

The proposed legislation is heading in the right direction but has some serious flaws as it now stands:

1. All the onus is on the tech companies to define what constitutes misinformation. A role of the ACMA should be to provide strong definitions of the type of information that falls outside what is deemed to be "true." Although there is information that is either definitely false or definitely true, there is also a grey zone where there will be valid conflicting views. How are the tech companies and the ACMA to know where to draw the line?

**The ACMA should provide the definitions and criteria that the tech companies need to follow.**

2. How will the ACMA be held accountable for their actions? Will there be a process for groups who have had their posts barred to argue their case? Will the views of the government of the time have an influence over what is deemed to be truth?

**There must be a process to dispute adverse findings against groups who have their posts taken down under the legislation.**

3. What is the basis for deeming certain groups are not compelled to follow this legislation? No group should be exempt from this legislation except those expressing comedy and satire. Governments, educational institutions and especially news outlets should be policed in the same manner as everyone else.

**The legislation should apply to everyone except when using comedy or satire where it is generally understood not to be true. No exempt groups.**

4. The fines proposed for non-compliant tech companies are excessive and probably unenforceable. How can the Australian government compel a multinational company to pay 5% of its global turnover? Such a company would pull out of Australia rather than pay such a fine. A fine of this size is not in keeping with other corporate fines in Australia.

**Reduce the proposed fines on tech companies to be commensurate with other corporate breaches.**