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14 November 2013

The Secretary
Classification Review Board
Surry Hills NSW

Dear Secretary,

Subject ACCM submissions to CRB review of 12 computer games titles

The ACCM wishes to be accepted as an interested party in these reviews by virtue of being an organisation which has a long standing involvement in the area of the classification of violent computer games, and concern about the access of children and young people to the levels of violence found in some MA15+ games.

We are not able to appear in person at the review but provide the following written submissions in support of reviewing the 12 titles.

Our submissions on each of these titles are similar, and relate to the application in each case of the criteria for violence in MA15+ games viz, “strong and realistic violence should not be frequent or unduly repetitive”.

It is the view of ACCM that the Classification Board has wrongly applied this criteria in classifying these games, as it has conflated what are separate concepts viz, “strong” and “realistic”. In the view of ACCM, as these concepts are listed separately, they must have distinct meanings, and therefore, one concept should not be used to moderate a judgement about the other. Eg the “realism” or otherwise of the game should not be used to moderate a judgement about whether it includes “strong” violence.

“Strong violence”: ACCM submits that in applying this section of the violence criteria for MA15+, “strong” violence should be interpreted as meaning that which is beyond a medium level of violence (eg punches, kicking, blows, guns) and would include dismemberment, torture, cruel or horrific depictions of death or injury, infliction of severe pain; senseless killing or injury to many innocent characters, and violence towards the defenceless.

“Realistic violence”: ACCM submits that “realistic violence” should be interpreted as meaning violence inflicted on humans, human-like characters (including zombies who look like human-like), animals or animal-like characters, and where the victims who die, or are injured, remain dead or injured, bleed, suffer or are in pain. Unrealistic violence might include the victims disappearing/ magically coming alive again etc.

Frequency: ACCM takes it as a given that all these games include frequent violence.

Interactivity: ACCM submits that the interactivity of these games, which contain strong and realistic violence and which is frequent, results in the games requiring R18+ classification.

ACCM asks that these comments are taken in as part of our submission on each of the following 12 games.

Comment on individual games

1.Killer is Dead

The violence in this game is "strong" as it includes executions, dismemberments

It is realistic as it is inflicted on humans or humanoids and results in bleeding (though some victims disappear)

This game should be classified R18+.

2.Alien Rage

The violence in this game is "strong" as it includes dismemberment, decapitations; and is "realistic" as it is performed against humanoids and includes injury detail and blood.

The violence is frequent.

This game should be classified R18+

3.Tom Clancy's Splinter Cell Blacklist

The violence in this game is "strong" as it includes stealth combat with a vast array of weaponry, torture.

It is realistic as it is set in a realistic real world setting and the violence is inflicted on humans, and results in corpses, blood, injury detail, death.

This game should be classified R18+.

4. Deadly Premonition the Director's Cut

The violence in this game is "strong" as it includes horror crimes including impaling on a hook, human traps.

It is realistic as it is inflicted on real people and humanoids and results in mostly real injuries.

This game should be classified R18+.

5. Company of Heroes 2

The violence in this game is "strong" as it includes dismemberment, executions.

It is "realistic" as it is inflicted on real soldiers, who are injured, and corpses remain.

This game should be classified R18+.

6. God Mode

The violence in this game is "strong" as it includes the use of melee weapons, decapitations, dismemberment, post-mortem damage.

It is realistic as it is inflicted on humanoids and animaloids, the victims remain killed, dismembered limbs remain.

This game should be classified R18+.

7. Borderlands 2: Add-on Content Pack

The violence in this game is "strong" as it includes the use of acid attacks, flame throwers and grenades. It includes dismemberment.

It is realistic as it is inflicted on humanoids and results in death, bleeding, bodies.

This game should be classified R18+

8. Fuse

The violence in this game is "strong" as it includes torture, throats slashed, necks snapped, bodies incinerated, highpowered weaponary melees, infliction of post-mortem damage.

It is realistic as it includes blood spatter and detail of bloods spills, dead bodies and other consequences of weapon attacks

This game should be classified R18+.

9. Deadpool

The violence in this game is "strong" as it includes decapitation and dismemberment, and disembowelling

It is realistic as it is inflicted on humans and humanoids, and shows bodies and blood.

As the violence is "strong" and "realistic" and frequent, it is required to be classified R18+..

This game should be classified R18+.

10. The Walking Dead

The violence in this game is "strong" as it includes hammer attacks to head, arms cut off with cleavers, eating of intestines.

It is realistic as it involves both humans and humanoid zombies, and the violence results in death and injury, blood.

This game should be classified R18+

11. Gears of War: Judgment

The violence in this game is "strong" as it includes close-range weapon kills, decapitations, skull crushing, dismemberment, neck snapping, flame throwing, post mortem damage to bodies.

It is realistic as it is inflicted on humanoid and animaloid creatures, and results in blood spills, many bodies remaining, screams, chunks of flesh.

This game should be classified R18+.

12. The Walking Dead: Survival Instinct.

The violence in this game is "strong" as it includes knives jabbed in eyes, shot gun injuries at close range, eating intestines,

It is realistic as it involves humans and humanoids with eyes, necks, mouths etc, and results in injury, blood, and death.

This game should be classified R18+.

Barbara Biggins, OAM

Hon. CEO