

29 May 2026

Department of Infrastructure, Transport, Regional Development, Communications, Sports and the Arts

Dear Ministers,

Re: Modernising and Harmonising Classification Standards

Noosa Libraries is a Southeast Queensland Public Library Service which serves a community of 59,000 residents and over 1 million visitors to the library service per year. This submission supports the majority of changes in the proposed reform of the Classification Standards with some exceptions. Our feedback is provided below.

In general, we believe the reform presents a balanced approach that better aligns the standards with community values, and we welcome the consistent approach to the different formats including publications, films and computer games.

We support:

Recommendation C01 implementing a new classification rating of PG13 for non publication media such as Films and Computer Games.

Recommendations C02, C03, C07 and C08 as positive moves to improve transparency regarding classification decisions including updated themes, updated definitions to terms and thresholds and consistent consideration of heteronormative and non-heteronormative sexual content.

Recommendation C05 to reflect the social benchmark at age 16 for more mature content including the legislation regarding maturity for online content via the Online Safety Act.

Recommendation C06 aligning publication classification with other media, with the introduction of the Unrestricted – General, Unrestricted Mature - MA16+, Category 1 Restricted - R18+, Category 2 Restricted - X18+ for publications.

Recommendation C11 providing the ability for classifications to be updated without a full review of the content, if the change is to a piece of the media.

Recommendations C15, C16, C17, C18, C19 that involve introducing a uniform classification matrix, personalised preferences to the ACB website, unification of formats under one listing, publishing of questions raised in the review of the piece of media and summary of community input into the classification. These are excellent improvements to transparency.

Recommendations C20, C21, C22 which identify positive actions to improve access to the classifications as well as improved understanding of the role they play in consumption of media.

We request care with:

Recommendation C12, C13 and C14 which requires more information for us to be able to understand how the self-classification would work in practice.

We also urge caution with the use of automated classification tools that may be influenced by data sets and machine learning that does not reflect the original intent of the classification framework and matrix. Will there be any checks on the efficacy and continued performance of such tools? What risk management is in place for the known issues with AI hallucinations and biases?

To a lesser degree we also seek to understand what checks are in place to ensure AI tools maintain data integrity when nesting titles together (C13).

Recommendation C9 which introduces a Classification Advisory Council, requires mechanisms to be put in place to protect this from being coopted by special interest groups. Transparency of selection and tenure will be important to professionals in the library industry as well as consumers of media content.

Recommendation C04 which reduces the stricter benchmark on games due to 'interactivity' except when there is 'real world replication'.

We challenge the perspective presented here, that interactivity with violent content is less compared to 'real world replication' of gambling behaviours in media. We point toward longitudinal studies that indicate it is difficult to *disprove or prove* the link between engagement with violent games and violence in the real world and encourage transparency around any new benchmark proposed. In particular we would like to see transparency and informed decision-making from health and other professionals.

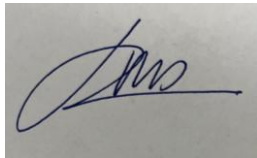
Drummond, A., Sauer, J. D., & Ferguson, C. J. (2020). *Do longitudinal studies support long-term relationships between aggressive game play and youth aggressive behaviour? A meta-analytic examination*. *Royal Society Open Science*, 7(7), 200373. <https://doi.org/10.1098/rsos.200373>

Thank you for this opportunity to share our feedback in the Classification Standards review. As a library service of passionate advocates for equity, inclusion and access we rely on the Australian Classification System to guide and support access to content in Library virtual and physical library spaces.

We cite the Australian Classification Standard and the Australian Classification Board in Noosa Libraries Collection Development Guideline and rely on the classification standards to articulate restrictions to content.

We are guided by our values to support access as a basic human right and to provide access to material that reflects the diversity of lived experiences in the community whilst maintaining community standards.

Regards,



Patricia Stahl

Collections Librarian

Noosa Libraries



Tracey King

Libraries Coordinator

Noosa Libraries