

YOUNG MEDIA AUSTRALIA

Submission to the Office of Film and Literature Classification's Review of Classification Guidelines for Films and Computer Games 31 October 2001

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1. Summary

Young Media Australia welcomes the opportunity to participate in this review of the classification guidelines for films and computer games, but notes that this is the first such opportunity in 6 years for films, and 7 years for computer games.

Such a time lapse warrants the provision of sufficient time for a very thorough review by the public, and should include the conduct of public hearings after the receipt of submissions and identification of the chief issues.

YMA's concerns can be summarised as follows:

1. The review seems to place undue reliance, for some of its recommendations, on the findings of the study "Computer games and Australians today".
2. The review has apparently not taken into account recent research on contextual factors that increase risk of harm to children at different ages and stages; nor research on the impact of different forms of media violence. A more thorough exploration of the research literature is required.
3. The review proposes to combine the classification criteria for films and computer games
4. The review has signalled a proposal to introduce an R classification for computer games, thus abandoning the conservative approach adopted by the Ministers 7 years back.
5. The review places undue reliance on the provision of consumer advice lines as a means of protection of children

2. Introduction

Young Media Australia (YMA) submits the following comments pertaining to the Office of Film and Literature Classification's (OFLC) Review of the Classification for Films and Computer Games.

YMA is a not-for-profit national organisation formed in 1957.

Mission Statement: Young Media Australia (YMA) exists to promote a quality media environment for Australian children, and to raise community awareness of the needs of children and young people in relation to print, electronic and screen based media.

Who we Are: YMA is Australia's only national advocacy organisation representing the interests of children and young people in relation to print, electronic and screen based media.

What we do: YMA collects and disseminates information, conducts research, and provides advice, education and training on the impact of print, electronic and screen based media on children and young people.

How we do it: YMA represents community concerns about the impact of print, electronic and screen based media on children and young people to legislators, regulators and the media.

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YMA bases this submission on consultation with its national membership, and on its Guidelines on Children's Media which include support for the UN Convention on the Rights of the Child, with particular reference to Article 13, and Article 17. The latter says in part that "State parties shall ... e) encourage the development of appropriate guidelines for the protection of the child from information and material injurious to his or her well being ..."

3. MAJOR ISSUES IN REGARD TO THIS REVIEW

3.1 The reliance placed on the study Computer games and Australians today.

YMA expresses great concern at the apparent reliance placed on this study, given the objectives of the study, the nature of the research conducted, and the conclusions drawn from it.

The stated aims of the study

The Executive Summary of the study says that:

“The broad objectives of the research were to:

- Determine the nature and extent of aggressive content in popular computer/arcade games in Australia today.
- Find out about the aspects of particular games, which make them popular, and the role of aggressive content within this context.
- Investigate whether aggressive content is perceived as such by young players and the extent to which the playing the game mitigates the impact of such aggressive content.
- Examine the usage patterns in the computer/arcade games children and young people play in terms of age and gender differences.
- Explore the nature and level of concern regarding aggressive content in the Australian community.
- Establish whether aggressive content in computer/arcade games is perceived to have more impact than in films and TV.”

This study was commissioned to assess community views and to provide a measure of community standards in regard to computer games and their potential impact.

The study’s objectives did not include conducting a full review of the research literature in relation to the impact of computer games on the young, nor the conduct of any original research in this regard.

The study did undertake a review of the international literature, which review, in our view, was inadequate in scope and in its findings.

The conclusions drawn from the study

The only conclusion that the study actually supports is whether the people surveyed *perceived* computer games as having detrimental impacts.

However, the study’s findings have been relied on as evidence that computer game play does not cause harm. Indeed, one of the authors of the report claimed recently that a number of studies had been conducted and that these were “usually conducted by people who believe that violence in computer games will cause children to behave aggressively”. He continued “ In fact if we look carefully, we find no effect at all, or in a few studies and effect in the opposite direction. Children who have been playing the aggressive

games are actually less aggressive”. (Durkin, K on ABC TV 7.30 Report August 2001).

Further, the Executive Summary claims that “...this (report) brings contemporary understanding of the effects of computer games to that reached about television content many years ago: they may have some effects for some people in some circumstances (still to be uncovered) but they do not have pervasive effects on young people in general.”

And again, at p51 of Review documents (Appendix E), the claim is made that “nevertheless a body of work is accumulating which indicates that early fears of pervasively negative effects are not supported. Importantly, several well designed studies conducted by proponents of the theory that computer games would promote aggression in the young have found no such effects. In contrast, other studies focussed on cognitive and spatial benefits have yielded positive results”.

Other researchers’ views of the Study

The report’s findings are questioned by mainstream researchers.

YMA was sufficiently concerned about the methodology used in the study, the study’s criticisms of overseas researchers’ methodology (as part of its limited research literature review), and the claims made by the study, to make contact with Australian and overseas researchers with a track record in the area, to gain their assessments. Their comments are illuminating:

Kirsh S J (see Appendix A- Bibliography) responded (in part) as follows in regard to the statements made in the Executive Summary:

“Chapter One:

My biggest concern is that factors that could increase the impact of violent computer games was not assessed. Although mitigating factors are important to find, it is of paramount importance to identify risk factors associated with violent computer game play. I should point out that the goal of identifying “mitigating” factors was not met ...no information was presented in the summary report”.

“Second, I do not agree with the conclusions drawn based on the review of the extant literature. First, I am not aware of “well designed” studies that have found “no effects” of violent computer game play ... Third, while it may be true that “pervasively negative effects have not been identified, that does not mean that moderate effects have not been found. Furthermore the manner in which the review is written suggests that these negative effects are not worthy of reporting”

“Chapter 3: Observational study of the arcade was interesting. However, the one time assessment in an arcade doesn’t take into consideration that people play these games for years at a time. It’s like watching a person smoke a cigarette and then saying that there are not immediate health concerns ... In addition the effects of play once leaving the arcade were not assessed. It is possible that violent video game play increased the likelihood of aggression, which could last several hours. Also, the cumulative effects of

violent video game play was not assessed.”

“Chapter 4: Fighting games were preferred more than any other type of game . Interestingly, the report listed fighting games second ...”

Jeanne Funk (see Appendix A- Bibliography) responded in part that “The main perspective missing from the report is an emphasis on the developmental level of the player. There are studies that indicate that young children are immediately and directly affected by playing violent electronic games. Playing violent computer games is not cathartic; the activity is much more likely to be arousing, as well as being an ideal situation for learning ways to solve conflict ...Playing violent electronic games may have a negative impact on vulnerable individuals ...”

Lt Col Dave Grossman found himself at odds with the following statement from the report , viz “... this [report] brings contemporary understanding of the effects of computer games to that reached about television content many years ago: ...do not have pervasive effects on young people in general ..” Grossman responded that “This statement (re:TV) is patently false and is completely disputed in the US by the American Medical Association (AMA), the American Psychological Association (APA), the US Surgeon General, The National Institute of Mental Health (NIMH), the American Academy of Pediatrics (AAP) and a recent United Nations (UNESCO) study. This broad and blatantly false statement displays patent bias and a clear failure of researchers to communicate the truth about this vital subject. At this time, all the major research institutions outlined above believe that the data on media violence must be applied directly to video game violence. The basic ingredient is violent visual imagery, and we know that this is harmful to children, whether in video games or TV or movies. To say otherwise is like saying that the data on the harmful effects of cigarettes does not apply to cigars: the basic ingredient is the same in both cases”.

The justification provided in the study, for the conclusion that the potential effects of playing video games is the same as the effect of the viewing of films is to our minds unproven.

The study does not provide a basis for change

A more useful study should have been commissioned to answer the questions related to the impact video games have on young minds. After all, one purpose of the guidelines is to prevent harm to children and young people. The Durkin and Aisbett study lacks this specific goal in any of its objectives, and we therefore query its usefulness as a basis for change in the computer games system .

The present computer games guidelines state that they are to be applied more strictly than those of the classification of films and videotape. In establishing those guidelines,

Ministers were concerned that games, because of their ‘interactive’ nature, may have had a greater impact, and therefore “greater potential for harm and detriment, on young minds than film or videotape.”

What has changed since this stance in 1995? If anything, video games have become more violent.

The 1995 legislation says that , “Under this scheme, classification decisions are to give effect, as far as possible, to the principles spelled out in the Code that:

- (a) adults should be able to read, hear and see what they want;
- (b) minors should be protected from material likely to harm or disturb them;
- (c) everyone should be protected from exposure to unsolicited material that they find offensive; and
- (d) the need to take account of community concerns about; -depictions which condone or incite violence and, in particular, sexual violence; and –the portrayal of persons in a demeaning manner.”

The Durkin and Aisbett study goes some way to addressing the principles in (d) (and the results do show community concerns).

Yet it is only logical and a precursor that (b) needs addressed. How can any reform of the guidelines or legislation be considered before the question as to whether violent computer games cause harm or disturb children is answered.

If the research in the area is, as Durkin claims (see Exec summary), so sparse, then no move should be made to reform the legislation until such fundamental research is carried out. The concern expressed by the Ministers in 1995, that interactive games may have greater impact, is still valid. This confirms their cautious approach was right. Research found thus far gives strong indicators of harm resulting from interactive violent computer games.

YMA is concerned that the OFLC’s commissioned study is not seen as comprehensive or balanced. It is vital that the OFCL be seen to be keeping an open mind until there is positive evidence of no harm.

YMA draws the OFLC’s attention to the Australian Psychological Society Position Paper on Media representation and responsibilities” (2000) at 3.2 “Violent video games”, viz “newer forms of media, including those involving video games and the internet, give the child an increasingly active role. Many of these have violence as a central theme, and the child needs to perform violent acts to achieve the end goal of the game ... Since the child is actively encouraged to identify with the aggressive “hero” and to rehearse aggressive acts, and is rewarded for doing so , it seems likely the processes identified in social learning theory and in models involving “priming” and “scripts” will be even more salient. Research is starting to document that play with violent video games does result in higher levels of aggressive behaviour, ,, physiological arousal ..., and aggressive mood”.

3.2 The role of research in framing classification criteria

From its extensive program of collection of information and research over many years, YMA is firmly of the view that there is much research that could have been usefully applied in this Review and appears not to have been.

Further, there is recent and compelling evidence of increased risk to children from frequent exposure to depictions of violence on screen, such that children will be more likely to choose to use violence in a conflict situation, be less sensitive to the use of violence by others, and to develop a “mean and scary view of the world”. Recent research gives us very good indicators of the contexts for and the types of media violence that increase those risks. Application of those findings would improve the classification guidelines.

Research, and research reviews, which YMA believes should be utilised in this review includes the Australian Psychological Society (2000), National Television Violence Study (1997, 1998), Cantor Joanne (1999), Anderson, Craig (2000), Paik H and Comstock G (1994), Josephson, Wendy (1995), Wilson, Barbara (1990). Copies of these studies are supplied at Appendix B.

In addition, the National Television Violence Study identifies contextual factors that increase the risk of harmful effects of media violence. (See Appendix B)

The need for a public hearing or research forum

YMA is of the view that a research forum or a public hearing should be held before this review is finalised, so that a broader view of the status and nature of the research in this field is gained by the OFLC, beyond that presented in “Computer games and Australians today”.

Effects of violent media

Recent studies have shown strong indicators of harm from violent computer games. (see Anderson, Craig and Bushman, B (2000) This is not reflected in the proposed guidelines, nor in the Report.

For example, Craig Anderson argued on ABC Radio National’s Background Briefing program Media Violence: Pushing the Ratings, broadcast on July 22nd, “The effect of media violence on aggression in general is bigger than the effect of lung cancer; it’s bigger than the effect of calcium intake on bone mass; it’s bigger than the effect of homework on academic achievement, or the effect of asbestos exposure on lung cancer. These are all the effects that people generally understand to be true, real effects that are large enough to be important and large enough to worry about.” See HYPERLINK "<http://www.abc.net.au/rn/talks/bbing/stories/s333630.htm>"

Anderson has also explained (email to B Biggins) that “if society requires experimental evidence that violent video games causes increases in homicide rates, then there will never be sufficient evidence. Of course, if these same criteria were used in the cigarette/lung cancer debate , we still would believe that there is no solid evidence that smoking causes lung cancer. There never has been an experimental study in which children were randomly assigned to become smokers or non smokers, with their lung cancer death rates examined 60 years later.”

Previous Govt recommendations on violence research

The role of research has been reinforced by the Ministerial Committee set up following the Port Arthur massacre by the Commonwealth Government in 1996. The Committee reviewed the portrayal of violence in the media. The Committee decided to put in place measures to ensure that the wide range of issues raised in public submissions could be further pursued, and that there be a means for the on-going monitoring of public concerns. The Government accepted the Committee’s recommendations which included the following:

- specific research should be commissioned to identify and investigate ways of assisting groups most at risk from the portrayal of violence. Public education campaigns by industry and in schools should also be continued. (The OFLC study did not canvass this)
- An Industry Code of Practice for Video and Interactive Software Retailers should be introduced;
- “.The Committee did not make a specific recommendation about computer or video games as the issue had received little detailed public attention in the public submissions and because the classification guidelines for computer and video games are already more restrictive than those for film and video (eg no R material is allowed)”

3.3 A unified classification system is not desirable

YMA is strongly supportive of the use of a common set of classification symbols across all media, but does not support the view that it is desirable to combine the classification criteria for all media, and in particular, not for films and computer games.

YMA believes that the research literature, as well as common sense, shows that the nature of the experiences are vastly different. The interactive element of video games makes the game playing experience different and raises special concerns. There should therefore be a separate and different set of criteria for classifying interactive media. (See for eg Grodal (2000) Appendix A).

Anderson (personal email to B Biggins) argues that “an evaluation system for video games must take into account the *active control possibilities* that are unique to video games. For example if a sports video allows the game player to harm characters by running them into walls or dropping them on their heads, that has to receive a more

restrictive rating than a sports video game that doesn't have such instances.”

YMA acknowledges that new media forms are combining both interactive and non interactive elements. YMA recommends that if a product has both interactive and non interactive elements then the product should be classified by applying the criteria relevant to each form and the highest classification applicable is retained.

3.4 The protection of children

YMA is strongly of the view that the classification systems for films and computer games could be strengthened considerably, and be made much more helpful for parents, if they were to incorporate an approach more directly related to children's ages and stages of development.

At present, the system revolves around the age of 15 years, and the use of G and PG symbols. There are some, but not many, films which can safely be said to be OK for all children under the age of 15 years. Further, the symbol PG (and often separated from any consumer advice lines) is not very helpful to parents, who do not know what they have to guide about, and in relation to which age groups of children.

Further, there has, in the past, (and indeed it is evident in the Review papers) been some reliance placed on the use of the consumer advice line “Some scenes may disturb very young children”, to warn parents that a film may not be suitable for under 8 year olds. While useful in some limited situations, this does not provide adequate protection. See section 3.6 below for more detail on this issue.

YMA believes that an age based system which indicated broadly which age groups of children would be likely to cope with the film without harm or disturbance, would be much more understandable to parents.

The research literature provides a sound basis for such an approach.

(See for eg, Cantor, Joanne 1999, and Josephson W 1995, in Appendix B, Australian Psychological Society)

Cantor argues (personal email to B Biggins) that children under age 8 are especially vulnerable, for the following reasons:

- 1) difficulty with fantasy-reality distinction. What they see is real to them
- 2) They are extremely responsive to visual images, especially those that are graphic, grotesque and gory. Even those shown only for a few seconds
- 3) they have relatively real world sophistication with which they might put what they see in perspective
- 4) they have great difficulty using information provided to them to cast what they are seeing in a different light (ie less threatening or something that shouldn't be copied)

It is worth noting that the newly established Netherlands system is based around four different age groups of children . We quote from the explanatory document:

“The NICAM system divides children into four age groups. Children up to 7 years old, between 7 and 12, between 12 and 16 and over the age of 16. These age groups are identified in child psychology as important phases in the development of the child. A number of factors play a role in this. In the first place, there is the distinction between fantasy and reality. In general this distinction is not so obvious for children under seven years of age. For children of up to seven, monsters and ghosts can be a part of reality. The way in which specific events are connected is the next important factor. The older children are, the more capable they become of making connections between events which do not follow each other directly. Thirdly, the amount of knowledge children have of the world is important. That knowledge determines the extent to which children can decide whether certain images are realistic or not. Finally, there is the interest in interpersonal relations. The older children are, the more interested they become in information about how people interact in different kinds of situations. In some cases, sex for instance, this information is available mainly through the media. In this area, the influence of the media on young people’s ideas is relatively great. The crucial question is to what extent images are credible or realistic. The influence of images which are perceived as unbelievable or even ridiculous is much less damaging.” (“NICAM a new classification institute in the Netherlands”” www.nicam.nl)

YMA strongly recommends:

- That the G classification (suitable for all under 15 years) be retained.
- The introduction of a G8 classification to indicate that the material is suitable for a child 8 years and over.
- The introduction of a G13 for material which can adequately be handled by those 13 years and over.
- Consequent on the acceptance of these 2 new classifications, YMA recommends the removal of the PG and M classifications.
- The MA 15+ and R 18+ categories should be retained with legal force.

3.5 The proposal for the introduction of R rated computer games

The draft guidelines propose that an R classification be introduced for computer games. This constitutes a considerably more liberal approach than that adopted in 1995, and one which promotes the freedom of adults to see and play what they want.

YMA has two major concerns about this proposal.

The problem of enforcement.

If an R rating is introduced then there is the risk that children will gain access to a more extreme category of material. It is evident that the state- based enforcement legislation has not been effective in keeping R rated home videos out of the hands of children.

The Act requires both that adults be free to see, hear and read, and that children be protected from harm. This balance can be seen to be achieved in relation to R rated cinema films, where there are many obstacles to children gaining entry.

However, there are few if any, practical constraints on children's access to home videos. YMA is of the view that the R classification for computer games will compound this existing problem (in relation to home videos) for parents, in being able to protect their children from exposure to material that the law says is harmful for them.

Although a video game may not be intended for a minor the video game entertainment industry has always been the domain of the young. R rated computer games may not be targeted to youths, but, by their very nature they will be of interest to youths and exist within a youth dominated market. It is similar to imagining a playground for children that has within it a sectioned off area for mature adults. This area is likely to be visible and accessible even though it is off limits. It is obviously not an ideal arrangement.

The dilemma is how to limit children's access to material that exists within an entertainment area that they dominate. YMA is of the view that if the computer games classification were expanded to include R, the Australian community would be flirting with real dangers especially since the enforcement measures and monitoring of the adherence to the classification rules and regulations is weak.

If an R classification were to be introduced for video games then an obligation rests with the OFLC to ensure that the enforcement rules and regulations are able to be met. These reforms can not be introduced without respect to the realities of the enforcement system. State police forces presently appear not to police state-based enforcement legislation.

YMA therefore seeks the provision of a statement of the safeguards that will be put in place if this proposal were to be adopted, and independent review of their efficacy.

Increased risk from computer games

The arguments in favour to allow R rated computer games seems to be premised on the view that computer games are not harmful, and that interactivity does not increase the harm.

YMA has to some extent tackled this view in 3.2 and 3.3 above, but reiterates its view that the proponents of the view that there is no proof of harm from computer games relying on a very limited, and somewhat uninformed, view of the research literature.

3.6 Consumer Advice Lines

Consumer advice lines provide useful content-based information about the films, videos and computer games.

However, the usefulness of consumer advice lines is limited by the fact that their use is not always required, and further, even when required, this does not happen.

Consumer advice lines are required to be printed on the covers of home videos and on covers of computer games. (Determination by Desmond Clark, 2000)

However, in relation to cinema films, the consumer advice lines are required to be printed in newspaper advertisements, only when the area of the advertisement is over 150sq cms. Many such advertisements are under this in size, and as a consequence, valuable information in regard to why a film is PG, or for eg, advice in regard to a G film that “some scenes may disturb very young children”, is lost. This is why YMA believes that the *classification symbol* must incorporate all the essential advice needed for parents to make an informed choice. ie, a G8 classification symbol would contain that essential advice.

The requirements are not observed

Further, many press advertisements which are over 150 sq cms in size do not carry the consumer advice lines, or use a font too small to be clear and legible. In other words the OFLC’s requirements here are clearly being ignored. YMA presented evidence of this widespread disregard for the law to last year’s OFLC Inquiry into the advertising of cinema films. YMA has also complained to the federal Attorney General’s Office and to the OFLC’s Community Liaison Officers and to the Motion Picture Distributors Association *and* still the practice continues. YMA has a continuing file of breaches.

It is evident that there are insufficient enforcement measures, infringement penalties and general regulation to ensure that the guidelines are complied with.

YMA is therefore unable to support any proposal for the protection of children that relies on the use of consumer advice lines (such as utilising a consumer advice line in preference to introducing a G8 classification).

Consumer advice lines need improvement

YMA contends that there is a further problem with the present use of consumer advice lines. This concerns the use of lines such as, “medium level violence”, “high level violence”, etc. At present these “levels” are relative to the classification given to the item. In other words, “medium level violence” in an R film is higher than “medium level” violence in an M film.

As such they are confusing to the public, who understand them to be relative to some overall scale of violence.

YMA recommends that the use of such levels be discontinued, and be replaced by more useful descriptions such as “strong violence”.

4. ISSUES FOR COMMENT

Issue 1: Should there be a uniform national approach, including a single set of classification standards, for the classification of entertainment media?

We believe that there should be a uniform national approach for the classification of entertainment media, ie there should be one set of classification symbols for all media. This assists in community understanding of the symbols.

However, we do not support the use of the same set of classification guidelines and standards to determine the classification, across all media.

We do support the use of the same classification guidelines for determining the classification of all forms of film, however delivered, (including television).

We take the view that computer games (and other forms of interactive media) should be classified using a different set of guidelines and standards, as the experience involved in these is significantly different. See 3.3 above.

Related questions include:

1.1: Should interactive products, such as DVDs, computer games and online content, be classified in the same way as cinema films and videotapes?

Our view is that they should not. See 3.3 above.

In regard to the arguments on page 10 of the discussion paper, we disagree with (a), and (c), noting in regard to (c), re the size of the screen, that this argument has not previously been advanced or accepted in relation to films and home videos.

YMA strongly supports arguments (d), (e) and (f) at page 10.

1.2: Should the current system for classifying computer games be retained?

Our view is that the more restrictive approach to classifying computer games is justified (see 3.5 above), but that there may be merit in adjusting some of the present criteria used in some classification categories.

See page 11 of the discussion paper, we agree with argument (a). Argument (d) has some truth as we have not yet managed to keep MA and R rated home videos out of the hands of children.

YMA strongly disagrees with arguments (f) and (g), (see 3.1 and 3.2 above).

Issue2: Should there be a single, consistent set of classification symbols and categories?

See 3.3 above for our argument here supporting the use of the same set of symbols denoting classification, across all media, but not supporting the use of the same criteria to assign the classifications, across media formats.

We note here that the review is proposing a single set of classification symbols and criteria, and that provision has been made for a future R classification for computer games by drafting the R classification standards in a way that would accommodate games. (Though the comments at last para p11 and 3rd para p13 are in apparent conflict).

A further inconsistency occurs where the draft makes the category of G8 only available for computer games and PG only applicable to films and videos.

We suggest that the classification review needs to rethink its approach to effectively signalling problematic content for under 8 year olds, and under 12/13 years, as per our section 3.4 above.

In this section the Review questions include:

2.1: Should there be an age based approach to naming classification categories, similar to the G8+ category for computer games?

Yes. See our section 3.4. In regard to Page 12 of the discussion paper, we agree with argument (a), but recommend the introduction of G 13, and the removal of PG and M.

We strongly disagree with the argument (f) which places reliance on the use of consumer advice lines to protect the young. YMA's extensive experience has been that consumer advice is often not included in press advertisements. See 3.6 above.

2.2: Should there be a special children's category 'C' with specific classification criteria?

At first sight this might be appealing, but would still leave the problem of what age of child is C directed at? "C" on TV has a special meaning (quality product directed at 6-12year olds, and meeting particular requirements in regard to technical and artistic production)

The usefulness to parents of the C classification is questionable given this classification will only apply to programs that are considered to be of superior production quality...and not necessarily suitable for very young children. It is therefore doubtful that adding a 'C' classification will assist parents in any significant way. It would be more helpful to

parents if the age appropriateness and content was stated on the label and given a G8 classification. See 3.4 above.

YMA does not support this proposal. See page 12 of the discussion paper, we disagree with (a) in its reliance on a C category, and agree with argument (d).

2.3: Should there be an ‘R’ classification for computer games?

There has been a strong industry push for an R classification for computer games (and even for an “X” by that industry). This push promotes adults’ freedom to see, hear etc, but seems not to recognise the practical difficulties in enforcement, such that children are protected.

A search of the OFLC’s web page under “Classification database” using a search on computer games and RC category since 1990 produces a list of those computer games which have been classified RC (Refused) in that time. Many of these titles may become available in an R category.

YMA is not convinced that effective protection mechanisms exist to keep R rated games out of the hands of children. See our section 3.5 above.

In regard to page 13 of the discussion paper, we disagree with (a) and (d) , (see our section 3.3 above), and support argument (e).

Issue 3: The draft combined guidelines contain new classification concepts, definitions and explanations relevant to convergent media. Are these new concepts, definitions and explanations going to improve the current relevance of the guidelines and provide assistance in understanding and applying the classification system?

YMA does not support the combination of the guidelines (see our section 3.3 above), and therefore is unable to support many of the proposed changes.

However, our view here is that while some of the new concepts are good, there are aspects that are lacking, especially in relation to:

- **the context of violence** . See National Television Violence Study extract supplied at Appendix B. The present criteria take into account factors such as frequency, impact, detail, but not factors such as who did the violence, whether it was rewarded, whether there were few real life consequences. Such contexts are shown to increase the risks that violence will be imitated, be used a preferred means to solve conflict, or desensitise, etc.

- **the concept of interactivity**, first person shooter, the issue of rewards for being best at the violence
- **YMA has considerable concerns around the issue of “stylised” vs “realistic” violence.** The criteria frequently state that “in stylised treatments, depictions of violence may contain more detail and be more frequent if this does not increase the impact”. YMA holds the view that violence in horror or action genre movies should not be seen as having less impact than violence in realistic movies. Even adults are susceptible to the techniques used in horror movies. Children may also understand the horror genre, but that doesn’t mean that they are not left with residual effects. YMA’s research “Kids and the Scary World of Video” clearly demonstrates this. (See Appendix A Bibliography).

Issue 4: Are the standards in the draft combined guidelines clear, appropriate and adequate?

See Issue 3 above. In addition there is the issue of portrayals of violence that tend to “socialise” children into the acceptance of the use of violence as a way to solve conflict. This concept is not presently “caught “ in the guidelines.

In regard to particular classifications, YMA comments briefly as follows:

“G” YMA does not support the view that ‘some elements in G may be very challenging to very young children.

Stylised violence or unrealistic characters should not be treated differently in G, from real characters or realistic violence.
(See Cantor et al Appendix B)

“G8” The distinctions between stylised and realistic violence are not supported.
Drug use should not be permitted

There should not be elements that require parental guidance in the G8 category.

“PG” Stylised violence should not be treated differently from real violence in this category.

Imitability should not be permitted in this category (consumer advice lines not useful)

“M” As for previous comments re real vs stylised violence
The contextual elements that increase impact (as per NTVS Study) are not used here.

Issue 5: Are there other issues related to the effective operation of the guidelines which should be considered in the review?

YMA has dealt with these in our section 3 above.

CONCLUSION

YMA would welcome the opportunity to discuss these issues further with the OFLC, especially in a public hearing.

YMA urges the OFLC to conduct or support the conduct of an extensive parent and industry education campaign to ensure that the new systems of classification are fully understood, implemented, and used.

**Barbara Biggins OAM
President
Young Media Australia
October 2001**