

via hello@onlinesafety.org.au

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To whom it may concern,

Consolidated Industry Codes of Practice for the Online Industry

The Eros Association is Australia's industry association for adults-only retail, wholesale, media and entertainment. We write in relation to the *Consolidated Industry Codes of Practice for the Online Industry (Class 1A and Class 1B Material)*.

We welcome the designation of "class 1C material" as a subcategory of class 1 material that is comprised of particular online pornography, including fetish material. This acknowledges the relative severity and potential for harm associated with different types of material.

This definition of this material is, however, reliant on the National Classification Code and Classification Guidelines, which are woefully out of date. We understand that the Department of Infrastructure, Transport, Regional Development, Communication and the Arts has finalised its report following the review of classification regulation and that the report proposes significant legislative changes.

The new Government has not yet been provided with a comprehensive briefing on the report, therefore we recommend that further development of these Codes await the release of the report and any legislative changes.

Nevertheless, we welcome the statement that these Codes do not apply to class 1C material. We are concerned, however, by the statement that "industry participants may use different terminology to describe... class 1C material for different audiences." In our view, consistent terminology should be used across the Codes to avoid scope creep and confusion. We recommend that this clause be deleted.

The Eros Association welcomes the opportunity to discuss with you further our views on these issues. If there is any way we can assist, please don't hesitate to contact us.



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