

To the eSafety Commissioner and Executive Manager, Investigations, eSafety Commission,

Thank you for the opportunity to be involved in the consultation process for the new RAS Declaration in Australia.

The requirement to form the eSafety Commission in Australia means it is self-evident that online safety for all Australians is one that has needed to be addressed, and is of ongoing concern. In particular, there is a need to protect our children from exploitation, abuse and exposure to content that is traumatising and damaging to their mental, emotional and physical wellbeing and development.

Despite the Restricted Access System Declaration 2014, your Office clearly identifies the trend for younger and younger children accessing pornography and the impacts this has. You have needed to develop a range of resources for professionals, parents, children and young people to try and both prevent this access, as well as address the problems that arise when such content is accessed from an initial exposure to ongoing engagement by children to this content. As such, it would seem obvious that the current declaration is at best, limited in its effectiveness, and at worst, of no use. To suggest that industry self-regulation in limiting access to adult R18+ content is an option, is laughable. The new RAS should absolutely be prescriptive in determining the measures used to limit children's exposure to this material, and the measure of its effectiveness will be the ongoing work your Office needs to do in education, prevention and resource development as a result of the trends seen in the age of people accessing this material, and any resultant harmful behaviours and/or wellbeing damage caused by such access, particularly in children.

In addressing the question of industry burden in implementing the RAS, the pornography industry worldwide generates billions of dollars of profit every year. It would seem that any additional administrative and financial burdens would easily be absorbed by current business models when implementing any requirements of the new RAS, and therefore is of least concern in the development of this system. Indeed, even if such cost were passed on to adult customers, the overwhelmingly greater concern to protect children, should be the paramount consideration, as it is in all Child Safe Standards.

Finally, while there is definite need to be aware of, and ensure compliance with, the Australian Privacy Policy, when establishing the identity and age of those accessing pornographic content, screening systems need also to be robust enough to prevent easy by-pass by tech savvy children, or organisations and platforms who have little desire to comply with the RAS. A simple 'tick a box' age declaration is clearly inadequate. Multiple site entry requirements are necessary as a bare minimum.

Again, thank you for the opportunity to make a submission,

Kind Regards

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