

On behalf of Newgency, I would like express our opposition to the proposed legislation. In our view this unrealistic, cumbersome and we feel it would drive content offshore & further challenge Australia's position in contributing to the volume of content on the World Wide Web.

Our position is supported by the following points:

- Content sharing is such that it would be virtually impossible to stop someone from posting, embedding or otherwise making content available on their own Australian hosted site regardless if the actual piece of content is hosted in Australia or not.
- Try stopping a 15-17 year old from doing something, they will try twice as hard to do it and will succeed
- There's no restricted access system for viewing MA15+ television programs
- How do you propose to authenticate a 15 year old's age?
- Any such system will be easily breached, if kids can get fake ids to get into nightclubs and pubs, they will definitely get access to any content that is restricted. Chances are they will pay for it too as no doubt hacks and the like will appear online for a fee.
- Overall seems like a waste of tax payers money, have we considered joining/forming some global consortiums and pool resources before embarking on these kinds of projects?

Kind Regards

Gavin Gorazdowski

**Gavin Gorazdowski**

Managing Director

**Newgency - a Moon Group company**

Where brands meet technology