Submission for the Review of Australian Classification regulation.

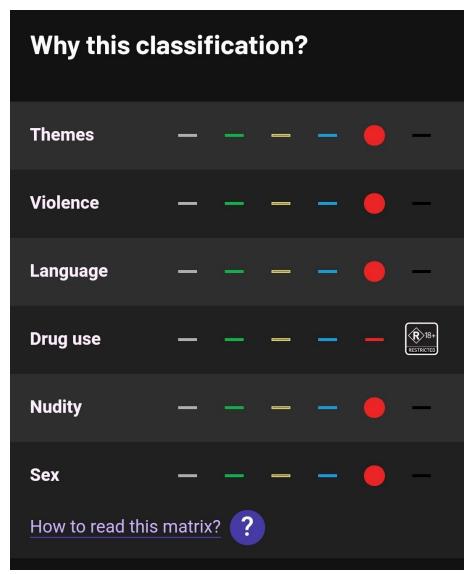
As somebody who has worked in the games industry for nearly 10 years, I began work before the classification entail that allowed R18+ video games to be classified and sold in Australia. This was a promising time for Australia as it gave adults the opportunity to gain access to more media that they're interested in, while in theory at least continuing to prevent the sale of inappropriate content to minors.

As someone located in Western Australia the rules regarding the sale of R18+ video games, have a few more restrictions.

For example R18+ video games must not be positioned with other games that are not R18+, they must also have signage that clearly states that it is an R18+ video game area. This proves ineffective as the same rule doesn't apply to other media, such as DVD's and BluRays, and not all retailers comply with this law.

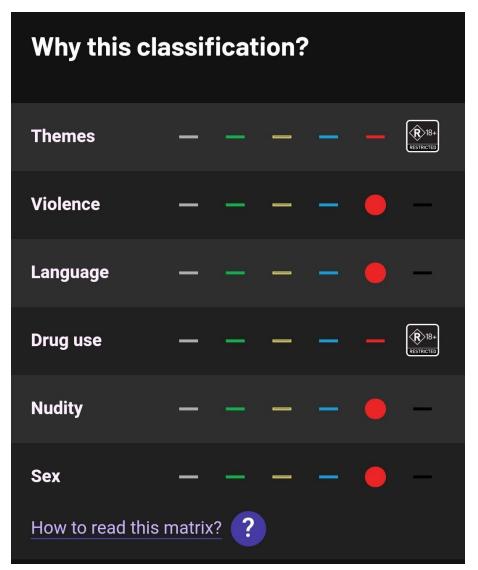
Regarding the actual classification of games, The current rules and teams responsible for the classification of games is extremely inconsistent. For example - The video game Grand Theft Auto 5 has been given an R18+ Rating. I think we can all agree that this rating is appropriate for this kind of game. Where the issue comes from is the reasoning and the method of communicating that rating. We're fortunate enough to have the classification.gov.au website that allows people to search for a particular title (whether it be a DVD, BluRay, Video game, etc...) then view an overview as to why it was given it's rating. Presumably to give parents the ability to decide what content they or their children consume.

This allows us to find the first issue with our classification system for video games. With our example of Grand Theft Auto V. The game has had 3 releases over time on different platforms. The first release was in 2013 for the PlayStation 3 and Xbox 360. For this release we were given the following matrix.



For those unfamiliar with how to read this Matrix. The rows represent each of the criteria a game is rated for. The columns represent where something falls in that system category. The Gray dash represents E ratings, the green for G, the yellow for PG, the blue for M, the red for MA15+ and the Black for R18+. The dot or R18+ logo represents where a title falls in a particular category. As you can see in the above matrix. The game checked all the boxes for MA15+, except Drug use where it got R18+. That means the game got an R18+ Rating.

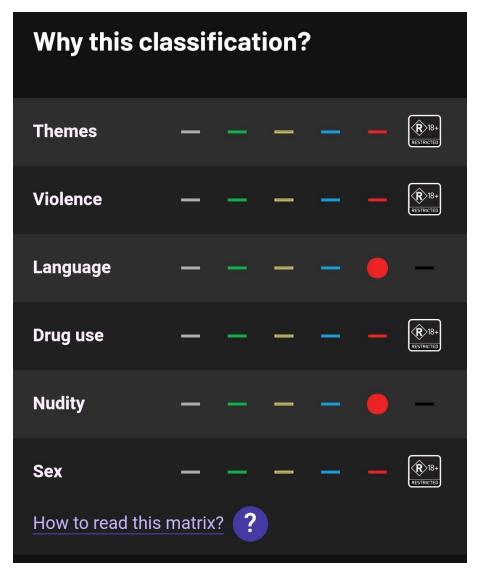
Let's move on to the next release of the game, This time it was released in 2014 on the PlayStation 4 and Xbox One Platforms. Let's look at the following matrix.



This time we see that the game has been marked as also needing an R18+ rating for Themes

Let me be clear this is the same game. It may look a little better, run a little better. But the game is the same.

Now I want to bring your attention to the third release of this game for the PC in 2015. See the matrix below.



Once again this is the same game. Once again looks a little better, runs a little better. But the content is the same.

This is the same game yet it has been rated differently 3 different times. Now as an Adult who has played this game. I believe the last one is the closest to accurate. Although I would also put language in the R18+ column. But this becomes even more of an issue when you look at the labels for ratings on games.

Let's look at the labels for the same game over 3 releases.



If you were to see this game on the shelf on 3 platforms with these rating stickers on each, it's easy to assume that the PC release of the game is much worse that the PS3 version. When in honesty it's the same game.

To make matters worse This is one example that is easy to show and explain. there are countless games that have been incorrectly rated within the rating that I believe acceptable and maybe a dozen or so that've been rated lower than I believe suitable for that game.

When I am in a shop and I hear little Johnny trying to convince Mum to buy him Call of Duty because it's not that bad. Then Mum looking at the R18+ label saying, ahh it's just Violence. Not understanding that violence doesn't just mean you're shooting people. It could be a moment where you're torturing somebody. Perhaps prying an eyeball out with a pocket knife. Clamping electrical clams to somebodies Nipples, All why putting the player in the position where there is no way forward other than abuse and torture. Where a young impressionable mind could become desensitised to such actions.

I believe that a rating system if done properly could prove very useful for parents especially when making decisions regarding their children.

Personally I have such little faith in our rating system that I either play or watch the content myself or check the PEGI or ESRB ratings before allowing my children to consume media.

In summary I can suggest only 3 things that would fix the problems with our video games classification.

1. Set out specific guidelines on what exactly would put content in each of the classification levels. G, PG, M, MA15+ & R18+. They would have to be very clear and have very little room interpretation.

- 2. Replace every person who is currently responsible for the classification of games, with people either from the industry, or people who can at least keep up with the game landscape. Even parents may be a good option.
- 3. Kill our entire classification system and use one that already functions correctly, or at least much less than our... i.e ESRB.