Report, pp. 172-175.

In this context, we support further expansion of self-classification as the industry standard, with regulator-made decisions available to publishers and distributors for exceptional cases. Importantly, this expansion should not require publishers or distributors to rely solely on self-assessment, and regulator-made classification should remain available as a parallel opt-in pathway. This approach would reduce cost and delay, maintain public confidence, and ensure the NCS remains fit-for-purpose in a converged media environment.

Recommendations:

- With the expansion of industry self-classification and the established role of IARC, much of the Classification Board’s workload has shifted. However, we continue to see an important role for the Board in providing regulator-made decisions in certain cases, as an opt-in pathway for publishers and distributors seeking official assessment or additional assurance.
- We maintain that the Classification Review Board should be replaced by an effective appeals mechanism provided by the regulator itself.

3.13 Expanding use of automated classification tools

Mettlesome-Social Research Centre recommendation #C14: Expanding the use of automation and self-classification tools could support industry to meet classification obligations more efficiently. This may involve reviewing existing tools, introducing new ones and investing in improved technologies aligned with updated definitions. These tools would not only streamline the classification process but also enable industry to more effectively reach their intended audiences.

We support Mettlesome-Social Research Centre’s recommendation in-principle, noting that any updates associated with broader adoption of automated classification tools should be targeted, proportionate and mindful of the significant time, effort and resources required to implement these changes to approved tools.

Recommendation: We recommend that expanded use of automated classification tools be supported, provided any associated updates are targeted, proportionate and take into account the significant time, effort and resources required to implement changes to approved tools.

3.14 Classification website – transparent decisions

Mettlesome-Social Research Centre recommendation #C18: The website could show a log of the questions, concerns and decisions raised/made by the Classification Board or Review Board for listings, especially where classifications were contentious. This communicates the consideration and effort undertaken by the classification process, so the public further understands the nuance that goes into classifications.

In-principle, we do not oppose greater transparency of classification. However, we caution that any publication of decision-making processes would need to carefully manage confidential and or unnecessary product information (including but not limited to potential spoilers), and should be undertaken in consultation with applicants prior to publication. We

also note that the objective of improving public understanding of the classification process is broadly framed and may be more effectively achieved through general measures (such as education and explanatory guidance), rather than by publishing detailed case-specific classification decisions.

Recommendation: We recommend that efforts to improve transparency in classification decision-making focus on proportionate, general communication methods, with any publication of case-specific information carefully managing confidentiality and undertaken in consultation with applicants.

3.15 Quick links to classification listings

Mettlesome-Social Research Centre recommendation #C21: Classification titles could come with an option to quickly access the title listing on the classification website, via QR Codes (or similar technology) for easy scanning. This would mean that some information could be displayed firsthand, while deeper detail is readily available via a smartphone scan.

The Mettlesome-Social Research Centre suggests the use of QR codes or similar mechanisms would provide faster access to classification listings and supporting information. While we acknowledge the intent to improve accessibility to classification information, members have raised concerns about the practical value of this approach. Industry already provides consumers with multiple readily accessible channels for classification information, including ratings, consumer advice, synopses, and platform-level disclosures, limiting any clear benefit from an additional mechanism.

Members have also noted the operational and design constraints associated with physical packaging, particularly the limited space available on retail boxes, which are already required to accommodate prominent classification markings. Any additional requirements should therefore be carefully considered to avoid imposing unnecessary operational burdens without demonstrable consumer benefit.

Recommendation: We do not support the introduction of QR codes or similar mechanisms on classification materials, noting the lack of demonstrated consumer benefit, the operational burden on industry, and the significant space constraints already imposed by existing classification requirements.

3.16 Generational education campaigning

Mettlesome-Social Research Centre recommendation #C21: Misunderstandings about classifications has led to confusion about its function and place in society and the modern media landscape. A public campaign to remind Australians of the purpose and functionality of the classification system could be implemented. It could provide clear education and communication around its role in advice and restriction of certain content, that it is a point of reference for information so that individuals can make informed decisions for themselves and their children, and clearer understanding on what the symbols and levels mean.

We agree that improving public understanding of the classification system is important, particularly as media consumption habits evolve and misconceptions persist about the

purpose and function of classifications. As we outlined in our previous submission, the video games industry has long taken a proactive role in educating parents and carers about responsible gaming, parental controls, online safety and the meaning of classification information. Through resources such as IGEA's parental control guides, our Australia Plays research, the Trust & Safety Hub, and global initiatives including askaboutgames.com, we have consistently invested in raising awareness and supporting families to make informed choices.

We would welcome a broader, government-led public education campaign that complements these industry efforts and provides clear, accessible information about the role of classification, the meaning of classification symbols, and how the system supports informed decision-making. A coordinated approach would help address community misconceptions, reinforce the advisory purpose of the NCS, and ensure that parents and carers have the tools and confidence to guide their children's media use.

Recommendation: We recommend that the Government lead a public education campaign on the purpose and use of the classification system, developed in partnership with industry associations and supported by funding to enhance and extend the industry's ongoing efforts to educate parents and carers.

For further questions or information about our submission, please contact us at policy@igea.net.

Appendix A – Interactivity and risk characterisation in video games

Appendix A consolidates material from our 2024 submission, which addressed closely interrelated questions concerning interactivity in video games, and the assessment of risk and impact. Taken together, these materials provide a coherent evidence-based overview of the role of interactivity in contemporary games, drawing on independent research and established academic literature. The content is reproduced here for completeness and ease of reference, rather than to restate arguments already made, and is organised into two subsections reflecting the distinct but connected strands of that analysis.

A.1 Independent research on video games, behaviour and real-world impacts

Christopher Ferguson and John Wang, 'Aggressive Video Games are Not a Risk Factor for Future Aggression in Youth: A Longitudinal Study' (2021) 24(1) *Cyberpsychology, Behavior, and Social Networking*.

- The study suggests that the harmful impact from aggressive video games “may have been greatly exaggerated”, with “older adults tend to be most concerned about the impact of games, consistent with moral panic theory”. This arises where the effects are exaggerated and proponents are incentivised to promote these exaggerations further.

Eun-Ju Lee, Hyun Suk Kim and Soonwook Choi, 'Violent Video Games and Aggression: Stimulation or Catharsis or Both?' (2021) 24(1) *Cyberpsychology, Behavior, and Social Networking*.

- The study found “overall game use had no significant effects on physical or verbal aggression” over time (measured six months later). Extended violent video game play was also found to lower aggression, anger and hostility among heavy users, regardless of the game type, suggesting that game playing provided an outlet for players to manage their stresses and negative emotions.

Aaron Drummond, James Sauer and Christopher Ferguson, 'Do longitudinal studies support long-term relationships between aggressive game play and youth aggressive behaviour? A meta-analytic examination' (2020) 7(7) *Royal Society of Open Science*.

- The longitudinal studies found that there was no support for the correlation between aggressive game content and youth aggression over the long term. Instead, where researchers have drawn correlations, it suggests these are due to “methodological weaknesses and researcher expectancy effects than true effects in the real world”.

Andrew Przybylski and Netta Weinstein, 'Violent video game engagement is not associated with adolescents' aggressive behaviour: evidence from a registered report' (2019) 6(2) *Royal Society of Open Science*.

- A study of 1,000 youths aged 14-15 indicated that video games do not cause aggressive behaviour and that “There was no evidence for a critical tipping point relating violent game engagement to aggressive behavior.” The research findings also suggested that “biases might have influenced previous studies on this topic, and have distorted our understanding of the effects of video games.”

Simone Kühn, Dimitrij Kugler, Katharina Schmalen, Markus Weichenberger, Charlotte Witt, Jürgen Gallinat, 'Does playing violent video games cause aggression? A longitudinal intervention study' (2019) 24 *Molecular Psychiatry*.

- The study findings showed that an extensive game intervention over two months did not reveal any specific changes in aggression, empathy, interpersonal competencies, impulsivity-related constructs, depressivity, anxiety or executive control functions, neither in comparison to an active control group that played a non-violent video game, nor to a passive control group.

Whitney DeCamp and Christopher Ferguson, 'The Impact of Degree of Exposure to Violent Video Games, Family Background, and Other Factors on Youth Violence' (2016) 46 *Journal of Youth and Adolescence*.

- In a study examining video games, family background and other environmental factors, researchers found "video game violence is not a meaningful predictor of youth violence and, instead, support the conclusion that family and social variables are more influential factors."

Christopher Ferguson, 'Do Angry Birds Make for Angry Children? A Meta-Analysis of Video Game Influences on Children's and Adolescents' Aggression, Mental Health, Prosocial Behavior, and Academic Performance' (2015) 10(5) *Perspectives on Psychological Science*.

- The researcher notes that academic publishing suffers from publication bias when it comes to video games, stating: "the overall results of the meta-analysis indicate that video games, whether violent or nonviolent, have minimal deleterious influence on children's well-being."

Source: 2015-2019 information and extracts from Entertainment Software Association information sheet

A.2 Research on interactivity and impact of game content

There is a body of research that provides evidence for the view that interactivity can decrease the effect of content on a player compared to viewing content non-interactively. These findings offer an intriguing perspective that contradicts the prevailing view of a positive correlation between interactivity and impact.

IGEA has reviewed the available research on the interactivity in video games and whether there was evidence that it increased, decreased or had no effect on the impact of content compared to non-interactive content like film. The context of this research was the evidence given in our past submissions, including to the Stevens Review and 2024 Stage 2 classification reforms consultation, citing research conducted by the former Department of Communications and the Arts finding that, at least concerning violence, interactivity appeared to reduce the impact of content on the player.²⁷

²⁷ Department of Communications and the Arts, 'Community standards and media content: Research with the general public' (Final Report, May 2017), p. 43, <https://www.classification.gov.au/sites/default/files/2019-10/community-standards-and-media-content-research-with-the-general-public.pdf>.

A.2.1 Limited research on interactivity available

Significant research has been conducted on whether violence in video games causes players and particularly children to be violent, with the overwhelming body of studies unable to show any evidence of a link. Even the American Psychological Association has maintained the position that there is insufficient scientific evidence to support a causal link between violent video games and violent behaviour.²⁸ We address violence in detail in our 2024 submission, so we will not repeat this discussion here.

Similarly, most research on the psychological effects of video games to date has tended to focus on violence.²⁹ By contrast, we found that relatively little research has been conducted on the general relationship between interactivity in video games and psychological effects.³⁰

Acknowledging the constraints of our modestly scoped desktop review, a key finding has been that there does not appear to be incontrovertible evidence that interactivity increases the impact of content on the player, whether violence or any other content. However, while the effect of interactivity in games is surprisingly an area of limited research, we have been able to identify some intriguing research that appears to help explain and provide an empirical basis to the Department's past finding that interactivity can decrease the effect of impactful content in a game.

A.2.2 How interactivity can reduce content impacts

Overall, there is a commonly accepted academic view that the effects of interactivity should not be exaggerated, and that interactivity may instead moderate both the negative (e.g. behavioural) and positive (e.g. educational) effects of video games.³¹ Notwithstanding this view, the objective of our review was to investigate a potential theoretical basis for the Department's past research finding that interactivity in video games appeared to decrease the impact of content compared to film content, at least concerning violence. Our review, therefore, sought to identify academic studies and research that might explain or at the very least help us better understand why this may be the case.

Research findings that we found to demonstrate this link are discussed further below.

²⁸ American Psychological Association, 'APA Reaffirms Position on Violent Video Games and Violent Behavior' (Press Release, 3 March 2020), <https://www.apa.org/news/press/releases/2020/03/violent-video-games-behavior>.

²⁹ Sarah Hodge, Jacqui Taylor and John McAlaney, 'It's Double Edged: The Positive and Negative Relationships Between the Development of Moral Reasoning and Video Game Play Among Adolescents' (2019) 10(28) *Frontiers in Psychology*.

³⁰ For example, see: Jonathan deHaan, W. Michael Reed and Katsuko Kuwada, 'The effect of interactivity with a music video game on second language vocabulary recall' (2010) 14(2) *Language Learning & Technology*. Also see: Wei Peng 'The mediational role of identification in the relationship between experience mode and self-efficacy: Enactive role-playing versus passive observation' (2008) 11(6) *Cyberpsychology & Behavior*.

³¹ Rene Weber, Katharina-Maria Behr and Cynthia DeMartino, 'Measuring Interactivity in Video Games' (2014) 8(2) *Communication Methods and Measures*.

Interactivity and mental processes

- Interactivity occupies a greater proportion of a player's mental capacity compared to non-interactive media, reducing the impact of game effects as fewer mental resources are left for other cognitive processes.³²
- The brain's focus on problem-solving in video games may moderate other effects of interactivity. In particular, a meta-analysis has found that violent games, and especially shooting games, helped to focus and develop the cognitive functions and spatial awareness of children.³³
- Video games and particularly violent games may provide an emotional release for players, such as enabling them to vent existing aggression and help them to 'get it out of their system' in a safe digital environment.³⁴

Player agency within games

- The ability to interact and make decisions in a video game can give players a greater sense of agency and a more nuanced understanding of what is happening on screen, compared to merely viewing a protagonist in a film.³⁵
- The ability to carry out violence and other 'bad' behaviour in the virtual environment of games appears to accentuate feelings of guilt associated with ethical violations and increase the moral sensitivity of players.³⁶
- Some studies have shown that rather than desensitising players to violence and other impactful content, interactivity in games has no negative impact on a player's empathy or ability to process emotion.³⁷

³² For example, see: Annie Lang, 'The information processing of mediated messages: A framework for communication research' (2000) 50(1) *Journal of Communication*. Also see: Seung-Chul Yoo and Jorge Peña, 'Do violent video games impair the effectiveness of in-game advertisements? The impact of gaming environment on brand recall, brand attitude, and purchase intention' (2010) 14(7-8) *Cyberpsychology, Behavior, and Social Networking*.

³³ Isabella Granic, Adam Lobel, and Rutger Engels, 'The benefits of playing video games' (2014) 69(1) *American Psychologist*.

³⁴ For example: Scott Cunningham, Benjamin Engelstätter and Michael Ward, 'Understanding the Effects of Violent Video Games on Violent Crime' (Discussion Papers, No. 11-042, 2011) ZEW - Centre for European Economic Research. Also see: Eun-Ju Lee, Hyun Suk Kim and Soonwook Choi, 'Violent Video Games and Aggression: Stimulation or Catharsis or Both?' (2021) 24(1) *Cyberpsychology, Behavior, and Social Networking*.

³⁵ Nathan Walter and Yariv Tsfati, 'Interactive experience and identification as predictors of attributing responsibility in video games' (2018) 30(1) *Journal of Media Psychology: Theories, Methods, and Applications*.

³⁶ Matthew Grizzard, Ron Tamborini, Robert Lewis, Lu Wang, and Sujay Prabhu, 'Being bad in a video game can make us morally sensitive' (2014) 17(8) *Cyberpsychology, Behavior and Social Networking*.

³⁷ For example, Gregor Szyck, Bahram Mohammadi, Thomas Münte and Bert te Wildt, 'Lack of evidence that neural empathic responses are blunted in excessive users of violent video games: An fMRI study' (2017) 8(174) *Frontiers in Psychology*. Also see: Simon Goodson, Kirstie Turner, Sarah Pearson and Pelham Carter, 'Violent Video Games and the P300: No Evidence to Support the Neural Desensitization Hypothesis' (2021) 24(1) *Cyberpsychology, Behavior, and Social Networking*.

Games as a moral educator

- Playing video games in a multi-player context helps players to learn to cooperate with others, stimulating higher moral reasoning and forcing them to consider the societal impacts of their behaviours better.³⁸
- The fact that games can reward or punish in-game decisions provides a powerful mechanism that can affect impact, as it helps the player to understand 'right' and 'wrong' behaviour.³⁹ Even high impact content is moderated by interactivity where it is justified or condemned by the game's overall narrative.⁴⁰
- The impact of interactivity is not a blunt instrument and can be safely calibrated, such as for education. For example, the evaluation of the Australian drug education game *Pure Rush* (see below) showed that it was an effective way to teach players, despite the sensitive topic.⁴¹

Pure Rush: Drug Education Game

Pure Rush is a drug education game created by [Positive Choices](#), an Australian Government-funded online resource providing interactive evidence-based drug education resources for schools. Developed by the University of Sydney's Matilda Centre for Research in Mental Health and Substance Use and educational game designer 2and2, *Pure Rush* is a side-scrolling platform game that enables the player to choose to consume or avoid particular drugs. Consuming a drug will show an on-screen drug effect and display a warning, while avoiding a drug enables the player to proceed towards a music festival.



As an aside, *Pure Rush* has not been classified by the Classification Board, although it has been classified G under the IARC tool. If the Board had classified it, we argue that this Government-funded game for children may need to be classified R 18+ due to interactive drug use, again highlighting the problematic treatment of game content under the Classification Guidelines.

³⁸ For example, see: Angeline Khoo, 'Video games as moral educators?' (2012) 32(4) *Asia Pacific Journal of Education*. Also see: Anat Shoshani and Maya Krauskopf, 'The Fortnite social paradox: The effects of violent-cooperative multi-player video games on children's basic psychological needs and prosocial behavior' (2021) 116 *Computers in Human Behaviour*.

³⁹ Michael Heron and Pauline Belford, 'Do you feel like a hero yet? Externalised morality in video games' (2014) 1(2) *Journal of Games Criticism*.

⁴⁰ Sarah Stang, 'This Action Will Have Consequences: Interactivity and Player Agency' 2019 19(1) *Game Studies*.

⁴¹ L.S. Stapinski, B. Reda, N. Newton, S. Lawler, D. Rodriguez, C. Chapman, & M. Teesson, 'Development and evaluation of Pure Rush: An online serious game for drug education' (2010) 37(1) *Drug and Alcohol Review*.

About IGEA

IGEA is the industry association representing and advocating for the video games industry in Australia and New Zealand. Our industry includes the developers, publishers, and distributors of video games, as well as the makers of the most popular video game platforms, consoles and devices.

IGEA has over a hundred members, from emerging independent studios to some of the largest technology companies in the world.

Among our various activities, IGEA also organises the annual Games Connect Asia Pacific (GCAP) conference for Australian game developers and the Australian Game Developer Awards (AGDAs), which celebrate the best Australian-made games each year.

Find out more: www.igea.net

Acknowledgement of Country

IGEA acknowledges and pays respect to the past and present Traditional Custodians and Elders of this land and the continuation of cultural, spiritual and educational practices of Aboriginal and Torres Strait Islander peoples. We would like to extend our acknowledgments to the indigenous people from countries overseas and recognise their strength, wisdom and creativity.

