Submission by Pacific Magazines and ACP Magazines

Senate Environment, Communications and the Arts
Committee

Inquiry into the sexualisation of children in the contemporary media environment

18 APRIL 2008

EXECUTIVE SUMMARY

- Pacific Magazines and ACP Magazines do not support the sexualisation of children.
- Pacific Magazines and ACP Magazines do not feature editorial content or advertisements which sexualize children.
- Pacific Magazines and ACP Magazines receive a negligible level of complaints in relation to this issue.
- Pacific Magazines and ACP Magazines are confident that the current levels of self-regulation provide appropriate community safeguards.

1. Introduction

Pacific Magazines and ACP Magazines welcome the opportunity to comment on the Senate Environment, Communications and the Arts Committee's Inquiry into the sexualisation of children in the contemporary media environment.

We note that the Committee's terms of reference are set out as follows:

- (a) examine the sources and beneficiaries of premature sexualisation of children in the media:
- (b) review the evidence on the short and long-term effects of viewing or buying sexualising and objectifying images and products and their influence on cognitive functioning, physical and mental health, sexuality, attitudes and beliefs; and
- (c) examine strategies to prevent and/or reduce the sexualisation of children in the media and the effectiveness of different approaches in ameliorating its effects, including the role of school-based sexuality and reproductive health education and change in media and advertising regulation such as the Commercial Television Industry Code of Practice and the Commercial Radio Codes of Practice.

At the outset, ACP Magazines and Pacific Magazines note that the above terms of reference (the 'Terms of Reference') for the Inquiry raise some important definitional considerations. Firstly, the term child is not defined. We note that often the term is taken to refer to young persons other than teenagers, or at least those people 13 years of age and below¹. ACP Magazines and Pacific Magazines would support an interpretation that reflected this common usage. Any approach that applies a broader age range would need to be carefully considered to ensure it takes into account considerations as to the important physical and emotional developments that affect people in the early teenage years. With the onset of puberty a person starts to develop sexually and there are important health reasons to ensure they have access to responsible and appropriate information on sexual development.

ACP Magazines and Pacific Magazines also note that the Committee will examine the sources and beneficiaries of *premature* sexualisation (emphasis added). ACP Magazines and Pacific Magazines believe it is necessary to ensure that when determining what constitutes 'premature sexualisation', the Committee exercises caution and takes into account all relevant considerations including the physical and emotional development of teenagers and the sources of information available to children and teenagers outside the media, such as peer to peer information sharing, parental and school education programs and awareness gained through observance of older persons.

¹ Section 1 of the *Children's Television Standards* prepared by the Australian Communications and Media Authority under the *Broadcasting Services Act 1992* (Cth) defines children as people younger than 14 years of age.

ACP Magazines and Pacific Magazines also support the Australian Association of National Advertisers recent announcement relating to changes to the Advertising to Children Code and commends the measures adopted to prevent the sexualisation of children. We believe that the change in the advertising standards will address many of the concerns the subject of the Inquiry.

We note that media publications can and do play an important role in correcting misconceptions and providing information to teenagers in order to gain a responsible and mature understanding of sexual issues and sexual development. Any move to restrict such a role may have unintended consequences including the reduction in the amount of credible and balanced information available to teenagers. This in turn may lead to anxiety and confusion in teenagers and also inappropriate sexual understanding or activity if their concerns are not addressed.

In relation to the Inquiry Terms of Reference, ACP Magazines and Pacific Magazines note that:

- 1. ACP Magazines and Pacific Magazines are responsible publishers who take care when presenting material targeted at children or involving children;
- 2. The content in our publications is regulated by the Classifications Act and Regulations;
- 3. Images and editorial in print publications are subject to the Press Council's principles and guidelines;
- 4. The current self regulatory scheme for classification of print publications is adequate to deal with community concern; and
- 5. Any further regulation would be better managed within the self regulatory framework to ensure the important principles surrounding freedom of the press are not eroded.

This submission will address these issues and others raised by the Terms of Reference in detail below.

2. Magazine Publishers have Adequate Complaints Handling Processes

Pacific Magazines and ACP Magazines each publish a number of magazines marketed at children and teenage girls, including Total Girl, Girlfriend, Disney Princess, Little Friends, Disney Adventure, Disney Girl and Dolly.

Each of the magazines has high readership figures. Girlfriend for example has a readership of approximately 550,000 girls, while Dolly has a readership of 400,000. ACP Magazines and Pacific Magazines note that, considering their popularity, there is a very low level of complaint in relation to these publications.

ACP Magazines and Pacific Magazines both have strict complaints handling mechanisms in place for the effective monitoring of and response to reader complaints.

For example:

- Complaints can be received through several avenues including the corporate website, individual magazine websites, written to head office, or registered verbally via phone.
- On the website, readers are invited via the "contact us" link to raise concerns in relation to any thing they may have seen or read.
- The names of writers are always included on stories and all the magazine team members' names are included on the masthead.
- Reader responses via both email and letter are regularly monitored by magazine staff.
- Complaints which raise issues regarding content within the magazine are forwarded to the relevant department head for response.

We note that complaints are generally handled directly at the editorial level of the relevant publication and by persons who have the appropriate understanding of the issues involved and can take any appropriate action. Further, we note that complaints comprise only a fraction of the correspondence ACP magazines and Pacific Magazines receive. For example, Total Girl magazine's records indicate receipt of approximately 2-3 complaint letters each year which refer to content deemed inappropriate compared to the hundreds of positive letters received. Similar levels of complaint are received in relations to ACP Magazines publications, Disney Girl and Dolly. Pacific Magazines and ACP Magazines have no record of receiving any complaints in relation to the sexualisation of children.

ACP Magazines and Pacific Magazines believe this indicates that there is not a discernible level of reader concern in relation to their publications, or in terms of the contribution of these publications to the sexualisation of children. Pacific Magazines and ACP Magazines attributes this to the fact that sexualisation of children does not occur in the editorial content or advertising in these magazines.

ACP Magazines and Pacific Magazines have a good record of responding to community concerns and taking immediate steps to address issues in relation to their publications as they arise. Many of Pacific Magazines' and ACP Magazines' publications have, over recent years responded to changing community attitudes towards content that deals with such issues. ACP Magazines and Pacific Magazines always seek to review and improve their content and promote self regulatory practices that help ensure community standards are maintained.

By way of example, with the re-launch of the publication *Disney Girl* in March 2006, a conscious decision was made to not feature public figures who are perceived as irresponsible role models for children or promote inappropriate behavior. Celebrities such as Paris Hilton and Lindsay Lohan have therefore been excluded from the publication.

Further, last year, the community group Kids Free 2B Kids complained to Girlfriend magazine about a free giveaway T-Shirt featuring the well known Playboy bunny shaped logo. Girlfriend magazine immediately altered its editorial policy disallowing the use of this product within its magazine. The complaint was discussed with relevant internal managers and a decision was made that no future advertising, editorial or promotional activity would be undertaken with this brand in the magazine.

3. Publications Abide by Existing Regulatory Framework

ACP Magazines and Pacific Magazines also operate in an appropriately regulated environment that involves both industry self-regulation and government regulation.

The National Classification Scheme

Australian has a robust classification system that reflects the views of the Australian community and appropriately balances the rights of Australians to read, hear and see what they want against the need to protect minors and to address community concerns regarding sex, violence and offensive material.

The classification of publications, among other things, is provided for under the Classification Act. The Classification Act establishes two bodies charged with making classification determinations: the Classification Board and the Classification Review Board. The Classification Act requires that, in appointing members of those Boards, regard is had to the desirability of ensuring members broadly represent the Australian community.

In making classification decisions, the Classification Board and the Classification Review Board have regard to the National Classification Code and the Classification Guidelines. Both the Code and the Guidelines are approved by Commonwealth, State and Territory Ministers with censorship responsibilities.

Each State and Territory has enacted classification enforcement legislation that prescribes penalties for classification offences and provides for enforcement of classification decisions.

ACP Magazines and Pacific Magazines have excellent records of compliance and cooperation with the Classification Board. ACP Magazines has participated in training sessions organised by the Classification Board and has a strong internal culture of compliance with the Classification Act.

• The Australian Press Council

ACP Magazines and Pacific Magazines are active members of the Australian Press Council, an industry self-regulatory body that is supported by all major print publishers.

The Australian Press Council's aim is to promote freedom of speech through responsible and independent print media, and adherence to high journalistic and editorial standards, by, among other things:

- considering and dealing with complaints and concerns about material in print publications;
 and
- encouraging and supporting initiatives by the print media to address the causes for readers' complaints and concerns.

ACP Magazines and Pacific Magazines comply with The Australian Press Council's principles and co-operates with complaint-driven reviews as they have arisen.

ACP Magazines and Pacific Magazines are not aware of the Press Council having received any complaints in relation to the sexualisation of children through any publication of ACP Magazines or Pacific Magazines. Indeed, it is ACP Magazines and Pacific Magazines' understanding that the Australian Press Council has never been called upon to issue an adjudication concerning the sexualisation of children. This indicates that the print media does deal responsibly with material directed to or depicting children.

• Advertising Standards Bureau

Advertising that appears in print publications, including magazines published by ACP Magazines and Pacific Magazines, is subject to industry self-regulation through The Advertising Standards Bureau. The Advertising Standards Bureau administers a national system of advertising self-regulation through the Advertising Standards Board. The Board is comprised of members chosen for their involvement in the community and their relevant professional expertise.

The Advertising Standards Board provides determinations on complaints about, amongst other things, concern for children and portrayals of sex, sexuality and nudity. Determinations by the Advertising Standards Board are made by reference to the Code of Ethics and Code for Advertising for Children adopted by the Australian Association of National Advertisers ('AANA').

Recently, the Advertising Standards Bureau has appointed an independent reviewer to provide the community and advertisers with a channel through which they can appeal decisions made by the Advertising Standards Board. The appointment of the independent reviewer has further strengthened an already robust complaint adjudication process.

As previously noted, the Advertising Standards Bureau has also recently reviewed the AANA Code of Ethics to expressly address the sexualisation of children in advertising and the use of sexual imagery in advertising pitched at children. That review came as the result of a broad industry and community consultation process that commenced in April 2007. The Advertising Standards Bureau's review is indicative of its responsiveness to community concerns and responsible stance in relation to the issues the subject of this inquiry.

We note that the major changes between the former AANA Advertising to Children Code and the Children's Advertising & Marketing Communications Code include:

- A prohibition against the sexualisation of children or using sexual imagery in advertising/marketing communications to children that is contrary to prevailing community standards.
- A prohibition against the placement of advertising/marketing communications targeted at children in media unsuitable for children.

ACP Magazines and Pacific Magazines believe that the statutory and industry self-regulatory environment in which print media operates at present appropriately limits the manner in which print media delivers content to and depicts children. ACP Magazines and Pacific Magazines contend that further regulation of the print media sector is unnecessary and raises significant freedom of speech concerns.

4. Industry Experts Support the Role of our Publications

ACP Magazines and Pacific Magazines also note that experts in the area of adolescent and child health believe our publications have an important role to play in responsibly informing adolescents and teenagers about sexual matters. In relation to the sexualisation of children generally, we note that industry experts believe it is predominately social and environmental causes that have encouraged girls to develop earlier.

Statement from Dr Michael Carr Gregg (industry expert on youth market)

Psychologists around the world recognise the phenomenon of developmental compression, where the physical development of young women is running ahead of their emotional and cognitive development. Although the precise cause of this early puberty phenomenon is not altogether clear, it is obvious that girls are developing earlier but I would argue against that Total Girl encourages girls to behave in a manner that is inappropriate for their age, if anything, it is a publication that celebrates what it is to be a young girl in today's society in a fun and informative way.

Where material dealing with sexual themes is included, it is limited to viewer generated questions and concerns. By way of example, Dolly magazine is targeted at adolescent teens and therefore does contain content dealing with sexual themes Typically, this content is confined to the 'Dolly Doctor' section of the publication. ACP Magazines notes that Dolly Doctor does not 'create' questions or provide 'how to guides' that promotes sexualisation. Dolly Doctor's content is confined to addressing real problems or issues for readers who have sought advice from the magazine's experts because they don't feel comfortable asking anyone else in their life and don't trust the information they find on the internet.

We note content such as Dolly Doctor can play an important role in providing accurate and responsible information to its adolescent readers. Child Psychologist, Lousie Remond states:

"I believe that the Dolly Doctor section provides an invaluable means of educating teenagers and addressing their concerns and issues re: sexual practices."

We provide accurate information which is tailored to their specific questions. We are cognizant at all times that we are dealing with teenagers. Our advice is therefore very much oriented to not engaging in any practices without seriously considering the consequences (and highlighting what issues they need to consider); emphasising open and effective communication with partners; pointing out potential legal, social, physical and emotional consequences of engaging in sexual behaviours as a minor, and encouraging involvement of a trusted adult or professional to ensure safety and well thought-out decisions.

Our experience suggests that many adolescents have worries or confusion about sexual behaviours which they are too embarrassed to raise directly with others (eg. face to face with a doctor or counsellor). The anonymity offered by the DOLLY Doctor section provides them with an opportunity to get accurate information which they may otherwise not be able to access. While such information may also be readily accessible via the internet, it can be difficult for a confused teenager to discriminate between helpful or biased information from unregulated sites."

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Similarly, Dr Melissa Kang provides:

I have written the medical column in Dolly magazine since 1993. I also work clinically in adolescent medicine and youth health, and conduct research and teaching at the University of Sydney in adolescent sexuality and sexual health.

During the 15 years I have written for Dolly magazine, I have been given access by editors, upon request, to many thousands of letters and emails, and conducted content analyses on these in order to better understand the health concerns of adolescent girls. Some of this qualitative research has been published in peer reviewed journals and presented at national and international conferences. Conducting research in this area of adolescent health has given me much deeper insights into the role of teenage girls magazines in the health and sexuality education of their readers.

Teenage girls magazines the world over are one of the most common sources of sexuality information for adolescents, particularly girls.

All questions published in Dolly magazine are reader-generated and unsolicited. Research I have been involved in in Australia has found that adolescents experience several barriers in accessing health professionals directly. Adolescents turn to magazines, the internet and friends most commonly for information about sex, ahead of parents, teachers or health professionals. This behoves magazines such as Dolly to present accurate, responsible and most of all, developmentally appropriate, information about sex. I believe that Dolly Doctor does this and that Dolly magazine takes this responsibility very seriously.

Questions submitted to Dolly Doctor about sex are diverse and include requests for facts based on curiosity, concerns about sexual development and identity, requests for advice about relationships as well as more explicit questions about sexual practices, and how to avoid pregnancy and sexually transmitted infections. This reflects the range of ages and experiences of the adolescent age group. Sexual content in the Dolly Doctor section is always in response to this overall range of concerns and combines evidence-based, factual information with broader discussion about healthy sexual development, self-awareness, respect, relationships, communication and practical guidance about where and how to get help and support, including talking to parents as appropriate. In my 15 years writing for Dolly, I have always been impressed by the efforts of staff writers in researching articles about sex and health by contacting well respected, credible health professionals and/ or by asking myself and Louise Remond, clinical psychologist, to review draft articles.

The impact of media on adolescent health is a subject of great interest to many adolescent health professionals around the globe. The area most well researched is the impact of media violence in the USA but in recent years, issues such as body image and sexuality have also been topics of interest and concern. The main criticisms of media by researchers and health professionals has been that sex is sensationalised and portrayed in a one-dimensional way, without any balanced information about safety, protection, and the importance of relationships and communication between partners. The Dolly Doctor section is the absolute opposite of this, and provides very much needed information about all these issues in language that is accessible to readers without glamorising or sensationalising sex, but rather acknowledging this fundamental part of humanity and growing up.

The magazine takes a conservative approach to condoning sexual activity in adolescents, in that readers are cautioned about engaging in sexual activity without being ready, emotionally or physically.

If Dolly was not allowed to publish the Dolly Doctor section, valuable, credible and balanced information about sex from a popular and trusted source would be denied adolescents around Australia and New Zealand. Adolescents would be likely to access such information from internet sites, and from what I refer to as "playground myths"

(many of which are dispelled by Dolly Doctor). Furthermore, the anxieties that many readers have about their sexual development and relationships would not be addressed. Self-consciousness in adolescence is normal but can lead to anxiety and confusion if concerns are not addressed appropriately.

Dolly Doctor is a comprehensive, popular, trusted source of information about health and sex and adolescent readers actively engage with the magazine via letters and emails about their health concerns. It complements sexuality education in schools and at home and over the past 15 years I have met many teachers and parents who use Dolly Doctor information to teach content and generate discussion.

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Ms Catherine Lumby, Director, Journalism and Media Research Centre further writes:

The images in Total Girl show girls who are primarily of late primary and early high school age. The models are dressed in age appropriate clothes and do not wear heavy make-up. The models are shown in friendship pairs engaging in fun activities together. That said, I must also add, speaking as a gender studies expert, that I find claims that the sexual abuse of children is ever related to the way children are represented in popular magazines or to the clothes they are wearing abhorrent. Those who sexually abuse children are not 'turned' into abusers by seeing children in swimsuits or cropped tops. This is equivalent to blaming the adult victims of sexual assault for wearing a short skirt to a bar. Abusers of children will of course try to find excuses for their criminal behaviour. The rational response is not tell young girls to police what they wear and 'cover up', it's to focus on catching perpetrators and educating our children to tell parents, teachers or other trusted adults if they are being abused.

Total Girl magazine does not deal in any explicit way with isues of sexual development or intimate relationships. A cover line on the magazine specifically states 'No boys allowed'. Advice is age appropriate and the overwhelming message of the magazine is on developing confidence, having fun and 'being yourself'. Its focus is on friendship, pets, popular music, and popular singers and actors. The great majority of the latter are female celebrities. There is a minimal focus on male celebrities – a welcome shift from tween/magazines of the 1970s when popular culture was dominated by male pop and rock stars and there were few successful women for young girls to admire. Tween magazines are not a new phenomenon. The Australian magazine, Dolly, for instance was first published in the 1970s and has always had a late primary as well as a primarily early to mid high school readership. Because it was also

aimed at an older readership Dolly magazine has always contained a Dolly Doctor section that deal more explicitly with issues appropriate to that older audience. It is refreshing to see a magazine tailored specifically to the tween market that allows younger girls to explore issues of interest to them in an age-appropriate way.

Professor Catharine Lumby
Director, Journalism and Media Research Centre

5. We have a Strong Commitment to Responsible Editorial Practices

ACP Magazines and Pacific Magazines take their responsibilities as publishers of material to children very seriously and are mindful of the need to protect children from harmful images. Each publication has strong editorial policies in place to protect children from harmful and inappropriate content and operates in a regulated environment. Each publication has available to it an expert who reviews content before it is published. Where a publication is marketed to children, experts in child development are consulted to ensure material is age appropriate. In selecting material, both Pacific Magazines and ACP Magazines are mindful of the Office of Film and Literature's Code and Guidelines. The Code states:

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

- (a) adults should be able to read, hear and see what they want;
- (b) minors should be protected from material likely to harm or disturb them;
- (c) everyone should be protected from exposure to unsolicited material that they find offensive;
- (d) the need to take account of community concerns about:
- (i) depictions that condone or incite violence, particularly sexual violence; and
- (ii) the portrayal of persons in a demeaning manner.

Further, the Classifications Act provides

The matters to be taken into account in making a decision on the classification of a publication include:

- (a) the standards of morality, decency and propriety generally accepted by reasonable adults;
- (b) the literary, artistic or educational merit (if any) of the publication;
- (c) the general character of the publication, including whether it is of a medical, legal or scientific character;
- (d) the persons or class of persons to or amongst whom it is published or is intended or likely to be published.

In applying these principles, Pacific Magazines and ACP Magazines understand that the general context of the material is an important factor in determining what material is suitable for children. ACP Magazines and Pacific Magazines take additional care in selecting material for publication. We note the editors of our publications often make conscious decisions to exclude material where it is likely to promote concepts and issues that are not suitable for children or by its context it may be above the maturity level of the readership.

Total Girl employs the following editorial policy:

Total Girl will provide readers with a safe place to read, interact and learn. Total Girl celebrates everything about being a girl, speaking to girls in their language and is always:

- × Fun, positive and informative;
- × Bright, ever-changing and stimulating; and

× Highly interactive and innovative, encouraging reader interaction both in the magazine and online."

As regards the appearance of readers and models in the magazine, Total Girl adheres to the following policy:

"Clothing: No girl in Total Girl appears wearing brief underwear, swimwear or sleepwear.

Make-up: Models appearing in Total Girl should only have bare and natural looking make-up. No lipstick or heavy eye make-up is to be used.

Models: Total Girl uses a variety of girls to model in its pages. They are always natural, healthy-looking, and age-appropriate.

Body Image: Total Girl does not encourage negative body images, but always talks about self respect and self confidence.

All girls photographed must provide written consent form a parent or guardian aged 18 years or older.

This policy covers editorial, marketing and advertising features from cover to cover.

The published editorial statement for Disney Girl indicates a dedicated concern to ensure material is age appropriate and identifies as its core target market "DGiRL is the guide for girls who aren't in a rush to grow up. Further, 'Girlfriend Magazine whole-heartedly supports the Victorian Voluntary Media Code of Conduct on Body Image. Girlfriend magazine was involved in the formulation of the Code and many of the Code's recommendations are already embraced by Girlfriend Magazine, in particular Girlfriend's Self Respect campaign.

Launched in 2006 Girlfriend's Self Respect campaign aims to encourage teen girls to take their mental and physical health more seriously. Each month Girlfriend magazine commits to dedicating at least 10 pages – the Girlfriend Guru pages – to talk to girls about their mental and physical health.

With regular 'Reality Checks' indicating pages on which models photos have been touched up or where professional hair and make up was used, now Girlfriend readers understand more about how much work goes into creating some of those looks.

As part of this campaign readers were asked which celebrities they thought lacked the self respect to be included in Girlfriend magazine and several celebrities like Paris Hilton, Britney Spears and Lindsay Lohan were banned from the magazine.

Girlfriend readers have responded overwhelmingly in support of this campaign and it has become one of the pillars of the magazine.

The negligible level of complaint indicates the effectiveness of this strict self regulation implemented by each publication in relation to editorial content, advertisers and promotions.

6. We have a Strong Commitment to the readership and editorial initiatives

As noted previously, both Pacific Magazines and ACP Magazines receive overwhelming positive feedback from parents, readers and industry experts for the editorial initiatives that these various titles have undertaken. Both Pacific Magazine and ACP Magazines, through the magazines Total Girl, Girlfriend and Dolly, take initiative to add value to reader's lives and contribute positively to their environment.

Total Girl, for example, aims to have a positive impact on readers lives from the magazine, especially through editorial initiatives such as 'I Can Make A Difference' (about empowering girls to make a positive change in their world, whether it be in the environment, in the schoolyard (bullies), at home, with friends and so forth) and 'Jump Start' (an initiative to help combat childhood obesity and body image issues with a positive and fun campaign encouraging activity and participation in a fun way).

These initiatives clearly indicate that these magazines are committed to encouraging a healthy, happy, positive outlook for all readers. ACP Magazines and Pacific Magazines also note that their publications play an important role in correcting misconceptions and providing teenagers with a responsible and mature understanding of sexual issues and sexual development. Any move to restrict such a role may have unintended consequences including the reduction in the amount of credible and balanced information available to teenagers. This in turn may lead to anxiety and confusion in teenagers and also inappropriate sexual understanding or activity if their concerns are not addressed.

7. Policies Concerning the Use of Models and Celebrities

All of these magazines use celebrities as positive role models. Pacific Magazines and ACP Magazines understand that young girls generally respond to celebrities that provide a 'heroic' image for them to look up to and aspire (for example "Ugly Betty" and Bindi Irwin) so these celebrities are used as cover shots. Any celebrity editorial covering males is very much fan based and is not intended to be viewed in a sexual way.

Pacific Magazines' and ACP Magazines teen publications target different segments of the market and accordingly aim to use age appropriate models that resonate with the target reader. This is to ensure that all models used are relevant to the reader. Total Girl therefore uses models that are appropriate for their 8 – 12 year old audience. Therefore, in most instances the average age would be 10 years old so that readers can identify with the models. As these models are photographed in accordance with the editorial policies, they are portrayed as 10 year old girls.

Accordingly, Pacific Magazine does not have a minimum age policy for the use of models and firmly believes that using older models for a young demographic would be inappropriate.

Additionally, Disney Girl utilizes imagery of the readers themselves who portray a healthy and natural body image for readers. Where make-up is used on children featured in the publication, it is limited to natural tones and does not extend to the use of heavy lipsticks or eye shadows.

Notwithstanding, where models are used for fashion shoots they are sourced through legitimate and well established agencies and a parent or guardian also is required to be present to supervise any photo shoot. Similarly, where competition winners win the opportunity to feature in a magazine, a parent or guardian is required to sign an approval form prior to the shoot and to attend the location of the photo shoot.

8. Conclusion

ACP and Pacific Magazines strongly oppose the sexualisation of children. The above detail supports a position that our magazines are not sexualizing children and are in fact committed to being a positive influence on the lives of their intended demographic readership.

ACP Magazines and Pacific Magazines believe our publications convey healthy, age appropriate and responsible messages. We strongly reject any assertion that Pacific Magazines' and ACP Magazines' publications contribute to the premature sexualisation of children. ACP Magazines and Pacific Magazines would be happy to work with any appropriate government body to further investigate self regulatory measures that would provide greater safeguards to children.

We thank the Committee for its consideration of these matters and would be happy to meet with any member to discuss our submission.