

Classification Reform Policy
Online Safety and Classification
Department of Infrastructure, Transport, Regional Development, Communications,
Sport and the Arts
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Canberra ACT 2601
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29 May 2026

Dear Sir/Madam

Re: Modernising and Harmonising Classification Standards

The Australian Christian Lobby (ACL) is grateful for the opportunity to make a submission on Modernising and Harmonising Classification Standards.

I would welcome the opportunity to elaborate on ACL's position in person.

Yours faithfully



Michelle Pearse
CEO



SUBMISSION:

Modernising and Harmonising Classification Standards

AUSTRALIAN CHRISTIAN LOBBY

About Australian Christian Lobby

The vision of the Australian Christian Lobby (ACL) is to see Christian principles and ethics influencing the way we are governed, do business, and relate to each other as a community. ACL seeks to see a compassionate, just and moral society through having the public contributions of the Christian faith reflected in the political life of the nation.

With around 250,000 supporters, ACL facilitates professional engagement and dialogue between the Christian constituency and government, allowing the Voice of Christians to be heard in the public square. ACL is neither party-partisan nor denominationally aligned. ACL representatives bring a Christian perspective to policy makers in Federal, State and Territory Parliaments.

acl.org.au

Executive summary

The Australian Christian Lobby (ACL) has serious concerns with recommendations in the 'Update to Modernise and Harmonising Classification Guidelines 2025'.¹ It recommends that the Classification Guidelines (the Guidelines), and associated consumer advice, adopt ideological narratives which promote gender fluidity, and do not protect against anti-religious sentiment and the promotion of occultism. The ideological narratives are contrary to the values of Christians and would likely concern the 'silent majority' of Australian citizens.

The proposed Guidelines have made a dramatic departure from the fundamental principles of the National Classification Code (May 2005), which was made under section 6 of the *Classification (Publications, Films and Computer Games) Act 1995*. Section 1 of the National Classification Code provides that 'minors should be protected from material likely to harm or disturb them' and 'everyone should be protected from exposure to unsolicited material that they find offensive'. The evidence for making this departure from long-held positions in Australian media is not convincing. The ideology it rests upon is very new in Australian society and is already being challenged by state and territory governments across Australia, as well as in many western countries.

ACL argues that the proposed changes to the Guidelines' classification of sex acts will fail to protect minors from material likely to harm or disturb them. Specifically, ACL is concerned by the recommendation that there should be no difference in the treatment of heterosexual, homosexual, fetish or kink-related acts.

A significant problem with the proposed changes is that they presuppose acceptance of queer theory. According to this post-structuralist belief system: sexual and gender diversity is normative for humanity; children are sexual from birth; and 'heteronormativity' is the product of a false and dangerous ideology. It is impossible to protect children from sexualisation while promoting the truth claims of queer theory. If the National Classification scheme has been conformed to the doctrines of queer theory, this begs the question: what is the scheme designed to protect children from? The National Classification scheme would previously have sought to mitigate the exploration of highly-sexualised subcultures and gender transitioning that queer theory encourages.

There are now many medical reasons for protecting children from gender ideology. Yet, under the proposed changes, the National Classification Scheme would not recognise this as a problem. The UK's Cass review has now confirmed what many Australian doctors and psychiatrists have been saying for years. Gender medicine, or 'Gender Affirming Care' (GAC), for children has been built on 'shaky foundations'² and a 'fundamentally different service model'³ for the care of gender confused children is needed. The promotion of gender ideology to children is, therefore, reckless.

¹ 'Update to Modernise and Harmonise Classification Guidelines 2025.' Mettlesome, Social Research Centre, 2025. <https://www.infrastructure.gov.au/sites/default/files/documents/update-to-modernise-and-harmonise-the-classification-guidelines-2025.pdf>.

² Hillary Cass, 'Gender medicine for children and young people is built on shaky foundations. Here is how we strengthen services', British Medical Journal, vol. 385, 9 April 2024, q814.

³ Hillary Cass, Independent Review of Gender Identity Services for Children and Young People: Interim Report, NHS England, February 2022. [1.35], 20.

Regrettably, Australian authorities with responsibility for child-safeguarding have a track-record of facilitating the indoctrination of children in these false beliefs. They are also ignoring the primacy of parents in decision-making for their children. The current proposals look set to continue that trajectory when a fundamentally different approach is needed.

While there are features of the proposed classification system that provide for better harmonising of classifications between media, the ACL is seriously concerned that the proposed changes to the Guidelines will not offer the protection to children which the Australian public expects.

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Background

ACL notes that Mettlesome, in partnership with Social Research Centre, were commissioned to research ways of making the classification system ‘effective, trustworthy and easy to understand’. In turn, Mettlesome’s report, ‘Update to Modernise and Harmonise Guidelines’, states that the concepts it recommends have been designed to ‘protect without overreach, inform without censorship, and reflect Australia’s diversity’.

At a high level, ACL is broadly supportive of the intent of these objectives. However, specific concern about how this has transpired into Mettlesome’s recommendations are outlined below. These concerns are reasonably significant. Given the critical role of the National Classification Scheme, ACL strongly recommends these concerns be given full consideration by the Government before any changes are made to the Guidelines.

As a starting point, it should be noted that the Christian sexual ethic is concerned with all forms of promiscuity, degradation and predation. In this regard, ACL is generally concerned about the promotion of: sexual promiscuity; sexual hedonism; the sexualisation of culture; degrading sexual practices; sexual violence; sexual predation; the objectification of women and children as sexual objects; and expansive sexual practices including kink and fetish. This lens should be applied to all decisions in relation to the National Classification Scheme and Guidelines.

1. The need for moral judgement

Mettlesome’s proposed changes to the Guidelines include ‘a re-balancing of both community concern about particular content with established evidence on potential harms, when classifying.’ This is picked up in concept C03 ‘Improved reliance on evidence over morality’.

No explanation is provided as to what the ‘particular content’ was, nor what the ‘potential harms’ might be and how they are to be identified. In this regard, ACL would contend that the potential harm cannot be assessed without delving into the morals of a person’s act? The degradation of another person should be a critical consideration, assessed on how demeaning the subject act is. To consider how much an act demeans a person, the value of a person must also be understood. This requires moral judgement.

2. Classifying using a ‘moral lens’

For concept C03, the report states that the classification of media should rely on evidence rather than morality. In this regard, the report alludes to one reason for the change in classification of sexual conduct being that it has been ‘judged through a moral lens rather than an evidence-based, harm-informed framework’. The report does little to substantiate this claim other than stating that ‘community and advocacy groups called for a more inclusive, evidence-based approach that reflects contemporary values and avoids moral framing.’⁴ The review presents an insubstantial alternative approach to using a moral lens. Obtaining evidence before classifying media will necessitate some form of ‘harm’ to have already occurred, with that harm

⁴ Mettlesome, p.2.

assessed through a moral lens. A moral lens will be required because there is more to be considered than simply physical harm. Moral judgement would also be required to identify *potential* harm that might occur to a viewer, again assessing harm beyond physical, and in consideration of the age, experience and maturity of the viewer. The Government should apply Australian values to their classification ratings to address the moral harm that can occur through media.

Another reason provided in the report for the change in classification of sexual conduct is that the previous classification no longer aligns with ‘modern content consumption’. Again, there is little explanation as to what is meant by ‘modern content consumption’ or the data to support this finding. The report does not explain how much, and in what respects, public opinion has changed in relation to same-sex relationships and how this conclusion was reached. Neither does the report identify what new content might fall within this category and what groups might choose not to watch the new content.

The report does not explore whether ‘modern content consumption’ has been driven by ideological groups, the media or the public. In fact, content involving non-heterosexual people have been increasingly screened during family television time (such as ABC’s ‘The Piano’) without the consent of parents or vigorous research into what content society wishes to view. It should not be assumed from this recent practice that viewers endorse this content. Mettlesome fails to interrogate what might have brought about these changes. There is no analysis as to whether the public would be happy with these changes.

In addition, it is not considered whether, as ACL would argue, the proliferation of exposure to non-heterosexual behaviour over the past decade in media and schools has artificially engineered a ‘change in community consumption’. Arguably, the proposed changes to the Guidelines are not indicative of what families really want. Rather, it is the engineering of what certain groups want families to want, to create community consensus for their own purposes. Such media influences need to be challenged before making recommendations that seek to replicate what such media is doing.

If adopted, the classifications will, in effect, cement the viewing practices of the next generation. The Government has a responsibility to manage the content for the betterment of society.

3. The problem with classifying based on ‘diversity’ rather than ethical values

Mettlesome bases its ‘concepts’ on Australia’s ‘diversity’, rather than mainstream values. The report’s starting point is that judgements regarding classification can cater for all. This can only be done by reaching a common denominator. This reveals a failure to appreciate that basing classifications on the lowest common denominator will not reach the goal of protecting young people. Neither will it accommodate the large group of people in Australia who have opposing views to the sexual ethics evident in the recommendations.

Religious and ethnic communities, and traditionally-minded Australians will differ from the LGBTIQ+ community. In particular, views on what sexual interests and behaviours are

acceptable for family viewing are likely to differ considerably. Even the 'LGBTIQ+ community' is comprised of subcommunities – including the sex industry – which might see nothing wrong with promoting sexual tastes and interests that other subcommunities might find confronting or objectionable. The predictable effect of Mettlesome's proposals will be to mainstream exotic sexual interests. While this obviously benefits those with a political, financial or personal interest in undermining conventional sexual ethics, no evidence has been presented to suggest that there is widespread community support for this. For obvious reasons, ACL opposes it.

In addition, we understand the desire to 'inform without censorship', but argue that appropriate classification and 'censorship' are different concepts. Appropriate classification still allows those who wish to access contentious content to do so, while protecting those who do not wish to be confronted with that material. Censorship is appropriate and necessary where content reaches criminal thresholds. It is concerning that the report does not appear to appreciate the difference between appropriate classification and censorship. The Government has a clear responsibility, especially where young people are involved, to act in the best interests of its people. Mettlesome's approach provides no reassurance that the important work of updating the National Classification Scheme is not being exploited for political purposes as a social engineering opportunity.

4. The unfounded claims regarding non-heterosexual, fetish and kink-related sex acts

Non-heterosexual sex

This is a critical recommendation because, in concept C08, it is decided that 'sexual content should be rated consistently, regardless of the artistic style or identities of those involved'. It objects to the current situation where 'sexual scenes involving participants that are non-heterosexual are often automatically considered higher impact, as are depictions that include fetish or kink-related acts'. There is no explanation as to why this behaviour should no longer continue to be viewed as higher impact behaviour. The report simply makes broad statements that the most recent classifications no longer align with 'modern content consumption'. There is little explanation as to how this is shown in its testing. It does not explain what is meant by 'modern content consumption'. The limited results from the survey do not show clear evidence of a drastic change in community attitudes. The people who were interviewed as 'experts' are not identified; neither are their organisations.

The report does not explain how much, and in what respects, public opinion has changed in relation to exposure to same-sex relationships in media. In fact, content involving non-heterosexual people have been increasingly screened at family television time without the consent of parents or rigorous research into what content society wishes to consume. Mettlesome presumes the wishes of viewers are reflected in what is being shown. The viewing habits of individuals has been the choice of media providers and should not be considered as proof of what consumers want, particularly given that providing feedback to television stations is not straightforward.

Mettlesome's survey and recommendations reveal a strong ideology which is contrary to mainstream Christianity and likely many Australians. It has been influenced by the aggressive

and all- pervasive engineering of public opinion in favour of LGBTIQI+ ideology. A key promoter of this ideology is ACON, which has been exposed by the NSW editor of the Australian, Stephen Rice⁵ for its coercive role in manipulating government departments and the corporate sector, over the past 6 months. Government departments have also been exposed for misusing public funds to advance ACON's objectives.

Fetish or kink-related acts

Fetish or kink-related acts are not separately considered by Mettlesome. These acts involve complex issues of consent and power. Determining whether there has been adequate consent, free from the powers or influence of others, is considerably problematic. Furthermore, the issue of consent could easily be lost or misunderstood on young viewers who are simply intrigued with the acts that are being introduced to them.

Fetish or kink-related acts can lead to criminal behaviour. It can lead to sadomasochistic sex, which eroticises inequality, violence and humiliation, especially against women.⁶ Kink culture normalises abusive dynamics under the language of consent. This activity must not be introduced to young people. Young people are immature in their ability to assess consent, verbalise consent and engage in risky behaviour.

ACL's position on these high impact acts

ACL considers that non-heterosexual, fetish or kink-related sex acts are all high impact acts. These should be identified separately for the sake of raising awareness to the viewers of the content of publications, films and computer games. There is otherwise inadequate protection for viewers who would consider this to be high impact viewing.

Mettlesome has presumed that its position in relation to gender is evidence-led but has failed to provide the evidence that supports this recommendation.

5 Rice, Stephen. "Inside ACON: The Lobby Group Driving Australia's Trans Rights Revolution." *The Australian* (Australia), December 6, 2025. <https://www.theaustralian.com.au/nation/inside-acon-the-lobby-group-driving-australias-trans-rights-revolution/news-story/c31d6792936cf4ee22e9759251ad1825>; Rice, Stephen. "Secrecy Rules as Children Taught 'Gender Ideology.'" *The Australian* (Australia), October 25, 2025. <https://www.theaustralian.com.au/education/secrecy-rules-as-children-taught-gender-ideology/news-story/e728cbc3f7c2508f38b1a56518827367>; Rice, Stephen. "Inside ACON: The Lobby Group Driving Australia's Trans Rights Revolution." *The Australian* (Australia), December 6, 2025. <https://www.theaustralian.com.au/nation/inside-acon-the-lobby-group-driving-australias-trans-rights-revolution/news-story/c31d6792936cf4ee22e9759251ad1825>; Rice, Stephen. "How the ABC's Pursuit of Platinum Status with ACON Put Its Integrity on the Line." *The Australian* (Australia), March 5, 2026. <https://www.theaustralian.com.au/business/media/how-the-abcs-pursuit-of-platinum-status-with-acon-put-its-integrity-on-the-line/news-story/23315b5ecc04a079fce02883d056706b#:~:text=More%20worrying%20for%20critics%20is,AWEI%20point%20in%20it%20too%E2%80%9D>; Rice, Stephen. "Regulators Asked to Investigate ACON's Clinic despite Ties with the Trans Lobby Group." *The Australian* (Australia), May 29, 2026. <https://www.theaustralian.com.au/nation/regulators-asked-to-investigate-acons-clinic-despite-ties-with-the-trans-lobby-group/news-story/5d48e77af00e048c8b22c6dc2cc2945c>.

⁶ Linden, Robin Ruth, Darlene R. Pagano, Diana E. H. Russell, and Susan Leigh Star. 'Against Sadomasochism: A Radical Feminist Analysis.' *Frog in the Well*, East Palo Alto, Calif., 1982.

There is a growing body of evidence that is revealing the harm of gender medication and the inappropriate accessibility and use at young ages and without parental consent.⁷ This classification will have the effect of normalising the behaviour among children at a highly suggestible age.

5. Discrimination is not clarified

Concept C02 states that themes would ‘reflect the most requested issues. These themes would be: Sexual violence, suicide, discrimination and scariness.’⁸ What is meant by ‘discrimination’ is not described other than that it is the ‘modern’ issue of discrimination and that ‘(inclusive of bullying)’ is placed in brackets after one of the uses of this word. Considering the radical flavour of the recommendations thus far ‘discrimination’ is likely to be influenced by ideologies that are pro queer theory. Less modern forms of ‘discrimination’ such as anti-freedom of religion, anti-free speech and anti-freedom of expression are less likely to be identified as discrimination. Many untested and ideological assumptions will influence the decision by a panel of what constitutes ‘discrimination’.

Other ‘themes’ that should be included are:

- Religious: Religious offense and discrimination should be identified to help control the effect of these sentiments.
- Occultism: The seriousness of this behaviour needs to be recognised.
- Drug use: This needs to be classified because of the danger and addictive nature of drugs.

6. Small survey

A quantitative online survey of only 1000 adults, parents and children was conducted for the review of the concepts that had already been developed. Similarly, only 1,020 people (802 adults and 218 children aged 8-17) were surveyed during the ‘concept-testing’ with a qualitative survey of the proposed new Guidelines. This was done online. An unidentified group of ‘experts’ were also consulted.

These are relatively small survey groups which have been consulted for what, if accepted, would result in a large move away from the conventional classification of media. As previously mentioned, it is also concerning that the experts were not identified. Given the extent of the changes recommended in the report, it is questionable whether the experts were impartial, that they provided a healthy variety of views and that their views were given a fair weighting.

7. Censorship is necessary

Mettlesome states that classifications should seek to ‘inform not censor’. This is a fundamentally misguided. Informing parents is not enough. Censorship is necessary. Not

⁷ Cass Review, Final Report, [9.22], 130.

adequately censoring certain content places the burden on parents to constantly monitor content instead of being able to rely on classifications. Mettlesome's current proposal is that non-heterosexual behaviour should not be censored. As written above, this would not cater to the concerns of a large part of the society.

8. Classifying according to 'diversity' is futile

Mettlesome has based its findings on the idea that the classification of media should reflect Australia's 'diversity'. Whereas, ACL believes classification should reflect Australia's values. Classifying on the basis of diversity is flawed for the following reasons:

- Seeking 'diversity' does not allow for opposing positions. It is better that viewers are informed of the content of the media rather than have the content of various identity groups placed together under the banner of 'diversity'.
- Comparing the opinions of groups with very different standards is complex and requires making 'moral' decisions when deciding what the diverse opinions are and how they should be balanced. There is no method that is offered to enable the Government to make moral/ethical decisions that can be consistently applied.

9. The Government must protect young people

If the Government adopts Mettlesome's findings, it is prioritising identity categories over shared values. Such an approach does not inform and provide trustworthy advice.

This approach misunderstands the responsibility of the Government and the public trust that is placed in the Government to do what is in the best interests of its people.

The Australian Government has recently prohibited young people from accessing social media under the age of 16. Such a stance has been applauded around the world. The Government should also take a strong and conservative approach to classifying media to protect young people from content that might harm them.

10. Classification Advisory Council

The people who are on the Classification Advisory Council, under concept C09, and how they are chosen, will determine whether the public can trust their determinations. The way they make their decisions should be carefully instructed according to the principles we have set out in our submission.

11. Advertising

Separately regulated advertising occurs on television, at sporting venues, in outdoor settings such as billboards and bus stops, public spaces, on transport, social media and online. These should be brought into the scheme so that there is consistency across all media and that young people are protected from all influences.

Conclusion and recommendations

It is essential the Australian Government carefully considers the needs of families, particularly children, in making any changes to the National Classification Scheme. Mettlesome's recommended changes to the Guidelines arrive at the peak of controversy regarding ACON and its influence in workplaces, schools and on the television. Much public concern has also generally been raised in relation to gender ideology and its controversial influence on education curricula, sport, gender medicine and other aspects of society. These influences need to be held in check through the Guidelines so that they cater to the concerns of the wider public, many of whom hold to mainstream Christian values. Fewer changes, rather than more, should be made at this time to the Guidelines.

Prior to agreeing to any changes to the Guidelines, the Government should carefully consider all of the concerns raised in this submission, as well as the following specific recommendations:

- Create a separate rating for non-heterosexual, fetish and kink-related sex acts. Classify them as being higher impact acts requiring more serious classification and clearly informing the viewer of this content.
- Publications should be classified at least 'unrestricted mature - MA16+' if they include non-non-heterosexual, fetish or kink-related sex acts.
- Classifications should be based on moral considerations rather than the tenuous basis of 'evidence' and 'potential harms', which lack clarity.
- The 'themes classifiable element' should include themes that include religion, occultism and drug use. If adopted, what is meant by the theme of 'discrimination' should also be clearly defined and include discrimination against religions.
- Ensure the Classification Advisory Council includes community voices that proportionately represent all of the Australian community, including the large proportion of Australians who hold to mainstream Christian values.