amazon

26 February 2020

Director, Policy and Research
Classification Branch
Department of Infrastructure, Transport, Regional Development and Communications

Via email: consultation@classification.gov.au

Review of Australian classification regulation

Amazon welcomes the opportunity to respond to the Government's consultation paper reviewing Australia's classification framework. Amazon fully supports the Government's goal of ensuring that classification laws are fit for the modern content market for all content distributors, within a regulatory framework that ensures appropriate classification information for Australians and their families.

Prime Video in Australia

Today Prime Video is available to customers in Australia as a benefit of a Prime membership, launched in June 2018. Prior to the launch of Prime, Prime Video had been available to customers in Australia as a standalone subscription video on demand offering since December 2016, when the service became available globally in over 200 countries and territories.

The service offers streaming video on demand content via www.primevideo.com, providing customers with access to thousands of titles including award winning Amazon Original content as well as a selection of third party movies and television series. Only Prime Members (or users accessing via a free trial) are able to access and view content across compatible devices, including web, mobile, gaming consoles and select smart televisions.

We know customers want to see unique, authentic, stories and talent that they cannot get anywhere else and we are constantly looking for opportunities to provide locally relevant worlds and characters that matter to our customers in Australia. This includes several already announced titles: Th*e Test: A New Era for Australia's Team*, produced by Cricket Australia Films with Whooshka Media (premiering on Prime Video on March 12); *LOL: Last One Laughing Australia*, executive produced and hosted by Australian actor, writer and producer Rebel Wilson and produced by Endemol Shine Australia; 10 Australian Amazon Original stand-up specials, produced by Guesswork TV and filmed in Melbourne; and *Back to the Rafters*, bringing back one of Australia's favourite shows, produced by Seven Studios.

Modernising Australia's classification framework
Accurate classifications - and ensuring our customers have the best possible information about content they are considering watching - is central to our corporate philosophy. Amazon is committed to creating safe and reliable online viewing spaces for families and subscribers. We support the need for a harmonised classification system.

The content available to Australian consumers continues to grow through the expansion of streaming services as well as diversified content offerings from broadcasters and telecommunications providers. While no single body can keep up with the classification demands created by this volume of content,

timely classification is essential to ensure that Australians are able to watch globally popular original content at the same time as consumers around the globe.

Yet, the current regulatory framework has led to a high degree of uncertainty regarding the manner in which certain aspects of the system may or may not apply to streaming video and other 'over the top' services.

Self-classification is consistent with ensuring Australians get the information necessary to make informed decisions about the content that is appropriate for their household. The Department has already seen the potential for success of efficient self-classification approaches. We believe that there are significant benefits to consumers that flow from enabling content providers to self-rate content in accordance with local requirements for classification ratings and consumer advice. Industry can and should partner with the Department on how to ensure consistency in application, including co-regulatory open lines of communication on ratings' revisions and education on locally relevant considerations.

We are constantly listening to our customers about the content we provide, and this feedback helps to improve our internal processes. We support a customer centric, complaint-based framework.
Amazon encourages the government to focus on the goals of the classification system - ensuring that Australians have accurate classification information so that adults can make informed viewing choices. However, we encourage flexibility in the achievement of those goals, including by focusing on the capacity of organisations to self-rate and how to ensure self-rating is done appropriately, without being overly prescriptive or stifling the availability of content for Australian customers.

We would be pleased to discuss any of the issues raised in this submission if it would be of assistance.

Regards,

Andrew Harris
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South East Asia, Australia, and New Zealand
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