



## Modernising Australia's National Classification Scheme – Stage 2 Reforms

### Paramount Australia & New Zealand Submission

30 May 2024

Paramount Australia & New Zealand (**Paramount**) welcomes the opportunity to comment on the *Modernising Australia's Classification Scheme – Stage 2 Reforms* public consultation paper.

Paramount is part of Paramount Global, a NASDAQ listed media and entertainment company. In Australia, Paramount owns and operates a commercial free-to-air (FTA) television network (Network 10), its broadcasting video on demand service 10 Play, subscription television broadcasting channels including MTV music channels, and the subscription streaming service Paramount+ which launched in August 2021.

Paramount supports the submissions of Free TV Australia and the Australia New Zealand Screen Association. In addition, we make the following points.

Paramount welcomes the Stage 1 reforms. As the Department has previously advised, if the same entity owns a terrestrial broadcasting service and its affiliated broadcast video on demand service, and also owns a subscription video on demand service, the entity will not need to notify the department when it uses the same classification decision for the terrestrial broadcast and affiliated broadcast video on demand services. However, it will need to notify the department if the classification is being carried over to the entity's subscription video on demand service.

As such, Paramount is required to follow two separate processes with regards to the same content appearing on Network 10 / 10 Play and Paramount+. The same Paramount classification team must provide a lengthy and onerous notice of classification merely because the business seeks to make the same content available across all its distribution platforms.

This dual process is unreasonably burdensome and not consistent with the 'classify once' principle or the objective of reform to "efficiently manage the rapid growth in the volume of classifiable content, particularly online content, reduce costs and promote industry compliance..."<sup>1</sup> For an entity such as Paramount, the deeming provisions should extend to its subscription streaming service at a minimum.

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<sup>1</sup> *Classification (Publications, Films and Computer Games) Amendment (Industry Self-Classification and Other Measures) Bill 2023*, Explanatory Memorandum, Page 2.

# Paramount



Furthermore, we submit that notifying the Department of classifications via the National Classification Database is unreasonably burdensome for streaming services. As the volume of content increases, including live content, the concept of maintaining one central database is not fit-for-purpose. There is no equivalent notification / database scheme for broadcasting and we contend that the classification requirements for streaming services should be regulated in a similar way.

Paramount appreciates the opportunity to respond and welcomes further discussion.