

19 February 2020



Classification Branch

Department of Communications and the Arts
(Department of Infrastructure, Transport, Regional Development
and Communications)
Locked Bag 3, HAYMARKET NSW 1240

Via email only: consultation@classification.gov.au

Dear Sir / Madam,

RE: Review of Australian classification regulation

Thank you for giving Communications Alliance the opportunity to comment on the Review of Australian classification regulation.

While we do not have any substantial comments on most aspects of the Discussion Paper of the Review, we would like to record our support for an amendment or clarification of the definition of 'film' in the context of classification of online material.

The current definition of 'film' covers content and videos on websites/services such as YouTube, i.e. the definition includes so-called User Generated Content (UGC). Consequently, as all films and computer games must be classified before they are made available in Australia (unless they are exempt), such content technically may require classification under the current arrangements.

Given the sheer volume of UGC, a requirement to classify such content is impractical. UGC should, therefore, not be included in the definition of 'film'.

We note that the concurrent reform of Australia's online safety legislation is set to consider harmful content, including where it is user generated, and approaches of how to minimise such harm and its effects.

If you have any questions or wish to discuss, please do not hesitate to contact Christiane Gillespie-Jones on 02 9959 9118 or c.gillespiejones@commsalliance.com.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Stanton'.

John Stanton
Chief Executive Officer