

- the definitions of misinformation and disinformation are far too broad. You need to clarify the meanings of false, misleading and deceptive. You need to make it clear that the ACMA assessment is a tiered approach (includes AND provisions, indicating that each element within the scope must be met before ACMA can intervene, i.e. the element of false must be proved, the element of reasonably likely to cause or contribute to serious harm.)

Definitions of:

Reasonably likely

Contribute

Serious harm

Wide reaching

All Need further work or indicate standard dictionary/ precedent meanings apply.

You cannot include message based services in this bill, and claim that 'serious harm' has to be wide reaching. The very aspect of private messages, IMs etc, is that they are reasonably personal in nature. You can't reach millions or even hundreds of thousand, or even a thousand people in a single IM post.

exemptions – take it out. Absolutely no need for exemptions. You've just spent the first half of this bill talking about serious harms, far reaching implications and all the awful things misleading information can do, and then you want to insert an exemption clause?! Kind of undermines your 'dressing up' of caring about truth reporting through our largest influencers of all – yourselves, media and government departments!!