



**Submission to the
Australian Government Attorney-General's Department
An R18+ Classification for Computer Games – Public Consultation**

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Executive Summary

*Multiple studies have found overwhelming evidence to suggest that exposure to violent video games is causally related to . . . aggressive feelings, aggressive thoughts, and physiological arousal . . . aggressive behavior, and other variables.*¹

“Should the Australian National Classification Scheme include an R18+ classification category for computer games?” No, it should not.

The Australian Christian Lobby (ACL) is opposed to the inclusion of an R18+ classification category in the National Classification Scheme (NCS) for computer and video games. The introduction of the R18+ classification for games would make available for sale and hire in Australia more graphically violent computer games, such as *Left 4 Dead 2*. The unedited version of this game received a Mature classification (suitable for persons aged 17 and older) in the United States, but was rated Refused Classification in Australia. The game contained “graphic depictions of blood and gore”.² Australia should not follow the lead of the USA and risk games such as this falling in the hands of children.

Despite the loud protestations of the gaming industry, the government, if it were to introduce the R18+ rating for games, would be acting in opposition to broader public sentiment on this issue. There are already deep concerns about depictions of violence and gratuitous sex in the media.

The classification regime for computer games in Australia precludes from sale or hire games that are rated unsuitable for minors. This approach is grounded in the commonsense and research-backed premise that the interactive nature of computer games causes their content to have a greater impact on players than the effects of similarly rated filmic depictions of violent or sexual conduct on viewers of movies.

As the highest rated games in Australia, MA15+ computer games would already have a higher impact on their players than MA15+ films, which depict the same level of content. There is little justification then for the even more graphic content of R18+ films to be portrayed in a form of media with higher impact. This is especially the case given the documented negative effects of violent computer games on their players, in particular the effects on children and adolescents.

This submission provides an overview of the research which demonstrates the negative effects of violent computer games, which includes reduced levels of empathic and pro-social behaviour, and increased levels of aggression. It will also highlight what ACL believes are serious structural flaws of the consultation process; and rebuff arguments of the adult gaming lobby, among them the claim that an R18+ rating for computer games would prevent inappropriate games from being ‘squeezed’ into the MA15+ rating. The answer to this perceived problem is not an R18+ rating, but ensuring the Classification Board is undertaking its role properly.

This submission will recommend the Department draw to the attention of the Government the clear evidence that video game violence correlates with aggressive behaviour. On this basis, ACL submits that the Department recommend to the government that an R18+ classification category for computer games not be incorporated into the NCS. At a time of strong public disquiet about

¹ Barlett, C.P., Anderson, C.A. & Swing, E.L. (2009) ‘Video game effects confirmed, suspected and speculative: A review of the evidence’. *Simulation & Gaming*, 40, 377-403.

² Evidence of D. McDonald of the Classification Board before the Senate Legal and Constitutional Affairs Committee, 8 February 2010, pp. 20-21.

depictions of violence in the media, the continued rejection of the R18+ rating for games would maintain the primacy of protecting vulnerable young people as a principle in public policy above that of allowing people to read, hear and see whatever objectionable material they want.

Overview of the consultation process

ACL wishes to briefly comment on the structure of the consultation process and in particular the composition of the Department's submission template. ACL understands that there is strong public interest in the consultation, which has led to the production of a submission template to standardise the expected large number of submissions for simpler processing. Departmental staff confirmed this position at recent Senate Estimates hearings:

We knew it would be a large consultation process. We were trying, in an attempt to put some indicators to those who wanted to put in submissions. We wrote to various organisations to seek their views as well. So it is not just the template which will form part of the consultation process, but as a lot of individuals will be having a view on this issue, we thought a template was a sensible way to go.³

Given the likely large number of submissions, ACL appreciates the practical considerations that provided the impetus for developing the submission template, but queries whether this will deliver the best consultation outcome. The structure of the consultation primarily invites simplistic, formulaic responses, with the discussion paper instructing participants to "Please use the submission template attached to this paper". Certainly the Department will accept submissions in varying formats, but the discussion paper is clearly capable of misleading participants to believe that completing the template is the only way to voice an opinion, thereby potentially discouraging more detailed and considered submissions.

The framing of the consultation around the simplistic central question of whether the NCS should include an R18+ rating for computer games is highly problematic, especially as the remaining survey questions flow directly from the first. The main question is innocuous and without context, potentially misleading participants about what is being proposed. It says nothing about the nature or content of R18+ games, and assumes a level of background information about this long-running debate on the part of participants.

The consultation process appears to be structured in a way to primarily encourage participation from people with a pre-existing understanding of the R18+ gaming debate, or from those who have a prior stake or interest in its outcome. It seems to be geared strongly in favour of gaming interests. The consultation could create an expectation that any response will be 'favourable' to the introduction of the R18+ classification for games by the Government.

Further, the simplistic way in which the consultation calls on all participants to answer either 'yes' or 'no' to a single question, seemingly as the primary basis of submissions, establishes the expectation that the number of submissions in favour of or against the R18+ rating for games is the primary way

³ Evidence of H. Daniels of the Attorney-General's Department before the Senate Legal and Constitutional Affairs Committee, 8 February 2010, p. 20.

of determining the outcome of the consultation. It appears that the consultation is a simple 'show of hands' exercise, which the public perceives as giving equal weighting to template submissions as more extensive and thoughtful written contributions.

Certainly the predictable weight of numbers for submissions in favour of the legalisation of R18+ games will be presented by gaming interests as conclusive evidence of widespread community support for their sale and distribution in Australia, when no such support actually exists. By calling on simple formulaic submissions, the consultation process has been poorly structured and could effectively negate the well-founded concerns of community organisations and family groups about the social and psychological effects of more graphically violent and sexually explicit interactive media content becoming more freely available in Australia.

Naturally ACL appreciates the opportunity to comment on whether the NCS should include an R18+ classification for computer games, but is deeply concerned that the consultation process is predicated towards an outcome that does not respect the complexity of this critical social issue. It is hoped that thorough research-based submissions which examine the pertinent issues in greater depth and detail than template submissions will be given the weighting and respect they deserve.

ACL proposes that the Department conduct public hearings that give an equal hearing to those who support and oppose the introduction of the R18+ rating for computer games. The hearings will provide the secretariat with an opportunity to draw out further nuance and detail in the debate, and reach a better-informed position to present to the Government. Such public hearings should view and examine the type of material that might become available in Australia as a result of any change.

Video game violence

There is little doubt that the R18+ classification for computer games will include games with a higher impact and level of violence than games that are presently legally available for sale and hire in the Australian market, despite claims that 'adult' games are squeezed into the existing MA15+ classification. Video game violence has a range of negative psychological and social consequences. These documented effects must be a key consideration of the Department's deliberations on the proposal for an R18+ rating for games.

The effects of video game violence

Prominent computer game researcher Professor Craig Anderson, who has numerous years of experience and is a leader in his field, states unequivocally that there is a strong and definite correlation between violent video games and aggressive thoughts and behaviour: "Violent video games are significantly associated with: increased aggressive behavior, thoughts, and affect; increased physiological arousal; and decreased prosocial (helping) behaviour".⁴

This position is confirmed by more recent research: "Children and young adults, males and females, high aggressive and low aggression people are all susceptible to increases in aggression, after even

⁴ Anderson, C. (2003) 'Violent video games: Myths, facts, and unanswered questions', *Psychological Science Agenda: Science Briefs*, 16(5), 1-3.

short exposures to violent video games”.⁵ This same study goes on to explain the wide-ranging effect of video game violence on behaviour in a broad cross-section of the community:

*A clear picture has emerged of the effects of violent video games on aggressive affect, behavior, and cognition . . . short term exposure to violent video games produces immediate increases in aggressive behavior, aggressive cognition, and aggressive affect; repeated exposure leads to the development of stable individual differences in aggressiveness . . . studies illustrate, a variety of methods converge to reveal detrimental effects of video game violence on all of these outcomes. These effects are observed in children, adolescents, and young adults.*⁶

Other studies of specific gaming scenarios have shown that playing a violent first person shooter video game can increase aggression significantly;⁷ and that video game violence is associated with stronger pro-violence attitudes in fourth and fifth graders.⁸ Another study has “provided evidence that everyday exposure to digital game violence can increase not only direct but also indirect aggression”,⁹ such as gossip or encouraging peers to socially isolate others. Participants in other research took significantly longer to help when a fight broke out compared to those who played a nonviolent game, and perceived the fight to be less serious.¹⁰

Further research has demonstrated that playing violent video games has a longitudinal effect, leading to “increases in physical aggression some months later in children and adolescents, relative to those who do not play violent video games”.¹¹ The same study also showed that the longitudinal effects of violent video games on youth generalises across cultures that are individualistic and have high rates of physical aggression (the United States), and cultures that are collectivist with low levels of aggression (Japan).

Another study has shown that “playing a violent video game, even for just 20 min, can cause people to become less physiologically aroused by real violence”.¹² In this study, participants who played a violent video game subsequently had a lower heart rate and galvanic skin response whilst watching actual violent footage than people who had played a nonviolent game. The study showed that

⁵ Anderson, C., & Swing, E. (2007) ‘The unintended negative consequences of exposure to violent video games’, *Cognitive Technology*, 12(1), 3-13, p. 3.

⁶ Ibid, p. 8.

⁷ Barlett, C.P., Harris, R. J. & Baldassaro, R. (2007) ‘Longer you play, the more hostile you feel: examination of first person shooter video games and aggression during video game play’, *Aggressive Behavior*, 33(6), 486-497.

⁸ Funk, J.B. et al (2004) ‘Violence exposure in real-life, video games, television, movies, and the internet: is there desensitization?’, *Journal of Adolescence*, 27(1), 23-39.

⁹ Wallenius, M., Punamaki, R.L. & Rimpela, A. (2007) ‘Digital game playing and direct and indirect aggression in early adolescence: The roles of age, social intelligence and parent-child communication’, *Journal of Youth and Adolescence*, 36(3), 325-336, p. 333.

¹⁰ Bushman, B. J., & Anderson, C.A. (2009) ‘Comfortably numb: Desensitizing effects of violent media on helping others’. *Psychological Science*, 20(3), 273-277.

¹¹ Anderson, C. et al (2008) ‘Longitudinal Effects of Violent Video Games on Aggression in Japan and the United States’, *Pediatrics*, 122(5), 1067-1072, p. 1070.

¹² Carnagey, N., Anderson, C., & Bushman, B., (2007) ‘The effect of video game violence on physiological desensitization to real-life violence’, *Journal of Experimental Social Psychology*, 43, 489-496, p. 494.

violence in computer games can desensitise players to real-life violence. Other desensitisation research has demonstrated the direct negative effect of video game violence on brain function and behaviour.¹³

No negative effect?

Groups who defend violent computer games routinely argue that the link between violent computer games and aggressive thoughts and behaviours is unproven or exaggerated. Despite claims to the contrary, however, the effect of violence in video games is generally well understood and accepted within the academic and research communities. Professor Anderson, along with fellow researcher Douglas Gentile explains that:

*The media violence research literature is large, diverse, and consistent. True scientific experts on media violence effects have reached a consensus that, in our view, meets the criterion of a scientific fact as a conclusion held with a reasonable degree of scientific certainty. The key fact is that exposure to media violence causes an increase in the likelihood of aggressive and/or violent behavior in both short- and long-term contexts.*¹⁴

In the same book chapter, Anderson and Gentile explain that the general public is often misinformed about the actual harm caused by video game violence because of commercial interests working to see that critical information suppressed:

*First, the media industries spend a lot of money on public relations experts who issue press releases, write op-ed pieces for newspapers, and give interviews in which they deny that any valid research shows any negative effects of violent media, and occasionally claim positive effects. Second, the media industries routinely promote (and sometimes fund) their own "experts," often academicians without true expertise in media violence research.*¹⁵

On this basis, ACL strongly encourages the secretariat to analyse the source of information cited by consultation participants who claim no harm is caused by video game violence. In particular, the secretariat should carefully scrutinise research directly commissioned and funded by the computer gaming industry. This is not to disparage the industry, but to highlight the commercial reality of allowing more violent games to be sold and hired openly on the Australian market.

Interactivity

Although the violent content of R18+ games would conceivably be similar to that currently portrayed in R18+ movies, the interactive nature of computer games would cause that violence to have a greater effect on the participant in the game than on the viewer of a movie of the same rating.

¹³ Bartholow, B.D., Bushman, B. & Sestir, M. (2006) 'Chronic violent video game exposure and desensitization to violence: behavioral and event-related brain potential data', *Journal of Experimental Social Psychology*, 42(4), 532-539.

¹⁴ Anderson, C., & Gentile, D., (2008) 'Media violence, aggression, and public policy', in Borgida, E. & Fiske, S. (Eds.), *Beyond Common Sense: Psychological Science in the Courtroom* (pp. 281-300). Malden, MA: Blackwell, p. 296.

¹⁵ Ibid, p. 283.

Computer games are currently treated differently by classification authorities because of the well-founded concern, expressed by Classification Ministers in the (previous) Office of Film and Literature Classification's original guidelines for the classification of computer games that their “‘interactive’ nature, may have greater impact, and therefore greater potential for harm or detriment, on young minds than film and videotape”. This concern has only grown as the complexity, sophistication and graphic detail of computer games have increased. Computer game violence is now more “real” than it has ever been before, and will continue to become more realistic as technology develops.

Even gamers admit that the interactive nature of computer games makes them more violent than watching television or film. Research commissioned by the Interactive Entertainment Industry Association found that Australians – both gamers (79%) and non-gamers (87%) – shared the view that “interactivity made media experiences more violent”.¹⁶

Professor Craig Anderson, and colleague Edward Swing, explain in detail why the effects of violent video games are stronger than the effects of violent films and television:

First, theory suggests that identification with an aggressor makes an individual more likely to behave aggressively in the future. Videogames force a player to identify with the aggressor because the player is controlling them . . . This increased identification with the aggressor is likely to make the rewards for the portrayed violence more direct and salient as well.

Violent videogames may also have a stronger effect on aggressive behaviour than films or television because these games often allow the player to rehearse the entire aggression sequence. A player may be required to look for threats, identify them, make a decision, and take aggressive action in a game, whereas television or film observer may not rehearse all of these steps in watching a film or television show. By developing more complete aggressive scripts, future aggressive behaviour becomes more likely.

The overall rate of violence tends to be higher in violent videogames than violent films and television shows. Even films and television shows with generally violent themes often spend a decent amount of time in non-violent plot development. Many videogames, on the other hand, contain non-stop violence. This difference in the quantity of violence is likely to make the effect of videogame violence stronger than that of television and film.¹⁷

Further research has shown that players of violent video games become more aggressive when they identify with the characters. Realistic games, and games that immerse the participant, were especially likely to cause participants to identify with violent characters.¹⁸ A study that compared playing a violent game against watching the same violence on television indicated that “playing a violent video game should lead to more aggression than watching television violence”.¹⁹

¹⁶ Brand, J.E. (2007), *Interactive Australia 2007: Facts About The Australian Computer and Video Game Industry*, p.11.

¹⁷ Swing, E.L., & Anderson, C.A. (2008), ‘How and what do video games teach?’ in T. Willoughby & E. Wood (Eds.) *Children's Learning in a Digital World* (pp. 64-84), Oxford, UK: Blackwell, pp. 75-76.

¹⁸ Konijn, E. Bijvank, N. & Bushman, B. (2007) ‘I wish I were a warrior: the role of wishful identification in the effects of violent video games on aggression in adolescent boys’, *Developmental Psychology*, 43(4), 1038-1044.

¹⁹ Polman, H., de Castro, B.O. & van Aken MA. (2008) ‘Experimental study of the differential effects of playing versus watching violent video games on children's aggressive behaviour’, *Aggressive Behaviour*, 34(3), 256-264.

Therefore, violent computer games, because of their interactive nature, have a higher impact on their players than similar film content has on its viewers. This is only sensible given that playing computer games involves active participation in the act of aggression, rewarding and reinforcing the violence, whereas watching film or television violence is a passive activity. Computer games are different from films, and should continue to be treated differently by the classification system, especially when they involve excessive amounts of interactive violence.

Children and violent games

Despite the strong evidence of the well-documented negative consequences of violent computer games on children, supporters of an R18+ classification category for games will point to the average age of gamers as justification for the introduction of such a rating. The claim, based on research commissioned by the gaming industry, is that the average age of gamers is now 30 years, and that these 'mature' gamers should be able to "read, hear and see what they want" in accordance with the classification standards.

The average age of Australian gamers does not obviate the more important principle of protecting children from harmful media content. In fact, ACL would strongly argue that protecting children from the deleterious effects of excessively violent interactive computer games is a far more important goal of the Australian classification system than allowing adults to play whatever they like. The common good, in this instance, is a far greater priority than the individual autonomy of adults, especially given the social harm of aggressive behaviour, and community concerns about increased rates of violence.

Children will access R18+ games

There is no doubt that even if there were introduced into the NCS an R18+ classification category for computer games these games would find their way into the hands of minors. This is despite the false claim of the gaming industry that the "R18+ classification category sends a clear, unambiguous message to parents that game material is unsuitable for minors". It is naive in the extreme to believe that children will not access R18+ computer games should this classification be introduced.

The ease with which children can access games that are legally only allowed to be hired and purchased by adults is clearly demonstrated by research from overseas. British research undertaken for their Board of Film Classification showed that parents believed that, "any restriction they impose will be frustrated by other parents or by retailers". The report also said that "Gamers confirm that restrictions are widely ignored".²⁰

Research by the New Zealand Office of Film and Literature Classification has shown that underage gamers are attracted to restricted games and do not abide by the existing R18 classification. It says that despite clear guidance about the R18 rating, parents will still break the law and facilitate access

²⁰ Dawson, C., Arnold, C., Taylor, C. & Toombs, B., (2007), *Video Games: Research to improve understanding of what players enjoy about video games, and to explain their preference for particular games*. London: British Board of Film Classification, p. 100.

to restricted games for their children. In a strong warning of the consequences of violent video games, the report says:

*Our greatest concern is that giving children and teenagers access to R18 games increases the odds that some of these young people will grow up to become adults who will contribute to a society that normalises nonchalant and callous attitudes to violent behaviour, and that becomes more inured to or ignorant of the consequences of violence, consequences that no civil society should tolerate.*²¹

If this is the consequence of having violent video games freely available to young people despite apparent restrictions, then the cautionary principle should inform public policy makers that implementing an R18+ game rating in Australia is a regressive step in our classification system. International research shows that 'adult' games find their way into the hands of children despite the best efforts of parents to protect them from harmful and violent gaming content. The government should not frustrate or exacerbate the effort of well-meaning parents attempting to regulate their children's gaming activities by allowing a flood of excessively violent adult games to enter the Australian market.

The current Australian classification scheme, and the way in which it is regulated and enforced, is not capable of protecting children and vulnerable young people from the harmful effects of violent computer games. Regardless of the average age of gamers, the welfare of children should be a more pressing social consideration.

Addressing other gaming concerns

There are a range of additional arguments used by gamers to justify the introduction of an R18+ classification category into the NCS. The most relevant arguments are addressed briefly below.

International parity

The claim is made that because Australia is unique in not having a specific classification for adult games that we should follow the lead of other countries. Yet pointing out the difference is merely a statement of fact, not a justification for an amendment to the current regime. This may in fact demonstrate that the Australian system prioritises the welfare of children over the interests of adults, which appears sensible given the complexity and dangers of contemporary childhood.

Content 'squeezed' into MA15+

A popular argument of the gaming industry is that there should be an R18+ classification because some violent games are squeezed into the MA15+ classification. It is true that some games that receive a classification restricted to adults in overseas jurisdictions are modified to allow them to be classified in Australia, and therefore be legally available for sale and hire. The claim is that because these games are incorrectly rated MA15+, supposedly misleading parents about the true nature of

²¹ New Zealand Office of Film and Literature Classification (2005) *Underage Gaming Research*, p. 17.

these games and diluting the effectiveness of the overall classification system, an R18+ rating should be introduced. A recent manifestation of this argument is that:

Video games that should otherwise be rated R18+ are slumped into the MA15+ category, and games that should otherwise be MA15+ are refused classification altogether. The only way out is to introduce an R18+ classification for video games and fall in step with the rest of the world; the only thing standing in the way is public ignorance of the issue.²²

The 'only way' to solve this apparent problem is not to introduce an R18+ rating for computer games in Australia, because the gaming industry incorrectly diagnoses the problem. The actual issue identified, as demonstrated by the fact both MA15+ games and potential R18+ are classified incorrectly, is with the Classification Board for incorrect application of the existing guidelines. The solution to inconsistent classification is not an R18+ rating, thereby opening the door to more graphically violent and sexually explicit games, but more consistent application of the existing classification guidelines.

The argument that extremely violent games are already being squeezed into the MA15+ classification is actually an argument for stricter classification and stronger application of the existing classification guidelines, not for introducing an R18+ category. Put simply, the Government should ensure the Classification Board is doing its job.

Illegal downloads of R18+ games

Another argument used in favour of the introduction of an R18+ classification category for games is that the Australian industry is losing a considerable amount of money, in terms of retail sales and hire, as gamers source 'adult' games illegally over the internet. Again, this problem is not solved by an R18+ rating, as games would still undoubtedly be sourced illegally. This is another argument in favour of stronger application of existing classification guidelines, as well as copyright laws.

Recommendations

ACL recommends that the consultation secretariat:

1. Conduct public hearings to gather more detailed and nuanced evidence;
2. Make clear to the public that the number of submissions for and against the central 'yes/no' question of whether to introduce the R18+ classification category is not the main factor determining the outcome;
3. Acknowledge the documented link between video game violence and aggression, especially in children and young people;
4. Recognise that the interactive nature of computer games is likely to increase the harmful effects of computer game violence;

²² Parker, L. (2010, February 1), 'Gaming classification bound in ignorance', *National Times*. Available: <http://www.smh.com.au/opinion/politics/gaming-classification-bound-in-ignorance-20100201-n8cs.html>

5. Accept that an R18+ rating for computer games would allow children to access more graphically violent video game content;
6. Prioritise, in its deliberations, the protection of children over the ‘right’ of adults to “read, hear and see what they want”; and, (most importantly),
7. Recommend to the Government not to introduce the R18+ classification category for computer games to the National Classification Scheme.

Conclusion

The Australian Government should not introduce into the National Classification Scheme an R18+ classification category for computer games, which would allow more graphically violent and sexually explicit games to be available for sale and hire in Australia. There is a clear link between violence in video games and aggression:

*Multiple studies have found overwhelming evidence to suggest that exposure to violent video games is causally related to . . . aggressive feelings, aggressive thoughts, and physiological arousal . . . aggressive behavior, and other variables.*²³

The impact of playing violent video games is greater than watching similar content in films because of the interactive nature of games. Players actively participate in the violence rather than passively watching. Players identify with the aggressor and are rewarded for their acts of violence. Violent games reinforce the “belief that hurting others is a successful way to resolve conflict”.²⁴

An R18+ classification will not provide greater protection for children against the harms of violent games, despite the fact that some extremely violent games are now being classified MA15+. This problem is not solved by the introduction of an R18+ classification, which could conceivably exacerbate the problem of incorrect classification. The solution to incorrect classification is stronger application of existing standards, not to introduce a softer standard altogether.

The introduction of an R18+ classification category for computer games will cause more violent games to find their way into the hands of young Australians. Overseas research shows that children are able to access violent ‘adult’ games despite the best attempts of parents to shield their children from them. An R18+ rating for games would frustrate the efforts of parents to protect their children from violent media content. These parents are already battling a tide of inappropriate violent and sexual content. The Government should support their efforts, not hinder them.

The best interests and welfare of children are protected by the continued application of the existing computer game classification system, where any game deemed unsuitable for minors is rated Refused Classification.

ACL National Office – February 2010

²³ Barlett, C.P., et al. (2009), op cit.

²⁴ Ibid.