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Submission to the Office of Film and Literature Classification

Review of Determined Markings

September 2004

Enquiries about this submission should be directed to:
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Introduction to YMA

Young Media Australia is a unique national community organisation whose members share a strong commitment to the promotion of the healthy development of Australian children. Their particular interest and expertise is in the role that media experiences play in that development.

YMA is committed to promoting better choices, and providing stronger voices in children's media.

What we do

YMA:

- collects and reviews research and information related to children and the media
- provides information and advice on the impact of print, electronic and screen based media on children and young people
- advocates for the needs and interests of children in relation to the media
- conducts and acts as a catalyst for relevant research.

How we do it in 2004

YMA:

- provides information to parents and caregivers via the **Young Media Australia website** www.youngmedia.org.au with over 60 topics relating to children and media use (including movie reviews) These topics are also available in hard copy format.
- provides advice and information via a 24 hour a day / seven days a week , national freecall **Young Media Australia Helpline 1800 700 357**. Helpline operators come from a strong child development and parenting perspective and can provide callers with research based information about the media. They can suggest strategies both for creating healthy media use and minimising harms.
- **represents community concerns** about the impact of print, electronic and screen based media on children and young adults to legislators, regulators and the media.

Who we are

YMA:

- is a national not-for-profit community organisation, structured as a company limited by guarantee
- is registered for the GST, has tax deductible status and is a Deductible Gift Recipient (DGR)
- has a national Board representative of all Australian states and its corporate members
- has a comprehensive organisational membership which includes ECA (Early Childhood Australia (formerly AECA Australian Early Childhood Association), ACSSO (Australian Council of State Schools Organisations), AHISA (Association of Heads of Independent Schools of Australia), AEU (Australian Education Union), SAPPA (South Australian Primary Principals Association), Federation of NSW P&C (Parents & Citizens), Mothers' Union in Australia, Gowrie Child Centres.

Submission on the review of the classification markings for film and computer games

Young Media Australia (YMA) strongly supports the value of the classification system.

However, YMA believes that consumer understanding and use of the system can be significantly improved, and welcomes this opportunity to offer its insights from many years of involvement in parents' perceptions of the system.

1.1 To what extent do the current markings effectively convey classification information?

Consumers currently are not given the opportunity to make the most of the system because classification markings are not as effective as they could be, in relation to their presentation and explanation of their meanings. They are often not clearly visible, and indeed may be absent when they are legally required to be present. Further, their relevance and significance can be downgraded when reviewers of films and computer games fail to mention the classification of a product.

1.2 Are the symbols (the shapes with letters) useful?

YMA believes that the symbols are useful for identifying classification.

1.3 How can the current markings be improved?

The current classification markings could be improved by always including a classification description, which would ensure consumers are always being informed about the content.

1.4 Would colour coding the symbols improve their visibility?

In most situations, colour coding the symbol would improve visibility. However this would not be of any use in most press advertisements.

1.5 Would colour coding the symbols improve consumers' understanding of their meaning?

Colour coding symbols would probably improve the consumers' understanding of the code. This would be particularly so if the colour coding were used to group different kinds of classifications eg advisory and restricted (see below). However as colour coding would not be of any use in press advertisements, the symbol would have to be clearly recognisable without the colour coding.

1.6 How could the markings be designed to differentiate between advisory and restricted categories?

Advisory markings and restricted markings could be differentiated by colour, and also differentiated by the wording used in the description. All Restricted categories should use the word "Restricted" in its description. Colour coding could be as follows:

Marking	Colour	
G	Green	Symbolising suitable for all
PG	Yellow	Symbolising that there is an advisory warning for people under 15
M		
MA 15+	Red	Symbolising that the category is restricted to people over 15 years of age
R18+	Black	Symbolising that the categories are restricted to

X18+

people over 18 years of age

1.7 Do the current classification descriptions provide adequate information about the classification types?

YMA does not believe that the current classification descriptions provide adequate information about the classification types.

The descriptions of the classification symbols can be significantly improved, particularly in relation to the likely impact and content of PG, M and MA movies/ games. For example, the letters PG may be well understood to mean Parental Guidance, and the letter M to mean Mature, but the present descriptions do not effectively convey their impact and content. Further the differences between M and MA are not widely understood.

The descriptions of the Restricted categories should include the word "restricted". The descriptions of the PG and M categories should make clearer the likely level of content of the film or video game, so that the consumer can make an informed decision.

1.8 How could the classification descriptions be improved?

We believe that the classification descriptions should be improved as follows. The wording we recommend is designed to provide a clearer understanding of each category's likely impact and content, rather than just an explanation of the symbol itself.

G	Suitable for all ages (There should be no further consumer advice line that follows this classification, including and especially any advice line that qualifies the statement that the product is suitable for all ages)
PG	May confuse or upset children under 15 years
M	May disturb children under 15 years. Alternative: Not recommended for children under 15
MA 15+	Restricted to 15 years and over
R 18+	Restricted to 18 years and over
X 18+	Restricted to 18 years and over. Real sex.

1.9 Is the current X warning label useful for consumers?

The current X warning label does not advise consumers that there is actual sex. YMA is unsure that the public appreciates that "explicit" means "real", as opposed to "looking like it is".

YMA also believes that the wording "may disturb children", while true, can equally be applied to lower classifications. The wording that indicates that showing this material to those under 18 years is a crime, is surely implicit in the label that says the material is "restricted".

1.10 Would it be useful to apply similar warning labels to other products containing restricted material?

Yes, it would be useful to apply similar warning labels (ie "restricted to those over 15/18 years, and "may disturb children") to other products containing restricted material.

2.1 What parts of products should display determined markings?

Determined markings should be displayed on the video/ disc, video/disc cover, there should be an on-screen display of the marking, and there should also be a determined marking on the outside of a boxed set.

2.2 What products should display determined markings on the product itself?

DVDs, videotapes and computer games should all display the determined marking on the product.

2.3 Do different types of products require multiple marking points on packaging?

The packaging should contain multiple markings, which should appear on the same place on each product. The markings should appear on the back, the front and the spine of the product.

2.4 What types of advertisements need to display determined markings?

Determined markings should be placed on all advertisements, and in particular, on merchandise sold in relation to the film or computer game. Product related to films or computer games and marketed as spin-offs, constitutes advertising for the film/games (for eg, see Spider-man 2 product labelled as "official movie merchandise").

Determined markings should also appear on television advertisements for the film or computer game, or television advertisements for the merchandise. Determined markings should also appear on press reviews and should be stated on cinema telephone information lines. YMA agrees that markings should also appear on all of the items mentioned in as examples in question 2.4 of the discussion paper, and question 10 of the questionnaire.

2.5 When would it be impractical to position markings on the bottom of each product?

2.6 When would it be impractical to position markings on the bottom of each advertisement?

YMA believes that it is highly desirable to position markings on a designated lower strip of covers and advertisements, so that they are in a consistent place, clearly visible, and of sufficient size to be read easily (particularly by the visually handicapped).

For example, the present requirement in press ads over 150sq.cm in area, for the classification symbols and consumer advice lines to be at least 2mm in height, is often ignored, or they are used in a very light type against unsuitable background art, and are placed in variable positions within the ad. This makes them hard to

find, and often difficult to read. They should be placed in a consistent and clear space designated for the classification markings.

2.7 What size or proportion of space on an item do the markings need to be in order to be visible?

YMA is of the view that the proportion of space should not be less than 15%.

3.1 Should the determination include the use of a classification type letter without its symbol? If so under what circumstances?

YMA believes that the classification letter should not be used without its symbol. The symbols provide to users with literacy problems, information that would not be conveyed otherwise.

3.2 Depending on space and other possible limitations, what kind of hierarchy of markings should there be?

YMA believes that levels 1, 2 and 3 of the hierarchy in question 3.2 should be used. Level 4 should not be used, as YMA does not consider that the classification letter should be used without the symbol.

3.3 Are there different combinations of the markings that could be effective in conveying the classification information?

YMA considers that the combination of markings we suggested in question 3.2 are adequate and will be effective.

3.4 Where should the consumer advice be positioned in relation to the other components of the markings?

The consumer advice should be positioned after the symbol. The advice should always be linked to the symbol and should always be legible.

3.5 How could the consumer advice be made more prominent?

The consumer advice would be made more prominent if it was always situated next to the symbol. The size of the advice should always be such that it is easy to read.

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Young Media Australia welcomes the opportunity to make these brief comments on these matters, and is happy to provide further information on request.

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for Young Media Australia, September 2004.