

Submission: Modernising and Harmonising Classification Standards

Australian Government, Department of Infrastructure, Transport, Regional Development,
Communications, Sport and the Arts

29 May 2026

About Collective Shout

Collective Shout (www.collectiveshout.org) is a grassroots campaigning movement challenging the objectification of women and sexualisation of girls in media, advertising and popular culture. We target corporations, advertisers, marketers and media which exploit the bodies of women and girls to sell products and services and we campaign to change their behaviour.

More broadly, we engage in issues relating to all forms of sexual exploitation, including the interconnected industries of pornography, prostitution and trafficking and their intersection with violence against women and girls [VAWG]. We work to end the growing trade in women's and child sex abuse dolls and replica child body parts,¹ the sale of children for Live Distant Child Abuse [LDCA],² and AI-enabled Image Based Sexual Abuse [IBSA] including sexually explicit deepfakes made using nudifying and undressing apps and web programs, including most recently xAI's Grok (Collective Shout, 9 Dec 2025; Tankard Reist, 23 Jan 2026; Collective Shout, 25 July 2024; Roper, 13 June 2024).³

We have extensively documented the harms of sexualisation, sexual exploitation and VAWG over the last 16 years, including in the following:

- Submission to the Amendment to the Online Safety (Basic Online Safety Expectations) Determination 2023⁴

¹ Roper, C. (2022). Paedophilia, Child Sex Abuse Dolls and the Male Sex Right: Challenging Justifications for Men's Sexual Access to Children and Child Sexual Abuse Material' in K Richardson & C. Odland, (eds) (2022). *Man-Made Women: The Sexual Politics of Sex Dolls and Sex Robots*. Palgrave MacMillan; Roper, C. (2022). *Sex Dolls, Robots, and Woman Hating: The Case for Resistance*. Spinifex Press; Roper, C. (09 Jan 2020). "Better a doll than a real child." The spurious logic used to justify child sex dolls. *ABC Religion and Ethics*. <https://www.abc.net.au/religion/spurious-logic-used-to-justify-child-sex-dolls/11856284>

² Tankard Reist, M. (2017). Why are Australian Telcos and ISPs enabling a child abuse pandemic? *ABC Religion and Ethics*. <https://www.abc.net.au/religion/why-are-australian-telcos-and-isps-enabling-a-child-sexual-abuse/10095644>

³ Collective Shout, 9 Dec 2025; Tankard Reist, 23 Jan 2026; Collective Shout, 25 July 2024; Roper, 13 June 2024.

⁴ Collective Shout (Feb 2024). Amendment to the Online Safety (Basic Online Safety Expectations) Determination 2023. https://www.collectiveshout.org/amendment_to_the_online_safety_base

- Submission to Draft Online Safety (Relevant Electronic Services and Designated Internet Services – Class 1A and 1B Material) Industry Standard 2024⁵
- Submission to the previous inquiry on this matter: Draft Consolidated Industry Codes of Practice for the Online Industry (Class 1A and 1B Material)⁶
- Submission to Select Committee on Social Media and Online Safety 2022⁷
- Submission to eSafety Consultation on the implementation roadmap for a mandatory age verification (AV) regime relating to online pornography 2021⁸
- Submission on Harm Being Done to Australian Children Through Access to Pornography on the Internet to the Senate Environment and Communication References Committee 2016⁹
- Submission to the Inquiry into Age Verification for Online Wagering and Online Pornography 2019¹⁰
- Submission to the United Nations’ review Children’s Rights in the Digital Environment 2020¹¹
- Submission to the inquiry into Law Enforcement Capabilities in Relation to Child Exploitation 2021¹²
- Numerous other publications and commentaries¹³

We agree that reform of Australia’s Classification Scheme is needed. We have previously made this case in previous relevant inquiries:

⁵ Collective Shout (22 Jan 2024). Submission to Draft Online Safety (Relevant Electronic Services and Designated Internet Services – Class 1A and 1B Material) Industry Standard 2024. <https://www.collectiveshout.org/tags/submissions>

⁶ Collective Shout (Oct 2022). Submission on Draft Consolidated Industry Codes of Practice for the Online Industry (Class 1A and Class 1B Material). https://www.collectiveshout.org/submission_draft_codes_class1a_1b

⁷ Collective Shout (Jan 2022). Submission to Select Committee on Social Media and Online Safety. https://www.collectiveshout.org/submission_social_media_online_safety

⁸ Collective Shout (2021). Submission: eSafety Consultation on implementation roadmap for a mandatory age verification (AV) regime relating to online pornography

⁹ Collective Shout (2016). Harm being done to Australian children through access to pornography on the internet: Submission to the Senate Environment and Communications References Committee. https://d3n8a8pro7vnm.cloudfront.net/collectiveshout/pages/1019/attachments/original/1457408234/CS_Submission_Harms_of_Pornography_Inquiry_March_2016.pdf?1457408234

¹⁰ Collective Shout (2019). Submission to Inquiry into Age Verification for Online Wagering and Online Pornography. https://www.collectiveshout.org/submission_to_inquiry_into_age_verification_for_online_pornography

¹¹ Collective Shout (30 Nov 2020). UN Submission: Children’s Rights in the Digital Environment. https://www.collectiveshout.org/un_sub_children_digital_rights

¹² Collective Shout (20 Aug 2021). Submission: Law Enforcement Capabilities in Relation to Child Exploitation. https://www.collectiveshout.org/submission_law_enforcement_child_exploitation

¹³ For example, see Tankard Reist, Melinda (2016). Early sexualisation and pornography exposure: the detrimental impacts on children, *Australian Childhood Foundation blog*.

<https://professionals.childhood.org.au/prosody/2016/07/melinda-tankard-reist/>; Tankard Reist, M. (2016). Growing Up in Pornland: Girls Have Had It with Porn Conditioned Boys, *ABC Religion & Ethics*.

<https://www.abc.net.au/religion/growing-up-in-pornland-girls-have-had-it-with-porn-conditioned-b/10097244>; Tankard Reist, Melinda (2018). Never Again? Addressing Sexual Violence Must Include Pornography, *ABC Religion & Ethics*. <https://www.abc.net.au/religion/never-again-addressing-sexual-violence-must-include-pornography/10094568>

- Submission on Modernising Australia’s National Classification Scheme: Stage 2 Reforms (2024)¹⁴
- Submission to the Review of Australian Classification Regulation (2020)¹⁵

The shift from the concept of ‘offence’ to one of evidence-based harm is a promising direction, but believe this can be strengthened, especially in regard to sexual content and harm.

We urge the Federal Government to maintain a firm and uncompromising stance against all fictional sexualised depictions of children, with no exceptions granted for ‘artistic merit’ or ‘context’. Just as children cannot consent to sexual activity, there can be no artistic or contextual defence for their sexual depiction.

Regarding fetish content (recommendation C08), we will provide extensive evidence to support the current prohibition or to consider expanding it. The National Classification Scheme should explicitly recognise that fetish and kink content is increasingly violent, humiliating and painful, and disproportionately harms women and girls. Insofar as the current reform process aims to better distinguish between illegal content and consensual adult material, our submission highlights how the most popular genres of pornography act to undermine consent.

Recommendations from the consultation document

C01 Introduction of a PG13 rating

Australia’s current ratings system, while generally recognised by consumers, is not sufficient for parents and carers to make informed decisions. It also lags behind the majority of other countries which have already implemented age-based categories, or at least have categories younger than age 15. PG has historically been a poor guide for parents seeking appropriate media for their children.

Children and Media Australia (formerly Australian Council on Children and the Media), researching Australian parents’ perspectives on the current ratings system, found more than 75% of Australian parents of young children say the PG category is too broad, and 88% think an age-based system would be more useful to them than the present one.¹⁶

The system used in The Netherlands (Kijkwijzer)¹⁷ educates on content that may be harmful to children. Its governance includes academic advisory panels and an Advisory Committee comprising representatives of stakeholder groups. The system “draws on expertise from a range of perspectives

¹⁴ <https://www.collectiveshout.org/submission-national-classification-scheme-stage-2>

¹⁵ <https://www.collectiveshout.org/submission-to-review-of-australian-classification-regulation>

¹⁶ Australian Council on Children and the Media (2019). *Australia’s national classification scheme has reel problems: Parents say PG is a ‘poor guide.’* <https://childrenandmedia.org.au/assets/files/accm-2019-survey-media-release-final.pdf>

¹⁷ <https://www.kijkwijzer.nl/en/>

while still having an ear to community concerns and values.”¹⁸ As Children and Media Australia note, this system is scientifically-based, evaluated frequently, and well received by parents.¹⁹

Collective Shout was co-signatory to a letter, submitted to the previous inquiry, from leading organisations and professionals working on behalf of Australia’s children, young people and families. This letter urged the introduction of an updated ratings system based on stages of child development, incorporating more detail to enable informed decision making. We called for a new system that provides evidence-based guidance for parents with children of different age groups under 15.²⁰ We commend this proposal to you for consideration in this next round of reform.

We support recommendations to introduce a new evidence-informed age-based rating system with the following categories: G (all), 5+, 9+, 12+, 16+, and 18+.

C06 Publications to adopt the rest of the classification system

We strongly support this recommendation, particularly for manga, graphic novels depicting child sexual abuse material [CSAM], apps, and computer games. These are forms of media parents are discovering are often not safe for their children to use.

The following examples demonstrate why industry self-regulation with reactive oversight is not a reliable way to ensure children are not exposed to harmful content.

Manga and Graphic Novels depicting CSAM

The previous inquiry rightfully targeted publications that contain CSAM. The exploitation of children to generate CSAM is a global epidemic and is published and broadcast through an increasing range of mediums.

National Center for Missing and Exploited Children (NCMEC) publishes the annual CyberTipline Report on suspected child sexual exploitation reported by the public and by electronic service providers. The latest report, published in 2024, includes 62.9 million bundled files (consolidated into 29.2 million separate incidents). The report documents a 192% increase in online sexual enticement of children and a 55% increase in child sex trafficking reports.²¹

CSAM in books feeds the growing demand for this material for child sexual exploitation material.

¹⁸ Stevens, Neville (2020). Report on the review of Australian classification regulation. P79. <https://www.infrastructure.gov.au/department/media/publications/review-australian-classification-regulation-stevens-review>

¹⁹ <https://childrenandmedia.org.au/taking-action/current-campaigns/classification>

²⁰ <https://www.infrastructure.gov.au/sites/default/files/documents/manacs--leading-organizations-and-professionals-working-on-behalf-of-australian%27s-children%2C-young-people-and-families.pdf>

²¹ National Center for Missing and Exploited Children (2026). 2024 CyberTipline Report Overview. <https://www.missingkids.org/gethelpnow/cybertipline/cybertiplinedata>

In 2020, former South Australian politicians Stirling Griff and Connie Bonaros drew the Classification Board's attention to several manga titles distributed by Kinokuniya and containing sexual depictions of minors.²² These unclassified novels and manga series were available in libraries and bookstores. The distributor decided not to pay the fee to have them classified, and instead pulled the series from sale. Images from books in school and public libraries around Australia had to be censored for inclusion on the parliamentary committee website in the 2024 inquiry because of their sexual content depicting minors.²³

In one volume, three young girls dressed in school uniforms with school backpacks were depicted in sexualised poses with revealing clothing. The girls were described as robots that were thousands of years old, trying to convince the main character to reproduce with them to save their species from extinction.

In another volume, in a double-page colour illustration, three girls including one who is eleven and another "in her late teens" were depicted as having their clothing disappear during a game. The eleven year old girl was

*"depicted from behind, leaning forward slightly and looking over her shoulder. She is nude, with the exception of thigh high stockings. While her pose obscures her chest from view, which the contour of her partially turned body implies is underdeveloped, her buttocks are pushed outward and some labial detail is depicted."*²⁴

This "loli" genre of titles featuring sexualised underage content has been available for sale and for library loan since 2015. The current system relies on members of the public to notice it, understand this content is illegal in Australia, and take the time to make a report. Many people will presume that if a book is in a school or public library, then it is safe and appropriate for children. We note it was half a decade before these books were brought to the attention of the Classification Board in 2020.

After an application for classification was submitted (and paid for) by South Australian political party Centre Alliance, the Classification Board permanently banned volumes 1, 2, and 9 on the grounds that the books contained content that violates Australia's classification laws on sexual depictions of minors.

Other extremely concerning manga material is written and illustrated by Ken Akamatsu who successfully lobbied for manga containing CSAM to be exempt from laws newly introduced in Japan

²² Morrissy, K. (25 Feb 2020). Australian Senator Calls For Review of Anime Depicting Child Exploitation. *Anime News Network*. <https://www.animenewsnetwork.com/interest/2020-02-25/australian-senator-calls-for-review-of-anime-depicting-child-exploitation/.156852>; Griff, S. (17 Feb 2020). Letter to Director, Policy and Research, Classification Branch, Dept of Communications and the Arts. <https://www.infrastructure.gov.au/sites/default/files/submissions/submission-of-senator-stirling-griff.pdf>

²³ Gaynor, B. (30 May 2024). Submission to Stage 2 reforms of Australia's National Classification Scheme. <https://www.infrastructure.gov.au/sites/default/files/documents/manacs-bernard-gaynor.pdf>

²⁴ Walker, Alex (20 Aug 2020). Why the Australian Classification Board Banned Three No Game, No Life Novels. *Kotaku*. <https://www.kotaku.com.au/2020/08/no-game-no-life-ban-australia-classification-board-explained/>

in 2014 banning possession of CSAM. Many of his books contain sexualised depictions of children, almost always girls, and sexual activity involving them. Akamatsu's books are easily found in libraries across the country.

Adult fans of manga and anime are often defensive of sexual content featuring characters that are, or appear to be, minors:

It makes you uncomfortable that grown adults watch a cartoon that can include mature themes? As for the illustrations referenced by the article, are they "kiddy porn", no. Are they uncomfortable images, poorly chosen by an illustrator from a culture different to yours, that tarnish otherwise okay novels. Most definitely. They violate our ideas of poor taste and regulation of sexualisation of minors.²⁵

Would love to see people try and to [sic] me why they should be able to absorb media that depicts people getting shot and stabbed. Give me a good reason why people should be able to watch murder and terrorism. This is you. Its literally no different. Just people feel even more uncomfortable about the topic here. I mean understandably so, but there is no denying that its just pixels/drawings in either case and that no real people are getting harmed in either case.²⁶

The government should be aware that the same organisations and individuals lobbying for acceptance of fictional child sexual abuse material are also lobbying for acceptance of kink and fetish material, the very change proposed under C08.

Some librarians and YA authors support manga with sexual content for teens and "young readers," arguing this content is actually beneficial.²⁷ However, even some anime fans express their concerns with certain features of Japanese animations, notably that consent seems to be absent, there are no repercussions for criminal behaviour, women and girls are routinely sexualised, and there are depictions of relationships between adopted family members or step-siblings.²⁸

Given recent exponential increases in sales of manga material, and its popularity amongst children in public and school libraries, manga comics and other graphic novels are an important target for the Classification Scheme.²⁹ Children are naturally attracted to the illustrations and colours. It is common

²⁵ Reader comment on Walker, Alex (20 Aug 2020). Why the Australian Classification Board Banned Three No Game, No Life Novels. *Kotaku*. <https://www.kotaku.com.au/2020/08/no-game-no-life-ban-australia-classification-board-explained/>

²⁶ Reader comment on Walker, Alex (20 Aug 2020). Why the Australian Classification Board Banned Three No Game, No Life Novels. *Kotaku*. <https://www.kotaku.com.au/2020/08/no-game-no-life-ban-australia-classification-board-explained/>

²⁷ Wood, Eleanor (2 Nov 2010). Pushing the Envelope: Exploring sexuality in teen literature. *J Res Libraries Young Adults*. <https://www.yalsa.ala.org/jrly/2010/11/pushing-the-envelope-exploring-sexuality-in-teen-literature/>

²⁸

https://www.reddit.com/r/TwoXChromosomes/comments/135n7c3/im_so_angry_at_how_many_people_just_accept/

²⁹ Earp, M. (2022). Graphic novels and manga selection: 101. Schools Catalogue Information Service. <https://www.scisdata.com/connections/issue-121/graphic-novels-and-manga-selection-101/> and

to find sexual content in manga, known as fan service, with characters appearing childlike in facial features, clothing, stature, voices, and mannerisms.

The YA section frequently contains sexual content, is often near the children's section, and can attract children to browse and read. Even if they are not allowed to borrow them, children are still able to find and read them in libraries. With self-checkout, they may well be able to borrow books that are unclassified.

In 2023, comic books containing graphic sex scenes and violent pornographic imagery were pulled from the 'Teenage Fiction' section of a Sydney library following an investigation by the Daily Telegraph. Included in the collection was a copy of *The Boys Volume 1* by Garth Ennis, including bestiality and rape scenes. Collective Shout campaigner Caitlin Roper explained:

This is not just 'adult content', this is extreme, graphic, degrading, violent pornographic imagery. We are talking about violent rapes of women - some of whom appear to be unconscious or dead - as well as bestiality. It's not a matter of content that should be merely restricted to adults. This material is an endorsement of male violence and abuse of women and it should not be tolerated anywhere, let alone in public libraries for an audience that includes children.³⁰

In June 2023 the Classification Board finally gave this title a rating of Category 1 Restricted.

While classification is an important step in protecting children from exposure to harmful material, it is also necessary to prevent circulation of material depicting illegal activities which are extremely harmful and abhorrent to a majority of people.³¹ This material should be refused classification and prohibited in Australia. While a few titles have been removed, much is still available in public libraries.

Australia needs an approach to manga, anime, and graphic novels which upholds the law against CSAM/CSEM. With classification reforms that began in March 2024, and with the potential of AI classification tools, classification may become more accessible and affordable, especially for smaller distributors and publishers.

(2025). Curating Manga with care: Guidance for school libraries.

<https://www.scisdata.com/connections/issue-134/curating-manga-with-care-guidance-for-school-libraries/>; Polaris Market Research (Jan 2023). *Manga Market Share, Size, Trends, Industry Analysis Report*. Polaris Market Research. <https://www.polarismarketresearch.com/industry-analysis/manga-market/>; Books+Publishing (4 May 2022). *The meteoric rise of manga*. <https://www.booksandpublishing.com.au/articles/2022/05/04/213684/the-meteoric-rise-of-manga/>

³⁰ Roper, Caitlin (30 Mar 2023). Teen Manga graphic comic novels in libraries feature rape, orgies, bestiality. *Collective Shout*. https://www.collectiveshout.org/teen_manga_comics_prn_in_libraries

³¹ BBFC (23 Jun 2025). 1 in 3 adult pornography users exposed to violent or abusive content online, with majority backing new legislation to prevent publication of harmful content. <https://www.bbfc.co.uk/press-releases/1-in-3-adult-pornography-users-exposed-to-violent-or-abusive-content-online-with-majority-backing-new-legislation-to-prevent-publication-of-harmful-content/>; OurWatch (13 Nov 2024). New report: Porn is shaping young people's views of sex and relationships, education is key. <https://www.ourwatch.org.au/news/new-report-porn-is-shaping-young-peoples-views-of-sex-and-relationships-education-is-key/>;

We would like to see a rating on all publications. This will allow parents and carers more confidence in allowing their children to browse in libraries and bookstores, and enjoy books without harmful content.

Computer Games

Computer games are an area of concern for Collective Shout, as for many who made submissions in the previous Classification inquiry. Hundreds of new game titles are released every day in an intensely competitive gaming market. Responsible parents want to prevent their children from being exposed to sexual content, violence, and drug use. A 2022 Australian study found adults highly valued classifications for computer games for children, and needed more detail and nuance to help them make informed choices, including regarding sexual content.³²

Valve's online gaming platform, Steam, features Adult games that include violent and sexual content. Valve is not a member of the International Age Rating Coalition [IARC] and most games are not classified. This limits parents' ability to be sufficiently informed to choose games for their children that will not cause them harm.

An additional issue with Steam is that underage users can easily access Adult-rated games simply by ticking a couple of boxes and entering an age of 18 or over. In addition to negotiating with Valve with regard to how game content and classifications are communicated to Australian customers, Valve should also apply stronger measures to Valve content when accessed in Australia to prevent children from accessing harmful material online.³³

Recommendation: Require gaming platforms to classify all games and block minors from accessing adult content (eSafety responsibility, as part of enforcing the Classification Scheme).

Apps

Apple's App Store was included in the National Center on Sexual Exploitation's [NCOSE] 2026 Dirty Dozen list as a mainstream contributor to sexual exploitation.

"The Apple App Store lulls parents with "kid-safe" labels while exposing children to hidden online dangers. Deepfake "nudify" tools, stranger connection apps for 13-year-olds, and sex

³² Hollett, R., Tomkinson, S., Illingworth, S., Power, B. and Harper, T. (Feb 2022). Evidence that digital game players neglect age classification systems when deciding which games to play. *PLoS One* 17(2):e0263560. doi:10.1371/journal.pone.0263560 PMID: 35192661; PMCID: PMC8863231.

³³ See also our campaign against Valve/Steam for hosting games featuring rape, incest, and sexual torture themes. Alison, C. (28 July 2025). Setting the record straight: Timeline of our campaign to take down rape, sexual torture + incest games. *Collective Shout*. https://www.collectiveshout.org/steam_campaign_history

games for preschoolers have all waltzed past Apple’s supposed safeguards—showing just how easily its review system can be gamed. With 87% of U.S. teens on iPhones, Apple is the de facto gatekeeper of childhood online. And until it reins in dangerous apps, fixes deceptive age ratings, and closes loopholes in its parental controls, Apple is failing the very kids it claims to protect.”³⁴

The researchers argued that app age ratings are deceptive and that Apple promotes and suggests sex-themed 17+ apps to teen users despite knowing the age of the account holder, including kink themed apps, hookup apps, adult dating, and chat roulette.

Apple’s claim, cited in the 2020 Stevens Review, that it “provides appropriate signalling to consumers of the nature of the game, and that suitable controls exist so that access to inappropriate content is restricted” is demonstrably untrue.³⁵

Recommendation: Hold Apple’s App Store accountable and align with an acceptable ratings system for Australia’s laws.

C08 Reconsideration of sexual content

The Discussion Paper’s proposal on sexual content appears to aim to correct inconsistencies between the treatment of kink/fetish material in Australia’s Film Guidelines (currently, specific kink/fetish acts banned from X18+) and those same acts being legal between ‘consenting adults’, legal to depict in print (Category 2 Restricted publications), legal to watch online via overseas-hosted services, and already widely consumed by Australians in online pornography.

Specifically, the Eros Association wrote in 2024:³⁶

“In this light, we believe that the Government should urgently bring forward a proposal to the Standing Council of Attorneys-General to remove the absolute prohibition on legal fetishes within the X18+ category, in line with recommendation 9-15 of the Stevens Review. We note that such a prohibition is not reflective of current community values given that the prevalence of interest in BDSM activities in the general population is as high as 69%. It is also inconsistent with the overarching principle in the classification 1 guidelines that “adults should be able to read, hear, see and play what they want.” Furthermore, in our view, if it is

³⁴ National Center on Sexual Exploitation (31 Mar 2026). *The 2026 Dirty Dozen List is Here!* <https://endsexualexploitation.org/articles/the-2026-dirty-dozen-list-is-here/>; See also our campaign to get XAI’s Grok removed from Apple and Google stores. <https://www.collectiveshout.org/grok>

³⁵ Stevens, Neville (2020). Report on the review of Australian classification regulation. P79. <https://www.infrastructure.gov.au/department/media/publications/review-australian-classification-regulation-stevens-review>

³⁶ Eros Association (30 May 2024). Submission: Modernising Australia’s Classification Reform Scheme - Stage 2 Reforms. <https://eros.org.au/wp-content/uploads/2025/07/Eros-Association-Submission-Modernising-Australias-Classification-Reform-Scheme-Stage-2-Reforms.pdf>

legal for consenting adults to do something, it should be legal to film and sell media depicting those same acts.”

In our opinion, the C08 proposal could ultimately contribute to an acceptance of sexual violence, pain, and humiliation - mostly of women - as normal.

We urge the Minister and the Department to reject this proposal and refuse classification to depictions of all forms of sexual violence, humiliation, and painful acts.³⁷ Such content is not an ‘artistic style’ nor should it be seen as an ‘identity’ (as referenced in the discussion paper). Rather, material depicting these acts, even where depicted as ‘consensual’, should be included in the category of Class 1A under the Online Safety Act 2021: illegal material. We reference the eSafety Commissioner’s description here:

“Extreme crime and violence material – material that describes, depicts, expresses or otherwise deals with matters of extreme crime, cruelty or violence (including sexual violence) without justification. For example, murder, suicide, torture and rape. Material that promotes, incites or instructs in matters of extreme crime or violence.”³⁸

Australia’s National Classification Scheme should be part of progress towards modernising and updating Australia’s approach to VAWG.

Mainstream pornography has become even more extreme, violent and harmful. The most popular genres are the most violent. This is where many young people are learning about sex. Many young women expect to be treated violently in relationships.³⁹ Strangulation injuries have increased since the rise in popularity of strangulation genres.

Australia contends with a national crisis of violence against women,⁴⁰ with one woman killed every eleven days by an intimate partner.⁴¹ Rates of sexual violence continue to rise. Federal and State governments are attempting to tackle coercive control as an element of violence against women.⁴²

³⁷ We have argued in the past that “Refused Classification” should be renamed “Prohibited” for more clarity in the public understanding, but this is out of scope in the current inquiry.

³⁸ eSafety Commissioner (Apr 2026). Online Safety Codes and Standards: Regulatory Guidance. Australian Government. https://www.esafety.gov.au/sites/default/files/2026-04/OnlineSafetyCodesandStandardsRegulatoryGuidance-April2026_2.pdf?v=1779209625769

³⁹ UK Children’s Commissioner (2023) ‘A lot of it is actually just abuse’ – Young people and pornography. assets.childrenscommissioner.gov.uk/wpuploads/2023/07/CCO-Pornography-and-Young-People-1.pdf

⁴⁰ Domestic, Family & Sexual Violence Commission (Oct 2025). *Yearly Report*. Australian Government. <https://www.dfsvc.gov.au/sites/default/files/2025-10/DFsvc-2024-25-YearlyReport.pdf>; PMC (Department of the Prime Minister and Cabinet) (2024a) *Unlocking the Prevention Potential: accelerating action to end domestic, family and sexual violence*, report prepared by Campbell, E., Fernando, T., Gassner, L., Hill, J., Seidler, Z. and Summers, A. Australian Government. <https://www.pmc.gov.au/resources/unlocking-the-prevention-potential>

⁴¹ Australian Institute of Health and Welfare (23 Apr 2026). Domestic Homicide. <https://www.aihw.gov.au/family-domestic-and-sexual-violence/responses-and-outcomes/domestic-homicide>

⁴² Attorney-General’s Department (22 Sept 2023). *The National Principles to Address Coercive Control in Family and Domestic Violence*. Australian Government. <https://www.ag.gov.au/families-and-marriage/publications/national-principles-address-coercive-control-family-and-domestic-violence>;

Pornography and especially violent genres are contributing to these high levels of violence and abuse in Australia and globally.

This is not the time to normalise pain, domination, humiliation, and strangulation fetishes.

Research and advocacy by survivors make clear that these acts reinforce beliefs and dynamics that enable real-world sexual violence. Research has established that the majority of submissive targets in kink and fetish pornography are women/girls.⁴³ We cite some of this research and the impact on women and girls below:

- In Sweden there has been an increase in physical aggression, especially gagging and choking, with the researcher concluding that aggression against women is deeply embedded in sexual scripts: “This type of violence risks being internalised as part of normative sexual practice, and through its repetition in pornographic material, viewers can learn that it is acceptable to carry out the acts where the norm is to disregard pain or the woman's pleasure.”⁴⁴
- “Dominant” behaviours like spanking, choking, name calling, aggressive fellatio, facial ejaculation, and anal penetration without consent are most often targeted towards women, and there is a positive association between pornography use and these sexual behaviours.⁴⁵
- In pornography, this violence is inflicted on real women, with real consequences.⁴⁶
- ‘Snuff’ and fatal violence is promoted by pornography publishers and by search engines. This includes BoundHub, known as “the PornHub of BDSM,” which includes content tagged with keywords like ‘snuff’, ‘murder’, ‘strangle,’ and ‘woman’. This content is easily found using Google Search. Branded Boundhub content is also published on sites like Pornhub, allowing users to seek out further and more extreme content offsite.⁴⁷

Global changes in understanding of kink and fetish material

Globally, the tide is turning against depictions of sexual violence and abuse. Many initiatives and movements around the world are heading in the same direction: understanding the harmful impact

Department of Social Services (2022). *The National Plan to End Violence Against Women and Children 2022-2032*. Australian Government. <https://www.dss.gov.au/national-plan-end-violence-against-women-and-children>

⁴³ Larva, M. A., & Rantala, M. J. (2024). An Evolutionary Psychological Approach Toward BDSM Interest and Behavior. *Archives of sexual behavior*, 53(6), 2253–2267. <https://doi.org/10.1007/s10508-024-02881-x>; Carrotte, E., Davis, A., Lim, M. (2020). Sexual Behaviors and Violence in Pornography: Systematic Review and Narrative Synthesis of Video Content Analyses *J Med Internet Res* 2020;22(5):e16702. <https://www.jmir.org/2020/5/e16702>, DOI: 10.2196/16702

⁴⁴ Blomgren, A. and Sjöström, E. (Oct 2024). *Portrayals of aggression in popular pornography: A quantitative content analysis of pornographic videos in Sweden*. Masters Thesis, Malmö University. <https://mau.diva-portal.org/smash/get/diva2:1916002/FULLTEXT02.pdf>

⁴⁵ Herbenick, D., Fu, T.C., Wright, P., Paul, B., Gradus, R., Bauer, J. and Jones, R. (18 Feb 2020). Diverse sexual behaviours and pornography use: Findings from a nationally representative probability sample of Americans aged 18 to 60 years. *J Sexual Medicine* 17(4):623-633, <https://doi.org/10.1016/j.jsxm.2020.01.013>

⁴⁶ Donevan, M., Svedin, C. G., Dennhag, I., & Jonsson, L. S. (2026). Behind the Illusion: Unmasking the Coercion in Pornography Production. *Violence Against Women*, 32(2), 593–618. <https://doi.org/10.1177/10778012251319300>

⁴⁷ The Other Half (July 2025). We Can't Keep Doing Nothing. *The Other Half UK*. <https://theotherhalf.uk/we-cant-keep-doing-nothing>

of sexually violent material that have been innocuously labelled “kink”, “fetish”, BDSM, and various types of “play” like:

- weapon play (use of real/replica weapons to create fear, threat, or psychological intensity during sexual activity)
- breath play (‘erotic asphyxiation’, restriction or control of partner’s breathing to heighten arousal)
- age play (role-play in which adults take on personas of significantly different ages, often caregiver and child dynamics)
- knife play (involving knives, blades or sharp objects drawn across the skin for sensation, fear, scratching, or cutting)
- water play (using water for restraint, submersion, spraying, or breath control).

Below we explain recent changes to law and emerging advocacy undertaken in response to wider understanding of the damaging impacts of pornography-fuelled practices especially on women. New research and lived experience accounts have changed the landscape since the recommendations on kink and fetish material in the Stevens Review (referenced in the current discussion paper).⁴⁸

First, kinks and fetishes have expanded since the early 2000s into more violent, abhorrent and harmful categories. Second, “rough sex” has been used successfully as a defence against charges of murdering women (mostly by asphyxiation) in several countries including Australia. This is a direct result of the acceptance of kinks/fetishes. Third, this phenomenon has triggered activism against the “rough sex” defence and more broadly against sexual violence as ever being consensual. Fourth, the UK has moved to prohibit pornography depicting choking, incest, and violent sex. Finally, a global investigation of Pornhub revealed non-consensual footage, trafficking, rape, and CSAM, with the platform forced to remove 80 percent of its content as a result.

The list of fetishes specified as offensive at that time (2011) included: body piercing; application of substances such as candle wax; ‘golden showers’; bondage; spanking; and fisting.⁴⁹ Popular kink/fetish categories now include ‘age play,’ BDSM (typically depicting violence against women), voyeurism or ‘hidden camera’ (typically covertly filming women and girls), exhibitionism, role-play (including adult-child, teacher-student, stepsister or stepmother etc.), ‘teen’ or ‘young’ (including children and infants), body modification, and gang-related scenarios (with women typically the subject).

The sleep-related paraphilia of somnophilia (sexual arousal from sexual acts with someone who cannot respond or consent in the moment) has emerged into the public consciousness with the horrific case of Gisèle Pelicot in France, drugged by her husband Dominic Pelicot and raped by dozens of men over ten years. Convicted in 2024 for drugging and repeatedly raping his wife, Pelicot

⁴⁸ Stevens, Neville (2020). Report on the review of Australian classification regulation. P79. <https://www.infrastructure.gov.au/department/media/publications/review-australian-classification-regulation-stevens-review>

⁴⁹ Australian Law Reform Commission (29 Nov 2011). *The Current Scope of RC Content*. Australian Government. <https://www.alrc.gov.au/publication/national-classification-scheme-review-dp-77/10-refused-classification-category/the-current-scope-of-rc-content/>

solicited dozens of men to also rape her, through a fetish forum titled whose title translates from French as ‘Without her knowledge.’

In 2026, a similar porn site, ‘Motherless,’ was exposed by CNN for hosting sleep rape content containing 20,000 videos of men abusing their partners. CNN found content tagged with #eyecheck, and while ‘sleep’ search term was banned by the time we gathered evidence, we found sleep content using similar search terms such as ‘snooze.’ Men gathered in groups on Telegram, sharing tips on drugging and sexually assaulting their unconscious wives and girlfriends. Our own investigation found video titles such as “Out Cold and Used”, and various groups organised by categories such as “Go Ahead She’ll Never Know,” “Blindfolded, Tied and Unaware,” and “Undressed Against Her Will” containing forums, images, and videos.⁵⁰ Following our own investigation, we continue to campaign against this content and similar material on other pornography hosting platforms.

Attempts have been made to normalise sexual interest in children as just a ‘fetish’.

A recent Australian survey found that one in six Australian men admitted they have sexual feelings for children.⁵¹ In commentary on the HBO series ‘Euphoria,’ Collective Shout’s Movement Director Melinda Tankard Reist highlighted the demand for child fantasy fetish content that fuels demand for actual children. Such material on the screen “contributes to mass de-sensitisation and trivialisation of dangerous sexual interests. Women and girls are morphed into explicit genres to fill every appetite and the global tally of victims races ever onward.”⁵²

We caution against the manipulative vocabulary of the sex industry. The term ‘vanilla’ is a derogatory term for women who defend their own bodies against sexual abuse. The term ‘play’ is used to describe torture methods (‘breath play’, ‘water play’, ‘weapon play’ etc.). Even where consent is claimed, this does not magically make abuse/violence acceptable. Egbert wrote for Feminist Current in 2014:

Consent is the magical fairy dust which turns rape into sex; trafficking into free speech; and sexualized abuse, torture, and subjugation into sexual liberation — or so many people claim. Many “sex-positive feminists” acknowledge the legal standard of consent (defined as a lack of active resistance) is problematic: it is victim-blaming, it normalizes male sexual

⁵⁰ Roper, C. (8 May 2026). “Go Ahead She’ll Never Know”: What we found on Motherless. *Collective Shout*. <https://www.collectiveshout.org/what-we-found-on-motherless>

⁵¹ Australian Human Rights Institute UNSW (Nov 2023). *Identifying and understanding child sexual offending behaviours and attitudes among Australian men*. <https://www.humanrights.unsw.edu.au/sites/default/files/documents/Identifying%20and%20understanding%20child%20sexual%20offending%20behaviour%20and%20attitudes%20among%20Australian%20men.pdf>

⁵² Tankard Reist, M. (19 May 2026). Sweeney’s Euphoria OF baby cosplay eroticising and normalising sexual fantasies for children. *MTR Blog*. https://melindatankardreist.com/2026/05/sweeneys-euphoria-of-baby-cosplay-eroticising-and-normalising-sexual-fantasies-for-children/?fbclid=IwY2xjawR5ct1leHRuA2FibQIxMABicmlkETFTZ3RYYUg0bVJqeIRNUEo4c3J0YwZh_cHBfaWQQMjlyMDM5MTc4ODlwMDg5MgABHuTsAEopy74NYx_lcyx-0djpJOuTFJQbQ-SSkxtYHCFQnzix3Ez2Tyufmvqh_aem_v7CuHm_OL71ATs-3U79XAQ

aggression, it arbitrarily draws a line between how much coercion is “too much” (it generally does not allow direct physical coercion, but permits social, emotional, and economic coercion), and it is irrelevant whether a woman wants to engage in sexual activity or merely submits to it...

BDSM advocates have a particular problem. Even while they take themselves to be the “gold standard” of consent, it is not the consent that is eroticized: it is precisely the coercion (bondage, domination) and the violence (physical abuse, “rough sex”) that is sexy.⁵³

We warn the Government against accepting claims that BDSM or other sexual kinks are ‘common.’⁵⁴ This does not constitute evidence that the community standards support such practices or that practices are safe or harmless. This presumption has devastating results, one of which is the ‘rough sex’ defence to a charge of murder.

‘Rough sex’ defence to murder charges

The ‘sex game gone wrong’ defence used by men charged with killing women makes the claim that consensual paraphilic sexual activity went wrong, resulting in the woman’s death. Most commonly the cause of death is strangulation. In kink, this is referred to as ‘breath play’ or ‘erotic asphyxiation.’ This defence relies on the norms of kink/fetish activities, on rape myths, and on the woman’s inability to contradict the man’s account.

Natalie Connolly died in 2016. Her partner, John Broadhurst, was convicted only of manslaughter after claiming she consented to sexual activities that left her dead with over 40 injuries including a brain bleed, a broken eye socket, and a bottle inserted into her vagina which broke and severed an artery.⁵⁵

Broadhurst claimed the 26-year-old mother-of-one was injured as a result of consensual sexual activity fuelled by alcohol and drugs. The court previously heard Ms Connolly had told people she and the defendant had an interest in masochistic sex.⁵⁶

We Can’t Consent To This and other grassroots movements

⁵³ Egbert, C. K. (25 Jun 2014). Why consent is not enough. *Feminist Current*. <https://www.feministcurrent.com/2014/06/25/why-consent-is-not-enough/>; See also our submission to the Statutory Review of the Crimes Legislation Amendment (Sexual Consent Reforms) Act 2021 (New South Wales) in March 2026. <https://www.collectiveshout.org/submission-consent-law-reforms>

⁵⁴ An often-cited Belgian study claims 69% of the population is interested in BDSM. The research counts self-reports of lifetime “ever tried” incidents and fantasies including blindfolds, hair-pulling, and light spanking - relatively mild and common compared to strict BDSM definitions. Holvoet L., et al. (2017). “Fifty Shades of Belgian Gray: The Prevalence of BDSM-Related Fantasies and Activities in the General Population. *J Sex Med.* 14(9):1152-1159. doi: 10.1016/j.jsxm.2017.07.003.

⁵⁵ Dillon, S. (2019). Natalie Connolly - her life meant something - her death is her killer’s script. *Aurora New Dawn*. <https://aurorand.org.uk/natalie-connolly-her-life-means-something-her-death-is-her-killers-script/>

⁵⁶ BBC (17 Dec 2018). Millionaire jailed for girlfriend’s ‘rough sex’ death. *BBC News*. <https://www.bbc.com/news/uk-england-46591150>

In response to the ‘rough sex defence,’ grassroots organisation We Can’t Consent To This⁵⁷ began to document women killed in ‘rough sex’ cases. In many cases the defence gained reduced charges or sentences by claiming the fatal violence was consensual. The Other Half (research branch of We Can’t Consent To This Campaign) writes:

“Britain, like most developed nations, has many women reporting violence being done to them in sex. This alarm bell has been ringing for years... But this violence did not come from the ether. Young men told us they saw this done to women in porn. Young women thought it normal mostly thanks to mainstream social media sites. These were children groomed by early exposure to extremely violent sexual content: we should view them as victims of abuse. We’ve done little to stop this. And now we have girls identifying away from their sex. Avoiding relationships. Astonishing rises in child-on-child sexual assault, our schools unsafe. Young women presenting to medics after violent sexual harm.”⁵⁸

“The arty, liberal culture I was a part of in my early 20s normalised sexual violence under the guise of ‘kinks’ and glorified one night stands instead of acknowledging the huge safeguarding issues for women. Growing up in these circles directly impacted my decision to engage in these activities, and try out violent and degrading acts...”⁵⁹

Our 2026 submission to the Statutory Review of the Crimes Legislation Amendment (Sexual Consent Reforms) Bill 2021 outlined the limits of the concept of consent and called on the criminal justice system to acknowledge the underlying structural and systemic societal conditions that give rise to sexual violence.⁶⁰

In 2025 in our submission to the UN’s Special Rapporteur on Violence Against Women and Girls on the concept of consent in relation to violence against women and girls, we called on UN Member States to recognise and address the global pornography industry as a driver of sexual violence and gender inequality, particularly in how it normalises coercion, aggression, and the degradation of women.⁶¹

⁵⁷ <https://wecantconsenttothis.uk/>

⁵⁸ The Other Half (July 2025). We Can’t Keep Doing Nothing. *The Other Half UK*. <https://theotherhalf.uk/we-cant-keep-doing-nothing>

⁵⁹ The Other Half (July 2025). We Can’t Keep Doing Nothing. *The Other Half UK*. <https://theotherhalf.uk/we-cant-keep-doing-nothing>

⁶⁰ Collective Shout (14 Mar 2026). Submission: Statutory Review of the Crimes Legislation Amendment (Sexual Consent Reforms) Act 2021. <https://www.collectiveshout.org/submission-consent-law-reforms>

⁶¹ Collective Shout (9 May 2025). Input to the addendum to the report of the Special Rapporteur on Violence Against Women and Girls to the HRC on the concept of consent in relation to violence against women and girls. <https://www.collectiveshout.org/submission-to-un-sr-vaw-consent-and-violence-against-women-and-girls>

The Breathless campaign⁶², run by It's Time We Talked, is another example of an Australian campaign. We know that while sexual choking is growing in prevalence, inspired by pornography, most people are not aware of the serious risks involved.⁶³

In the UK, a coalition in the House of Lords sought to align laws between online and offline pornography regulation, resulting in the landmark report *Creating a Safer World: The Challenge of Regulating Online Pornography* by Baroness Bertin in February 2025.⁶⁴

One recommendation here was to harmonise online and offline pornography material by making harmful pornographic content illegal in any format, including degrading, violent, and misogynistic as well as incest and child-related sexual content. This is the opposite approach to what is currently being proposed in C08. We encourage the Minister and the Department to follow the UK's lead.

The UK report included a raft of recommendations to make this effective, including independent audits, accreditation, sanctions, and compliance measures.

UK law moves to prohibit choking and incest pornography

As a result, the UK has now introduced expansions to its pornography laws via amendments to the Crime and Policing Bill and building on the Online Safety Act 2023. These changes classify certain content as illegal, with the result of criminalising possession and publication/distribution. Platforms will have a duty to proactively remove content including strangulation/choking pornography,⁶⁵ incest pornography,⁶⁶ and adults role-playing as children.⁶⁷ This includes step- or foster-family relations where one person pretends to be under 18.

Research links violent pornography to violence against women

Adults are being exposed to pornography that consistently depicts men's violence against women and girls.

⁶² <https://www.breathlesscampaign.com/>

⁶³ Conte, I., Sharman, L. S., & Douglas, H. (2025). Choking/Strangulation During Sex: Understanding and Negotiating "Safety" Among 18-35 Year Old Australians. *Archives of sexual behavior*, 54(2), 483–494. <https://doi.org/10.1007/s10508-025-03097-3>

⁶⁴ Baroness Bertin (Feb 2025). *Creating a Safer World - the Challenge of Regulating Online Pornography*. UK Government. https://assets.publishing.service.gov.uk/media/67bf014ca0f0c95a498d1f9a/The_Challenge_of_Regulating_Online_Pornography_A.pdf

⁶⁵ McGlynn, C. (6 Nov 2025). 'Choking' in porn has become the new normal. Here's why a new UK law banning it is so vital. *The Guardian*. <https://www.theguardian.com/commentisfree/2025/nov/06/choking-strangulation-in-porn-new-uk-law-banning-vital>

⁶⁶ Boyd, R. (10 Apr 2026). Peers vote to ban pornography depicting sex acts between stepfamily members. *The Guardian*. <https://www.theguardian.com/society/2026/apr/10/pornography-depicting-sex-acts-between-stepfamily-members-banned-in-uk>

⁶⁷ Morgan, L. (10 Apr 2026). From 'incest porn' to 'semen-defaced images', here's what the new abuse laws really mean. *Glamour*. <https://www.glamourmagazine.co.uk/article/incest-porn-semen-defaced-images-new-laws>

- Research from 2020 found that 35-45% of all videos on two major pornography platforms contain violence, with women the target of violence in 97% of these scenes⁶⁸
- A report by the French equality watchdog found that 90% of pornography features violence against women with much of it amounting to torture⁶⁹
- A study carried out in 2021 found that one in eight titles shown to a first-time visitor on mainstream pornography sites depict sexual violence, with incest (including between step- and biological family members) the most frequent form of sexual violence on the landing page⁷⁰
- Our own investigations found that on Pornhub, of the first eight thumbnails, seven referenced 'incest'. Of the next eight titles, four references either 'incest', 'violence' or "'surprise" sex acts'

An Australian study explored what adolescents and young adults actually see when they view porn. It found that 70% frequently saw men portrayed as dominant; 36% frequently saw women being called names or slurs; 35% frequently saw 'consensual' violence towards women; and 11% frequently saw non-consensual violence towards women.⁷¹

The National Plan to End Violence against Women and Children 2022-2032 highlights that "viewing pornographic material that showcases violence can have negative impacts on a young person's development with regard to their well-being and relationships and it can influence their attitudes and beliefs about sex, intimacy and consent."⁷²

A systematic review of 20 years of research into pornography and violence found that violent content in pornography may serve to legitimise violence through knowledge transmitted among men.⁷³ Other impacts of exposure to violent and/or misogynistic pornography are multitudinous and none of them are positive:

- Exposure to violent and/or misogynistic pornographic content has a significant association with attitudes supporting violence against women⁷⁴

⁶⁸ Vera-Gray, F., McGlynn, C., Kureshi, I., & Butterby, K. (2021) Sexual violence as a sexual script in mainstream online pornography, *The British Journal of Criminology*, 61(5), 1243–1260. doi.org/10.1093/bjc/azab035

⁶⁹ Chrisafis, A. (27 Sep 2023) French equality watchdog finds 90% of online pornography abuses women. *The Guardian*. www.theguardian.com/world/2023/sep/27/online-pornography-breaks-french-law-equality-watchdog-france

⁷⁰ Vera-Gray, McGlynn, Kureshi, & Butterby, 2021, op. cit.

⁷¹ Davis, A. C., Carrotte, E. R., Hellard, M. E., & Lim, M. S. (2018). What behaviors do young heterosexual Australians see in pornography? A cross-sectional study. *The Journal of Sex Research*, 55(3), 310-319. [doi:10.1080/00224499.2017.1417350](https://doi.org/10.1080/00224499.2017.1417350)

⁷² Commonwealth of Australia (2022). *National Plan to End Violence against Women and Children 2022-2032*. pg. 52. www.dss.gov.au/national-plan-end-gender-based-violence/resource/national-plan-end-violence-against-women-and-children-2022-2032

⁷³ Mestre-Bach, G., Villena-Moya, A., & Chiclana-Actis, C. (2024). Pornography Use and Violence: A Systematic Review of the Last 20 Years. *Trauma, Violence, & Abuse*, 25(2), 1088-1112. doi.org/10.1177/15248380231173619

⁷⁴ Upton, J., Hazell, A., Abbott, R. and Pilling, K. (Feb 2020). *The relationship between pornography use and harmful sexual behaviours: A primary research report prepared by The Behavioural Architects for the Government Equalities Office*. www.gov.uk/government/publications/the-relationship-between-pornography-use-and-harmful-sexual-behaviours/the-relationship-between-pornography-use-and-harmful-sexual-attitudes-and-behaviours-literature-review

- Exposure to violent pornography is the strongest predictor of sexual violence among males and females⁷⁵
- The use of pornography in couples can normalise violence even in nonsexual contexts⁷⁶
- The use of violent pornography (specifically sadomasochistic content) is associated with an increased tendency to demonstrate aggressive behaviour and attitudes⁷⁷
- Pornography use is associated with (and even predictive of) sexual aggression, teen dating violence, and experiences of sexual victimisation⁷⁸
- Exposure to pornography has been linked to sexual coercion, as well as higher levels of rape-supportive beliefs, peer approval of forced sex and acceptance of myths about rape⁷⁹
- Men who watched mainstream pornography scored significantly higher on self-reported likelihood of raping⁸⁰
- The more often young men consume pornography, the more likely they are to enact sexual behaviour that the other person does not want.⁸¹

The global pornography industry has become the most prominent sex educator. It normalises violent or coercive behaviours as part of ‘sexual expression’. Young men now seem to believe that extreme content is ‘normal.’⁸² Many young people *expect* sex to involve physical aggression, and many believe that girls expect or enjoy physical aggression such as strangulation or slapping (42% of 16-21

⁷⁵ Upton, J., Hazell, A., Abbott, R. and Pilling, K. (Feb 2020). *The relationship between pornography use and harmful sexual behaviours: A primary research report prepared by The Behavioural Architects for the Government Equalities Office*. www.gov.uk/government/publications/the-relationship-between-pornography-use-and-harmful-sexual-behaviours/the-relationship-between-pornography-use-and-harmful-sexual-attitudes-and-behaviours-literature-review; Ybarra, M. L., & Thompson, R. E. (2018).

Predicting the Emergence of Sexual Violence in Adolescence. *Prevention Science: The Official Journal of the Society for Prevention Research*, 19(4), 403–415. doi.org/10.1007/s11121-017-0810-4; Dawson, K., Tafro, A. and Štulhofer, A. (2019). Adolescent sexual aggressiveness and pornography use: A longitudinal assessment. *Aggressive Behavior* 45(6):587-597. doi.org/10.1002/ab.21854.

⁷⁶ Dawson, K., Tafro, A. and Štulhofer, A. (2019). Adolescent sexual aggressiveness and pornography use: A longitudinal assessment. *Aggressive Behavior* 45(6):587-597. doi.org/10.1002/ab.21854.

⁷⁷ Tomaszewska, P., & Krahé, B. (2018). Predictors of Sexual Aggression Victimization and Perpetration Among Polish University Students: A Longitudinal Study. *Archives of Sexual Behavior*, 47(2), 493–505. doi.org/10.1007/s10508-016-0823-2

⁷⁸ Rostad, W. L., Gittins-Stone, D., Huntington, C., Rizzo, C. J., Pearlman, D., & Orchowski, L. (2019). The Association Between Exposure to Violent Pornography and Teen Dating Violence in Grade 10 High School Students. *Archives of Sexual Behavior*, 48(7), 2137–2147. doi.org/10.1007/s10508-019-1435-4;

Huntington, C., Willoughby, B., & Rhoades, G. (2022). Associations of Adolescents’ Pornography Viewing with their Romantic Relationship Skills and Behaviors. *The Journal of Sex Research*, 61(1), 80–91. doi.org/10.1080/00224499.2022.2096844

⁷⁹ Commonwealth of Australia (2022). National Plan to End Violence Against Women and Children 2022-2032. www.dss.gov.au/system/files/resources/national-plan-end-violence-against-women-and-children-2022-2032.pdf

⁸⁰ Ibid.

⁸¹ Warren, D. and Swami, D. (2018). ‘Teenagers and sex’ in AIFS, LSAC Annual Statistical Report 2018, AIFS, Australian Government, 2018: 47–56. static.aifs.gov.au/files/r1GplwOaS7tS/LSAC-ASR-2018-Chap5-teenagers-and-sex.pdf

⁸² Antevska, A., & Gavey, N. (2015). “Out of Sight and Out of Mind”: Detachment and Men’s Consumption of Male Sexual Dominance and Female Submission in Pornography. *Men and Masculinities*, 18(5), 605–629. doi.org/10.1177/1097184X15574339

year old respondents), more than boys (37%), according to a UK nationally representative survey of young people aged 16-21.⁸³

In research among adolescents, false beliefs were more often held by those who had been exposed to pornography. This included, for example, the idea that rough sex is common (gagging, spanking, verbal abuse) while gentle sex is rare (kissing, hugging, and compliments), and that most women enjoy anal sex.⁸⁴ These erroneous beliefs were held by porn-exposed adolescents whether or not they had sought pornography out to learn from it. As they gained real sexual experience, their erroneous beliefs continued, suggesting that their sexual partners had internalised and acted out those erroneous beliefs.

Pornography introduces new anxieties, presents sex as performative and compulsory, implies that natural bodies are not good enough, and portrays deviance as normal.⁸⁵ Research finds that those most likely to believe pornography reflects reality also are more likely to watch it.⁸⁶

Pornography undermining true ‘consent’

Acceptance of kink/fetish material rests on a presumption of consent among all parties depicted. But recent events have made clear that the pornography industry is one where consent cannot be presumed. Pornography is a leading setting for sex trafficking cases. Commercial mainstream pornography and prostitution are *the destination market* for sex trafficking.

Commercial pornography sites, especially user-upload platforms such as Pornhub, have been shown to be infested with sex trafficking, rape, coercion, and footage of minors. For extensive evidence on this point, see Collective Shout’s briefing and recommendations to Canada’s House of Commons Standing Committee on Access to Information, Privacy and Ethics on Protection of Privacy and Reputation on Platforms such as Pornhub in February 2021.⁸⁷

⁸³ UK Children’s Commissioner (2023) ‘A lot of it is actually just abuse’ – Young people and pornography. assets.childrenscommissioner.gov.uk/wpuploads/2023/07/CCO-Pornography-and-Young-People-1.pdf

⁸⁴ Wright, P. J., Tokunaga, R. S., Herbenick, D., & Paul, B. (2021). Pornography vs. sexual science: The role of pornography use and dependency in U.S. teenagers’ sexual illiteracy. *Communication Monographs*, 89(3), 332–353. doi.org/10.1080/03637751.2021.1987486; Nadrowski K. (2024). A New Flight from Womanhood? The Importance of Working Through Experiences Related to Exposure to Pornographic Content in Girls Affected by Gender Dysphoria. *Journal of Sex & Marital Therapy*, 50(3), 293–302. doi.org/10.1080/0092623X.2023.2276149

⁸⁵ Bauer, M., Hämmerli, S., & Leeners, B. (2020). Unmet Needs in Sex Education-What Adolescents Aim to Understand About Sexuality of the Other Sex. *The Journal of Adolescent Health: Official Publication of the Society for Adolescent Medicine*, 67(2), 245–252. doi.org/10.1016/j.jadohealth.2020.02.015

⁸⁶ A meta-analysis (n=3846) found a positive association (r=0.39) between perceived realism, “the extent to which one views pornographic media as reflecting reality,” and pornography consumption in adolescents. Gunnoo, A., Powell, C. The Association Between Pornography Consumption and Perceived Realism in Adolescents: A Meta-analysis. *Sexuality & Culture* 27, 1880–1893 (2023). doi.org/10.1007/s12119-023-10095-x

⁸⁷ <https://www.ourcommons.ca/Content/Committee/432/ETHI/Brief/BR11186220/br-external/CollectiveShout-e.pdf>

Major credit card companies suspended payment processing for MindGeek sites because of trafficking and non-consensual content uncovered by the New York Times. And these problems continue, as has been further exposed in 2025.⁸⁸

The pornography industry's failure to protect women and girls, including through personal testimony of survivors, undermines claims of universal 'consent' in the industry. Pornography platforms' business model of high-volume uploads have enabled this abuse on a mass scale.

GirlsDoPorn operators deceived and coerced dozens of young women including teens into filming pornographic videos under false pretences.⁸⁹ Footage was then uploaded to Pornhub (Aylo) and other sites without consent, where the videos were hosted and generated profits. Pornhub failed to remove them despite victim complaints. Aylo/Pornhub admitted in 2023 to knowingly profiting from sex trafficking proceeds. Multiple GirlsDoPorn operators were convicted, and victims have filed lawsuits seeking millions in restitution.⁹⁰

For a list of current lawsuits against businesses such as MindGeek, Twitter, XHamster, XVideos and others which facilitated sexual exploitation and sex trafficking, see the NCOSE website.⁹¹

In a recently published paper, Donevan and colleagues explain how apparent compliance is a facade used by the industry to render violence invisible:

"Our findings reveal how documented sexual violence is often misinterpreted as proof of consent rather than as evidence of a crime."⁹²

"The illusion of desire is indeed most apparent in such settings of tyrannical control and abuse. Victims appear compliant, but this compliance is a facade maintained under duress and the threat of further harm, functioning as a survival strategy to avoid additional violence."⁹³

"The accounts reveal how the documentation and dissemination of the sexual acts and the roles that participants were compelled to perform created a paradox. On the one hand, most of the images that participants appeared in constituted documented crimes and violence, including human trafficking, rape, and sexual abuse. Yet the documentation and

⁸⁸ Kristof, N. (10 May 2025). These internal documents show why we shouldn't trust porn companies. *Medium*. <https://medium.com/@dinuchoudhary0813/these-internal-documents-show-why-we-shouldnt-trust-porn-companies-9b3a43da114a>

⁸⁹ United States Attorney's Office, Eastern District of New York (21 Dec 2023). *Pornhub Parent Company Admits to Receiving Proceeds of Sex Trafficking and Agrees to Three-Year Monitor*. <https://www.justice.gov/usao-edny/pr/pornhub-parent-company-admits-receiving-proceeds-sex-trafficking-and-agrees-three-year>

⁹⁰ BBC (16 Dec 2020). Pornhub sued by 40 Girls Do Porn sex trafficking victims. *BBC*. <https://www.bbc.com/news/technology-55333403>

⁹¹ https://endsexualexploitation.org/law-center/?sm_guid=NzAwOTU4fDc4NDE2ODE0fC0xfHNlbGVuYUBjb2xsZWNOaXZlc2hvdXQub3JnfDY2ODc3OTB8fDB8MHwxOTY5OTYwOTH8MTEzMnwwfDB8fDY5NDY1MXww0

⁹² Donevan, Svedin, Dennhag & Jonsson (2026). Op. cit

⁹³ Donevan, Svedin, Dennhag & Jonsson (2026). Op. cit

*dissemination of such violence, under the guise of “pornography,” renders the violence invisible. Instead of being seen and treated as evidence of the crimes endured, the images become “proof” that they “wanted it.”*⁹⁴

*“After being subjected to a filmed gang rape, which was then spread on the internet, Ida turned to the Child and Adolescent Psychiatry Emergency Service (BUP-akuten) in hopes of finding support. However, the staff minimized the violence she had endured: “I went to the emergency psych services and talked to them. I’ve got to say, their response was awful. ... They said that what I went through was normal and that some people like that sort of thing.”*⁹⁵

Painful/scary sexual experiences

Women have become resigned to porn-inspired sex acts, no longer always identifying them as assault or abuse.

Roper explains that when acts of violence and degradation are portrayed as desirable, it makes it harder for women to identify them as abuse.⁹⁶ In the SBS documentary *See What You Made Me Do*, exploring domestic abuse in Australia, two survivors illustrated how the legitimacy of strangulation as a sexual practice contributed to their abuse. One said her partner would strangle her and hold her down under the guise of ‘kink’, while another did not recognise strangulation by her partner as abuse because he did it during sex, and she did not know “if it counted”. In an op ed, one woman acknowledged the complexities of ‘consenting’ to sexual strangulation in a context of intimate partner abuse:

“The first time I was strangled, I called it consensual...But the truth is, I was trapped in a cycle of domestic violence.

“I’d confused trauma with kink.”

Women much more than men report that they have had ‘scary’ sexual experiences. Most frequently referenced was anal sex, according to sexual health researcher Debby Herbenick: “For such a common behavior, we found it striking how commonly anal sex was included in descriptions of scary sex.”⁹⁷

⁹⁴ Donevan, Svedin, Denhag & Jonsson (2026). Op. cit

⁹⁵ Donevan, Svedin, Denhag & Jonsson (2026). Op. cit

⁹⁶ Roper, C. (25 Feb 2025). “Safe,” “shaming,” consenting adults”: Responding to myths about sexual strangulation. *Collective Shout*. <https://www.collectiveshout.org/responding-to-strangulation-myths>

⁹⁷ Herbenick, D., Bartelt, E., Fu, T.C., Paul, B., Gradus, R., Bauer, J. et al. (4 Apr 2019). Feeling scared during sex: findings from a U.S. probability sample of women and men ages 14 to 60. *J Sex Marital Therapy* 45(5):424-439. <https://doi.org/10.1080/0092623X.2018.1549634>

Other Australian research investigates unpleasant, painful and unwanted sexual experiences, from the perspective of health practitioners.⁹⁸ Women are the primary group experiencing this, often participating in unwanted 'diverse' sex acts, like anal sex, strangulation, or hitting. Other pornography-inspired acts include hair pulling, spanking hard enough to leave marks, facial ejaculation, confinement, double-penetration, anal-to-mouth penetration, penile gagging, and abusive name-calling.⁹⁹

Pornography is a major player in promoting sexual submission and subservience of women, and acceptance of male aggression.

One doctor says:

I often talk with younger female patients presenting for contraception about consent and the impact of pornography on sexual acts and body dysmorphia—as a lot of issues that patients present with tend to be related to being coerced into unpleasant sex that their (usually young male partner) has learned to be 'normal' through pornography.¹⁰⁰

Increasingly popular, 'erotic breath play' almost always involves men's hands on women's necks.¹⁰¹ In a sample of US college student young women, choking was very common. Most women did not initially ask to be choked, even if they did eventually come to accept it. The pattern was women being choked by a partner without prior communication or consent, and in these situations it was uncomfortable, scary, and part of broader experiences of pressure, aggression, and unhealthy relationship dynamics. This is consistent with research indicating that women are socialised to hide their own desires and focus on male partners' desires. Few openly communicated with their partners about choking.¹⁰²

Is BDSM really acceptable by community standards?

⁹⁸ Sharman R, Allen A, van Niekerk K, Coles A, Manocha R, Foran T. (2024). "What Is Normal?": A Qualitative Exploration of Health Practitioners' Reports of Treating Patients Presenting with Unpleasant Sexual Experiences. *Archives of Sexual Behavior*. 53(10):4099-4116. DOI:[10.1007/s10508-024-02994-3](https://doi.org/10.1007/s10508-024-02994-3)

⁹⁹ Wright, P. J., Sun, C., Steffen, N. J., & Tokunaga, R. S. (2014). Pornography, Alcohol, and Male Sexual Dominance. *Communication Monographs*, 82(2), 252–270. doi.org/10.1080/03637751.2014.981558

¹⁰⁰ Herbenick, D., Bartelt, E., Fu, T. C. (Jane), Paul, B., Gradus, R., Bauer, J., & Jones, R. (2019). Feeling Scared During Sex: Findings From a U.S. Probability Sample of Women and Men Ages 14 to 60. *Journal of Sex & Marital Therapy*, 45(5), 424–439. <https://doi.org/10.1080/0092623X.2018.1549634>

¹⁰¹ Castleman, M. (31 Aug 2021). A potential risky kink? Breath play is becoming more popular. *Psychology Today*. <https://www.psychologytoday.com/us/blog/all-about-sex/202108/potentially-risky-kink-breath-play-is-becoming-more-popular>

¹⁰² Joshi, M., Thomas, K. A. and Sorenson, S. B. (26 Apr 2012). "I didn't know I could turn colors": Health problems and health care experiences of women strangled by an intimate partner. *Social Work in Health Care* 51(9):798-814 <https://doi.org/10.1080/00981389.2012.692352>; Herbenick, D., Guerra-Reyes, L., Patterson, C., Gonzalez, Y.R.R., Wagner, C., and Zounlome, N. (10 Nov 2021). "It was scary, but then it was kind of exciting": young women's experiences with choking during sex. *Arch Sex Behav*. 51(2):1103-1123. doi: [10.1007/s10508-021-02049-x](https://doi.org/10.1007/s10508-021-02049-x)

A small number of Australian research papers are commonly used to justify the idea that BDSM is not pathological and thus meets community standards in Australia.¹⁰³

Many more men than women are aroused by fetishism/sadism and engage in BDSM activity.¹⁰⁴ For women who do participate, a significant proportion did not consent. Women in the UK reported that many had experienced violence during sex: slapping (59%), choking (38%), gagging (34%), spitting (20%), and biting (59%).¹⁰⁵

But did the women want those experiences? Less than half (44%) said the acts were always wanted, 29% said they were unwanted some of the time, 14% unwanted most of the time, and 10% unwanted every time. The level of unwanted 'rough sex' is substantial.¹⁰⁶ In another study from Scotland, a third of men admit slapping, choking, gagging or spitting on their partner without asking for consent; this is assault, potentially sexual assault.¹⁰⁷

There is very little proof that Australian women *want and enjoy* such activities. Instead, the evidence strongly suggests that women are routinely victims of non-consensual violence during sex:

*As to the question of erotic asphyxia there is no evidence that it heightens women's sexual libido but there is evidence that men routinely use strangulation as a method of assault, that it is a trope and a reality in pornography, that women die in the course of it and that it is part of the misogyny narratives.*¹⁰⁸

Who is lobbying for this change?

The most vocal proponents of the proposal to relax restrictions on kink/fetish are commonly the same people who lobby for legalisation of fictional/fantasy content depicting sexual abuse of children. That is the now-closed organisation ProStasia, its Founder Jeremy Malcolm, and its successor organisation, the Center for Online Safety and Liberty. Australia's sex industry also favours recommendation C08, yet has also repeatedly lobbied against requirements for consent and age declarations before uploading pornographic content.

¹⁰³ Stevens, N. (29 Mar 2023). *Review of Australian Classification Regulation (the Stevens Review)*. Department of Infrastructure, Transport, Regional Development, Communication, Sport, and the Arts. Australian Government. <https://www.infrastructure.gov.au/department/media/publications/review-australian-classification-regulation-stevens-review>

¹⁰⁴ Brown, A., Barker, E. D., & Rahman, Q. (2020). A Systematic Scoping Review of the Prevalence, Etiological, Psychological, and Interpersonal Factors Associated with BDSM. *The Journal of Sex Research*, 57(6), 781–811. <https://doi.org/10.1080/00224499.2019.1665619>

¹⁰⁵ Harte, A. (27 Nov 2019). 'A man tried to choke me during sex without warning.' *BBC*. <https://www.bbc.com/news/uk-50546184>

¹⁰⁶ Bows, H. and Herring, J. (29 June 2020). Getting Away With Murder? A Review of the 'Rough Sex Defence'. *J Criminal Law* 84(6). <https://doi.org/10.1177/0022018320936777>

¹⁰⁷ The Scottish Sun (23 Mar 2020). Over two-thirds of men under 40 have slapped, choked, gagged or spat on partner during sex, BBC Scotland doc finds. <https://www.thescottishsun.co.uk/news/5415762/rough-sex-bbc-scotland-partner-men/>

¹⁰⁸ Bows, H. and Herring, J. (29 June 2020). Getting Away With Murder? A Review of the 'Rough Sex Defence'. *J Criminal Law* 84(6). <https://doi.org/10.1177/0022018320936777>

Prostasia Foundation has been criticised for supporting child-like sex dolls, fictional depictions of minors in art/cartoons, opposition to sex offender registries, rebranding pedophilia as a sexual orientation/identity via MAP terminology, and for promoting ‘comprehensive sex education’ that includes chronophilias and fetishes for children.¹⁰⁹ The Foundation (now shut down) had submitted to the UN:

“that access to representations of non-existing children is not associated with greater social acceptability of sexual interaction with children, and that it may actually decrease rates of actual sexual offending against children. This may be because virtual representations such as cartoons and dolls can provide a safe, victimless outlet for some people who are sexually interested in children, but who abhor the idea of harming a real child.”¹¹⁰

“this claim that representations of non-existing children contribute towards the sexualization of real children is insufficient to justify the blanket censorship of such representations, let alone the criminalization of their mere possession.”¹¹¹

We challenge cultural and commercial forces that normalise harmful sexual behaviour and sexual harms. Pornography and prostitution are central parts of the sex industry that contribute to this. The industry consistently pushes boundaries to expand its market, and the current Classification inquiry is no exception. It does not lobby for community safety and wellbeing, but rather for maximum industry freedom.

To this end, the sex industry typically opposes most proposals that impact on adult sexual expression and industry profits, even if these measures are in favour of community safety and child protection, for example:

- Age verification and consent verification for people depicted in pornographic material uploads;
- Age verification to protect children from online pornography;
- Mandated safety measures (condoms, dental dams, etc.) in pornography production

C09 Classification Advisory Council

We welcome the establishment of an independent Classification Advisory Council, with the caveat that there must be a robust mechanism by which the broader community can make complaints and raise issues, as well as having an appropriate legislative instrument to enforce where necessary.

¹⁰⁹ Worlow, A. (16 Feb 2022). Why you should be concerned about Prostasia. *WrongSpeak Publishing*. <https://www.wrongspeakpublishing.com/p/why-you-should-be-concerned-about-prostasia>

¹¹⁰ Prostasia Foundation (15 Mar 2019). Comments on Draft Guidelines on the implementation of the OPSC. <https://web.archive.org/web/20200525025140/https://prostasia.org/wp-content/uploads/2019/03/UNCRC-submission.pdf>

¹¹¹ Prostasia Foundation (15 Mar 2019). Comments on Draft Guidelines on the implementation of the OPSC. <https://web.archive.org/web/20200525025140/https://prostasia.org/wp-content/uploads/2019/03/UNCRC-submission.pdf>

The concept that such a panel would be a source of advice, informed by empirical evidence, community research, international best practice, and consultation with stakeholders, is a model that Collective Shout endorses.

The Council should include representatives with specialist expertise in sexual and domestic violence, child development and psychology, the links between pornography consumption and attitudes that fuel violence against women, mental health, parenting, teen and young adult wellbeing, and respectful relationships.

This would significantly contribute to upholding Australia's commitments to address child sex abuse and family violence which are at critically high levels in Australia, as demonstrated in recent research:

- The Australian Child Maltreatment Study (ACMS), the first nationally representative study of child maltreatment rates, found that 28.5% of Australians experienced child sexual abuse. Girls experience double the rate of child sexual abuse (37.3% compared to 18.8% of boys).¹¹²
- According to the most recent Australian Bureau of Statistics (ABS 2023) Personal Safety Survey, 27 percent of women and 12 percent of men had been a victim of violence by an intimate partner or family member since the age of 15.¹¹³
- One in five women have experienced sexual violence in Australia, with men the most common perpetrators.¹¹⁴
- Almost one in ten Australians (8.7%) experienced forced sex in childhood.¹¹⁵
- In 2023, there were 36,318 victims of sexual assault recorded across Australia — an increase of 11% (3,547 victims) from the previous year. Around two in five victims (41%) were aged between 10 and 17 years at the date of incident. Eighty-four per cent of victims were female.¹¹⁶
- These figures are widely understood to represent a significant undercount. Research by the NSW Bureau of Crime Statistics and Research found that just 8% of reported contemporary child sexual assault incidents resulted in a proven charge, with the largest point of attrition

¹¹² Mathews, B., Pacella, R.E., Scott, J.G., Finkelhor, D., Meinck, F., Higgins, D.J., Erskine, H.E., Thomas, H.J., Lawrence, D., Haslam, D.M., Malacova, E., Dunne, M.P. (2023). The prevalence of child maltreatment in Australia: Findings from a national survey. *Medical Journal of Australia*, 218 (6 Suppl.), S13-S18. doi: 10.5694.mja2.51873.

¹¹³ Payne, J. and Morgan, A. (Sep 2024). *Prevalence of recorded family and domestic violence offending: A birth cohort study*. Trends and Issues in Crime and Criminal Justice. Australian Institute of Criminology. Australian Government. https://www.aic.gov.au/sites/default/files/2024-09/ti701_prevalence_of_recorded_family_and_domestic_violence_offending.pdf

¹¹⁴ OurWatch (2026). Quick facts about violence against women. *OurWatch*. <https://www.ourwatch.org.au/quick-facts>

¹¹⁵ Mathews, B. (Coordinating author). (2023). The Australian Child Maltreatment Study: National prevalence and associated health outcomes of child abuse and neglect [Supplement]. *Medical Journal of Australia*, 218(S6), S1–S51. <https://www.mja.com.au/journal/2023/218/6/supplement>

¹¹⁶ Australian Bureau of Statistics. (2024). Recorded crime - Victims, 2023 (Sexual assault section). <https://www.abs.gov.au/statistics/people/crime-and-justice/recorded-crime-victims/2023>

occurring during the investigation stage, where no legal action was taken in 85% of reported incidents.¹¹⁷

- The AFP-led Australian Centre to Counter Child Exploitation (ACCCE) recorded a 41% jump in reports of online child sexual exploitation in the 2024–25 financial year.¹¹⁸

There is little public confidence in the Classification Review Board to reflect community standards on matters of child safety and protection. In 2023 the Classification Review Board rejected expert analysis by Dr Lesley-Anne Ey (University of South Australia, with a research focus on child sexual exploitation and harmful sexual behaviour) and decided that an image depicting child sexual abuse by a grown man was instead an image of ‘consensual sex’, not paedophilia, and concluded that “all content in the book [*Gender Queer: A Memoir* by Maia Kobabe] is justified in context and appropriate to its intended audience” with a classification of Unrestricted.¹¹⁹

The Board granted an MA15+ rating to animation *Eromanga Sensai*, in which a 15-year-old boy and his 12-year-old sister create pornographic comics together, stating: "The film contains strong themes that are justified by context." These materials were commonly shelved alongside *Pokemon* and *Astro Boy* titles.¹²⁰

We agree that the current Scheme is inefficient and fragmented, with lengthy timeframes and an unequal regulatory regime. We are particularly concerned by lack of enforcement of compliance with classification requirements by online film and game platforms. We have witnessed this kind of blatant disregard for Australia’s regulatory systems in the case of the Ad Standards, the advertising self-regulation body.¹²¹

For an effective Classification Scheme, members of the public and community groups must be able to submit unclassified content for classification without incurring a prohibitive cost.

¹¹⁷ NSW Government (29 May 2024). Only 7% of sexual assaults reported to NSW police result in a guilty outcome in court. <https://bocsar.nsw.gov.au/media/2024/mr-attrition-sexual-assaults-BB170.html>

¹¹⁸ Australian Centre to Counter Child Exploitation. (7 Sep 2025). 41 per cent jump in online child sexual exploitation reports underscores need for whole-of-community approach. <https://www.accce.gov.au/news-and-media/news/41-cent-jump-online-child-sexual-exploitation-reports-underscores-need-whole-community-approach>

¹¹⁹ Annex D at <https://www.infrastructure.gov.au/sites/default/files/documents/manacs-bernard-gaynor.pdf>

¹²⁰ MacLennan, L. (28 Feb 2020). Anime and manga depicting sexual images of children spark calls for review of classification laws. *ABC News*. <https://www.abc.net.au/news/2020-02-29/mps-wants-review-of-classification-laws-for-manga-and-anime/12012522>

¹²¹ For example, Roper, Caitlin (22 April 2024). 34 Reasons Why Ad Industry Self-Regulation is a Disaster. *Collective Shout*. https://www.collectiveshout.org/32_reasons_why_ad_industry_self_regulation_is_a_disaster