



Australian Government
Classification Board

[REDACTED]
ASTRA Subscription Media Australia
5 Thomas Holt Drive
NORTH RYDE NSW 2113
[REDACTED]

Dear [REDACTED]

Thank you for your letter of 3 December, 2018, advising of the proposed changes to the ASTRA Codes of Practice. The following response is on behalf of the Classification Board (the Board) and does not reflect the views of the Classification Branch nor the Commonwealth Department of Communications and the Arts. The Department maintains policy responsibility for the National Classification Code and the statutory Guidelines.

The Board notes the consistency of continuing to use the Guidelines for the Classification of Films (2012) and the continued requirement to display classification icons where a film is classified PG or higher and the display of consumer advice at M or higher. From time to time, the Classification Branch undertakes a review of the Guidelines. If you have any enquiries in this regard, please contact the Classification Branch Assistant Secretary, Mr Aaron O'Neill, email: [REDACTED]

The Board is able to offer the following comments in relation to the proposed changes:

1. The definition of "classifiable programs" (referred to as "films, drama programs and reality programs") appears to be ambiguous. These terms do not appear to be included in the list of definitions. It is unclear if previous Board classification decisions are used or if film content is being independently classified. It may perhaps be preferable for ASTRA to consider using the FreeTV definitions for "classifiable programs" and "exempt programs".
2. It is noted that the "content of a promotion" must not exceed the classification of the classifiable program in which the promotion is broadcast. This appears to be broadly consistent with the provisions of the Classification legislation relating to advertisements for other films that are on home entertainment content (DVDs/Blu-Ray).
3. Under your section 6 - Promotions, fifth paragraph, there is a statement that "Classification categories are age-based". This statement is not correct in so far as there is reference only in the M to R 18+ categories to 15 and 18 year olds respectively. There is no age construct attached to either the G or PG classification categories, rather classification categories are impact based.

4. While your aim of streamlining your Codes of Practice is appreciated, it may be preferable, because of issues relating to clarity and direction, to retain those provisions in your existing Codes of Practice relating to the consideration of children as an audience and the appropriateness of advertising which is aimed at children or which deals with social issues that are of concern to some sections of the community, for example, gambling.

The Board appreciates the opportunity to provide feedback on the proposed changes.

Yours sincerely,



Margaret Anderson
Director
25th January 2019