

ICA, AIDA, CAA, MPDAA
Response to the
Classification Guidelines Review 2026

Update to modernise and harmonise classification guidelines

Introduction

This submission represents the views of the Motion Picture Distributors Association of Australia (MPDAA), the Cinema Association Australasia (CAA), the Australian Independent Distributors Association (AIDA) and Independent Cinemas Australia (ICA) — collectively referred to as the Film Industry Associations (FIA) — representing Australia's cinema exhibition and distribution sectors.

The FIA thank the Government for the opportunity to contribute to the review of the 2025 Update to modernise and harmonise classification guidelines and support efforts to develop a flexible, adaptive and fit-for-purpose classification system.

The FIA believe the National Classification Scheme is functioning effectively. While some longstanding issues remain unresolved, exhibitors and distributors operate efficiently within the current framework, and the Australian public continues to have confidence in the system.

The 2024/25 Classification Board Annual Report¹ recorded only 193 complaints relating to ratings or consumer advice, including just 74 relating to films and television series. Given there were 56.5 million cinema visits in Australia in 2025, and more than 25 million digital and physical home entertainment transactions, this validates our view that there is no systemic public confidence issue requiring structural overhaul.

Previous Government reviews and subsequent reforms have produced a well understood and widely respected system. The Department's 2022 research² into classification usage and attitudes found the system was largely meeting community expectations.

The FIA supports targeted updates that improve efficiency, clarity and consistency across an evolving content environment while reducing unnecessary regulatory burdens and inequity.

However, while the SRC research points to a need to "adjust" rather than "overhaul" the guidelines, many proposals in the current review go significantly further. The FIA question the benefit of major structural reform, particularly proposals to alter established classification categories or impose retrospective obligations across existing content catalogues.

Any classification framework must remain practical for public exhibition environments. Cinema staff are the frontline administrators of classification enforcement, often working in fast-paced customer-service settings staffed by younger casual employees. Classification categories and restrictions must therefore remain simple, clear and easily explained to consumers at point of sale and entry. Overly complex systems risk undermining both consumer understanding and practical compliance.

¹ <https://www.classification.gov.au/about-us/corporate-reporting/annual-reports/classification-board-and-review-board-annual-report-2024-2025>

² May 2022, ORIMA Research for the Australian Government - Department of Infrastructure, Transport, Regional Development and Communications: ***"Report on classification Usage and Attitudes Research"***.

ADDITIONAL PROPOSAL: THE ADVERTISING SCHEME FOR UNCLASSIFIED FILMS

One of the most critical issues affecting the financial health of the cinema sector is the Advertising Scheme for unclassified films. The FIA have been petitioning for changes to the Advertising Scheme for Unclassified Films and Computer Games (the Advertising Scheme) for over fifteen years, and while Government has acknowledged the complexity and unfair restrictions this legislation imposes, changes have not been made.

Knowing how infrequently Classification Reviews occur, we urge the Government to seize this reform process to consider changes to the Advertising Scheme, particularly in this rapidly evolving, challenging and volatile entertainment ecosystem.

This proposal seeks to modernise Australia's Advertising Scheme for Unclassified Films which is outdated, inconsistent and unnecessarily restrictive.

Under the current rules, a trailer for an unclassified film can only screen before films with the same or higher likely classification. In practice, this prevents many trailers from reaching appropriate audiences — particularly M and MA15+ audiences — even when the trailer itself contains lower-level content suitable for those viewers.

The FIA argue this approach no longer reflects how audiences consume film marketing. The same trailers are freely available online, on social media, television and public advertising, yet cinemas — one of the most controlled and supervised viewing environments — face stricter restrictions. The current scheme also disadvantages Australian films and limits marketing opportunities during peak periods such as school holidays.

The **industry proposal** would allow trailers for unclassified films to screen one classification category lower than the likely classification of the advertised film, provided:

- the trailer content itself is suitable for the audience of the feature film;
- the trailer is appropriate and relevant to that audience, particularly children; and
- audiences are clearly advised to “Check the Classification” for the advertised film.

For example, a film likely to be classified MA15+ could have a trailer suitable for M audiences and therefore screen before M-rated films. However, trailers could never screen more than one category below the likely classification of the advertised film — for instance, an MA15+ trailer could not screen before a PG film.

The proposal also recommends the introduction of standardised trailer “tags”, similar to those used in the USA, to indicate that the advertised film's final classification may differ and encourage consumers to check the rating closer to release.

The following trailer is rated M

**The film being advertised may have a
different rating.**

Please Check the Classification

The FIA believe these reforms would:

- Increase the accuracy of trailer placement.
- Increase industry's opportunity to market upcoming feature films as well as provide a clear framework for authorised Assessors when assessing trailers.

- Bring Australia into line with countries such as NZ, the USA and the UK where trailers are assessed or classified based on their content.
- Reduce the restrictions on cinema advertising rules which are not applied to other platforms.
- Recognise the reality of how trailers are viewed online.

More than 50% of all Australians typically find out about new movies being released in cinemas by seeing the trailer screen before another movie. Therefore, in addition to our imperative to use limited in-cinema trailer opportunities effectively, we are confident that consumer complaints will ensure industry compliance.

There are a very limited number of trailer opportunities in cinemas. Advertising to an audience who is likely and able to see the advertised film is the dominant rationale for trailer placement.

The industry has proposed a one-year trial of the revised system, followed by a review of its effectiveness.

FIA RESPONSES TO THE REVIEW PROPOSALS

NOTE: The FIA have not provided comments on C04 (Interactivity classifications) and C06 (Publications).

PROPOSAL C01: PG13 Rating

DESCRIPTION: The guidelines could be updated with a new classification rating - PG13.

RECOMMENDATION: Not supported.

The FIA have significant concerns about this proposal and have seen no evidence of community support for it.

The Department's 2022 research study on classification usage and attitudes³ found that 74% of respondents did not think that classification categories needed to change, with only 5% disagreeing. The PG rating received the highest percentage (93%) of familiarity with respondents.

Similarly, in the 2015 research by the Attorney-General's Department⁴, unprompted (61%) and prompted (93%) awareness was highest for the PG classification rating

With most research studies indicating high levels of familiarity and perceived usability of the current classification categories, a major education campaign would be required to introduce this change with little evidence of resultant benefits.

Significant operational concerns would need to be addressed, in close consultation with the key industry stakeholders, should this new category be implemented, including confirmation that the new category be advisory (not restricted) and guarantees that re-rating of retrospective content would not be required even where titles are re-released.

PROPOSAL C02: Overhaul of classifiable element 'Themes'

DESCRIPTION: 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.

³ May 2022, ORIMA Research for the Australian Government - Department of Infrastructure, Transport, Regional Development and Communications: ***"Report on classification Usage and Attitudes Research"***.

RECOMMENDATION: No further changes supported. Assess in a year.

It's the understanding of the FIA that the first part of this proposal was implemented in March 2026 and, following industry consultation, were broadly accepted as a means to simplifying consumer advice.

However, because it is too soon to assess consumer understanding of these changes and because there is some support amongst industry for genre identifying themes, we propose that an assessment of this change be undertaken in a year and consumer surveys conducted to test how it is functioning.

In regard to thematic sub-elements with a higher degree of community concern, the FIA have no issues with these being incorporated into the list of Consumer Advice terms approved for use by the Board. These could be incorporated into the classification matrix on the Classification database should the Department implement improvements to the current website.

PROPOSAL C03: Improved reliance on evidence over morality

DESCRIPTION: 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.

RECOMMENDATION: Not supported.

While the FIA recognise the importance of balancing community expectations with evidence-based research in the development of the Guidelines, we are concerned about over-reliance on research that may reflect particular ideological or policy perspectives. We encourage the Classification Branch to ensure — and clearly demonstrate — that guideline changes minimise the risk of bias and are informed by a broad cross-section of industry and community views and supported by robust, objective evidence. Striking this balance is essential to maintaining confidence in a fair and well-informed classification system.

The FIA support the ANZSA proposal that *“proposals to make changes to the system must reach a high bar in terms of evidence of actual harm, and benefits to consumers; any reform should be led by the evidence, targeted, and avoid disruptive changes to longstanding structural planks of the system”* and that close consultation be held with industry in determining and drafting any changes.

PROPOSAL C05: Updating MA15+ to MA16+:

DESCRIPTION: The MA15+ classification could be updated to MA16+, 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.

It is proposed to change the MA15+ rating to MA16+, aligning with:

- Social norms that recognise sixteen as a key age benchmark.
- Existing legislation, such as the minimum age for social media in the Online Safety Act, which restricts certain online content for those under sixteen.
- Aims to clarify and further delineate between PG and M (both of which have an age 15 recommendation).

RECOMMENDATION: Not supported.

The FIA strongly oppose the proposed change from MA15+ to MA16+ and have significant concerns about the proposal.

MA15+ is a legally restricted category requiring minors to be accompanied by a responsible adult when purchasing cinema tickets, placing responsibility on parents and guardians to decide what children watch — a key principle of the Classification Act. While this safeguard is less enforceable online, no evidence has been presented linking professionally produced screen content with the harms associated with user-interactive social media

In response to the SRC's reasons for the proposal to change MA15+ to MA16+, the FIA submit the following:

1) Aligning with social norms and existing e-Safety legislation

The proposal cites age sixteen as an emerging benchmark, including under the Online Safety Act 2021, where the Australian eSafety Commissioner seeks to limit under-16 access to social media due to risks such as cyberbullying, explicit content, harmful algorithms, and addictive engagement practices.

The FIA argue this is not relevant to professionally produced commercial content directed at Australian audiences – the three types of content⁵ identified in the 2020 Stevens review⁶ as appropriate for classification.

Stevens recognised that classifying all online content is impossible due to the vast scale of user-generated material, necessitating separate online safety measures.

The appropriate age for viewing classified films, television, and streaming content should not be conflated with the age considered suitable for social media use. There is no broadly accepted social norm establishing sixteen as a universal benchmark, particularly given the long-standing acceptance of fifteen within Australia's classification system.

The FIA also reject comparisons between social media and professionally produced content. Social media requires active, interactive engagement and constant decision-making, whereas professionally produced content is a passive, single-focus experience. Classification guidelines already account for the immersive and emotional impact of screen content and are based on decades of research and evolving Australian community standards.

2) Clarifying and further delineating between *PG* and *M* (which both have an age 15 recommendation)

The 2023 Orima research⁷ found Australians were generally familiar with the Classification Scheme, though some confusion existed around the recommended age range for M classifications.

The 2020 Stevens Report similarly noted overlap between M and MA15+ but concluded there was limited public demand for change and no clearly superior alternative system. While imperfect, the current system is well understood and accepted by Australians.

The FIA further submits that age sixteen is not an appropriate universal benchmark because:

- Adolescents mature at different emotional, cognitive, and social rates.
- Cultural expectations around age milestones vary significantly.
- The digital age has altered how adolescents interact and mature, reducing the relevance of traditional benchmarks.

Rights granted at sixteen, such as driving or working, do not necessarily relate to an individual's capacity to view, process and understand screen content, which young people have engaged with throughout childhood.

⁵ The 2012 ALRC review recommended that a new Act should provide that "feature films and television programs that are likely to have a significant Australian audience and made and distributed on a commercial basis should be classified before content providers sell, screen, provide online, or otherwise distribute them to the Australian public."

⁶ May 202. Department of Infrastructure, Transport, Regional Development, Communications and the Arts. **Review of Australian Classification Regulation**, Neville Stevens AO.

⁷ August 2023, Australian Government Department of Infrastructure, Transport, Regional Development, Communications and the Arts. **Report of classifications and community standards research**. ORIMA

Finally, there is no evidence of public support for changing MA15+ to MA16+. The FIA submits that the case for reform has not been established and reiterates the need to distinguish between the impacts of professionally produced content and user-generated online content on Australian teenagers.

PROPOSAL C07: Clarify definitions

DESCRIPTION: The current language in the guidelines is ambiguous, which can lead to broad interpretation and potential bias in classification decisions. 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.

RECOMMENDATION: Supported following industry consultation.

The FIA support clarification of any language in the guidelines considered to be ambiguous or imprecise, particularly related to Consumer Advice. There is also support for Accredited Classifier training to address changes to consumer advice on an ongoing basis.

We submit that any changes should only occur after industry consultation and input.

PROPOSAL C08: Reconsideration of sexual content

DESCRIPTION: 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.

RECOMMENDATION: Supported.

FIA members are not aware of cases where classification decisions for Public Exhibition films have been judged “*through a moral lens*” but support the principle that sexual content should be rated consistently, regardless of the artistic style or identities of those involved. There is general agreement that the current guidelines are clear regarding how sexual content should be considered and classified.

PROPOSAL C09: Classification Advisory Council

DESCRIPTION: 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.

Creating a community-led Classification Advisory Council: Although classifications are intended to reflect community standards, current processes lack a modern, direct channel for public input. Government, industry and the Classification Board are often disconnected from evolving community sentiment.

To address this, a Classification Advisory Council could be established that:

- Is comprised of community members, not industry professionals.
- Acts as a structured feedback mechanism for policy updates and classification decisions.
- Supports ongoing alignment between classification practices and community expectations.

This council would strengthen transparency, trust and responsiveness in the classification system.

RECOMMENDATION: Not supported.

As outlined in the FIA response to the “Modernising Australia’s Classification Scheme – Stage 2 Reforms” consultation paper, the current proposal does not clearly define the relationship between the Classification Advisory Council (CAC) and a single Regulator. While the Stevens Review⁸ proposed an advisory panel, it did not

⁸ May 2020. Department of Infrastructure, Transport, Regional Development, Communications and the Arts. **Review of Australian Classification Regulation**, Neville Stevens AO.

clarify whether this would be a standing body or one convened periodically to commission research and provide advice. This clarification is important to determine the FIA support of this proposal.

The FIA support the Stevens recommendation⁹ for a mechanism to periodically review and update classification guidelines to ensure they remain relevant, useful and reflective of community standards. We believe the proposed four-year review cycle is sufficient.

However, the FIA do not agree with the proposal's assertion that "*current processes lack a modern, direct channel for public input*" or that government, industry and the Classification Board are "*disconnected from evolving community sentiment*".

For decades, the Classification Branch and Board have demonstrated their ability to assess changing community standards and adapt policies, guidelines and processes. The Government has repeatedly invited public participation in classification policy reviews and commissioned qualitative and quantitative studies to gauge community standards and behaviours.

The most recent research was conducted in August 2023¹⁰ where participants from across Australia — including parents and carers, young people, CALD and First Nations community members, and adult gamers — reviewed content and provided feedback.

The FIA therefore question the necessity of an advisory council, particularly where it may duplicate or undermine the existing research, policies and expertise of the Board and Branch. We also question how this council would operate, the criteria for participation, the scope of its advisory role — especially where recommendations may affect the economic viability of the cinema sector — and why industry professionals would be excluded.

Through their daily engagement with cinema audiences, film industry professionals have a sophisticated understanding of the purpose, strategy and consequences of creative and emotional film techniques.

It is critical that experienced filmmakers, distributors and exhibitors are represented on any advisory panel to ensure discussions are grounded in practical expertise and a real-world understanding of film impacts on audiences. Any consultation process can only be considered genuinely holistic if it includes industry professionals.

PROPOSAL C10: Single touch Classification

DESCRIPTION: 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.

RECOMMENDATION: Further clarification of proposed changes required.

Past consultation on this issue saw wide industry approval and the FIA consider that the "classify once" principle has been well established in practice for many years. It's not clear what changes to the current system are being proposed.

⁹ Ibid

Recommendation 8-1: The classification guidelines should be updated to contain specific, objective criteria for consistent classification decisions.

Recommendation 8-2: The classification guidelines should be reviewed every four years.

¹⁰ August 2023. Australian Government, Department of Infrastructure, Transport, Regional Development, Communication and the Arts. **Report on Classifications and community standards research**. ORIMA.

We support the Stevens Review¹¹ recommendation that *“Once content is classified, it should not generally need to be classified again, unless it is modified and the modification is likely to change the classification category. Content providers should be able to give additional consumer advice in certain circumstances.”*

The current legislation is not clear on what constitutes a “modification” to a feature film if bonus material such as a director’s introduction or sneak-peek of an upcoming sequel is included with an already rated feature film that is being re-released in cinemas. Applicable classification processes for such material included in Home Entertainment releases exist but none for theatrical feature films.

An example of this is the 2025 re-release of **Jaws** that included an introduction by Director Steven Spielberg. The distributor was unable to rate the introduction as a separate element but instead had to re-classify the film, with associated costs, and with the same rating result. A new classification of the film should not have been necessary, especially since the introduction was not locked to the feature and exhibitors could choose not to screen it.

The FIA support the AHEDA submission for *“a flexible classification framework that recognises the differing operational and commercial characteristics of theatrical, transactional digital and physical home entertainment distribution”*.

PROPOSAL C11: Permit updates to classifications

DESCRIPTION: 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.

RECOMMENDATION: Further clarification of proposed changes is required.

The FIA are not certain what changes to the current system are being proposed. However, we support any modifications that provide clarity on the Classification Branch website and database - to both the general public and to industry – about the different versions of content across other platforms.

The British Board of Film Classification¹² has developed a useful and clear model for this. Each version of the content for a title – cinema, Home Entertainment, bonus materials and trailers - is noted and the classification rating and key classifiable elements are prominently displayed. Pulldown menus expand the available information. Different versions are clearly identified by year of release, release platform and format. This is the template recommended by public exhibition distributors and exhibitors.

PROPOSAL C12: Self-classification as default

DESCRIPTION: 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.

RECOMMENDATION: Supported if the option of submitting to the Classification Board is maintained.

While supporting the expansion of options for classifying screen content, some film distributors have raised concerns about this proposal. Even though films might increasingly be assessed in-house by Accredited

¹¹ May 2020. Department of Infrastructure, Transport, Regional Development, Communications and the Arts. **Review of Australian Classification Regulation**, Neville Stevens AO.

Recommendation 6-7: If a content provider does not want to carry over a classification category from another platform without modifying the content, they should apply to the regulator for permission to reclassify the content.

¹² <https://www.bbfc.co.uk/>

Classifiers, distributors believe the Classification Board's ongoing availability to classify material on request is vital.

Companies are willing to pay for this service and consider it to be essential where the distributor does not have the capacity to classify their own material, wishes to rely on the independence and expertise of the Board or considers the material sufficiently contentious to require a "third party" arbiter, actually and perceived to be independent of the distribution company's need to commercialise the film.

Additionally, we recommend that the Branch remains the first point of contact for classification complaints regarding theatrical films and trailers. Because exhibitors are not involved in the classification process, cinema staff are unable to respond to ratings-related complaints, and the distributor of that film is unlikely to be identifiable or accessible.

PROPOSED ADDITION: Modernising electronic submission workflows

The FIA support improvements to the operational efficiency and accessibility of the Classification Board process, including secure electronic submission and review workflows for classification materials.

Electronic delivery of films to the Classification Branch has been under discussion for more than three years. Service providers including Deluxe, MPS and QubeWire have designed, trialled and offered secure electronic delivery systems — at no cost to Government — that would provide faster delivery, reduced resourcing demands, fewer operational complications, improved support and significant environmental benefits compared with physical delivery.

Had these systems already been implemented, distributors would not face the same time pressures and operational concerns associated with the current physical delivery process.

As theatrical distribution and release timelines continue to accelerate across cinema and digital platforms, modern and efficient submission systems are increasingly necessary to support timely classification outcomes and operational certainty for distributors and exhibitors.

PROPOSAL C13: Modernise the classification database

Updating the database so titles are nested together, potentially utilising AI/natural language to aid in search functionality to remove potential error from different spelling/grammar, and the reduction of required elements for an entry could aid in making the user experience of the database more manageable.

RECOMMENDATION: Supported.

The FIA strongly support modernising the classification database and improving search functionality.

A search of the film **Ready or Not 2** on the Classification Branch database¹³ – using the filter for "Films" – produces **139,124 results** while a dropdown menu for "Versions" of this title brings up **55** options including meaningless distinctions such as "Y(N87/11209) or "unfinished D-H Print". The same search on the BBFC database produces **2 results**.

¹³ https://www.classification.gov.au/search/title?search=ready%20or%20not%202&sort_by=search_api_relevance&f%5B0%5D=category%3AF

Australian Classification Branch Database:	BBFC Database:
ready or not 2 Refine search Clear filters Title Showing 1 - 10 of 139124 results	2 Results for 'ready or not 2' Filters ^  15 Ready or Not 2: Here I Come (2025) strong bloody violence, gore, threat, drug misuse, very strong language FILM  18 Ready Or Not ... (scouts) (1997) FILM

This example is only one of hundreds of titles demonstrating that the Classification Branch search function is inaccurate and inadequate.

Finding films with generic titles is almost impossible. Countless titles from the early 1980's are not on the database and there are no records from the 1970's. Recently, Branch staff had to search the physical archives to find the rating for **The Rocky Horror Picture Show** (1975) for its' re-release in 2025.

Re-releasing older films in cinemas is becoming more common. In 2025, 46 films were re-released – some had played recently (**Avatar: The Way of Water**, released initially in 2022), others were older (classic Australian film **Wake in Fright**, released in 1971) while most were celebrating release milestones such as the 60th anniversary of **The Sound of Music** (1966) or the 30th anniversary of **Toy Story** (1996). Establishing the original classification is important and should not require anyone – distributor staff or the Classification Branch or Board – to search through tens of thousands of titles to find that information.

Industry would like a better search engine with comprehensive and accurate information and functional filtering. And from the many website and database modifications proposed by the SRC and Mettlesome, we assume the general public has expressed similar frustration in their attempts to find specific film ratings.

The state of the database suggests maintenance, governance and infrastructure investment have not been prioritised for some time.

The FIA support the AHEDA submission that “...considers that responsibility for maintaining the accuracy of any central classification database should sit with the Classification Board or another clearly designated central authority to minimise inconsistency and compliance risk”.

PROPOSAL C14: Expand use of automated classification tools

DESCRIPTION: 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.

RECOMMENDATION: Supported.

The FIA support the principle of expanding the use of automation and self-classification tools to allow industry to meet classification obligations more efficiently. We also support the ongoing review of existing tools, the introduction of new ones and any investment in improved technologies aligned with updated definitions.

The Classification Board 2024/25 annual report¹⁴ highlights how the current approved classification tools and Accredited Classifier systems show strong accuracy and reliability with few rating changes. Suggested modifications were made simply to further refine the Consumer Advice.

¹⁴ <https://www.classification.gov.au/about-us/corporate-reporting/annual-reports/classification-board-and-review-board-annual-report-2024-2025>

However, the FIA reiterate our strong commitment to the Classification Board's ongoing availability to classify material on request and refer to our response to Proposal **C12**.

PROPOSAL C15: Classification website - uniform matrix:

The website could be updated and refreshed to always show the classification matrix, ensuring consistency and usability for consumers wanting to know more about certain content.

RECOMMENDATION: Support all website and database upgrades.

The FIA believe that the matrix on the current Classification Branch website appears to be working well and we support any further efforts to update and refresh the website and database and provide more useful classification information to consumers who may seek it.

Please see our detailed feedback in response to Proposal **C13** as well as our proposal regarding electronic submissions in Proposal **C12**.

PROPOSAL C16: Classification website - personalised preferences

DESCRIPTION: The classification website could allow users to create accounts and set personalised preferences for themselves or those they care for. When logged in and viewing a title, a consumer could then see how this title aligns with their chosen settings. It could also direct the consumer to important resources and information relevant to the content - e.g. how to introduce teenagers to higher rated content safely.

RECOMMENDATION: Not supported.

While the FIA support the principle of providing more classification information to consumers who seek it, we have reservations about the practicality and cost benefit of this proposal.

Additionally, we question if it is appropriate for the Classification Branch to guide consumers to particular films or content and, given the complexity of differing community and individual standards and taste, we caution that this proposal may carry unnecessary risks.

PROPOSAL C17: Classification website - unify listings

When viewing a listing on the classification website, it currently provides a list of all possible iterations or versions of one single title. The website could be updated to provide one listing for a title, for ease of search, and then include the ratings under this for different versions or formats. This might greatly improve the usability of the website and reduce confusion for consumers.

RECOMMENDATION: Support all website and database upgrades.

The FIA reiterate their strong support for an updated, accurate and functional classification website, database and search function. Please see our response to Proposal **C13** for further details.

PROPOSAL C18: Classification website - transparent decisions

DESCRIPTION: 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

RECOMMENDATION: Not supported.

The FIA understand that consumers have expressed a need for more information and further explanation about why a film may have received a particular classification rating. The Classification Branch website makes some information on the classifiable elements accessible to the public but perhaps not to the degree suggested.

We are cautious about (a) in-depth classification details potentially providing spoilers that should not be made public to protect the cinema going experience and (b) the increased workload for the Classification Board and Accredited Classifiers in crafting these explanations.

The need to provide generalised extended information on decisions risks eroding the level of detail provided in these submissions should they be made public.

We submit that explaining a particular rating generally requires a level of detail that may not be appropriate for the general public and could potentially lead to more complaints.

PROPOSAL C19: Classification website - Classification website - addition of extra community information

DESCRIPTION: The public actively seeks input and perspectives on content and classifications from other organisations and community groups. Further information and nuance are often sought to understand content appropriateness. Example resources/groups include Children & Media Australia, Common Sense Media etc. The website could display a summarised dashboard of community input from these groups on content

RECOMMENDATION: Not supported.

The FIA strongly oppose the suggestion of referring to third-party classification advisory websites. The stated Government objective for the National Classification Scheme (NCS) is to ensure it is “effective, inclusive, and trusted”. Advising the Australian public to seek third-party rating information undermines the NCS, particularly where that advice is contrary to decisions made by the Classification Board, approved tools or Accredited Classifiers, which are deemed to be decisions by the Classification Board.

There is an inherent risk in referring to third party rating advice which may reflect particular ideological or policy perspectives and be underpinned by agendas that differ from those of the Government. These sites may also change their views over time without reference to or authority from Government.

This happens in several instances where, for example, the CMA’s “**Know Before You Go**” (KBYG) service applies excessively narrow advice about the key rating elements and frequently diverges from the classification guidelines. Examples of this include:

GOAT¹⁵:

KBYG makes assessments contrary to the Classification Guidelines under several classifiable elements, including:

- **Sexual references:** “A kiss-cam shows several couples kissing including 2 rabbits, 2 giraffes and 2 parrots.” – this is not a sexual reference under the guidelines as it needs to be “a prelude to sexual activity” to be considered sexual and this, taking place in a sports arena, is clearly not.
- **Use of substances:** “A bar is having happy hour” – Depictions of alcohol and alcohol use are not classifiable as “Drug Use”. “Substances” as KBYG use the term on their website are not a classifiable element unless they form a major thematic part of a film (for example *Leaving Las Vegas*).
- **Coarse language:** KBYG lists “Schmuck” and “Bunghole” under this element however neither are classifiable language terms in the Guidelines.

***The Devil Wears Prada 2*¹⁶**

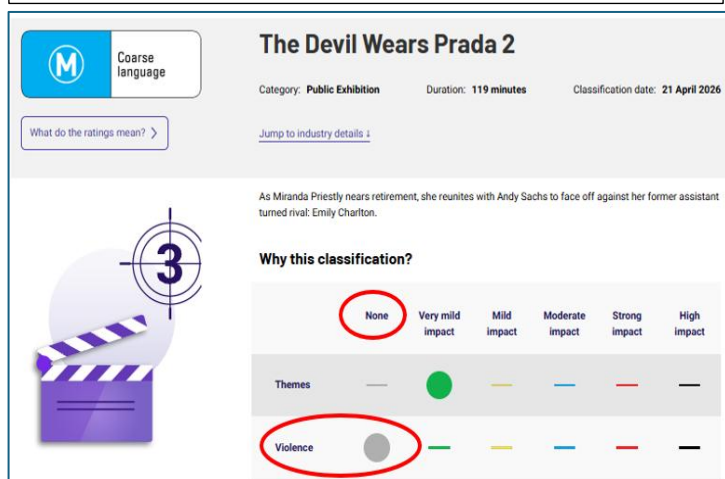
The Classification Board has determined that this film contains no violence. Conversely, the KBYG review¹⁷ identifies two incidences of “Violence”, neither of which are classified as “Violence” under the current Classification Guidelines

¹⁵ <https://childrenandmedia.org.au/movie-reviews/movies/goat>

¹⁶ <https://www.classification.gov.au/titles/devil-wears-prada-2>

¹⁷ <https://childrenandmedia.org.au/movie-reviews/movies/devil-wears-prada-2-the>

Australian Classification Branch database



Know Before You Go Website

Use of Violence

There is some violence in this movie, including:

- Miranda is often caustic towards Andy and puts her down in public.
- Irv has a heart attack at a function and falls to the floor, bringing down a table with him. This crashes onto the floor, breaking all of the glasses and crockery.

Additionally, KBYG does not provide any impact guidance, making the advice appear to be at odds with that of the Classification Board decisions

There is a regular occurrence of classification interpretations on the KBYG site that differ from those of the Classification Guidelines. The elements highlighted in KBYG reviews – such as alcohol use, smoking and product placement – often have little bearing on the rating or consumer advice.

Acknowledging that websites such as KBYG may be useful tools for some parents, their reviews are not consistent with the Guidelines used by the Board and Accredited Classifiers to classify films.

Referrals to third party classification services may result in confusion and additional complexity for Australians seeking ratings clarification and we fail to see any benefits for the public, industry or Government.

PROPOSAL C20: Element icons

DESCRIPTION: Icons could be implemented to highlight the most important and highest rated classifiable elements (e.g. Nudity, Violence, Sex) in a given media. Specialised icons could be used to highlight areas of significant community concern when they are otherwise hidden under 'Themes' (e.g. sexual violence, suicide).

RECOMMENDATION: Not supported.

Whilst the element icons have some logic in an icon-literate world, the FIA have questions about how these could be displayed on films and think it would be impractical to place them on most forms of advertising. If the icons require the addition of consumer advice in words, we feel that there may be too much information to absorb quickly and, instead of clarity, would cause confusion.

Introducing new systems requires time and resources and we have doubts about the value of expending funds on this with so many other significant matters to resolve.

In regard to this proposal, the FIA support the view of the ANZSA that *“Consumer understanding and protection is enhanced through simplification of the existing, well-understood system, not unnecessary expansion. Adding additional layers of parallel advisory signals or new visual signals risks undermining understanding and trust. Any new presentation tools should only be pursued as part of a broader simplification of the overall existing advisory system.”*

PROPOSAL C21: Quick links to classification listings

DESCRIPTION: 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.

RECOMMENDATION: In principle support on completion of more critical website and database improvements.

Connecting consumers to the classification website via QR Codes is helpful in principle, there are notable timing issues to be considered given the delay between producing advertising materials, rating the film and then uploading the ratings information to the website database.

Before this proposal could be considered, the classification website and database upgrades and improvements need to be completed (noted in comments for Proposal **C13**). These require significant funding. As this proposed modification is unlikely to produce income to offset the cost of enhancements, we query if this is the most efficient use of limited Government funds.

PROPOSAL C22: Generational education campaign

DESCRIPTION: A public campaign to remind Australians of the purpose & functionality of the classification system could be implemented, providing clear education & 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 & their children, & clearer understanding on what the symbols mean.

RECOMMENDATION: In principle support.

The FIA strongly support the development, introduction of generational education campaigns that provide the public with a clear understanding of the role of classification and the rationale for restricting certain content. We refer to the BBFC education portal¹⁸ as an ideal model for educational support. Their website incorporates a wide range of school resources, teaching assets, case studies and information for parents.

While urging the Department and the Classification Branch to develop and disseminate similar Australian educational resources, we submit it would be unacceptable for industry to be asked to pay for this. The Public Exhibition sector already faces a higher regulatory burden for content moderation than many other content platforms and, given the rapidly changing eco-system for consuming film and video content, face some critical challenges in maintaining and enhancing the viability of the cinema experience.

¹⁸ <https://www.bbfc.co.uk/teachers-and-educators>

Teachers and Educators	Film & Media Resources	RSHE Resources	Primary Resources
Teacher FAQs	The BBFC and the Law	KS1 - What are age ratings for?	Rate a Trailer
Book a Talk	BBFC Intros	KS2 - Resisting Peer Pressure	Trailer Tag!
Using Film in the Classroom	Case Studies	KS3 - Healthy Relationships	BBFC Intros: Primary
Education Newsletter	Rate a Trailer	KS4 - Emotional Wellbeing & the Media	
Order a Classroom Poster	Our Book	KS4 - Pornography & Expectations	
Teacher Panel	Student FAQs	KS4/5 - Pornography & Regulation	

ABOUT THE FILM INDUSTRY ASSOCIATIONS (FIA)



The **Australian Independent Distributors Association (AIDA)** is a not-for-profit association representing independent film distributors in Australia, being film distributors who are not owned or controlled by a major Australian film exhibitor or a major U.S. film studio or a non-Australian person. Collectively, AIDA's members are responsible for releasing to the Australian public approximately 75% of Australian feature films which are produced with direct and/or indirect assistance from the Australian Government (excluding those films that receive the Refundable Film Tax Offset).



The **Cinema Association Australasia (CAA)** - previously The National Association of Cinema Operators - is the peak cinema body representing cinema operators across Australia & New Zealand - including Event, Village Roadshow, Hoyts, Reading and many independent and regional cinemas, including Palace, Wallis, Ace, Nova and Limelight. Our members represent in excess of 85 per cent of the box office generated across Australia and New Zealand. CAA continues to host the annual Australian International Movie Convention (AIMC), now in its 77th year, attracting key industry delegates from Australasia. NACO has an active relationship with other international cinema associations to facilitate best practices in, and protection of, an industry that has thrived for over 125 years.



Independent Cinemas Australia (ICA) is the national industry association representing independent cinemas, film festivals and cultural screen organisations across Australia and New Zealand. ICA represents 205 member cinemas and 804 screens, together with 13 cultural members. Its members include single-screen regional cinemas, family-owned businesses, suburban independents, iconic arthouse venues, and cinema groups including Palace, Dendy, Wallis, Luna and Cineplex. ICA's membership also includes leading cultural screen organisations and festivals including Sydney Film Festival, Adelaide Film Festival, Byron Bay Film Festival and ACMI.



The **Motion Picture Distributors Association of Australia (MPDAA)** is the industry association representing the aligned interests of theatrical film distributors in Australia – Paramount Pictures Australia, Sony Pictures Releasing, Universal Pictures International, Walt Disney Studios Motion Pictures Australia and Warner Bros. Entertainment Australia. The MPDAA members make available and promote the supply of a range of screen content to entertain all Australian audiences. Formed in 1926, the MPDAA strives to advance and support the interests of theatrical film distribution on a range of matters. The MPDAA takes an active role on relevant industry bodies to articulate the sector's value to film exhibitors, affiliate businesses, the Government and the creative industry.