Safer Online Services and Media Platforms

April 2024

Te Tari Taiwhenua
Internal Affairs

Te Kāwanatanga o Aotearoa
New Zealand Government

About this report

This report has been prepared by the Department of Internal Affairs (the Department) to provide a summary of submissions received during public consultation on the discussion document *Safer Online Services and Media Platforms* (the discussion document). The purpose of undertaking public consultation through the discussion document was to enable industry groups, regulators, community groups, civil society groups and the wider public to provide feedback on an initial set of proposals on a new approach to regulating media platforms, prior to the detailed design of a new regulatory system.

The Department, with the support of the Ministry for Culture and Heritage, held public consultation from 1 June 2023 to 31 July 2023. During the public consultation period, the Department received over 20,000 submissions. A small number of extensions were granted on a case-by-case basis for organisations that needed additional time to finalise submissions, which closed on 31 August 2023.

This report provides a summary of key themes that emerged from submissions made by stakeholder groups and individuals on the proposals outlined in the discussion document. The summary does not reflect the views of the Department.

Submissions made by individuals are anonymised in this report.

Contents

Executive Summary

The Department received submissions on the discussion document *Safer Online Services and Media Platforms* from a range of stakeholder groups. These groups included: existing regulators, overseas online services and media platforms, traditional media, industry adjacent groups, civil society groups, youth groups, community representative groups and individuals.[1] A large proportion of submissions were made via third party process and these submissions opposed all, or some aspects of the proposals.

Key themes from submissions included:

- more work is needed to make definitions clearer, particularly definitions for 'harmful content' and 'platforms';

- a regulator should lead code development processes, not the industry;

- a diverse range of people and groups outside of government should be included in the development of the regulator and codes of practice;

- the focus should be on regulating online platforms and social media, rather than traditional media;

- submitters recognised the importance of protecting freedom of expression;

- children and young people should be recognised as key stakeholder groups;

- there is support for creating a clear and accessible complaints process;

- education initiatives should be accessible and adequately funded; and

- agencies that may be impacted directly by the proposals had concerns about the impact on their respective areas and wanted a new regulatory system to align with existing frameworks and international policies.

---

1   Refer to Appendix B for an overview of all organisations.

Introduction

The Safer Online Services and Media Platforms (SOSMP) initiative, formerly known as the Content Regulatory Review, was an initiative led by the Department of Internal Affairs (the Department) with support from the Ministry for Culture and Heritage.

New Zealand's current regulatory system was designed over 30 years ago, before the internet was widely used, and focuses on traditional media like broadcasters for television and radio, print publications, films and audio. It has become increasingly reactive as more and more of the content we access is on platforms that fall outside of the professional standards and consumer warning rules. In particular, user generated content and platform recommendations fall outside the regulatory system. This leads to harmful content frequently slipping through the cracks and a lack of tools to ensure a uniform level of consumer protections.

The SOSMP initiative sought to create a single regulatory framework that would reduce the risk of harmful content for consumers. The objective of the SOSMP initiative was to improve consumer safety for all New Zealanders. A particular focus was given to providing better protections for children and young people. The four areas that make up the SOSMP proposals[2] include:

- an industry regulation model that uses codes of practice, which set out expectations for an industry or sector group to achieve safety objectives;

- a regulator, which would be stablished to oversee the framework and would be at arm's length from government;

- modernise enforcement levers against the distribution of illegal material, including powers to issue takedown notices for this type of content; and

- further investments in education and awareness initiatives to promote safer media and online content experiences.

---

2   The full discussion document and fact sheet can be found here:
    https://www.dia.govt.nz/Safer-online-services-media-platforms-consultation

Summary of targeted engagement with stakeholder groups

To date, the Department has undertaken three phases of targeted engagement, in the period from September 2021 to July 2023. A summary of targeted engagement to date and the public consultation process can be found at **Appendix A**.

Feedback from phase one and two of targeted engagement was used to develop the discussion document. The discussion document provides information on the current regulatory landscape, the need for modernisation and proposes a high-level design for a new regulatory framework.

Overview of submissions received on the SOSMP proposals

During the public consultation period, the Department received over 20,000 submissions that contained written feedback. The number of submitters will be lower because some submitters provided multiple submissions, with some choosing to use aliases for anonymity. Approximately 80 individual submissions received were incomplete.[3] Incomplete submissions have not been included in the overall statistics referred to in this report.

Submitters ranged from stakeholder groups mentioned above to the wider public. Submissions were sent through a web form, by email and by post. **Table 1** provides a summary of each type of submission received. A list of organisations that submitted on the proposals is attached as **Appendix B**.

The sum of submissions received within each category does not equal the total number of submissions received. This is because some submissions have been categorised in a number of ways during the submission analysis process. The Department will release all submissions received as part of public consultation in the proactive release that is to follow this report.

---

3   **Incomplete submissions:** some individuals had started but not submitted a formsite submission. These submissions were automatically saved.

Table 1: Summary of submissions received on the SOSMP proposals

Type of submission		Number of submissions
Template submissions made via third party processes[4]	Free Speech Union and Voices for Freedom	18,978
	Makes Sense	531
Email and formsite submissions	Organisations	105
	Individuals	667
Total submissions received		**20,281**

Quantification of submissions

Throughout this document, graphs have been inserted to provide an overview of support shown in submissions received on the discussion document. In these graphs, the terms 'mostly positive', 'mostly negative', and 'unspecified' have been used.

- **Mostly positive:** submissions had clear statements indicating support for the proposals.

- **Mostly negative:** submissions had clear statements indicating their opposition towards the proposals.

- **Unspecified:** submissions did not clearly state their position on the proposals.

---

4 **Third party processes:** use of a submission template or submission process created by a party other than the Department to make a submission on the SOSMP discussion document.

Table 2: terms used to quantify the number of submissions received on particular areas of the proposals

Classification	Definition
Few	Fewer than 5% of submitters
Some	5 to 25% of submitters
Many	26 to 50% of submitters
Most	More than 50% of submitters
All	100% of submitters

Figure 1 provides an overview of the support shown by **organisations** for the proposals outlined in the discussion document. Note that Figure 1 does not include submissions made by individuals, or template submissions[5] received through third party submission processes (Free Speech Union, Voices For Freedom and Makes Sense) as it was difficult to obtain an accurate number of submissions made due to duplicates and multiple submissions made by submitters.

Figure 2 provides an estimated overview of submissions made by **individuals** and submissions made through **third party processes**.

---

5 **Template submission:** a response made on the SOSMP discussion document with the use of a third-party submission template.

Figure 1: Overview of the 105 submissions on the SOSMP proposals from organisations (note that this excludes individual submissions and submissions made through third party processes)
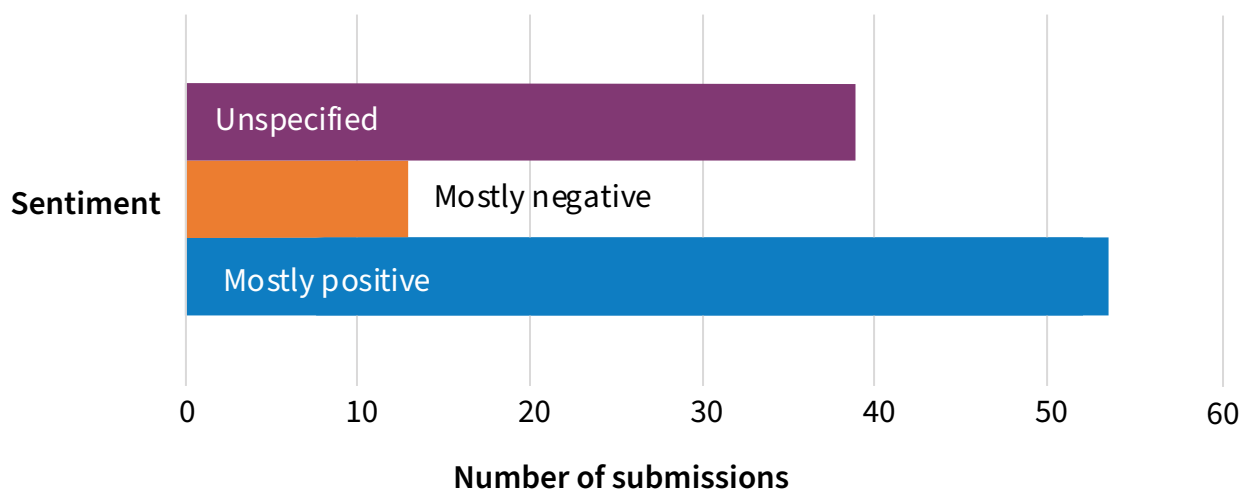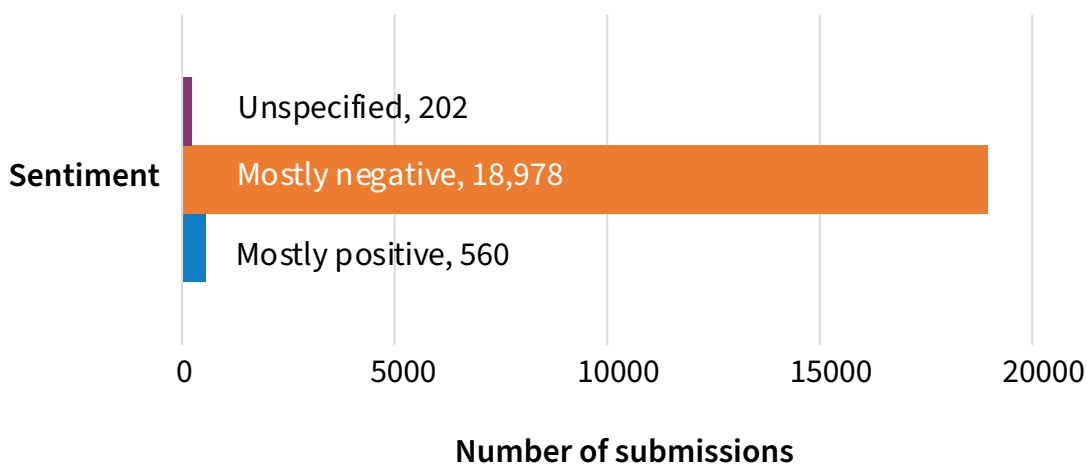

Figure 2: Overview of the 20,176 submissions made by individuals and third-party processes

Social Media Platforms and Online Services

The Department received submissions from the following organisations: Google, MEGA, Meta, Microsoft, Reddit, Snapchat, TikTok and X Corp.

Most online and social media platforms that made submissions agreed on the need for change

Google, Meta, Microsoft, TikTok and Snapchat showed support for the objectives of the proposals, and modernisation of New Zealand's existing regulatory system for content and platforms. They also agreed with the proposals' commitment to provide better protections for content consumers and that a new system should continue to uphold human rights such as freedom of expression.

In addition, many of these platforms agreed that responsibility for consumer safety must be shared between government, platforms, civil society and communities. Submitters also supported educational and awareness measures to support media literacy and online safety. All submitters made suggestions to refine or improve specific aspects of the proposals in the discussion document. Below is an overview of these suggestions.

The regulator should have a lead role in the code development process

Some platforms have suggested that the proposed new regulator should take a lead role in developing codes of practice, in consultation with platforms, civil society and communities, rather than tasking different industry groups (that would be made up of member platforms) to lead this process. Many of the platforms thought that the possibility for the creation of multiple codes of practice for various industry groups may introduce unnecessary complexity and may be overly burdensome for platforms to develop. One submitter noted that industry-led code-development processes are often time-intensive, highly technical, and can be burdensome for smaller companies that do not have the resources to dedicate exclusively to the code-drafting process.

The size of a platform should not be the primary determining factor for regulation

While submitters understand the rationale behind the proposed 'Regulated Platform' definition and thresholds to provide simplicity across different platform types, they consider that other criteria should also be considered aside from scale. Some suggestions included: taking into consideration a platform's features, its risk profile, safety mechanisms and protections that a platform already has in place, and the nature of the platform's relationship with its end users. One submitter was concerned that the proposed framework does not properly account for the nuance of businesses with differentiated models, sizes and resourcing capabilities.

Definitions for harmful content need to be clearly distinguished from illegal content

Some platforms also raised the need to clearly distinguish harmful content from illegal content to ensure there is no crossover between the two. They believe this is necessary to maintain a distinction between illegal and legal but harmful content and avoid prescribing specific requirements for responding to legal content to preserve freedom of expression.

> "Regulation must balance the legitimate interests of individual users, business users and the community, while meeting public policy objectives, such as supporting the digital economy and ensuring fair access to online services."

Figure 3: Overview of the eight submissions made by social media platforms and online services
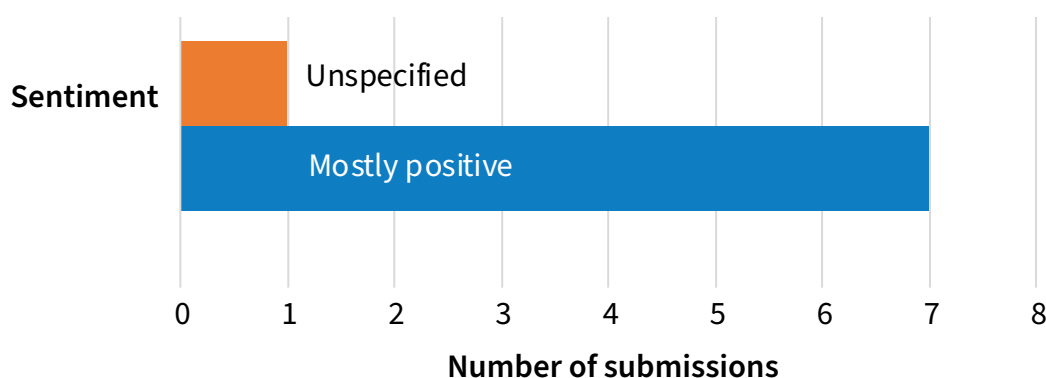
Traditional Media Platforms

The Department received submissions from the following organisations: Allied Press, New Zealand Media and Entertainment (NZME), Radio New Zealand, Reality Check Radio, Stuff, Television New Zealand (TVNZ) and Warner Bros Discovery NZ.

Below is an overview of the themes from the submissions made by submitters in this category.

More focus should be given to social media platforms which are currently not regulated in New Zealand

While submitters agreed that the current system needs updating, most of them noted that more focus should be given to social media platforms who are currently not regulated in New Zealand and that these platforms should be held accountable to the same extent that traditional media is. They mentioned that online and social media platforms pose greater risks to New Zealanders. They stated that as professional media outlets, they are already covered by, and are compliant with, existing regulations and provide access to content responsibly. However, some submitters acknowledged that the existing system is confusing for users, especially when making a complaint and the system should be simplified. Most of these submitters expressed interest in being involved in the policy development moving forward.

There are concerns about traditional media and social media being regulated under one umbrella

Within this stakeholder group, there is concern about the platform-agnostic or "one size fits all" approach. Some suggested differentiating between different types of media platforms and content as an alternative approach to the scope of the proposals outlined in the discussion document. For example, differentiating between edited/curated content and user-generated content. Many of these organisations described professional media as responsible actors who are already regulated in New Zealand. They are concerned that 'levelling the playing field' risks limiting freedom of the press, and journalistic and editorial independence.

Submitters also noted that there needs to be a clearer recognition of the role of user-generated content because in the current environment anyone can produce content with little to no liability. There is also concern that the regulator may not be able to perform effectively unless online media platforms commit to taking responsibility for content that can be published on their services.

Some submitters were concerned about placing the same regulatory requirements on professional news media based in New Zealand as social and online media outlets that operate globally, noting that the cost of compliance would be another financial burden for professional news media that are already operating in a financially constrained environment.

Definition of 'harmful content' and 'unsafe content' should be clearer

Most of these submitters felt that the definitions of 'harm' and 'unsafe content' were ill defined and subjective, noting further work needs to be done in this area. One submitter was opposed to bringing the concept of 'harm' into a new regulatory system. They noted 'harm' is a subjective concept and will lead to subjective decisions by a new regulatory body.

> "The definitions are too subjective as they do not sufficiently define 'harmful' or 'unsafe' content, and would also result in unintended consequences, particularly when applied to the news media. If a piece of content is deemed 'harmful' or 'unsafe' merely because it impacts (or has the potential to impact) a person's rights or 'social, emotional or mental wellbeing' then this would seriously limit the news media's ability to cover the news in an accurate and transparent manner."

Figure 4: Overview of the seven submissions made by traditional media groups
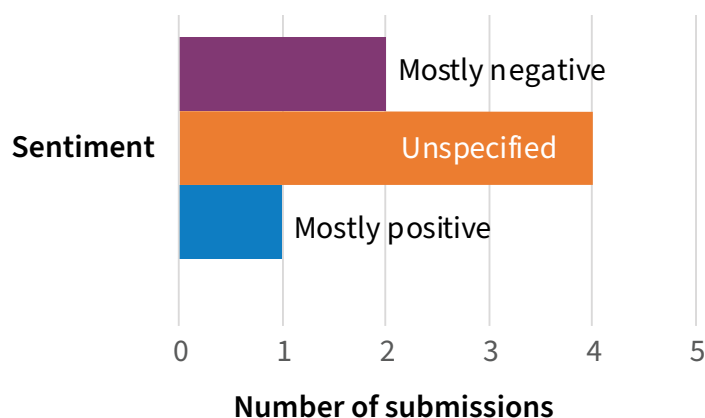
Industry Adjacent Groups

The Department received submissions from the following organisations: Association of New Zealand Advertisers (ANZA), Australia New Zealand Screen Association, Commercial Communications Council, Internet Society, Interactive Games & Entertainment Association (IGEA), News Publishers' Association, NZ on Air, NZTech, Radio Broadcasters Association, Spark and New Zealand Telecommunications Forum.

Internet Society, IGEA, NZ On Air, NZ Tech, and Telecommunications Forum mentioned their support for the objectives of the proposals. Others suggested amendments to certain areas of the proposals, while some noted that only platforms that fall outside of existing regulation should be included in the proposals.

A new regulatory regime should take a platform neutral approach

Some submitters noted that a new regulatory regime should have platform neutral rules for all content providers, regardless of their size. However, all agreed that social media platforms should be looked at more closely, with a special consideration to the increase of children and young people's presence in social media platforms.

News and advertising groups tended to align with the views of traditional media, wanting the new regulations to focus on the currently unregulated global platforms rather than their areas. They felt that the current regulation of traditional media is working and that new regulations would increase compliance costs.

Most of these submitters support a code-based system, education initiatives, and engagement with relevant bodies including community groups during creation and reviewing of codes of practice. Some made references to ensuring New Zealand's unique cultural context and identities are taken into consideration when creating and enforcing codes.

Most of these submitters agreed that the definition for 'content' requires more work

Some said that the definition of 'content' requires a better definition for the new act. Any loopholes here will leave the legislation less than robust when it comes to dealing with issues on new and future platforms who may not want to take responsibility for all the content they publish. Many submitters also made similar references on the definition of 'platforms' and noted more work should be done in this area.

> "The proposed definition of 'platforms' is so broad that it could arguably apply to any online service or platform within all layers of the internet, including those outside the intended scope. While this broad definition will likely cover video games and video game platforms generally, it is unclear whether responsibility falls on developers, publishers or distributors of video games."

Figure 5: Overview of the 11 submissions made by industry adjacent groups
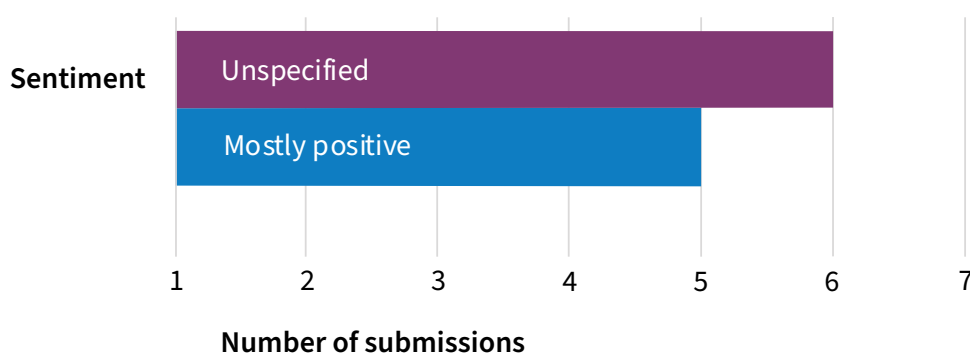
Regulators (New Zealand)

The Department received detailed submissions from the regulatory bodies that exist under the current system: Advertising Standards Authority, Broadcasting Standards Authority, Netsafe, NZ Media Association and Te Mana Whakaatu – Classification Office.

Most of these submitters in this group support the proposals or support aspects of the proposal

Regulatory bodies included in this stakeholder grouping believe in the importance of regulating online platforms and the need to simplify the content regulation regime. These submitters showed support for a code-based approach, placing greater emphasis on education, research and engagement, and the establishment of a clearer complaint process. They also showed support for the concept of the regulator being at an arm's length from the Government, and having the responsibilities for approving, implementing and monitoring codes of practice.

Regardless of what the specifics of the new system may look like, submitters affirmed that it must ensure there is adequate funding and resources made available to the users who need it, so that the system created is one that is practically affordable.

Engagement with community groups and treaty partners should be part of the code development and review processes

Alongside other stakeholder groups, submitters agreed that in a new system, there should be meaningful participation from civil society and affected community groups in the drafting and reviewing of codes. Some submitters mentioned that there needs to be more incorporation of obligations under Te Tiriti o Waitangi and built in protection of Māori rights and interests.

Some submitters opposed bringing traditional and online media under the same regulatory framework

Submitters agreed on the need to regulate platforms that are currently not regulated in New Zealand. However, some argued that the proposal to combine the current regulatory regimes with online platform regulation under one regulator has not been sufficiently justified. These regulators claim that wholesale system-level change is not required if the intent is to capture unregulated and irresponsible global technology companies, especially when the current frameworks for the regulation of traditional news media and advertising is working and is flexible to change.

The regulator should have sufficient powers to manage non-compliance

Some mentioned that there needs to be strong penalties to incentivise platforms to comply and for the regulator to regulate effectively. Submitters noted that a new regulator should have the authority to levy fines for ongoing non-compliance. Financial penalties or enforcement notices followed by prosecution were suggested. Submitters also noted that fines should be substantial and similar to that of overseas fines, to have an impact on content providers, to have an impact on large content providers.

> "We think more thought is required on how a regulator can fulfil its statutory functions at the same time as having the necessary independence from the Executive – especially in the context of regulating speech and the wider effects on rights under the NZBORA. Ultimate Parliamentary and judicial oversight may be a better model."

Most of these submitters agreed that more work needs to be done on the definition of harmful content

Submitters mentioned that the definition of harmful content is subjective and broad, and it needs to be clearly defined to be effective. One submitter said that any new legislation must include the specific harms that the regulator wants to protect New Zealanders from, like the Irish Online Safety and Media Regulation Act 2022. They believe this would make it clear to platforms , especially to those based overseas, exactly what constitutes as harmful content and where New Zealand stands on harmful content.

Figure 6: Overview of the five submissions made by New Zealand regulatory bodies
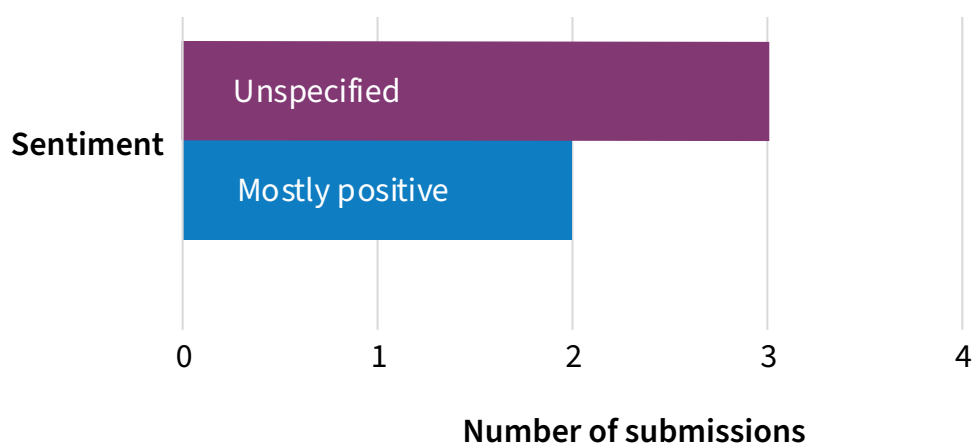
Community Representative Groups

The Department received submissions from the following groups: Asian Family Services, Deaf Aotearoa, Disabled Persons Assembly, Family Planning, Federation of Business and Professional Women NZ, Intersex Aotearoa, National Council of Women of NZ, Pacific Panthers, Rainbow Support Collective, Tauranga National Council of Women and Tu Wahine Trust.[6]

Community groups agree that there is a need to modernise the current regulatory system

Community groups spoke of the need to modernise the current regulatory system which can no longer keep New Zealanders, especially children, young people, and at-risk community groups, safe from online harm. This is also something that the Department heard in the two workshops held with a wide range of community groups as part of the public consultation process. While all community groups agreed on the need for change, their submissions had mixed views on aspects of the proposals set out in the discussion document. These comments mainly concerned the definition of harm, code of practice, minimum safety standards and the role of the regulator.

---

6   There were also submissions from some organisations that requested to remain anonymous.

The definition of 'regulated platforms' and 'harmful content' needs to be further defined

Some submitters believed the definition of 'regulated platforms' to be too narrow and noted the importance of capturing smaller platforms who can also carry harmful content. Many of the community submissions brought up the need for community groups to be involved in further defining harm. Most submitters thought the definition of harm is too narrow, while others thought the definition of harm is too broad. It was recommended that the definition of harm should have layers of defined harms which would have differing policy responses dependant on the level of harm.

For the system to be effective in minimising harm to community groups, they noted that the regulator should also engage with communities during the code development processes. One group mentioned that this could be achieved through an established reference group or advisory group.

The regulator's role and powers of the regulator

Some community groups remarked that the regulator should be given more powers to action meaningful change in a new system, while some had concerns about the accountability and neutrality of the regulator. Many of these submitters also expressed their preference for the regulator to lead the development of codes as opposed to this being led by industry with the approval of the regulator.

> "We are concerned about regulatory capture by industry, who not only have much greater resources and political power than the communities most impacted by online harm, but also have a profit incentive to weaken regulations in their favour. We therefore advocate for a single independent regulator that remains responsive and accountable to the voices of communities most impacted by online harm at a governance level."

To have meaningful change, the regulator should work closely with community groups

The need for the regulator to work closely with community groups was raised by many of these submitters, including the processes of defining harm, creating codes and community education programmes. Some touched on the importance of ensuring people with diverse views and backgrounds are included in a new regulatory body. This is something that was reiterated during workshops held with community groups.

Some groups mentioned the importance of including Māori in decision-making roles at all levels of regulation and on all issues that concern or impact Māori. Others agreed with this and mentioned that similar involvement should be provided to other community groups that are at risk of content harm.

All stakeholders were supportive of education being a priority in a new system

Some submitters noted that educational programmes on content harms should be extended to not just users of platforms but also to industry groups. They also mentioned that similar training should be provided to employees of traditional media outlets - such as journalists and producers. Submitters also raised the importance of community educational programmes being accessible to those who may have language or accessibility barriers, as well as recognising and supporting the funding of existing community initiatives. Some noted that there should be opportunities for developing education initiatives led by iwi and Māori, with support and resourcing from a new regulator, stating that community led initiatives can be more effective and influential.

Several community groups raised the importance of building strong transparency requirements as part of the code development process to ensure users are well informed on why they are being shown particular content. It was also noted that this should be built into search engines as well as social media platforms.

Figure 7: Overview of the 12 submissions made by community groups
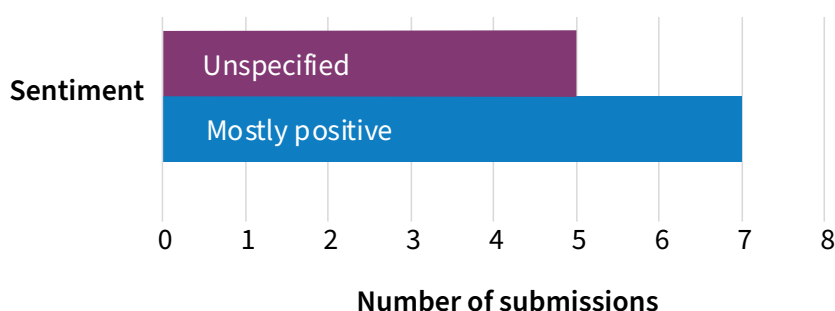
Youth and Children Focused Groups

The Department received submissions from Save the Children and Sticks 'n Stones.

Children and young people should be included as a stakeholder group in decision making processes

In their submission, Save the Children noted the importance of including children and young people in decision making processes, especially when children make up a large percentage of online media users and creators. They recommended that children and young people should be recognised as a key stakeholder, with the ability to particate in informing and strengthening the new system and are not being limited to providing a protection lens.

Similar to other stakeholders, Sticks 'n Stones also noted the need for the definitions of 'unsafe' and 'harmful' content to be better expressed in ways that are easily understood. They noted that there needs to be a clear explanation on the difference between 'being harmed' and 'being offended' rather than simply stating that there is a difference. They also commented on the definition of a 'regulated platform' noting that this definition focuses on 'major players' and misses the issues around smaller platforms where harm can and does take place.

> "We acknowledge that it is essential that children are protected from harm, but also note their rights to participate and share their views on issues on that are important to them. This relates to content that is available, children as content creators themselves, and children that can directly contribute to education materials and delivery of education."

Civil Society Groups

A total of 39 civil society groups made submissions on the discussion document. These included: Alcohol Expert Panel of Health Coalition, Alcohol Health Watch, Antistatic, Better Public Media, Brainbox, Burnett Foundation Aotearoa, Cancer Society NZ, Canterbury Suicide Prevention Working Group, Clinical Advisory Services Aotearoa, DCANZ, E tū Union, Fight Against Conspiracy Theories (FACT), Free Speech Union, GE Free New Zealand, Hamilton YWCA, Hugh Green Foundation, Internet NZ, Internet Research Agency Te Tari o Te Rangahau Ipurangi, LGB Alliance, Lighthouse Clinic NZ, Council of Civil Liberties, Mental Health Foundation, Mental Health and Wellbeing Commission, NZ Drug Foundation, NZ Family Violence Clearinghouse, NZ Outdoors and Freedom Party, NZ Taxpayer's Union, Online Safety Exchange, Physicians and Scientists for Global Responsibility, PGF Group (formerly Problem Gambling Foundation), Public

Health Communication Centre, Public Service Association (PSA), Safe Surfer, SPCA, Speak Up For Women, Stop Services, The Light Project, Tohatoha, Transparency International NZ, Voices For Freedom, Women's Liberation Aotearoa and Women's Rights Party.

The recurring themes that came from the submitters within this stakeholder group are outlined below.

There is agreement among civil society groups that New Zealand's current content regulatory environment needs updating

Most civil society groups, including Internet NZ, Tohatoha, Better Public Media and the Mental Health and Wellbeing Commission, agreed that New Zealand is overdue for a more consistent regulatory framework for online services and digital media platforms, that will better protect New Zealanders from harm. Most agreed that having consistency of standards, provided by a single independent regulator, is important to coherently address harms that New Zealanders are facing.

There were also groups who oppose all or aspects of the proposals

Within these organisations, there were groups who opposed the proposals entirely including Free Speech Union, Voices For Freedom, LGB Alliance, Women's Rights Party and New Zealand Taxpayers Union. Most of these submissions focused on restrictions to freedom of speech and opposed the proposals on the grounds that they believed they would lead to a decrease of people's ability to speak freely.

Te Tiriti o Waitangi should be embedded in a new system

Most agreed that Te Tiriti o Waitangi needs to be embedded in the regulatory system. They suggest that as Te Tiriti partners, Māori need to be approached first with opportunities to achieve equity and be equal partners in the development and oversight of this process. They proposed significant Māori presence within all levels of the proposed regulatory body along with adequate partnership arrangements, designed by Māori for Māori, that uphold rangatiratanga.

Protection of human rights should continue to be a priority

Most emphasised that protection of human rights, freedom of expression, and freedom of the press also needs to be a priority. They said that this should be done through a strong regulatory framework that protects freedom of expression by helping more people feel safe and free to participate. They also mentioned that the current disparate nature of media regulation disadvantages people, particularly vulnerable groups.

Community and civil society groups should be engaged throughout the design of the regulator and the code development process

Some submitters noted that groups disproportionately affected by harmful content need to be involved in the development of the independent regulator so that their needs are met, and their rights are protected. Many of the civil society groups felt that the voices of those most affected by online harms are often left out of conversations about how to regulate them. They want to see these initial proposals, the design of the regulator, the codes of conduct and education campaigns to be developed in collaboration with communities and groups most affected by them.

Scope of the proposals should take into consideration future technological advancements

Submitters also made suggestions on the scope of the proposals, noting that a new system needs to have the resources and adaptability to adapt to future technological advancements to capture possible harms that could come from these.

> "For a new system to be effective, the framework needs to be proactive by providing information, tools, and resources to better equip everyone to deal with, report, and minimise online harms. However, this will require significant investment in order to keep up with the rapid development of technologies, systems, and tools, as evidenced by the relatively quick emergence and prominence of artificial intelligence and large language models since the beginning of 2023."

The definition provided for harmful content is incomplete and needs to be further clarified

Many submitters mentioned that the definition of harmful content needs to be refined. One submitter noted that the definition for harmful content does not capture content that actively encourages others to cause harm. An example that was provided was content that incites violence. While this could potentially fall into the category of harmful content, they mentioned that this is not clear in the definition in the discussion document.

Many of the health advocacy and research groups support the proposals

Most of these groups support the proposals set out in the discussion document and showed specific support for educational aspects of the proposals. In their submissions, they also provided examples of harms they see in their respective areas of work. Several groups wanted the scope of the proposals widened to include regulation of advertising, and promotion of potentially harmful products and services such as alcohol, vapes and gambling.

Figure 8: Overview of the 40 submissions made by civil society groups (excludes template submissions made by third party processes[7])

Number of submissions

---
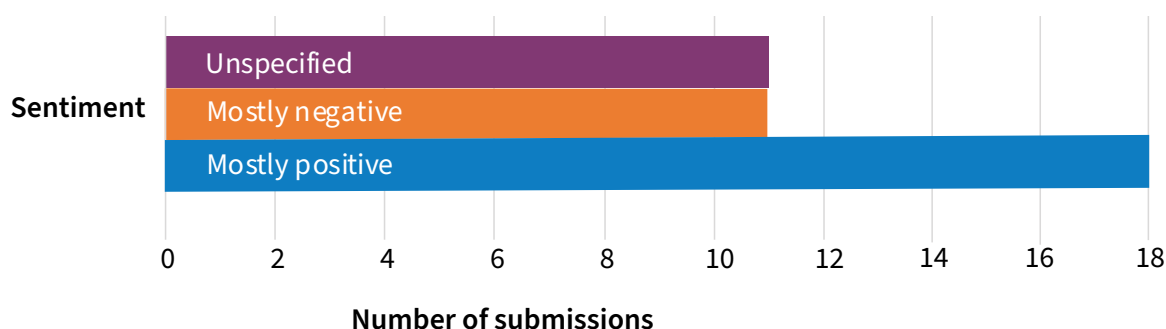
7 **Template submissions** refer to a document or form that provides a standard format and structure for presenting views/feedback on proposed change or policy. Third party processes refer to submissions received outside of the Department's provided pages and contacts for public consultation.

Overview of template submissions made by Free Speech Union and Voices For Freedom

A template submission is a document or form that provides a standard format and structure for presenting views or feedback on a proposed change or policy. The Department received approximately 18,500 template submissions from the Free Speech Union (FSU) and Voices For Freedom (VFF).

FSU is a registered union that advocates for freedom of speech rights and provided submitters with an editable template[8] to make submissions, as well as their own submission portal through the FSU website.[9] VFF is a not-for-profit community advocacy organisation that is focused on raising awareness about matters impacting rights and freedoms of New Zealanders. Similar to FSU, VFF also provided submitters with an editable template.

The resulting submissions made with the use of these third-party processes had similar themes but were not homogenous. This is due to these submission templates being editable, allowing submitters to change and add more information. The Department received a large number of submissions from reused email addresses. 5,049 submissions were made from 2,291 unique email addresses. For example, some submitted multiple times with different material, while others submitted the same response more than once. Due to this, it was difficult to determine an exact number of individual submitters and submissions made. **Appendix C** provides an example of the templates used by submitters who used FSU and VFF templates.

Most submitters that made a submission through the FSU or VFF process were concerned that the proposals would result in the narrowing of people's right to freely express themselves

Some expressed this by stressing the importance of the Bill of Rights, freedom of expression, or 'rights to' freedom and equality in general. Others described scenarios that ranged from totalitarian censorship regimes to self-censorship. Many thought that the proposals would result in the narrowing of public discourse on the internet and were concerned that the right to express opinions would be lost.

---

8 **Editable template:** where submitters can change and alter a set template to suit their viewpoints.

9 https://web.archive.org/web/20230614063857/https:/www.freespeechsubmission.com/

Many submitters compared the SOSMP proposals to hate speech laws. Of these, some felt that a regulator should not have the power to define terms such as 'hate speech' or 'misinformation'. Some worried that the proposals set out in the discussion document would extend further than hate speech legislation, leading to censorship of free speech. Many with this concern felt that any approach that was similar to the hate speech legislation would fail to deal with the underlying problems with the internet. Others felt that the proposals were unnecessary as existing laws could be used to cover online harm.

Many of the submitters that made a submission through FSU and VFF expressed concerns about how accountable the proposed regulator would be to the public

Submitters wanted democratic checks and balances for the regulator, including the ability for the public to have input into codes of practice. They felt that without accountability, the regulator would undermine public trust in the media. However, many of the same submissions emphasised the need for a regulator with censorship powers to be separate from the Government.

Some submitters were concerned about regulation lead by industry groups. They felt that by letting industry lead code development, those with the biggest market share would be able to use the codes to suppress competition. Some expressed scepticism about whether the proposals could be enforced overseas. Consequently, submitters felt that the proposals were unlikely to reduce harm and that the only possible outcome from regulation was the restriction of 'legal' speech.
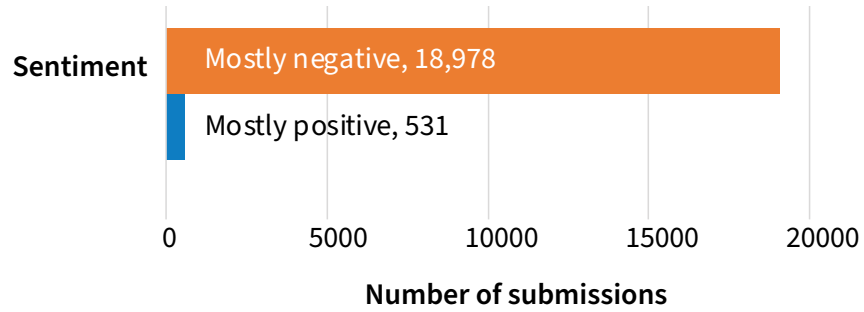
Overview of submissions made by Makes Sense advocacy group

Makes Sense is a New Zealand based organisation that advocates for the protection of children from online harms. Similar to FSU and VFF, Makes Sense also created a submission template for submitters to sign their names to. All submitters who used the Makes Sense submissions template support the proposals. Submissions focused on how easy it is for children to be exposed to or access child sexual abuse material, bestiality and rape videos on the internet. The vast majority of the 531 submissions from this source made no changes to the template, with a handful adding personal details or stories.

The template (attached as **Appendix D**) showed support for the expansion and improvement of the current Digital Child Exploitation Filtering System, take-down powers for the regulator in relation to non-compliant platforms, and supported further funding of education directed towards parents and caregivers of children.

Figure 9: Overview of the 19,509 submissions made by the Free Speech Union, Voices For Freedom and Makes Sense

Sentiment

Mostly negative, 18,978

Mostly positive, 531

0 5000 10000 15000 20000

Number of submissions

Agencies, Commissions and other Public Entities

The Department received written submissions from a range of stakeholders including Consumer NZ, Copyright Licensing NZ, Hamilton City Council, Human Rights Commission, Library and Information Advisory Commission, Library and Information Association of New Zealand Aotearoa (LIANZA), Mana Mokopuna Children and Young Peoples Commission, Privacy Commissioner, Public Health Agency, Safer Wanganui, Taituarā Local Government Professionals, Te Hiranga Mahara (Mental Health and Wellbeing Commission), and Westland District Council.

Most of these stakeholders showed general support for the proposals

Across these submissions, there were broad acknowledgements on growing online harm, especially the rise of misogyny, transphobia and racism, and the need for efficient take-down powers. Some indicated concern that the regulator will not be prescriptive enough and that the codes will be too lenient with respect to countering online hate.

Engagement with Māori representatives and other community stakeholders is an important step in developing a new system

Some showed significant support for the need to ensure fair and representative Māori participation in the new system. Similarly, a recognition that those most affected by online harm need to be included in the code development stages and have input into how the regulator is governed and operates. Recommendations were made by the Human Rights Commission to amend the proposals outlined in the discussion document to clearly recognise the rights of Māori to participate, on their own terms, in the development, design and implementation of a regulatory system which will uphold tikanga Māori, and address and respond to the unique harms Māori experience online.

Some said more information is needed on how a new system will receive input from community groups when developing codes.

> "The Commission submits that greater input is needed from civil society and non-governmental organisations during the development phase to ensure vulnerable groups are adequately protected. Meaningful involvement of diverse non-industry and civil society groups is crucial to ensuring human rights and te Tiriti obligations are appropriately implemented from the design phase, since different communities are affected in unique and sometimes disproportionate ways."

Among these groups, there are concerns with regards to their respective work areas

Submitters showed interest in their respective areas. For example, the Human Rights Commission made references to the ways in which national and international standards of human rights can be imbedded into a new system. They showed concern for possible unintended consequences that may come from removal of content. Similarly, other submitters showed interest in their respective areas, for example, the Privacy Commissioner, Children's Commissioner and the Mental Health and Wellbeing Commission. Submitters also suggested alignment of the new regulatory system with existing frameworks (or international regimes) that cover these areas. Some made suggestions on the potential to align with Australia's online safety regime.

Most (62%) of these submissions showed concern for the growth of harm caused by misinformation. Some noted that councils and council groups experience a lot of abuse from conspiracy theorists, and they are aware of the harm that occurs in their communities. Some submitters were fearful that the regulator will not be well-resourced enough to effectively operate and when the (central) government's desire to effect change inevitably dies down, so too will the resources allocated to the regulator.

Figure 10: Overview of the 13 submissions made by agencies, commissions, and other public entities
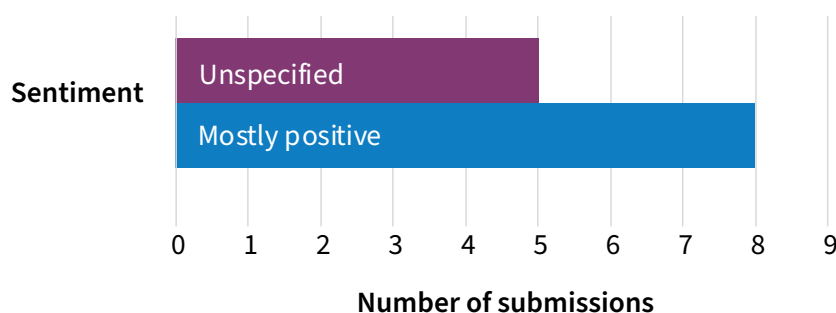
International Regulators and Alliances

The Department received submissions from the following international regulatory bodies: Asia Internet Coalition (AIC), eSafety Commissioner (Australia), Ofcom (UK) and WeProtect Global Alliance.

All international regulators and alliances were broadly in support of the need to modernise regulation of the online services and the SOSMP proposals

In their submissions, most of these stakeholders provided in depth details on their current policies and initiatives. They all offered their aid and experiences to help further develop the SOSMP proposals. There was support across the submissions for the proposals' 'whole-of-society approach' where everyone would have a role to play in keeping each other safe online.

All submissions were in support of a code-based approach and the creation of a new regulator. They referred to the importance of ensuring that a new regulator has strong enforcement powers to ensure efficiency and to make sure that, when things go wrong, the regulator can act quickly. Some showed support for a more child focused approach than what was proposed in the discussion document. Stakeholders also showed support for education and awareness initiatives to promote safer media and online content experiences across all age groups.

Some submissions suggested that more consideration should be given to the definitions for 'platform' and 'regulated platform' as at present the definitions are wide and risk placing a large compliance burden on platforms that have a low-risk threshold.

> "Ensuring that New Zealand's regulatory framework is suitable to tackle current threats, flexible enough to adapt to future technological innovation and that the formulation of the response is both representative and inclusive of all New Zealanders is of paramount importance not only in the national fight for a safer and better internet for all, but also in terms of shaping the wider global response."

Individual Submissions

The Department received approximately 580 individual submissions. Most of these submissions made overarching statements to show their opposition or support for the proposals. All individual submissions have been anonymised for the purpose of this report.

Most individuals who made a submission opposed the proposals or opposed aspects of the proposals

Approximately 438 submissions made by individuals opposed the proposal in some form. The main reasons provided for their opposition included the protection of free speech and not wanting a single regulator.

Approximately 28 submissions made by individuals showed support for the proposals

Some of these provided personal examples of harms that they or their whānau have experienced and elaborated on the need for a new regulatory system. Most of those who support the proposals spoke of the need to minimise content harm to New Zealanders, especially children and young people. A few of these submitters noted that the current environment is challenging for individual parents to enforce rule and be vigilant with their children's access to the internet especially in complicated living circumstances. Some of these submissions noted the importance of establishing a prevention focused system as opposed to the current reactive regulatory environment.

Approximately 202 submissions did not specify support or opposition for the proposals

While submitters agreed on the need for a new regulatory framework, submitters made references to the proposals needing more work. Some noted that the definitions are a useful starting point, however, the current definitions are not strong nor comprehensive enough to have a strong impact in a new system.

Figure 11: Overview of the 667 submissions made by individuals
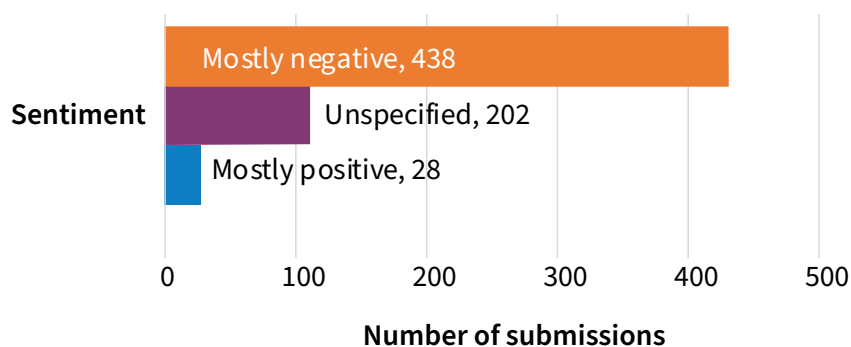
Appendix A:
Summary of targeted engagement to date

Phase of targeted engagement	About engagement
Phase One: September 2021 to April 2022	Phase One aimed to understand the problems, gaps and overlaps that exist within the current regulatory system; the impacts that content interaction may have on individuals, communities and society, including harms that may result directly or indirectly; and what stakeholders think can be done to reduce harm from content, including what they think government, media providers and communities' roles should be. Due to COVID-19, targeted engagement was conducted virtually – through Zoom engagement sessions and online survey forms.
Phase Two: May 2022 to July 2022	Phase Two of targeted engagement was to test and refine proposals for a new content regulatory framework. This involved the Department working with relevant government agencies, regulators, regulatory design experts and others with relevant expertise including in Te Tiriti o Waitangi, freedom of expression and rights frameworks to test the feasibility of possible regulatory and non-regulatory tools. Due to COVID-19, workshops in this phase were conducted virtually.
Phase Three: June 2023 to July 2023 This document summarises Phase Three feedback.	Phase Three consisted of public consultation on the discussion document which was released on 1 June 2023.[10] Additional to public consultation, the Department held workshops with stakeholders who were to be directly impacted by the review. These workshops were a mix of in person and virtual sessions.

---

10 https://www.dia.govt.nz/safer-online-services-media-platforms-consultation#Discussion

Appendix B:
Overview of organisations who made a written submission on the SOSMP proposals

Stakeholder Group	Organisation Name
Social Media Platforms and Online Services	Google, MEGA, Meta, Microsoft, Reddit, Snapchat, TikTok, and X Corp.
Traditional Media	Allied Press, New Zealand Media and Entertainment (NZME), Radio New Zealand, Reality Check Radio, Stuff, Television New Zealand (TVNZ) and Warner Bros Discovery NZ
Industry Adjacent Groups	Association of New Zealand Advertisers (ANZA), Australia New Zealand Screen Association, Commercial Communications Council, Internet Society, Interactive Games & Entertainment Association (IGEA), News Publishers' Association, NZ on Air, NZTech, Radio Broadcasters Association, Spark and New Zealand Telecommunications Forum
Regulators (New Zealand)	Advertising Standards Authority, Broadcasting Standards Authority, Netsafe, NZ Media Association and Te Mana Whakaatu – Classification Office
Community Representative Groups	Asian Family Services, Deaf Aotearoa, Disabled Persons Assembly, Family Planning, Federation of Business and Professional Women NZ, Intersex Aotearoa, National Council of Women of NZ, Pacific Panthers, Rainbow Support Collective, Tauranga National Council of Women and Tu Wahine Trust
Youth and Children Focused Groups	Save the Children and Stick 'n Stones

Stakeholder Group	Organisation Name
Civil Society Groups	Alcohol Expert Panel of Health Coalition, Alcohol Health Watch, Antistatic, Better Public Media, Brainbox, Burnett Foundation Aotearoa, Cancer Society NZ, Canterbury Suicide Postvention Working Group, Clinical Advisory Services Aotearoa, DCANZ, E tū Union, Fight Against Conspiracy Theories (FACT), Free Speech Union, GE Free New Zealand, Hugh Green Foundation, Internet NZ, Internet Research Agency Te Tari o Te Rangahau Ipurangi, LGB Alliance, Lighthouse Clinic NZ, Council of Civil Liberties, Mental Health Foundation, Mental Health and Wellbeing Commission, NZ Drug Foundation, NZ Family Violence Clearinghouse, NZ Outdoors and Freedom Party, NZ Taxpayer's Union, Online Safety Exchange, Physicians and Scientists for Global Responsibility, PGF Group (formerly Problem Gambling Foundation), Public Health Communication Centre, Public Service Association (PSA), Safe Surfer, SPCA, Speak Up For Women, Stop Services, The Light Project, Tohatoha, Transparency International NZ, Voices For Freedom, Women's Liberation Aotearoa and Women's Rights Party
Agencies, Commissions, and other Public Entities	Consumer NZ, Copyright Licensing NZ, Hamilton City Council, Human Rights Commission, Library and Information Advisory Commission, Library and Information Association of New Zealand Aotearoa (LIANZA), Mana Mokopuna Children and Young Peoples Commission, Privacy Commissioner, Public Health Agency, Safer Wanganui, Taituarā Local Government Professionals, Te Hiranga Mahara (Mental Health and Wellbeing Commission), and Westland District Council
International Regulators	Asia Internet Coalition (AIC), eSafety Commissioner (Australia), Ofcom (UK) and WeProtect Global Alliance
Individual Submissions	All individual submissions have been anonymised for the purpose of this report

Appendix C:
Free Speech Union and Voices For Freedom submission templates

Free Speech Union

The website template provided pre-written lines based on topic(s) selected and provided the space for additional thoughts to be written.11[11] Below are screenshots of the website templates:

---

11 **Archived copy of template:** https://web.archive.org/web/20230614063857/https:/www.freespeechsubmission.com

If all topics are selected the following pre-written lines are provided:

- The Government's latest proposals will be devised by an unaccountable regulator, impervious to public scrutiny. The fact that this entity, which holds sway over our freedom of expression, will operate without democratic checks and balances presents a significant risk of abuse.

- These codes of practice leave no room for doubt that they will effectively serve as hate speech and misinformation laws for the internet and media. The specific definition of content that "interferes in democratic processes" is unspecified. The impact of these regulations would extend far beyond the proposed hate speech laws, leading to broader enforcement and consequences. By assigning the responsibility of assessing platform and publisher compliance with the codes of practice to an independent regulator, the regulator will inevitably have to determine what constitutes hate speech and misinformation. Allowing an unaccountable entity to make such decisions, particularly in matters involving speech rights, is undemocratic and undermines public trust in the Government and the media they consume. This perspective is shared by popular mainstream media outlets, with senior officials at Stuff newspaper and Radio New Zealand expressing similar concerns.

- The proposed "regulator" tasked with assessing platform and publisher compliance with codes of practice would effectively become a 'Ministry of Truth'. This Orwellian expansion of Government interference on free speech could potentially lead to the suppression of legally protected speech that goes against cultural sentiments of those with decision-making power. The vagueness and impracticality of the proposals pose a significant danger. The specific content that will be subjected to regulation remains unclear, and the regulator will lack the authority to enforce the codes on international platforms.

- Engaging in internet censorship is an impractical pursuit, and the proposed codes of practice are unlikely to effectively mitigate harm while simultaneously suppressing legitimate speech. It remains unclear whether these changes

will genuinely reduce 'harm' or merely limit the parameters of acceptable discourse. The history of social media moderation is marked by inconsistent enforcement and the extensive reach of subjective terms. Despite this, the proposed regulations aim for intricate censorship of online content with rigorous enforcement, which may inadvertently result in the blanket censorship of specific content.

- As per the proposals, the regulator will collaborate with industry members, without democratic oversight, to develop the codes of practice. Inevitably, these industry members involved in the development process will predominantly consist of the largest and most influential entities within their respective sectors. However, the resulting codes of practice will be applicable to all members within their industry sectors, irrespective of whether other industry members had the chance to provide input or consent to the code requirements.

- This situation introduces an unacceptable risk of regulatory capture. Essentially, the proposals invite established players in media and online spaces to shape the regulations that their competitors must comply with. This is likely to be exploited as a means to suppress and eliminate competition, especially from smaller and newer media platforms.

- The regulations introduce complex and extensive compliance requirements, with the proposals anticipating that platforms will need to undertake substantial efforts, alongside the broader tech industry, to fulfil their proposed obligations. These onerous requirements are likely to generate significant costs for platforms operating in New Zealand. It is probable that only the largest platforms with abundant resources would be capable of meeting these costs, thereby diminishing competition and erecting barriers to entry in the media sphere. Particularly concerning social media and other internet platforms, enforcing the codes against international actors would present challenges, implying that enforcement mechanisms would be more easily directed at New Zealand-based platforms. This would strangle local media platforms and substantially reduce diversity and competition within New Zealand's media landscape.

- The proposed regulatory scheme intends to mitigate harm by imposing constraints on the content that can be featured on online and media platforms. However, like hate speech laws, it fails to address the root issues. Censorship does not result in changed perspectives. Instead, an open media and internet foster an environment where even challenging discussions can transpire, enabling education and counter-speech to effectively combat flawed ideas.

- Please step back and consider the potential adverse outcomes that could stem from this proposal and completely discard these plans.

Voices for Freedom Template

Online Censorship Feedback

Have Your Say! Feedback Due Monday, 31 July 2023

INSTRUCTIONS – HOW TO USE THESE MATERIALS:

1. Copy and paste the template email into your own email (to email) or use this document: TIP: Use 5-15 bullet points and choose from a variety of headings to be sure your feedback is unique.

2. Choose 3+ points from the bullet points below and add them to your draft email or Word document. It's important to use your own selection so that your feedback is unique to you.

3. Add any other points you wish.

4. SEND BY EMAIL TO: sosmp_consultation@dia.govt.nz

5. OR SEND BY POST TO:
   Safer Online Services & Media Platforms Consultation
   Dept. of Internal Affairs
   PO Box 805

Your Email Template:

To: sosmp_consultation@dia.govt.nz

Department of Internal Affairs

RE: 'Safer Online Services and Media Platforms Discussion Document'.

I oppose the proposals for the reasons given in this feedback.

- [reason one]
- [reason two]
- [reason three]
- [reason four] …. [5-15 is a good amount]

No convincing case for these reforms has been made. The proposals should be abandoned.

Yours sincerely,

[your name]

Bullet Points To Choose From:

TIP: Use 5-15 bullet points and choose bullet points from a variety of headings to be sure your feedback is unique. Remember you can add your own reasons as well.

Censorship is not the answer to speech we do not agree with:

- Censorship is not the answer to speech we do not agree with. On the contrary, an open online media enables robust discussion. This is the hallmark of a free society.

- Efforts to censor online content are destined to fail. Codes of practice are unlikely to successfully diminish an unquantifiable "harm". On the other hand what will be achieved is a restriction in public discourse, the suppression of valid speech, and the right to hold a differing view.

- Section 14 of the New Zealand Bill of Rights Act 1990 protects freedom of expression. This includes the freedom to seek, receive and impart information and opinions of any kind, in any form. A robust interpretation must apply to this fundamental freedom.

- Rather than censor what New Zealanders say, we would do better to encourage more healthy debate on confronting issues. Banning speech doesn't eradicate it. It drives it underground. While we may temporarily run the risk of offence, the best solution to bigoted ideas is to discuss why they are undesirable.

- The best solution to new concepts that worry people is talking about them and working out how we want to manage them together. In this way, New Zealanders will not only become more resilient, but they'll also become more empathetic, wiser and retain their precious freedoms.

The Codes Are A Loophole To Bringing In Hate Speech Legislation:

- The proposed codes are a Trojan horse. Ostensibly being introduced to help "protect" Kiwis from an ill defined and subjectively assessed "harm" (such as the nebulous "interference in a democratic process") the codes will inevitably be used to stifle free speech.

- The new Regulator, will have the power to determine both the content of a code and to assess a platform's compliance with this same code, to determine what qualifies as "harmful" or "unsafe" content.

- The proposed legislation will provide a loophole for the Government to bring in its controversial "hate speech laws" (and more) whilst being the ultimate arbiter of what constitutes misinformation or disinformation.

- What is proposed is the establishment of infrastructure with soft definitions to target 'unsafe' and 'harmful', which will inevitably be expanded, updated, amended and revised. We only need to look towards what has been proposed or adopted in Ireland, Australia and Canada to see examples of this.

The Dominant Industry Players Will Dictate The Censorship Code:

- The dominant industry players will dictate the (censorship) codes.

- The Regulator will have power to endorse specific industry groups to develop codes on behalf of their member platforms, and power to take over leadership of code development should an industry group fail to make progress on an acceptable code.

- It is inevitable that within each sector, the industry groups involved in the code development process will be the biggest and most influential. This is particularly the case in news media where a high risk of regulatory capture arises as these established players shape the rules for their competitors, suppressing and marginalising smaller and emerging platforms.

An Unfair Compliance Burden On Smaller New Zealand Media Outlets:

- The online censorship laws as proposed will create significant monitoring and reporting obligations leading to substantial compliance costs on platforms.

- Only the bigger platforms with abundant resources will be able to afford compliance. In addition, enforcing compliance against international platforms will be challenging, resulting in New Zealand-based platforms bearing the brunt of the effects.

- Compliance costs will have a chilling effect on the local industry, reducing competition and creating a barrier to entry.

- Non-compliance or a breach of the codes is at the identification and behest of the Regulator and will result in extraordinary monetary penalties that will likely make operative longevity impossible.

What Constitutes "Harmful Content" Or "Unsafe Content" Is Subjective:

- The test of what constitutes "harmful content" or "unsafe content" is a subjective one. New Zealanders will be in a position of not knowing which content will be deemed harmful or unsafe.

- There will be a clear chilling effect on society as platforms are forced to ensure people bite their tongues online for fear of breaching ambiguous provisions, the scope of permissible speech narrows. This is undoubtedly an egregious result in a democratic and free society.

- There will always be bigots who say things others find offensive. There will also be people holding strong beliefs others find offensive. We may consider particular statements and opinions upsetting or even repulsive, but our feelings don't warrant these beliefs being made illegal.

- There is no defence of "truth". The implications for this are alarming: if content is true, its sharing could potentially still lead to criminal prosecution.

An Unaccountable Regulatory Body Is Not Democratic:
- An unaccountable regulatory body is not democratic.

- The proposed online censorship laws will put immense power in the hands of Regulatory body that has no accountability to Parliament and therefore none to the New Zealand public. The Regulator will be entitled to specify which code applies to which platform, and will be empowered to target those platforms it chooses to.

Participation in a particular group should not afford individuals with special rights:
- Participation in a particular group should not afford individuals with special rights, nor remove the ability of others to hold opinions, whatever they may be, about that group. Who deems which groups get special protection? Who decides what is and isn't an acceptable view? These seem to be considerations best addressed by public discussion, not by laws imposing hefty penalties.

- Race has no place In determining what speech should or should not be allowed. Under the proposed censorship laws the Regulator will be responsible for ensuring appropriate processes are built into the code development and approval process to guarantee Maori participation and to ensure the codes reflect Maori social and cultural values.

- Co-governance requirements will lead to division, conflict, uncertainty and most of all lack of fairness.

- The discussion document mandates co-governance on the one hand whilst citing racism as a harm of significant concern on the other hand.

- The Regulator will be responsible for making sure appropriate processes are built into the code development and approval process to "ensure Maori participation" and to "ensure the codes reflect Maori social and cultural values".

Appendix D:
Makes Sense submission template

To the SOSMP Consultation team at the Department of Internal Affairs,

I am writing this submission to share my view on the Safer Online Services and Media Platforms proposed regulatory review currently being undertaken. I support this review and believe significant work needs to be done to manage the illegal content available online, to better protect children and young people.

The easy access of child sex abuse material, bestiality and rape videos on the internet is alarming. It normalises sexual violence, illegal sexual behaviour, and is impacting the children and young people that stumble across it and those involved in the creation of it. It is imperative that New Zealand takes proactive measures to address this issue.

The following should be incorporated into online regulation:

6. Empower the regulatory body to mandate Internet Service Providers block objectionable content.

    This should include, but is not limited to, mandating the Digital Child Exploitation Filter System (DCEFS), and additional filters that may be developed for objectionable content. This content is detailed under Section 3 of the Films, Videos, and Publications Classifications Act 1993.

7. Expand and improve the current DCEFS filter.

    The existing filter blocks minimal Child Sex Abuse Material (527 CSAM URLs blocked, according to IRG Minutes, March 2023). The current process is dated, requires manual checking, and does not use advanced technology, such as hashing.

8. Develop a new filter or block list for rape and bestiality content.

    This content is currently easily found, and it is unacceptable that our children can search for this content online and have immediate access.

9. Ensure that Industry Codes include and allow for age verification on mainstream adult porn sites.

10. Support and empower the regulatory body for swift take downs of non-compliant platforms.

    A slow response allows more children access to potentially harmful content.

11. Increased funding to the following:

Department of Internal Affairs and/or the new regulatory body, to ensure objectionable content is managed quickly and effectively.

Community Educators - parents and caregivers are largely unaware of the harmful content available online and more education within the community needs to be done to prevent exposure to this. A recent social media poll showed that 39% of respondents were not aware that objectionable content was easily accessible for children and young people. 34% believed there was existing regulation of this content in place.

The majority of illegal sexual content online is entirely unregulated, this needs to be tackled. Bestiality and rape videos inflict severe physical and psychological harm on the people involved. Furthermore, the consumption of such content perpetuates a culture of violence and can have significant negative impact on children and young people viewing it. The presence of this content online undermines the principles of respect, consent and empathy that our society values.

If a child were to see an act of sexual violence on the street, we would immediately act to prevent it. This would be treated, by caregivers and professionals alike, as a traumatic incident. It is essential that we protect children from exposure to the same acts of sexual violence online. By doing so, we can safeguard the welfare of individuals, particularly vulnerable populations, and take a stand against what we know to be criminal.

It is incumbent upon us, in Aotearoa, to act now to curb the proliferation of these destructive materials which are impacting our tamariki.

Thank you for considering my submission and taking child protection online seriously.

Kind regards,

[INSERT YOUR NAME]