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Feedback on Draft Equipment Code for Class 1C and Class 2 Material

Introduction

LG Electronics Australia Pty Ltd ("LGEAP") is a major importer and supplier of consumer electronic products in Australia.

We appreciate the opportunity to contribute to the consultation paper regarding the draft Equipment Code for Class 1C and Class 2 Material, which aims to protect Australian children from exposure to online pornography and other harmful content.

LGEAP supports the overarching goals of the draft Phase 2 codes designed to create a safer online environment for Australian children. We have proactively integrated several parental control features into our smart TV devices, which include:

- TV Rating Lock: Prevents access to programs exceeding a pre-set rating.
- Program/Channel Lock: Allows users to block specific channels or programs.
- Application Lock: Restricts access to designated applications.
- Site Filtering: Enables parents to register websites for blocking or allowing access as follows:
 - Approved Sites: Accessible by all users.
 - Blocked Sites: Require parental control PIN for access.
- Usage Limits: Allows parents to set time restrictions for device usage.

These existing controls underscore our commitment to online child safety and align with our support for the overall objectives of the existing and proposed Codes.

We believe these features, combined with app-level age verification, will adequately protect children while avoiding unnecessary industry-wide disruptions.



Concerns Regarding Tier 1 Device Classification and Age Assurance

While we endorse compliance measures, we express concerns about the proposed blanket application of these tools to all Tier 1 devices defined as:

"interactive (Tier 1) device means equipment that satisfies all of the following:

- (a) is user-interactive;*
- (b) is personal and portable (may be carried with the end-user);*
- (c) is capable of operation without the use of any other interactive (Tier 1) device; and*
- (d) general internet browsing through a screen or display capable of displaying video or images is intended significant function of the device."*

This broad definition encompasses a range of devices with varying capabilities and maturity levels. Many Tier 1 devices are not commonly used by children for web browsing, highlighting the need for a nuanced and risk-based approach.

Compliance measures should be proportionate to the level of risk each device poses regarding potential harm to children. For instance, stronger measures may be justified for devices specifically designed for children, while optional measures for less risky Tier 1 devices would be more appropriate. This distinction would ensure that safeguards are effectively targeted.

Mandating extensive modifications to all Tier 1 devices, regardless of their functionality or risk level, would pose significant challenges for manufacturers operating in Australia. Many rely on global operating system platforms from overseas entities, and implementing these requirements for devices unlikely to be used by children would disproportionately burden the industry.

Furthermore, we recommend that age-assurance tools be implemented at the application or website level, rather than imposing blanket changes at the operating system level for all Tier 1 devices. This targeted approach would focus on high-risk applications, alleviating unnecessary burdens on manufacturers of less-risky devices.



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Conclusion

LGEAP is committed to collaborating with the Codes development team and the Government to develop effective online safety measures for children. We believe a balanced approach that prioritises app/site-level solutions over blanket operating system requirements for all Tier 1 devices presents a more practical and effective pathway to achieving the Codes' objectives.

We appreciate the opportunity to provide feedback and are available for further discussions on these matters. Thank you for considering our submission.



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