

Response to ‘Update to modernise and harmonise classification guidelines 2025’

RESPONSE SUBMITTED BY THE AUSTRALIAN HOME
ENTERTAINMENT DISTRIBUTORS ASSOCIATION

27 MAY 2026

Executive Summary

The Australian Home Entertainment Distributors Association (AHEDA) represents leading international studios, independent distributors and local home entertainment businesses operating across the following areas in Australia:

- Transactional Video-on-Demand (TVOD; known to the consumer as ‘renting’) and Electronic Sell-Through (EST; known to the consumer as ‘buying’) via platforms including Apple TV, Prime Video, YouTube Movies, Fetch, and Foxtel.
- Physical media including DVD, Blu-ray, and 4K UHD via retailers including JB Hi-Fi and Sanity.
- Pay TV, Free-to-air TV and Subscription Video-on-Demand (SVOD) licensing markets
- Theatrical releases (for independent and local members)

The home entertainment industry is a \$311M¹ market in Australia. Tens of thousands of films and television series have been classified and distributed since the formation of AHEDA in 1983, and our member companies have worked constructively with successive classification frameworks and regulatory bodies across every major format evolution; from VHS and Beta cassettes through to DVD, Blu-ray, 4K UHD and today’s digital transactional platforms.

AHEDA members have worked within Australia’s classification framework for more than 40 years and consider it to be a system that has operated effectively for both industry and audiences.

AHEDA members have positively adopted the following Stage One Reforms implemented in 2024:

- The increased use of the Accredited Classifier Scheme and approved technology partners to support self-classification workflows
- The streamlined use of television classifications already determined under the Australian Communications and Media Authority (ACMA)-administered broadcast arrangements

These Stage One reforms are considered by AHEDA members to deliver meaningful operational improvements whilst, crucially, avoiding disruption to the broader classification framework.

Overall Position

AHEDA welcomes the opportunity to respond to the Department’s consultation paper *Update to Modernise and Harmonise the Classification Guidelines 2025*.

The consultation paper correctly identifies opportunities to modernise parts of the framework to better reflect today’s digital media environment. AHEDA supports workable reforms that focus on improving how the classification system operates, providing these reforms comprise incremental improvements rather than widescale disruptive changes.

Disruptive changes not supported by AHEDA members include those that would create unnecessary complexity, consumer confusion, or retrospective obligations across existing product catalogues.

Consumer Confidence in the Existing System

AHEDA believes that any major structural changes to the classification system should be supported with evidence that the current system is no longer meeting community expectations.

¹ Dowd, B. (2026). *Australian Home Entertainment Market Review 2025 Q4*. GFK, an NiQ Company.

The available data suggests that Australia's existing film and television classification framework continues to operate effectively and remains broadly trusted by consumers.

Classification Board and Classification Review Board reporting from 2024-2025 shows they only received 74 complaints relating to classification decisions or consumer advice for films during that year. These complaints come from a pool of 56.6 million cinema admissions and more than 25 million home entertainment transactions across digital and physical formats.²

This is convincing evidence that the current classification system for film and television content is aligned with community expectations and continues to be well-understood by audiences.

The available data also shows strong alignment between accredited industry classification tools and Classification Board outcomes, with very few changes made to self-generated age ratings. In most cases where the Board intervened, the result was a refinement of consumer advice rather than a change to the age-based classification itself.³

We therefore argue that the core architecture of Australia's classification framework remains sound. While there are opportunities to modernise operational processes and improve consistency across platforms, proposals involving significant structural change should be supported by straightforward evidence of consumer benefit and demonstrated need.

Key Operational Considerations for AHEDA Members

Classification Across the Content Lifecycle

Many AHEDA members distribute content that is first classified at the theatrical release stage, before moving into downstream home entertainment windows. The 'classify once' approach allows films released theatrically to carry the same classification into digital and physical home entertainment formats.

AHEDA considers it important that any 'classify once' framework is sufficiently flexible to accommodate both theatrically released content, and titles releasing directly into the home entertainment market. The classification for titles falling into the latter category becomes the primary or 'master' classification used across the title's lifecycle.

There will also be circumstances where separate assessments are required, for example:

- Where bonus content, value-added material or special features are included in home entertainment versions.
- Where extended editions differ materially from theatrical versions

For digital releases where content is identical across formats a single classification outcome may often be appropriate. Physical products, however, may still require separate consideration where additional content is included.

Classification Certainty and Post-Release Changes

Certainty around classification is a key concern for AHEDA members. Classification has a direct influence on every stage of a title's distribution, including:

² Classification Board and Classification Review Board. (2025). *Classification Board and Classification Review Board Annual Reports 2024-2025*. ISSN: 2981-8869.

³ Ibid.

- Acquisition decisions
- Release planning
- Platform discussions
- Marketing campaigns
- Retailer implementation
- Metadata management
- Long-term catalogue exploitation

Whilst AHEDA supports appropriate oversight of self-classification tools and authorised assessor schemes, members have concerns about any system that creates ongoing uncertainty around ratings after release.

Direct-to-digital and direct-to-physical releases are more likely to be exposed to post-release amendments or oversight-related changes, particularly in a framework that increasingly relies on automation and self-classification tools.

AHEDA does not support a system that places titles in a continuous state of reassessment.

Where post-release amendments are necessary, there should be clear operational rules and timelines, and a distinct delineation of responsibilities for updating metadata and retailer systems.

Metadata and Catalogue Management

For AHEDA members, one of the biggest operational impacts of the proposed reforms sits not with the content itself, but with metadata management.

Classification information now flows across digital storefronts, retailer databases, internal film libraries, physical packaging workflows and more. Any changes to classification, consumer advice or other information on the title may require extensive downstream updates across thousands of titles.

It is important to note that home entertainment markets are not driven solely by new release content. Historically, physical media sales have reflected a split of approximately 55% new release and 45% catalogue activity, with digital transactional platforms also maintaining substantial catalogue libraries. Therefore, any reform proposals that create retrospective obligations across existing catalogues have the potential to create significant operational and commercial impacts across title libraries.

AHEDA strongly recommends that any significant changes to classification categories, descriptors, icons or consumer advice requirements apply prospectively only.

The scale of classification activity across the home entertainment sector is significant. Over 1,000 commercial film classification decisions are made annually across the Board, authorised assessor and approved classification tool pathways.⁴ The detailed responses we have provided to the key reform areas below reflect AHEDA's commitment to the film and television industry in Australia and our robust belief in the existing classification framework.

⁴ Ibid.

AHEDA Position on Key Reform Areas

Classification Categories and Consumer Clarity

AHEDA does not support:

- The introduction of a new PG13 classification category, or
- The proposed change from MA15+ to MA16+

Australia's existing classification categories are already well-understood by audiences and have operated effectively across theatrical, digital and physical home entertainment markets for decades. AHEDA members reject that there is sufficient evidence that either proposal would deliver meaningful consumer benefits nor that there are demonstrable issues with the current system.

C01: PG13 Rating.

The introduction of a new PG13 classification risks creating consumer confusion amongst a population who are well-aware of the differences between the current classifications PG and M. According to data in the consultation paper we are responding to, 'Adults find the classification symbols most helpful when choosing what to watch with their families, with over half describing it as 'very or extremely helpful.'⁵ Whilst the paper states that over half of the children surveyed found the classification symbols only 'sometimes helpful' the fact that 'Most children easily recognise common classification symbols like G, PG, M and MA15+'⁶ is clear evidence of a classification system that is instantly recognisable to both children and adults and at the same time is empowering the key decision makers (adults) to identify appropriate content for their families.

Operationally, an additional category would create unnecessary complexity and disruption across numerous facets of the industry for our members, including:

- Theatrical marketing
- Retailer systems
- Metadata management
- Packaging
- Digital storefronts, and
- Catalogue management

With a lack of evidence for consumer benefit, AHEDA members therefore do not support the inclusion of a new PG13 classification under Reform C01.

⁵ Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts. (2025). *Update to modernise and harmonise classification guidelines 2025*. Mettlesome and the Social Research Centre.

⁶ Ibid.

C05: MA15+ – MA 16+.

The current MA15+ classification is a long-standing and well-understood restricted category that already places responsibility with parents and guardians to make viewing decisions for younger audiences.

One of the primary arguments presented in the consultation paper for changing the age rating on this classification is to align with the Online Safety Act, which was devised to prohibit children under 16 from accessing social media and other online environments. AHEDA does not consider professionally produced and classified film and television content to be directly comparable with the highly unregulated and interactive online environments for which the Online Safety Act was devised. Film and Television classification serves a different purpose to the Online Safety Act, and these frameworks should continue to operate independently.

Established retail safeguards exist across both digital and physical home entertainment markets to support the restricted nature of MA15+ and R18+ content. Australian digital retailers typically apply parental controls, age-gating tools or additional account confirmation steps before restricted content can be purchased or rented. Physical retailers similarly operate within long-standing classification compliance obligations regarding the sale and rental of restricted content.

Community research conducted by the Australian Classification Board in 2022 found that consumers were more likely to check the consumer advice when they saw content rated MA15+, as they knew there was a greater likelihood that the film would contain content that would make them uncomfortable. These adults were checking consumer advice for themselves as well as teenage children, and the research found that ‘the type of content participants found disturbing and/or made them feel uncomfortable was found to vary by the individual’.⁷ Changing the age rating to 16+ would therefore serve no demonstrable purpose in alerting consumers to sensitive content, as this classification can be seen to be already well-understood as significantly different to the M classification rating and worthy of further investigation before making the decision to watch.

With robust retail safeguards in place and consumer feedback that they understand the current classification rating and use it as a significant point of difference to the M classification, we argue that changing the age from 15+ to 16+ has no discernible consumer benefit apart from aligning with the Online Safety Act, which we have already noted has been introduced to regulate a completely different space and should remain as a separate framework.

This change would create significant operational impacts for AHEDA members across existing catalogue libraries, including metadata updates, packaging changes, and the likelihood of both MA15+ and MA16+ classified products remaining in market simultaneously for an extended period.

As with the PG13 proposal, with a lack of evidence of consumer benefit, significant operational disruption and the distinct possibility of confusing consumers when the current framework is considered one of the most robust and reliable in the world, AHEDA does not support the change of the classification from MA15+ to MA16+ under Reform C05.

‘Classify Once’, Self-Classification and Post-Release Updates

C10: Single touch Classification.

AHEDA supports the principle of ‘classify once’ arrangements where:

⁷ Department of Infrastructure, Transport, Regional Development and Communications. (2022). *Report on classification usage and attitudes research*. Orima, Melbourne.

- A theatrical classification can flow through to downstream home entertainment release windows.
- A classification determined for content premiering in the home entertainment market (including transactional digital platforms such as EST and TVOD) can continue across later distribution windows including SVOD providers.
- Duplication is reduced, and
- Consistency across formats and platforms is improved.

In practice, a single classification outcome may continue across multiple stages of a title's commercial lifecycle, including:

- Transactional digital release (EST and TVOD)
- Physical home entertainment release (DVD, Blu-ray, 4K UHD)
- SVOD licensing
- Pay TV
- Free-to-air TV
- Airline exhibition
- Educational licensing, and
- Other non-theatrical distribution environments.

This consistency will have positive operational impacts for AHEDA members across metadata management, retailer implementation, marketing continuity, and consumer clarity.

AHEDA is supportive of Reform C10 where it can be applied across the product's entire lifecycle.

C11: Permit updates to classifications.

AHEDA believes clear operational guardrails are essential, particularly in relation to:

- Post-release amendments
- Accountability for updates
- Implementation obligations across platforms and retailers

We support oversight mechanisms that ensure consistency and compliance, including targeted review processes undertaken by the Classification Board. However, any review mechanism should operate within clearly defined timelines prior to release to avoid disruption to release planning or marketing activity, and to lessen the financial impact of marking changes.

Theatrically released titles are likely to have classification outcomes largely settled prior to downstream release windows. Direct-to-digital or direct-to-physical titles may however be more exposed to classification adjustments after release.

AHEDA therefore recommends:

- Clear and tightly defined post-release update rules
- Consistent implementation of frameworks nationally

- A pro-active approach to any significant classification changes

C12: Self-classification as default.

C14: Expand use of automated classification tools.

AHEDA supports the use of accredited classifier schemes and approved self-classification tools and technology partners, where appropriate and supported by effective oversight and quality assurance processes. Classification Board annual reporting shows:

- The Netflix Tool made 2,237 classification decisions during the reporting period, with fewer than 10 resulting in changes to age-based ratings.
- The Spherex Tool made 1,110 decisions, with fewer than four resulting in ratings changes.
- The Amazon Tool made 3,907 decisions, with fewer than five resulting in ratings changes.⁸

These outcomes suggest that the current combination of accredited tools, authorised assessment arrangements and regulatory oversight is functioning effectively and delivering highly consistent classification outcomes at scale.

AHEDA members are already successfully using technology partners and the accredited classifier scheme as part of their classification workflow. Some are still utilising the Classification Board to facilitate their classification requirements, and it is important to note that for theatrical releases many AHEDA members value the independent role of the Classification Board in providing confidence for distributors, exhibitors, marketing partners, and consumers.

Therefore, AHEDA supports having flexible classification pathways that allow distributors to utilise the most appropriate classification mechanism depending on content type, format, and release window.

Support for Reforms C12 and C14 is contingent on a variety of classification options remaining available for distributors, and that the Classification Board maintains a rigorous role in the oversight of self-classification tools to ensure consumer confidence in the system remains high.

Government and Structural Reform

C09: Classification Advisory Council.

AHEDA acknowledges the importance of ongoing community engagement and maintaining public confidence in the classification system.

However, AHEDA does not support the creation of a permanent Classification Advisory Council composed exclusively of community representatives without formal industry participation.

AHEDA is concerned that introducing an additional advisory structure may:

- Create unnecessary complexity
- Increase regulatory uncertainty, and

⁸ Classification Board and Classification Review Board. (2025). *Classification Board and Classification Review Board Annual Reports 2024-2025*. ISSN: 2981-8869.

- Risk creating ongoing pressure for incremental guideline expansion beyond demonstrated community need.

Industry consultation and public research mechanisms already provide Government with effective means of gauging community standards and industry impacts. While broader community input is valuable, there must also be structured mechanisms ensuring operational and implementation considerations are properly understood.

If an advisory structure is pursued, it would only be supported by AHEDA if:

- **Industry expertise is incorporated**
- **Operational impacts are properly considered**
- **The role of any council is consultative rather than determinative.**

Technology, Database Modernisation and Consumer Information

C13: Modernise the classification database.

C15: Classification website – uniform matrix.

C16: Classification website – personalised preferences.

C17: Classification website – unify listings.

AHEDA supports ongoing improvements to the Classification website and database where these help consumers more easily access and understand classification information. Improved search functionality, clearer title listings, and optional consumer tools which allow for personal classification preferences may assist audiences in navigating classification information across an increasingly digital media environment.

AHEDA's support of Reforms C13, C15, C16, and C17 is contingent upon proper governance oversight from the Classification Board to ensure:

- **Careful metadata integration planning**
- **Clear accountability regarding updating responsibilities, with AHEDA arguing that this responsibility should sit with the Classification Board or another clearly designated central authority**
- **That this remains a government-led initiative and any costs associated with the updates do not fall back on the industry**

C21: Quick links to classification listings.

Physical home entertainment products operate within materially different practical constraints to digital storefronts. Therefore, any proposals involving additional icons, expanded descriptions or QR codes should carefully consider the limited space available on physical packaging, where classification markings, legal notices, retailer requirements, and marketing materials already compete for placement.

Manufacturing physical media now operates within highly globalised production environments. Additional classification material required on physical media products would create disproportionate

cost and operational impacts for local distributors, particularly for catalogue products and lower-volume releases. Similarly, changes requiring the re-mastering of existing physical media for any new classification guidelines applied retrospectively would add an extra layer of cost and complexity for our physical distributors.

We argue that mandatory QR code solutions would provide no material improvement to consumer understanding, given that clear consumer advice already exists on packaging and digital storefronts, and the current classification framework is well-understood by consumers. The Classification Board's 2022 community engagement paper also showed evidence that consumer advice is generally ranked lower as a helpful source of determining content suitability, when looked at across the entire classification framework.⁹ Including an additional level of detailed information via a QR code is therefore most likely an unnecessary addition to these reforms.

AHEDA does not support Reform C21.

Consumer Advice, Icons and Public Education

C02: Overhaul of classifiable element 'themes'

C03: Improved reliance on evidence over morality

C07: Clarify definitions

AHEDA notes that several reforms relating to consumer advice terminology and 'themes' classifications have already been implemented and came into effect on 13 March 2026. These reforms were extensively workshopped with industry, including AHEDA members, and were broadly accepted as practical operational updates aimed at improving consistency and simplifying consumer advice terminology across the classification framework.

AHEDA considers this to be a positive example of measured and consultative reform that modernises the classification system without fundamentally altering the broader classification architecture.

Given that these changes have been implemented so recently, there has been no opportunity for industry to accurately assess how well consumers understand the updated terms. AHEDA therefore argues that any further significant changes to consumer advice categories or 'themes' terminology should be approached cautiously and supported by unambiguous evidence of consumer benefit.

AHEDA is supportive of efforts to clarify guidelines language and consumer advice terminology where definitions are ambiguous or inconsistently interpreted.

C08: Reconsideration of sexual content

AHEDA supports the principle that film and television content should be classified consistently regardless of the identities of the participants, i.e., non-heteronormative content should not automatically be classified as 'higher impact.'

Any updates to guidelines wording or consumer advice requirements for Reform C08 should be developed in close consultation with industry to ensure changes are practical and scalable.

⁹ Department of Infrastructure, Transport, Regional Development and Communications. (2022). *Report on classification usage and attitudes research*. Orima, Melbourne.

C18: Classification website – transparent decisions

C19: Classification website – addition of extra community information

AHEDA acknowledges that some consumers may seek additional information regarding classification decisions, particularly in circumstances where classifications are reviewed or contested. However, AHEDA remains cautious about proposals that would require extensive publication of decision-making commentary or explanatory materials through the Classification database.

AHEDA's position is that the Australian classification system should remain the primary and authoritative source of classification advice for consumers. Providing links or references to alternative third-party ratings systems may create unnecessary confusion where those systems apply different standards or interpretations from the official Australian classification process.

C20: Element icons

AHEDA does not support the broad expansion of additional consumer advice icons as part of the classification framework. Clear, written consumer advice remains the most effective and practical way of communicating classification information to audiences across theatrical, digital and physical distribution environments.

The negative impact on consumer understanding is one of our primary concerns. Consumers have a robust understanding of how the current framework operates, with strong recognition of each individual Classification emblem as evidenced in this department's paper of 2022¹⁰. Whilst consumer advice is not reported as a key consideration when an adult is choosing a title for themselves, it provides important additional information when choosing a title with a higher classification rating or when selecting a film for a child. Adults can quickly read the short consumer advice currently provided and immediately decide whether to watch the title. Icons will require a separate level of knowledge, and converse to what the paper argues, will be *less* quickly understood than written consumer advice. The use of icons would also prove overwhelming if there were multiple pieces of consumer advice to communicate but conversely using the suggested 'limit of the top three'¹¹ in the paper could mean notable content will become less rigorously signposted.

Such a change would have an enormous, disruptive impact on AHEDA members, not limited to those distributing physical media. Areas that would be affected include:

- Packaging
- Advertising
- Digital storefronts
- Posters
- Trailers
- Key Art
- Digital Assets
- Retailer catalogues

¹⁰ Ibid.

¹¹ Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts. (2025). *Update to modernise and harmonise classification guidelines 2025*. Mettlesome and the Social Research Centre.

Any changes to a Classification rating after the release of a film would require amendments to materials in all the above areas, which would have a significant operational and commercial impact on distributors.

AHEDA has seen no evidence of consumer demand or appetite for replacing written consumer advice with icons. This would therefore only serve to create unnecessary complexity and has the potential for subjective interpretation, which is at odds with the overall aims of the reforms to improve clarity and consistency. AHEDA is concerned that introduction of the icons would mean disruption to both consumer awareness and faith in the Classification Framework as a whole.

AHEDA does not support Reform C20.

C22: Generational education campaign

Any introduction of icons will require a government-led public education campaign to ensure consumers understand the new system. Extensive explanatory materials would need to be developed, and the industry should not carry the sole responsibility for educating consumers regarding structural changes to the classification system.

Other Reform Proposals

AHEDA has not provided detailed comments on:

- C04: Interactivity classifications
- C06: Publications

as these proposals fall outside the core operational focus of AHEDA members.

Conclusion

AHEDA supports practical and proportionate modernisation of Australia's classification system, where reforms improve efficiency, consistency, and consumer understanding without creating unnecessary operational burden or market disruption.

The current framework remains broadly effective and well-understood by Australian consumers.

AHEDA does not support reforms that:

- Introduce unnecessary complexity
- Reduce classification certainty
- Create retrospective catalogue obligations
- Diminish industry flexibility in how classification pathways are utilised across differing formats and release windows

AHEDA strongly recommends that reforms:

- Preserve the existing classification architecture
- Avoid retrospective catalogue obligations
- Maintain stable and trusted classification outcomes

- Preserve distributor flexibility and operational choice
- Recognise the differing operational realities of theatrical, transactional digital and physical home entertainment markets.

AHEDA appreciates the opportunity to contribute to the consultation process and looks forward to ongoing engagement with the Department as the reform process progresses.

AHEDA Member Companies

All Interactive Distribution
 Defiant Screen Entertainment
 Madman Entertainment Pty Ltd
 Paramount Home Media Distribution Australia
 Rialto Distribution
 Roadshow Entertainment
 StudioCanal Australia
 Sony Pictures Television
 Umbrella Entertainment
 Universal Pictures
 The Walt Disney Company (Australia) Pty Ltd
 ViaVision

About AHEDA

Now in our fifth decade as the voice of the home entertainment industry, AHEDA continues to champion the sector and support members on a broad scale including:

- Working with government on regulatory and policy matters
- Collaborating with other associations on copyright and enforcement
- Educating stakeholders and creating campaigns to advance the industry
- Identifying solutions to industry-wide issues affecting business efficiency
- Providing industry data and research findings to members and stakeholders
- Engaging with the community and proudly supporting The Starlight Children's foundation for over 25 years
- Preserving and promoting the unique benefits of home entertainment

AHEDA also works closely with industry organisations BASE (British Association for Screen Entertainment), DEG (Digital Entertainment Group), ANZSA (Australia New Zealand Screen Association), CCA (Creative Content Australia) and MPDAA (Motion Picture Distributors Association Australia) to raise awareness about the essential role of copyright and the impact of piracy on creativity. Together we work to protect and promote the safe and legal consumption of movie and TV content.

We are committed to the growth of screen entertainment across digital and disc. Our team of industry professionals brings insight, expertise and a clear vision for the future of this unique sector.