

30 May 2014

Ms Koh Lin-Net  
Chief Executive Officer  
Media Development Authority  
3 Fusionopolis Way, #16-22, Symbiosis  
Singapore 138633

**Feedback on MDA's plan to allow self-classification of arts entertainment content**

Dear Ms Koh

We refer to MDA's media release, dated 12 May 2014 and titled "MDA to forge co-regulatory partnership with arts sectors", regarding the launch of a public consultation on its proposed amendments to the Public Entertainments and Meetings Act (PEMA) to forge a co-regulatory partnership with the arts sectors.

As a leading social service agency in Singapore with a representation on the Media Literacy Council, we would like to contribute to the public consultation process and share our perspectives on MDA's proposal to allow arts entertainment event organisers to self-classify performances.

Having worked extensively among children and youths over the last 20 years, we are deeply concerned by the potential impact on the move to allow self-classification by arts entertainment event organisers and we take the position that the proposed move will ultimately result in proliferation of entertainment that is detrimental to society.

MDA's media release stated that event organisers should be "mindful of community standards and expectations" when classifying their own performances. This guideline opens up a major grey area as community standards and expectations differ from person to person and this point is exacerbated further by the fact that event organisers are conflicted in their interest to widen their audience base.

In addition, when show organisers are left to classify their own content, inconsistencies are bound to occur as individual beliefs affect perceptions on community standards and expectations, and erroneous interpretation on MDA's guidelines may result in an inaccurate classification.

While we understand that MDA may conduct checks on show organisers, damage may be done if our impressionable youths have already been exposed to the dire performance.

MDA's role is to promote and regulate the media sector, so as to contribute towards economic growth and help foster a cohesive and inclusive society in Singapore. While MDA's latest proposal will undoubtedly foster a pro-business environment for media industry players, it will come at a cost of our societal values and against the interest of consumers – both of which are principles that guides MDA's regulatory policies. Savings in the areas of cost and time or being pro-business at the expense of our country's social and moral fibre is a serious matter. Its consequences must not be taken lightly.

**TOUCH Community Services Limited**  
Blk 162 Bukit Merah Central  
#05-3545 Singapore 150162  
Tel: +65 6377 0122 Fax: +65 63770121  
[www.touch.org.sg](http://www.touch.org.sg) Email: [tcs@touch.org.sg](mailto:tcs@touch.org.sg)

MDA plays an important role in providing an independent, unbiased and objective authority on media content and acts as an important safeguard to ensure the young lives which represent the future generation of Singaporeans are brought up in a safe and secure media environment.

We understand that MDA has a difficult task of promoting and regulating the media sector and we are appreciative of the efforts of the Authority on both fronts. However, our view is that the role of the regulator should not be delegated because the responsibilities of the regulator and any interested parties (i.e event organiser, show promoter etc) must be separated to avoid any conflict of interest, either directly or indirectly.

Just as an independent external audit exercise is required for most commercial firms to ensure the integrity of the organisation is being upheld, it is equally if not more important, that MDA play its role as the regulator in this arena to uphold the social and moral fibre of our nation. We hope that MDA reconsiders its proposal to allow arts entertainment event organisers to self-classify and to maintain the current process of content regulation.

If needed, we will be glad to contribute further to discussions on this matter.

Thank you.