



Wednesday February 26, 2020

Director, Policy and Research, Classification Branch  
Department of Infrastructure, Transport, Regional Development and Communications  
By email: [consultation@classification.gov.au](mailto:consultation@classification.gov.au)

Dear Director,

Thank you for the opportunity to engage with the Australian Government about its proposed Review of Australian classification regulation, as outlined in the discussion paper released January 2020.

By way of background, DIGI is a non-profit industry association that advocates for the interests of the digital industry in Australia, with Google, Facebook, Twitter and Verizon Media as its founding members. DIGI also has an associate membership program and our other members include Redbubble, eBay and GoFundMe. DIGI's vision is a thriving Australian digitally-enabled economy that fosters innovation, a growing selection of digital products and services, and where online safety and privacy are protected.

As noted in the discussion paper, the definition of "film" in the Classification Act is broad and technically covers all content online apart from online games and online advertisements. We agree with the assessment in the discussion paper that *"the definition of 'film' be clarified so that industry has clearer obligations about what must be classified, as it is impractical that virtually all online content must be classified in the same manner."* In other words, we suggest that user generated content be explicitly excluded from the definition of "film" under the Act.

We also urge consistency in the usage of the updated definition of film in relation to the proposed Online Safety Act, which contains a proposal that family filters be implemented to restrict access to MA15+ and R18+ content using the "best available technology". Should the implication here be that this involve content detection technologies, this may prove to be an extremely difficult undertaking because of the aforementioned impracticalities noted in the Classification Review discussion paper in relation to classifying online content, as well as the margin for error and cost of such technologies across the digital industry.

DIGI looks forward to further engaging with the Classification Review reform process. Should you have any questions or wish to discuss any of the representations made in this short submission further, please do not hesitate to contact me.

Best regards,

A handwritten signature in black ink, appearing to read 'Sunita Bose', written over a light blue horizontal line.

Sunita Bose  
Managing Director  
Digital Industry Group Inc. (DIGI)