My main goal in writing this letter is to give some of my thoughts on the consistency of ratings across different mediums in Australia.

As a game designer I am extremely wary about approaching certain topics because in my projects, I feel like it's possible they would be banned simply for containing adult themes. Ideally I would like to enable computer games to become more mature, to not be relegated to children's entertainment and inline with the themes we see across the board in adult content on every other medium.

I am happy to see recommendations in binding computer games and film ratings together, I also believe television should be looked at. In many instances I can see film and television doing things that are simple unacceptable in gaming. I believe this comes from an exacerbation of how interactive elements are experienced, the actions undertaken by a gamer having varying levels of abstraction from reality.

A primary example of this is in health mechanics, one simply applies a health pack and voila, magically healed. Many games use these types of mechanics to prolong play, which in a way could be seen as advantageous to the player but if those mechanics are seen as too heavily drug related they receive a ban even though they have no bearing on reality. The opposite being quite true of gambling that's found within computer games, the only variation being the lack of return on your money.

We should not provide instructional material on illegal activities across the board, especially not with interactivity which mimics reality but I would like to be able to approach drug addiction so that I can campaign against it as in the Australian movie *Candy*. Having an abstract mechanic which gives you a bonus from drugs does not really map to real world behaviour in a similar manner to currencies. A game containing entirely virtual gambling with no real world currencies could simply be labeled as gambling themes, much as the descriptor drug use or violence. When it comes to instructional bordering on real gambling I believe it warrants a game being rated for adults only, even if that games other themes are largely okay for everyone such as in *NBA2K20* or *FIFA Ultimate Team* mode.

There are also instances where virtual weaponry could too closely mimic its real world counterparts, in a game where you are clicking a mouse button to fire a gun is entirely different to a Virtual Reality motion controller which more accurately represents the actions taken to use a firearm. The abstractions of a

games mechanics should be considered more closely and not simply all bundled because of strong themes and/or hyper realistic art styles.

It's in this that I find myself swaying away from protecting adults freedom of choice and towards protecting children from predatory practices. We have ratings in place so that children who don't understand the difference between reality and these abstractions are protected, it becomes very difficult when tutorials train you to buy using in-game currencies and don't teach children about the real world money they might be spending. As developers we have a responsibility to educate, gamification is a valuable tool in the right hands and can turn an accounting spreadsheet into a fun science fiction game about managing a future civilisations.

To expand on my thoughts in regards to adult content and what should be allowed in the computer game space, movies such as *Saving Private Ryan*, *Pulp Fiction* and *The Wolf of Wall Street* are considered by many to be great works. They all contain drug use and varying levels of violence, they have been rated for adults and we expect someone watching won't try to mimic whats in these films because adults are responsible for their own actions. The interaction in regards to computer games as mentioned earlier is largely abstracted and no where near as instructional as a movie like *Pulp Fiction*, these scene was controversial but its clear audiences can handle it as they can with the positive depiction of quaaludes in *The Wolf of Wall Street* or even the euthanasia scene in *Saving Private Ryan* when a soldier asks for more morphine with his dying breath.

I do appreciate the intent of the ratings board in the past in regards to refusing classification but I believe it to be fruitless when you compare similar material in other mediums. To jump over to sex and sexual violence I could use *Game of Thrones* as an example of content which doesn't fit within the computer game or film ratings, there are depictions of incest and even an implied sexual assault between a brother and a sister. While not pleasant these scenes are there to provoke and warnings are there to protect those who might be easily offended by such content. I believe this type of content should be allowed under an adult rating, as in movies such as *I Spit on Your Grave* or *Hostel 2* in all mediums provided its not instructional and is largely implied and not interactive.

It's important to approach these topics as adults, we know when themes are being blatantly perverse or macabre and with self-assessment I do believe the community would monitor itself. We see this already in online communities across a variety of platforms, some will try to push the rules but they get reported and then the platform holder decides on what type of content it wants

to promote. Bringing down the cost of ratings will be important and I do believe if a piece of content requires looking into by our classification board it should come with a fine if they are found to be out of line. I do think having a board of trained review personnel could be a good idea so that its not just board members who need to review content, it could be a tiered system where a review committee pass along recommendations to the board for oversight.

I believe our current classification system works in that the primary focus is on protection adults rights to consume content that is within our laws and secondary to that is protecting children from consuming adult content. It should also protect everyone who might be offended by certain themes by having accurate descriptors of the content, in the *Silent Hill* movies case MA15+ and Horror Violence doesn't really tell me about the sexual violence later in the movie so I do believe we can expand descriptors.

More recently *Call of Duty: Modern Warfare* computer game received only an MA15+ rating even though we have the space in the R18+ rating. Could it be a sign of the trends with regards to gaming, that the community less and less sees games as being the direct cause of issues they are linked to in the real world.

Lets take for example the World Health Organisations recognition of gaming disorder and that addiction to any form of entertainment can be dangerous. Causing people to act out in a similar way to drug users or gamblers when the object of their addiction is taken away, its not just games but social media, even electronic devices or internet access. I believe this presents a more serious threat to safety than the themes of certain content or its level of interactivity.

Ultimately I feel as though the R18+ for computer games was more of a token gesture than a real attempt to make a space for adult games, I largely play games in the MA15+ rating and they tend to be reasonably rated. I am over twice the age of 18 though and would like to think I can choose what types of entertainment are suitable for myself and that I won't be unduly influenced especially when it comes to interactivity because, like special effects, I understand that its all make believe.

Some of the most influential artists on the planet approach taboo and use it to evoke emotional response, all I would like is for a similar opportunity in the computer games space without fear of my product being refused rating. There is plenty of space for children and teenage content within the lower ratings that

we don't need to apply those standards to an R18+ rating, the only rating we have for adult content in the computer game space.

Jumping back to the mechanisms behind rating games, a computer games length could determine the cost of the rating, in the case of small indie games there could be a minimal costing vs the larger AAA open world type titles which would require more time and scrutiny. Having more trusted storefronts whether through the IARC or similar, Steam, Epic Game Store, UPlay, GoG, Humble Store would open up more options for developers looking to do self-assessment. As an adult I want the freedom to enjoy all types of content but I am willing to do that through platforms where my age can be verified accordingly.

Games not distributed through approved storefronts should require more scrutiny as the likelihood of someone trying to distribute content outside of the community standards is much higher here. Mobile phones are largely protected against this type of content because of the nature of how their operating systems work. Self-assessment on titles which M rating and under seems like a fair compromise, so people can release free projects, game jam titles without having to incur a large cost associated with getting a game rated and being on the store.

Thank you for your time, I hope this will help us improve the entertainment industry in Australia.