



Update to Modernise and Harmonise the Classification Guidelines 2025

Submission - May 2026

About ALIA

The Australian Library and Information Association (ALIA) is the professional organisation for the Australian library and information services sector. ALIA represents and supports the interests of the library and information profession and the communities served by Australian libraries.

Libraries are on the frontline of book challenges and debates about access to information in Australia, and along with books libraries lend items such as DVDs, Blu-ray, magazines, and provide access to on-demand streaming video platforms and online databases ALIA therefore has a strong and direct interest in the classification of publications and other media in Australia. We welcome the opportunity to comment on these proposed reforms. We also welcome the Government's commitment to consultation and request that ALIA be included as an industry stakeholder in discussions as the recommendations are refined and implemented.

Summary of Key Recommendations

In summary, ALIA urges the Department to:

- Reject any proposal to introduce new mandatory access restrictions for publications, for example through a MA16+ publication category. By preference mandatory classification for publications should be confined to adult restricted categories (R18+ and X18+).
- Proceed with Recommendation C08 to require equivalent treatment of LGBTQIA+ and heterosexual content in classification assessments.
- Ensure genuine diversity in the membership of the proposed Classification Advisory Council (C09), including representation from LGBTQIA+, multicultural and First Nations communities.
- Include library-sector voices in policy and development conversations around any automated classification tools (C14).
- Proceed with recommendations to improve communication and accessibility of classification decisions and information, including addressing ALIA's specific requests regarding ISBN-based identifiers, proactive industry notification, and searchable publication lists.
- Prioritise the library sector, including provision for appropriate training and funding, in the public education campaign under C22.
- Address the fragmentation of classification enforcement across states and territories.

General Comments

ALIA supports the goals of this review: a practical renewal of the classification framework rather than a wholesale redesign, with the aim of achieving a simpler and more consistent approach across all media. We also strongly support the conclusions drawn from the stakeholder consultation – that classification decisions should be grounded in evidence of harm rather than morality; that clearer signposts should be provided for the most harmful content; and that guidelines should be made more accessible with streamlined processes.

We particularly wish to express our support for the foundational principles articulated in the review: that classification should “protect without overreach, inform without censorship, and reflect Australia’s diversity.” These principles capture what a modern classification system should aspire to, and ALIA urges that they be applied with rigour as each recommendation is implemented. There is an inherent risk in any classification system, focused as it inevitably must be on materials at the edge of community norms, that the system will slip from an informative role into a restrictive one – sacrificing access to information in the name of protection. Libraries believe strongly that Australia’s classification framework should exist to inform choices, not to restrict them. As a sector, we are directly and practically invested in keeping that distinction clear as reforms are implemented.

This principle is why we have particular concerns about Recommendation C06, which as currently framed appears to propose new legal restrictions on publications in library collections. We address this in detail below.

The importance of freedom to read

ALIA wishes to place its specific comments in the broader context of increasing threats to freedom to read in Australia and internationally. Any proposal to add a new restricted classification category for publications must be assessed against this backdrop.

We note the review’s finding that around one-fifth of parents recognise their children are exposed to more mature content through books and graphic novels, and that children show the most independence in choosing what to read. This independence is not a deficiency – it is a feature of intellectual development and a core value of library services. Reading independently across a wide range of material, including content that might be considered ‘above age’, is strongly associated with positive literacy and developmental outcomes. The purpose of classification labels on books should be to assist children and parents in making informed decisions, not to function as an enforcement mechanism governing the management of library collections.

Book challenges and threats to the diversity of library collections are an increasing problem globally. The American Library Association has documented 5,668 books challenged or banned from libraries in the United States in 2025 alone – the highest rate recorded since 1990.¹

While Australia has not yet experienced widespread book bans on this scale, ALIA’s own reporting mechanisms indicate a pattern in recent years of coordinated campaigns targeting the collections of public libraries. From March 2023 to the end of 2025, 309 challenges to 184 titles were reported to ALIA – a phenomenon so rare before 2023 that ALIA had not

¹ [Censorship by the Numbers: Banned Books Data | Banned Books](#)

previously needed to track it.² The vast majority of challenged titles were teen health education materials or involved LGBTQIA+ themes or authors, or both. These campaigns are similar to, and in some cases appear to be coordinated with, those seen in the United States, and at least one campaign was successful at having books banned at the local level, if only temporarily.³

The international experience shows that such campaigns can easily escalate, creating environments in which free speech, access to knowledge, and democratic discourse suffer. In recognition of this risk, the Hon. John Graham, NSW Minister for the Arts, has recently introduced a bill to the NSW Parliament which seeks to strengthen the right of local libraries to freely collect and make available materials based on rules set by their own governing body.⁴ In his Second Reading Speech, the Minister quoted the NSW Parliamentary Library Advisory Committee of 1938: “Public library service is a national necessity... Without libraries, the citizen has no check on indoctrination and propaganda.” The Minister noted that those words “are just as true today – perhaps truer in the age of misinformation and disinformation in which we live today.”⁵

ALIA has been advocating for similar protections nationally to safeguard the freedom to read and to assist libraries in resisting book challenges. It would be a significant step backward to introduce additional restrictions on reading in Australia at this time, and we strongly oppose any move to do so.

State and Territory Variation Remains Unaddressed

ALIA also notes with some concern that the review acknowledges overlapping responsibilities and inconsistent enforcement across states and territories but does not seek to resolve this structural problem. For libraries, this is a critical issue. The rules governing what content a public library in Queensland can hold differ from those in Victoria or NSW. No amount of label harmonisation achieves consistency in outcomes if the enforcement framework underlying it remains fragmented. ALIA therefore reiterates its call in our 2024 submission to the Stage 2 reforms for harmonisation of the regulatory and enforcement framework surrounding classification.⁶

Priority Comments on Key Recommendations

C06 – Harmonisation of Publication Classification Standards

ALIA is cautiously supportive of the general principle of aligning publication classification standards with those applied to other media. The existing publications classification system, as the review itself notes, is less clear than and inconsistent with the broader media classification framework. We acknowledge the finding that more than a quarter of adults feel classification symbols offer no help when deciding what to read, and we support a move towards a system which is more accessible and widely understood.

However, ALIA has significant concerns about the details of the proposed new system, which

² [Freedom to Read 2025 wrap-FINAL.pdf](#) (members-only resource – please ask for a copy)

³ [Cumberland Council's book ban has been overturned, but what is really happening in Australian libraries?](#)

⁴ Library Amendment Bill 2026, [Library Amendment Bill 2026](#)

⁵ [Legislative Council Hansard - 05 February 2026 - Proof](#)

⁶ [ALIA Submission on Modernising Australia's Classification Scheme – Stage 2 Reforms | ALIA Library](#)

as written in the consultation paper appear to signal the introduction of additional legal restrictions on access to books.

The proposed MA16+ category

While ALIA agrees that the 1 Restricted and 2 Restricted categories currently used for publications are roughly equivalent to the R18+ and X18+ categories used for films, we strongly contest the claim in the consultation paper that the 'Unrestricted Mature' publication classification aligns with the MA15+/16+ film classification.

As the Department's own fact sheet makes clear, the Unrestricted Mature category is used for publications where, while some content may warrant a mature perspective, the Classification Board has determined that the overall impact is not so strong as to require legal restriction.⁷ This is substantively equivalent to the film M category, which also applies to low impact material and which similarly - and importantly - is advisory in nature. By contrast, the MA15+ category which the consultation paper says is equivalent to Unrestricted Mature applies to materials that "contain content such as sex scenes and drug use that may have a strong impact on the viewer," and carries mandatory restrictions limiting access to persons under 15 unless accompanied by a guardian.⁸

Any decision to apply an MA15/16+ classification would represent a reversal of policy for publications. Currently, no legal restrictions apply to publications unless their impact is assessed as sufficiently strong to warrant the Category 1 or Category 2 restricted classifications (equivalent to R18+ and X18+). The Unrestricted Mature category is substantially broader than the current 18+ restricted publication categories and could potentially apply to a significant proportion of adult literary fiction, graphic novels, and non-fiction currently on open shelves in public libraries.

It is unclear how a library open to community members of all ages could operate if large portions of its collection were legally restricted to people over 16. In resource-constrained environments, ALIA anticipates that the practical result would be the removal of MA16+ rated materials from many collections. This would constitute de facto censorship: not as a deliberate policy choice, but as an unintended consequence of an unworkable legal obligation.

We also fear there would be a significant risk of deliberate misuse. If additional restricted classifications applied to books, libraries would likely face increased pressure from interest groups to remove materials that carry an MA16+ rating - or even just materials that those groups believe should carry one. Given the current environment of coordinated book challenges, this is not a hypothetical risk.

ALIA also notes that if this classification level could be independently applied by publishers under the proposed self-classification system (C12), the risk of error and misapplication would be substantial. A self-classification system applicable to the full breadth of the Australian publishing ecosystem - far broader than the commercial entertainment sector for which such systems were designed and involving increasing amounts of self-published material - would amplify these risks significantly.

At a minimum, ALIA requests a clear industry consultation process and a dedicated regulatory impact statement addressing library lending obligations before this aspect of C06

⁷ [australian-classification-publications-overview-february2025.docx](#)

⁸ [What are the ratings? | Australian Classification](#)

advances. Our strong preference, however, is that the proposed introduction of an MA16+ equivalent for publications not proceed, and that only the R18+ and X18+ classifications be applied to publications.

The M and 13+ classifications

ALIA's preference is for only R18+, X18+ and Unrestricted/G classifications for publications, and that additional advisory M and 13+ categories not apply.

In theory an M classification could be treated as equivalent to the Unrestricted M classification, as long as it was kept advisory in nature and did not impose mandatory requirements to mark or restrict access to publications. However, we believe that introducing additional classification levels would result in increased workload for libraries, the book industry and the Classification Board, and could fuel the coordinated challenges and increase in pressure to restrict books described above.

C08 – Equal Treatment of Sexual Content

ALIA strongly supports Recommendation C08 – the proposal to treat heterosexual and other sexual content in the same manner under the classification framework. A formalised and principled policy on this matter is long overdue.

As discussed above, libraries have significant experience with the discriminatory treatment of LGBTQIA+ content in the context of book challenges. The majority of challenges reported to ALIA in recent years have rested on assumptions – often explicit – that content featuring non-heteronormative relationships is inherently more sexual than equivalent content depicting heterosexual relationships. Common examples include objections to picture books featuring same-sex parents on the grounds that they are “sexualised”, and claims that books about transgender children or adolescents constitute “grooming” content, regardless of whether any sexual content is present. The logic underlying these challenges is that the mere depiction of LGBTQIA+ people or relationships is itself a form of sexualisation, a standard applied to no equivalent heterosexual content. While many challenges are framed in terms of concerns about sexual or educational content, the aggregate pattern strongly suggests that the primary driver is the LGBTQIA+ nature of the material alone.

A clear, evidence-based classification policy requiring that LGBTQIA+ and heterosexual content be assessed on equivalent terms would provide direct and practical support to libraries responding to these challenges. It would also help to protect against the risk – very real in the current environment – of the classification system being used as a tool to discriminate against or suppress the voices of marginalised communities.

Other Recommendations

ALIA offers the following comments on the remaining recommendations.

C02, C03 – General Framework Improvements

We support the general changes proposed under C02 as sensible, reducing administrative burden and improving transparency. C03 – balancing evidence of harm with community views – seems a particularly valuable amendment. Classification decisions should always be

evidence-led: morality judgements are inherently variable across community groups and are vulnerable to being co-opted by small but vocal interest groups. An evidence-based approach provides a principled and defensible foundation for the system.

C09 – Classification Advisory Council

ALIA is cautiously supportive of the proposed Classification Advisory Council. Drawing on diverse community perspectives in classification decisions is important and appropriate. However, care must be taken to protect the Council from being co-opted by particular interests – a risk that ALIA is acutely aware of based on our experience with coordinated book challenge campaigns. ALIA renews its call, first made in our 2024 submission, to ensure that Council membership is genuinely diverse, with particular attention to the inclusion of people from minority groups – especially those communities whose voices have historically been subject to censorship, including LGBTQIA+, multicultural and First Nations communities.

C10 – The Single Touch Classification Principle

Libraries support the single touch classification principle as a sensible reduction in administrative burden. Our understanding is that under this principle a publication classified once would not require reclassification when issued in a new edition or format, unless significant content changes have been made. This is appropriate and useful, and would make a real difference to library workload on the ground. We would welcome clarification in the final guidelines that this principle extends to digital editions and substantially similar formats of already-classified titles.

C12 – Industry Self-Classification

ALIA neither strongly supports nor opposes Recommendation C12. The publishing industry already applies cover warnings and age recommendations informally, as do other media sectors, and there is a logic to standardising this practice under a managed framework. We appreciate the practical imperative of reducing Classification Board workload and enabling common-sense classifications for the majority of materials. We recognise that most publishers and content creators are responsible actors who would seek to apply appropriate guidance.

However, self-classification systems are susceptible to significant error and misunderstanding – particularly across the breadth of published material that libraries hold, which extends well beyond commercial entertainment to include translated literature, academic works with adult content, graphic novels, local and self-published works, and other niche material. Thorough education and clear guidance for classifiers would be essential prerequisites, as would a clear and accessible process for appealing classifications to the Classification Board.

C14 – Automated Classification Tools

ALIA is supportive in principle of using modern technologies to streamline classification processes. However, consistent with the recommendations of the Royal Commission regarding Automated Decision-Making and the Australian AI Ethics Principles, care must be taken to ensure human oversight and judgement remain central. Automated tools should be used to flag materials for human consideration – not to apply classifications or make decisions. A ‘robodebt-style’ outcome, in which automated classifications are applied without adequate human review, would be deeply problematic in this context.

ALIA also notes that, similar to our concerns under C12, automated tools trained primarily on commercial entertainment content may be poorly equipped to handle the breadth and diversity of material held in Australian library collections. We recommend that explicit library-sector involvement be built into the policy development and testing processes for any auto-classification tools before they are deployed.

C15–19 – Website and Communications Improvements

ALIA is generally supportive of the proposed improvements to the Classification Board website and communications. We reiterate the following specific requests, which were raised in our 2024 submission:

- A comprehensive, easily searchable list of all classified publications, with the option to filter out pornographic material. This is a practical need raised frequently by libraries and library vendors.
- Clear and proactive notification to industry when titles are being considered for classification or when a classification decision is made. Libraries currently rely on monitoring the Classification Board's RSS feed, which is an inefficient approach prone to gaps. A subscription-based notification system would significantly reduce the risk of publications not being promptly updated with classification information.
- Use of International Standard Book Numbers (ISBNs) as standard identifiers in classification communications. ISBN-based identification would enable rapid updates to library catalogue records, clarify the application of a classification across different versions of a title (print, ebook, omnibus editions), and aid efficient compliance across the broader book industry.

C22 – Public Education Campaign

ALIA strongly supports a public education campaign on the reformed classification system. Librarians are frequently on the frontline of explaining government initiatives of this kind to community members, and they will inevitably play a central role in community education about the new framework. The campaign should include training specifically designed for intermediaries such as librarians, and the Government should consider what additional support – including funding – could be provided to the library sector to fulfil this educational function.

We also caution that materials recommended or linked to on the Classification Board's website or in educational campaigns should be carefully curated. External sites recommended by official channels can be co-opted by specific interest groups, and any such links should be regularly reviewed.