



7 December 2018

The Convenor

Classification Review Board

By email: crb@classification.gov.au; Lock, David David.Lock@classification.gov.au

Subject: Review of the film *Bumblebee* (M) 2018

I apologise for the late arrival of this letter, but the notice of the review hearing for *Bumblebee* was received very late. I ask that this letter be taken into account by the CRB.

ACCM notes that the CRB is to conduct a review of the classification assigned to the 2018 film *Bumblebee*. This film was classified M by the Classification Board on 19/11/18, as was a modified version on 4/12/18. Both versions have consumer advice "Action violence".

ACCM understands that the applicant for review is seeking to have the film reclassified PG.

ACCM requests that the CRB accept its submission below as from an interested party.

ACCM is an interested party by virtue of its long and active involvement in classification issues as they relate to children. ACCM's views are well informed by virtue of its 16 years of providing reviews related to the age-appropriateness of current films, and through its ongoing study of the research relating to the impact of the content of films on children.

ACCM has been unable to see the film as the release date in Australia is December 14, but wishes the CRB to take the following points into account in making its decision.

1. ACCM has read both of the Classification Board's reports on the movie and we believe that the scenes and themes described in the Board report create an impact greater than mild, and have significant potential to cause harm to, and to disturb children under the age of 15 years.
2. ACCM has consulted with an overseas contact who has detailed knowledge of the film, and has given us this opinion from a child development perspective.
Violence is shown in a way that creates a great impact on the viewer. There is explicit and harsh violence in the film. The victim is noticeably hurt; this also appears to be the intent of the perpetrator; and/ the impact of the acts is displayed in detail.

These are violent acts done by living beings with human characteristics (such as the ability to speak), used knowingly and willingly against other living beings with human characteristics. This includes Transformer-like characters when they show/ have humanlike characteristics. Children empathise with these characters when they show these humanlike emotions so harsh violence that is shown on screen is still experienced as harsh violence. [despite the fantasy elements]

There are some frightening elements in the film, like frightened people, injuries, threat of violence,

3. ACCM has viewed the trailers for the movie, and notes the strong emphasis on violence and conflict.
4. ACCM notes that the uncut film has received the classification of:
 - 12A in the UK for moderate fantasy violence (“There are chaotic battles between good and bad robots featuring exchanges of heavy blows, gunfire and the use of bladed weapons. There are also scenes in which people fire guns”).
 - 12 in The Netherlands for violence
 - PG 13 in the US for sci-fi action violence

ACCM acknowledges that overseas classification schemes differ in their criteria, and comparisons in classifications are not always helpful, but these classifications do seem to represent a consensus about the film’s unsuitability for children under 12 years of age. ACCM believes that therefore, a PG classification would not be appropriate

ACCM also notes that the cuts made in the modified version would be unlikely to change the overall assessment of the violence in this film from moderate impact to mild.

5. ACCM notes that the Classification Act requires that:

1. Classification decisions are to give effect, as far as possible, to the following principles:

(b) minors should be protected from material likely to harm or disturb them;


The Code also requires that films (except RC films, X 18+ films, R 18+ films and MA 15+ films) that cannot be recommended for viewing by persons who are under 15 must be classified M.

6. For this film to be classified PG, the CRB would need to be satisfied that a) that the content has an impact which is no higher than mild, and that b) that the violence is mild and infrequent.

If the CRB lowers the classification of this film to PG, many young children will be encouraged to see it. Those children need the protection from harm or disturbance that an M classification could provide.

7. ACCM has formed the view, given the information it has received and provided above, that the levels of, and theme of, violence in this film have an impact that is more than mild, and warrants an M classification.

Yours sincerely



Barbara Biggins OAM CF
Hon CEO