



## Australian Government

### Classification Board

## Classification Board submission on Modernising and Harmonising Classification Standards (2026)

### Introduction

The Classification Board (the Board) welcomes the opportunity to provide feedback on recommendations to improve the standards used to guide classification decisions about films, computer games and certain publications.

As demonstrated through the implementation of 2024's Stage 1 Classification Reforms, the Board is committed to working with Government to modernise the classification scheme by responding to evolving community standards and to the changing way Australians access media content.

The Board is an independent statutory body established to apply relevant legislation to determine classifications for films, computer games and publications that reflect Australian community standards. Its governance and functions are prescribed by the *Classification (Publications, Films and Computer Games) Act 1995* (the Classification Act).

The Board's primary role is to classify in accordance with the Classification Act so that Australians can make informed choices about what they and their families watch, play and read. Alongside classification decisions determined by the Board, decisions are made through delegations to Accredited Classifiers who have completed approved training or by approved Classification Tools. All decisions are made to standards approved by the Board, which also carries out monitoring and quality assurance of industry decisions.

In 2024-25, a total of 405,659 classification decisions were made for Australian audiences. This included 394,619 decisions made by the International Age Rating Coalition (IARC) tool for computer games; 7,254 by approved Classification Tools for subscription video on demand platforms including Netflix and Amazon Prime; 2,957 by Accredited Classifiers; and 829 by the Board.

Alongside self-classification, industry continues to rely on the Board for the classification of high-profile releases. This is demonstrated by the Board having classified more than 80% of the Top 20 films at the Australian Box Office in 2025 - representing films accounting for \$449m out of the \$532m total revenue generated by these top cinema releases<sup>1</sup>.

### Summary view

The Board considers the existing standards to be both trusted by the public and broadly fit for purpose, with only minor amendments needed to meet the growth in digital and online content, online interactions and the emergence of new content sharing platforms.

The Board's overarching view is that updates to the classification guidelines should focus on the harmonisation of film and computer game guidelines, addressing online interactions and updating the definition of the MA 15+ classification to ensure it is fit for purpose when used online.

In reaching this view, the Board has considered the need for the appropriate treatment of classified content in the context of the digital duty of care being developed under the *Online Safety Act 2021* and the need for effective definitions of restricted categories to facilitate Federal enforcement of the Classification Act online. These views, and the Board's views on other recommendations, are discussed below. Individual responses to each recommendation are included in Annex 1.

### **Update to the MA 15+ classification**

The Board believes that the definition of the MA 15+ restricted category should be updated to support a fit-for-purpose application in the online environment. An update to the definition of MA 15+ should consider parental controls as functioning as the online equivalent of parental 'accompaniment'.

In effect, this would align the online world with existing community expectations where a person aged under 15 can view in a cinema, or purchase in a shop, an MA 15+ rated title if accompanied by their parent or guardian.

The Board believes this update would facilitate regulation of the Classification Act online and enable classified content to be appropriately considered under the digital duty of care.

The Board does not support updating the MA 15+ rating to MA 16+. The Board believes that aligning the MA 15+ classification with elements of the *Online Safety Act 2021* that prohibit certain online environments for those under sixteen introduces a false equivalence between individual pieces of classified content and social media platforms more broadly. The Board also notes that implementation would require recalibration of classification thresholds for the M, MA 15+ and R18+ categories, potentially resulting in less consumer protection at the M and MA levels.

### **Interactivity and online interactions**

The Board supports updating the guidelines to remove the stricter treatment of classifiable elements in games, including in relation to interactivity. It believes all classifiable elements should be consistently classified across both films and games. This should include interactivity, incentives and rewards being treated as contributing and mitigating factors across all classifiable elements, rather than the guidelines automatically setting defined classification levels for specific individual instances of interactivity.

The Board also believes the current guidelines do not adequately consider online interactions as part of the classification process. The guidelines should be updated to reflect the varying impact of different types of online interaction. A mandatory minimum

classification legally requiring the online equivalent of parental accompaniment should be considered for games where interacting with others online is the only mode of play.

Other minimum mandatory classification levels should also be considered for games that feature microtransactions, online chat, unmoderated user-generated content, in-game trading, cryptocurrency and play-by-appointment mechanics.

Consideration should also be given to an appropriate minimum classification for titles that are free to play without adequate sign-up protections and therefore not well suited to the traditional point of purchase consumer protection and information that a PG rating was designed to provide.

### **Other opportunities for improvement**

The Board recognises a number of other opportunities for improving the efficiency, effectiveness and understanding of the classification scheme, including its general administration, administrative updates to consumer advice, classification of trailers and public education.

The Board supports the ‘classify once’ principle that is currently in place. The Board notes there is an opportunity to improve the efficiency of the existing ‘deemed decision’ process relating to the use of decisions made under the *Broadcasting Services Act 1992*, through improvements to the National Classification Database and through greater consistency between the classification standards followed by Broadcasters and Board standards.

The Board supports, in principle, efforts to simplify the process of updating classifications of existing content, where required for administrative purposes. Any updates should be subject to Board approval.

To improve transparency in the classification of trailers and ensure appropriate audience protection, consideration should be given to replacing the Authorised Advertising Assessor scheme with the current Accredited Classifier scheme and approved tools.

The Board also supports ongoing education on the purpose and functionality of the classification system. This would be particularly important should any significant changes be made to the classification ratings or similar.

### **Next steps**

As updates to the standards and guidelines are developed further, the Board would welcome the opportunity to discuss the measures raised in this submission to ensure all Australians can continue to make informed choices about what they read, watch and play.

## Annex 1 - Classification Board responses

| Recommendation                                                   | Board response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Summary of Board response |
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| <b>C01</b><br>PG13 rating                                        | The Board does not support the recommendation to introduce a PG-13 rating, unless there is overwhelming support from industry and the community to do so. The Board notes that implementation would require recalibration of classification thresholds for the PG, M and MA 15+ categories, and assessment of legal and regulatory implications, including enforceability.                                                                                                                                                                                              | Not supported             |
| <b>C02</b><br>Overhaul of classifiable element 'Themes'          | The Board does not support the introduction of a themes-specific submatrix. The Board notes steps have been taken in the past six months to make substantial changes to the classification of themes, through a simplified list of consumer advice terms that has removed genre themes and given more prominence to issues of community concern. The revised consumer advice terms include suicide, mental health, self-harm and scary scenes, with consumer advice for sexual and family violence included under the element of violence.                              | Not supported             |
| <b>C03</b><br>Improved reliance on evidence over morality        | The Board supports, in principle, balancing consideration of morality with the consideration of any established, evidence-based research of actual harms. The Board notes that the use of evidence-based research into harms alone may result in less protection for audiences, including in relation to very high impact violent content and content related to issues of community concern.                                                                                                                                                                           | Supported in principle    |
| <b>C04</b><br>Interactivity classifications focus on replication | The Board supports updating the guidelines to remove the stricter treatment of classifiable elements in games. It believes all classifiable elements should be consistently classified across both films and games. This should include consideration of interactivity, incentives and rewards as contributing and mitigating factors across all classifiable elements, without specific reference to individual instances of interactivity.<br><br>The Board also believes the guidelines do not adequately consider online interactions as part of the classification | Supported                 |

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|                                   | <p>process. The guidelines should be updated to reflect the varying impact of different types of online interaction. A mandatory minimum classification legally requiring the online equivalent of parental accompaniment should be considered for games where interacting with others online is the only mode of play.</p> <p>Other minimum mandatory classification levels should also be considered for games that feature microtransactions, online chat, unmoderated user-generated content, in-game trading, cryptocurrency and play-by-appointment mechanics.</p> <p>The Board believes that the introduction of minimum mandatory classification levels for online interactions should be considered in conjunction with the development of a digital duty of care under the <i>Online Safety Act 2021</i>, to ensure the appropriate treatment of material that has been classified.</p> <p>Where a minimum mandatory classification involves the MA 15+ and R 18+ restricted categories, appropriate regulation arrangements should be considered.</p> |               |
| <p><b>C05</b><br/>MA15→ MA16+</p> | <p>The Board does not support updating the MA 15+ rating to MA 16+. Instead, it believes that the definition of the MA 15+ restricted category should be updated to ensure it is fit for purpose when used online. An update to the definition of MA 15+ should consider parental controls as functioning as the online equivalent of parental ‘accompaniment’, which is included in the existing definition.</p> <p>The Board believes this update would facilitate regulation of the Classification Act online and enable classified content to be appropriately considered during the development of a digital duty of care under the <i>Online Safety Act 2021</i>.</p> <p>The Board believes that aligning the MA 15+ classification with elements of the <i>Online Safety Act 2021</i> that prohibit certain online environments for those</p>                                                                                                                                                                                                             | Not supported |

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|                                                                           | under sixteen introduces a false equivalence between individual pieces of classified content and social media platforms more broadly. The Board also notes that implementation would require recalibration of classification thresholds for the M, MA 15+ and R18+ categories, potentially resulting in less consumer protection at the M and MA levels.                                                                                                                                  |                        |
| <b>C06</b><br>Publications to adopt the rest of the classification system | The Board supports, in principle, improving the clarity of classification categories as they apply to publications. The Board notes that this could include closer alignment with film and game classifications at the highest impact levels.                                                                                                                                                                                                                                             | Supported in principle |
| <b>C07</b><br>Clarify definitions                                         | The Board supports clarifying definitions in the guidelines, particularly those definitions that currently vary between the guidelines for publications, films and computer games.                                                                                                                                                                                                                                                                                                        | Supported              |
| <b>C08</b><br>Reconsideration of sexual content                           | The Board supports a review of the treatment of the specific fetish practices referenced in the current guidelines for the X 18+ category. The Board notes that all content is consistently classified in line with the guidelines, regardless of the characteristics of the communities represented.                                                                                                                                                                                     | Supported              |
| <b>C09</b><br>Classification Advisory Council                             | The Board does not support the establishment of a standing advisory council, noting challenges with ensuring appropriate representation, governance and powers. However, the Board does support the establishment of a mechanism or process to consult with community and industry at regular intervals, particularly to support revisions to classification guidelines.                                                                                                                  | Not supported          |
| <b>C10</b><br>Single touch classification                                 | The Board supports the 'classify once' principle that is currently in place. The Board notes there is an opportunity to improve the efficiency of the existing 'deemed decision' process relating to the use of decisions made under the <i>Broadcasting Services Act 1992</i> , through improvements to the National Classification Database (see recommendation C13) and through greater consistency between the classification standards followed by Broadcasters and Board standards. | Supported              |
| <b>C11</b><br>Permit updates to classifications                           | The Board supports, in principle, efforts to simplify the process of updating                                                                                                                                                                                                                                                                                                                                                                                                             | Supported in principle |

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|                                                            | classifications of existing content, where required for administrative purposes. Any updates should be subject to Board approval.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                        |
| <b>C12</b><br>Self-classification as default               | <p>The Board does not support self-classification as the default, but believes industry should have the choice of seeking a Board decision, using the Accredited Classifier scheme, or using an approved classification tool.</p> <p>To improve transparency in the classification of trailers and ensure appropriate audience protection, consideration should be given to replacing the Authorised Advertising Assessor scheme with the current Accredited Classifier scheme and approved tools.</p> <p>The Board supports the delivery of any administrative efficiencies by the Department to further improve the timeliness of Board decision-making, including implementation of e-delivery options.</p> | Not supported          |
| <b>C13</b><br>Modernise the classification database        | The Board supports the modernisation of the National Classification Database. To support single-touch classification and the 'deemed decision' process, consideration should be given to opening the database to the voluntary publishing of classification decisions made under the <i>Broadcasting Services Act 1992</i> .                                                                                                                                                                                                                                                                                                                                                                                   | Supported              |
| <b>C14</b><br>Expand use of automated classification tools | The Board supports, in principle, the expanded use of tools, including to replace the Authorised Advertising Assessor scheme, noting that relevant quality assurance and monitoring processes need to be considered to ensure ratings remain fit for purpose and do not undermine the scheme.                                                                                                                                                                                                                                                                                                                                                                                                                  | Supported in principle |
| <b>C15</b><br>Classification website<br>- uniform matrix   | The Board supports, in principle, the publishing of a uniform matrix for all content (as is currently the case for all decisions made by the Board). However, the Board notes the potential burden on industry, as broader use of the matrix would require a level of classification detail not currently provided by Accredited Classifiers and approved tools.                                                                                                                                                                                                                                                                                                                                               | Supported in principle |

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| <b>C16</b><br>Classification website<br>- personalised preferences             | The Board does not consider this recommendation a priority.                                                                                                                                                                                                                                                             | Not supported |
| <b>C17</b><br>Classification website<br>- unify listings                       | The Board supports this recommendation, noting the need for users to be able to clearly identify modified versions of content.                                                                                                                                                                                          | Supported     |
| <b>C18</b><br>Classification website<br>- transparent decisions                | While the Board supports efforts to increase the transparency of classification decisions in general (such as its recently launched e-newsletter), it does not support the default publishing of details around specific decisions, noting that these are generally already available on request to interested parties. | Not supported |
| <b>C19</b><br>Classification website - addition of extra community information | The Board does not support the addition of extra community information on the website, noting the importance of maintaining the Board's neutrality and independence in the classification space.                                                                                                                        | Not supported |
| <b>C20</b><br>Element icons                                                    | The Board does not support the introduction of visual icons, noting logistical implications of displaying icons alongside ratings and text-based consumer advice, and sensitivities around the depiction of issues of community concern.                                                                                | Not supported |
| <b>C21</b><br>Quick links<br>to classification listings                        | The Board does not support the use of QR codes, noting the potential burden on industry and the requirement for ongoing technical maintenance into the future.                                                                                                                                                          | Not supported |
| <b>C22</b><br>Generational education campaign                                  | The Board supports ongoing education on the purpose and functionality of the classification system. This would be particularly important should any significant changes be made to the classification ratings or similar.                                                                                               | Supported     |

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<sup>i</sup> Australian Box office from Numero; detailed Figures from the Classification Board.