

There are no carve outs for small / start ups or home IT services.

If people want to respond to ask exemptions be allowed for under 1k users or for non profit and private use cases that would be very helpful.

The bill requires all internet services that facilitate end user communication to, verify user identity, implement content moderation and anti bullying procedures. And register the service owners contact details with the federal government.

This bill will disadvantage local IT companies and IT professionals competing with Facebook, Twitter etc as they do not have the resources to implement automated content moderation or complex compliance processes needed.

Without allowances for IT professionals and researchers to easily build and test new software for personal development or exploration without first needing to file and register with the federal government will do tremendous damage to IT development in Australia.

While unlikely to be an effective argument, the notion that by providing an end user messaging service (like email or chat) you will be required to intercept and moderate the content of conversations between consenting adults, provide details of participants and where feasible be able to intercept end to end encrypted communication of your users is outrageous. The expectation that two people can have a conversation at the pub or on the phone and there is a high threshold of evidence required to obtain a warrant for surveillance should apply to the conversations between people using email or messaging platforms.

The wording of the bill means any service on the internet that facilitates end user communication is in scope. It will be applicable to private email servers, small companies running github, jira, irc, slack or similar collaboration and chat tools to engage with customers or their communities. Thus forcing many small organisations to institute online harm reduction strategies in addition to workplace safety programs or reasonable customer/acceptable use guidelines.

Further there is no ability to have a private service (non commercial use, no public or open registration) that is for personal use by immediate friends and family. Many people wishing for greater privacy and control of their data implement services at home or on cloud platforms for use by their friends and family. That many document repositories, photo sync and Web blog software allows messages or comments would put a huge burden on individuals to comply with legislation that is designed for large IT giants like Facebook, Google and Twitter.

While protecting children and preventing online bullying might have merits in specific situations, the internet is