



IRISH FILM CLASSIFICATION OFFICE

Annual Report of the Director of Film Classification 2022



An Roinn Dlí agus Cirt
Department of Justice



IRISH FILM CLASSIFICATION OFFICE ANNUAL REPORT 2022



To Helen McEntee T.D
Minister for Justice

Dear Minister,

I am pleased to present the Annual Report of the Director of Film Classification for 2022 as prescribed by Section 29 of Video Recordings Act 1989.

Our statutory functions are governed by the Censorship of Films Act 1923 and The Video Recordings Act 1989 together with their relevant amendments. We also adhere to the following principles as described on our website www.ifco.ie:

- We believe that adults (i.e., persons over 18) should be free, within the law, to choose what they wish to view.
- We have a duty to protect children and young people from harm.
- We strongly encourage and promote the exercise of parental responsibility.

In 2022 a total of 438 films were certified for cinema release in Ireland. This is an increase of 52% on the previous year and is indicative of the Irish cinema industry returning to pre-COVID levels of theatrical release.

The total number of DVD titles certified in 2022 was 1511, a decrease of 26% on the previous year and is in line with the increasing contraction of the DVD market in the context of the rise of streaming and VOD platforms.

During 2022 there were no decisions appealed to the Classification of Films Appeal Board.

I would like to take this opportunity to thank George Sinclair who, as Acting Director during 2022, helped steer the office in a challenging post-COVID environment. I would also like to thank Brian Moran who left IFCO after five years to take up a new role in Garda Headquarters. Brian played a leading role in helping to ensure IFCO met the challenges posed during COVID.

Finally, I would like to place on record my appreciation of the work done by my IFCO colleagues, the Assistant Classifiers and also the Governance team in the Department of Justice for their support.

Yours Sincerely,

Dr Ciarán Kissane
Director of Film Classification



Statements of Compliance with State Body Governance

1. I confirm that an Oversight Agreement has been agreed with the Department of Justice, which indicates compliance with the requirements of the Code of Practice for the Governance of State Bodies.
2. An appropriate assessment of IFCO's principal risks has been carried out. The main risks identified were:
 - Possible breakdowns in online data transmission resulting in delayed service delivery. As the number of online submissions continue to rise, and remote working is normalised a failure of connectivity or security would be a serious impediment to IFCO's ability to function and possibly compromise release dates.

I am satisfied that measures taken by this office, particularly through the use of technology to provide reliable methods of IFCO receiving content and the development of an updated Business Continuity Plan, address those risks.

- A further risk identified related to meeting agreed financial targets due to the continued decline of Home Entertainment submissions and applications for related retail licences.

I am satisfied that ongoing tracking and engagement with the sector and the Department of Justice on financial performance and planning addresses this risk.

3. IFCO is adhering to the Public Spending Code.
4. IFCO is compliant with Irish tax law.
5. On Behalf of the Irish Film Classification Office, I acknowledge my responsibility as Director for ensuring an effective system of internal control is maintained and operated.

The system of internal control is designed to manage risk to a tolerable level rather than to eliminate it. The system can therefore only provide reasonable and not absolute assurance that assets are safeguarded, transactions authorised and properly recorded, and that material errors or irregularities are either prevented or detected in a timely way.



Risk and Control

A risk register is in place which identifies key risks facing IFCO and these have been identified, evaluated and graded according to their significance.

The risk register details the controls and actions needed to mitigate risks and responsibility for operation of controls assigned to specific staff. I confirm that a control environment containing the following elements is in place:

- Procedures for all key business processes have been documented.
- Financial responsibilities have been assigned at management level with corresponding Accountability.
- There is an appropriate budgeting system with an annual budget which is kept under review by senior management.
- There are systems aimed at ensuring the security of the information and communication technology systems
- There are systems in place to safeguard the assets.

Procurement

I confirm that IFCO has procedures in place to ensure compliance with current procurement rules and guidelines.

Internal Control Issues

No weaknesses in internal control were identified in 2022 that require disclosure.

Protected Disclosures

I confirm that no Protected Disclosure submissions were made in respect of IFCO in 2022.



Internal Audit 2020

I confirm that an Internal Audit of the Irish Film Classification Office took place in 2020. The Audit Unit reviewed the implementation of all outstanding audit recommendations to ensure adequate progress has been made to address the risks identified.

The Internal Audit confirmed that IFCO is progressing well with the implementation of these recommendations with 12 of 17 having been completed and the remaining 5 will be addressed in 2023, with some dependant on external factors.

Administrative controls and management reporting

I confirm that a framework of administrative procedures and regular management reporting is in place, including segregation of duties and a system of delegation and accountability and, in particular, that there is an appropriate budgeting system with an annual budget, which is kept under review by management.

- There are regular reviews by management of periodic and annual financial reports which indicate financial performance against forecasts.
- A risk management system operates within IFCO.
- IFCO ensures that there is an appropriate focus on good practice in purchasing and that procedures are in place to ensure compliance with all relevant guidelines and procurement policy.

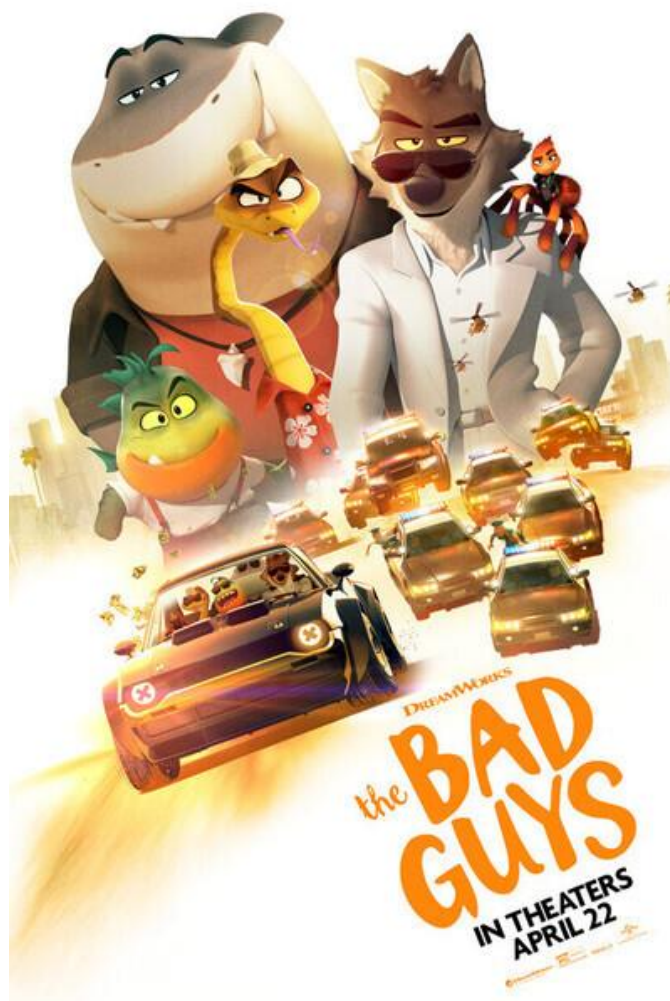
Compliance with Section 42 of the Human Rights and Equality Commission Act 2014

I confirm that IFCO is in compliance with the relevant provisions of the Act having regard to the need to eliminate discrimination, promote equality of opportunity and treatment of staff and persons to whom we provide services, and protection of human rights and service users.



IRISH FILM CLASSIFICATION OFFICE

'Mild violence, threat and rude humour'
(Consumer advice for *The Bad Guys* on IFCO's website)



The Bad Guys
Director: Pierre Perifel.



IRISH FILM CLASSIFICATION OFFICE ANNUAL REPORT 2022



Key Developments in 2022

Operational Activity and industry trends

Theatrical

The total number of cinema feature films certified during 2022 was 438, an increase of 52% on the previous year. As outlined in the table below, the number of submissions in 2022 was 85% of pre-Covid levels and the upward trend is expected to continue in 2023.

Theatrical	2018	2019	2020	2021	2022
Feature	448	502	254	289	438
Trailer	687	660	234	390	533
Short	12	7	5	4	8
Total	1147	1169	493	683	979

Cinema box office revenues also showed significant recovery and at €92,089,883 were over 75% of their pre-pandemic peak €119,741,264 in 2019. Further growth is projected for 2023.

The top five grossing films in 2022 collectively accounted for almost 20% of the total revenue as outlined in the table below. It is noteworthy that the Avatar revenue is based on only 3 weeks in the cinema.

Title	Distributor	Release Date	Opening Weekend Gross	2022 Gross
Top Gun Maverick	Paramount	27/05/2022	€585,159	€6,097,918
Minions: The Rise of Gru	Universal	01/07/2022	€1,005,771	€4,842,670
The Batman	Warner	04/03/2022	€1,371,825	€4,400,147
Avatar 2	Disney	16/12/2022	€791,021	€3,741,344
Sing 2	Universal	28/01/2022	€881,538	€3,454,977

(Source: Comscore)

Home Entertainment

The total number of video works certified was 1,511, a decrease of over 20% on the 2021 figure and 40% on 2018 (2885). Submissions were in excess of 1900 each year between 2019 and 2021 so the decrease in 2022 reflects a return to the trend identified in pre-Covid annual reports. Future trends are difficult to predict.



The introduction of new regulations in respect of Video on Demand services in the Online Safety and Media Regulation Act 2022 may result in an increased level of voluntary submissions by relevant operators. This will be monitored.

The decrease in demand for physical DVDs continues to negatively impact the number of Video Licences issued. The majority of these relate to a small number of suppliers.

Video Games

During 2022, IFCO examined 21 games rated 18 by the Pan European Games Information System (PEGI) to ensure compliance with provisions of The Video Recordings Act, 1989.

Appeals

There were no appeals regarding classification decisions in 2022.

Focus Groups/Presentations

Pursuing IFCO's education role promotes the work of the Office and allows vital feedback from parents, guardians, students and younger children.

While the easing of Covid restrictions allowed a limited number of Educational Presentations to schools in 2022 via video-link, one of IFCO's key strategic goals is to resume and enhance its in-person engagements in 2023.



Audience Research

An extensive research project which was undertaken by IFCO as part of the review of the Strategy Statement 2020-2022. The final report was presented in 2022. The research aimed to:

- (a) examine citizens' views on the suitability of existing classification guidelines,
- (b) explore attitudes to, and awareness of, the work of IFCO and
- (c) inform its strategic direction as it enters its 100th year.

The report will be published in 2023 alongside the 2022 Annual Report and in a key information source for IFCO's Strategy Statement 2023- 2025.

Carried out in conjunction with Behaviour & Attitudes and led by IFCO Assistant Classifiers David Power, Niamh McCole and Zélie Asava, the research sought feedback from both parents and teens with a particular focus on social concerns, cultural changes and attitudes to the depictions of sexual violence, suicide and self-harm, the portrayal of young people on screen and the importance of context in classification.

Findings indicate that 80% of parents aware of the organization trust IFCO to provide reliable age ratings; and 88% of parents evaluate the sample IFCO.ie content as useful, affirming the website's potential in highlighting IFCO's activities. The quantitative feedback from parents does suggest generalised awareness raising initiatives are required for the age rating symbols; key uncertainty centres around symbols 12A & 15A and what those rating mean in practise.

The most concerning areas for parents are:

- Violence/Threat; Discrimination and Derogatory Representation; Sexual
- Violence/Suicide/Portrayal of Young People on screen.

'Bullying' is especially perceived as an area which can be treated in an educational/supportive manner. The vast majority of parents believe the outcome of a film should influence the age rating it receives (i.e., the context in which material is presented should be the deciding factor in how material is rated).

Among teenagers, Sexual Violence, Suicide, and the Portrayal of Young People are the areas where guidance/boundaries are most needed, along with content that can be seen to impact on mental health. Overall, teenagers would like to see less focus on age classification and more emphasis on alerting them to triggering content to help them make their own decisions about what is and isn't suitable for them to watch.



IRISH FILM CLASSIFICATION OFFICE

The broader media context in which IFCO operates generated key concerns for respondents. Managing the material their children are watching day to day is an increasing challenge for parents today. The research revealed that practically all children currently use a 'solo' viewing device with content consumed, from about the age of 13/14 often alone and with minimal parental supervision/monitoring. In this landscape, 61% of parents reported concern about their children accessing content from streaming sites; 61% worry that with multiple media devices, children may be exposed to inappropriate content with 76% worried about the effect that may have on children. 50% of parents surveyed reported feeling overwhelmed monitoring the number of media devices in the house; and reported confusion about how streamed content is classified, recommended, and accessed.

In terms of updating its Classification Guidelines, the research suggests IFCO should pay close attention to the following areas which are of specific concern to respondents:

Violence/Threat: Graphic/gruesome violence, violence/threat that feel pertinent to children's real lives, serious consequences of violence made obvious, threats/violence that impact on a psychological level.

Discrimination and derogatory representation/language: Use of politically problematic language, reinforcing problematic stereotypes without questioning them, obvious sexual suggestiveness in inappropriate contexts, creating negative associations with normal states of being, brutal/violent representations of bullying.

Sexual violence/suicide/young people: Graphic representations of suicide/self-harm/sexual violence, normalisation, glamorisation and/or 'encouragement' of problematic behaviour, suicide/drug taking, 'depraved' behaviours like taking sexual advantage of the vulnerable. Other key findings of the research include:

- 76% of parents agreed that 'I am concerned about the effect that viewing inappropriate content might have on my children's mental well-being'.
- The high incidence of parents checking age classifications falls off markedly when children reach their teenage years, suggesting this parental group as a key target for IFCO.
- 83% agreeing that 'classifications are a useful guide only – at the end of the day it is the responsibility of the parent or guardian'.
- The issues parents most definitively feel deserve an 18 age rating focus on sex and sexual violence and the normalisation of problematic behaviour such as suicide or drug taking.
- Key areas of concern for parents are the treatment of child abuse, suicide and bullying.

IRISH FILM CLASSIFICATION OFFICE ANNUAL REPORT 2022



'Mild violence, treat, rude humour and bereavement theme. Some scenes may frighten younger viewers'.

(Consumer advice for *Guillermo del Toro's Pinocchio* on IFCO's website)



Guillermo del Toro's Pinocchio

Director: Guillermo del Toro





Complaints

During 2022, IFCO received 10 complaints from the public in relation to such titles as *Smile*, *Emancipation* and *The Northman*.

Goals and Performance 2022

The following were the main outcomes of the targets set for 2022:

- The number of classifications issued was 2,511 which was a decrease of 3.2% on the total of classifications issued in 2021.
- All client deadlines were achieved. This was facilitated by the online delivery system introduced in 2019. This allowed viewing and classification of works remotely.
- The target of not exceeding €713k expenditure was achieved. The outturn for the year was €378k.
- The income target of €822k was exceeded with a total income in 2022 of €872k

IRISH FILM CLASSIFICATION OFFICE ANNUAL REPORT 2022



'Moderate action sequences.'

(Consumer advice for *Top Gun: Maverick* on IFCO's website)



Top Gun: Maverick
Director: Joseph Kosinski.



IRISH FILM CLASSIFICATION OFFICE ANNUAL REPORT 2022



IRISH FILM CLASSIFICATION OFFICE

Financial

The fees charged by the Office for the certification of cinema films and DVD/videos and for the issuing of licences in 2022 were as follows:

Video	€331k
Film	€346k
Licences	€140k
Games	€55k

Total income received on behalf of the Department in 2022 was **€872k**.

Revenue was up €51k on 2021 and but down over 25% on pre-pandemic levels. This reflects the decrease in home entertainment material. This trend is being actively monitored.

Income

Income (€000)	2018	2019	2020	2021	2022
Video	682	595	396	353	331
Film	366	420	299	298	346
Licences	211	175	113	170	140
Games	Games revenue included in video				55
Total	1259	1190	808	821	872

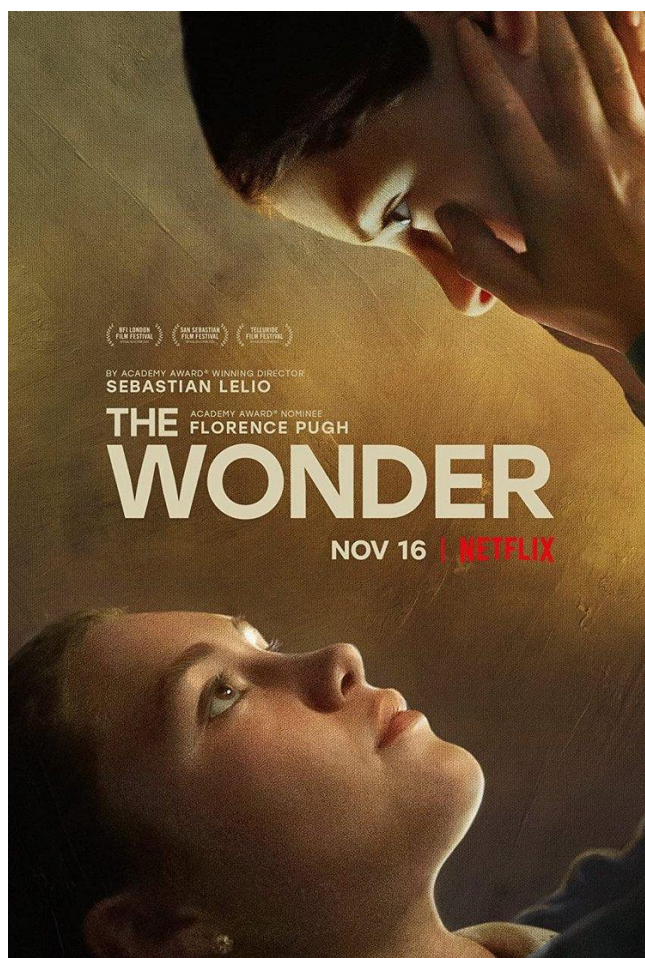
Recovery in theatrical fees is not sufficient to balance the ongoing decline in video and licence revenue. Fees have not be reviewed since 2004 and this is a priority under the 2023-2025 Strategic Plan. The review will include research on trends in other jurisdictions and extensive stakeholder consultation. A report and recommendations will be presented to the Minister for consideration.

IRISH FILM CLASSIFICATION OFFICE ANNUAL REPORT 2022



IRISH FILM CLASSIFICATION OFFICE

Strong sex, infrequent strong language, drug use and references to child abuse.’
(Consumer advice for *The Wonder* on IFCO’s website)



The Wonder
Director: Sebastián Lelio

15A



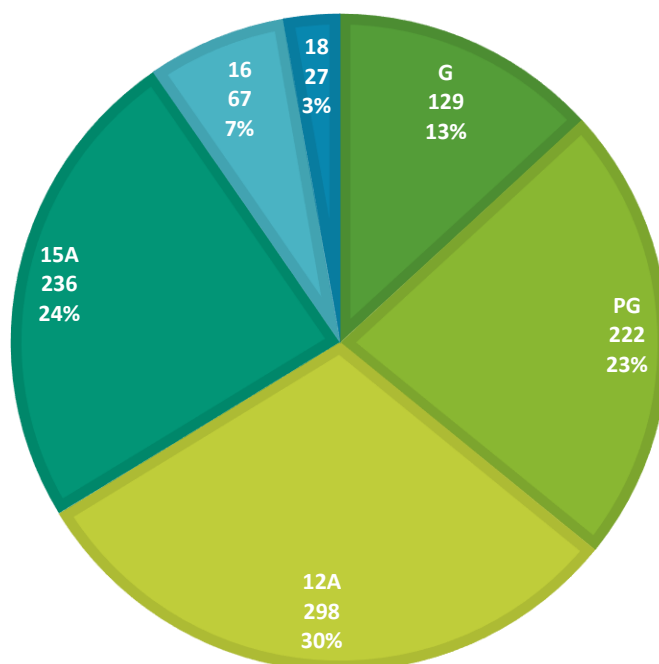
Certifications Issued in 2022

Details on the numbers and types of certificates issued in 2022 is provided in the tables and charts below for Home Entertainment and Theatrical content. These illustrate the ongoing decline in the quantity of Home Entertainment material being submitted for classification. On a more positive note, the statistics also show the recovery in theatrical submissions following the pandemic.

Theatrical	2018	2019	2020	2021	2022
Feature	448	502	254	289	438
Trailer	687	660	234	390	533
Short	12	7	5	4	8
Total	1147	1169	493	683	979

THEATRICAL BY CLASSIFICATION CATEGORY

■ G ■ PG ■ 12A ■ 15A ■ 16 ■ 18



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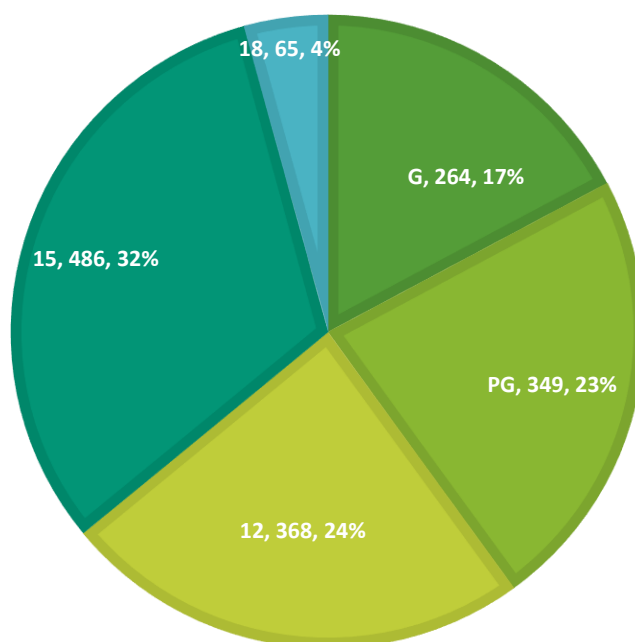


IRISH FILM CLASSIFICATION OFFICE

Home Entertainment	2018	2019	2020	2021	2022
Feature	1173	769	511	371	379
Composite	443	309	533	569	363
DVD Extra	830	784	851	907	737
Trailer	127	79	42	42	30
Advert	12	1	3	1	2
Video-Game	36	35	21	23	21
Total	2621	1977	1961	1913	1532

HOME ENTERTAINMENT BY CLASSIFICATION CATEGORY

■ G ■ PG ■ 12 ■ 15 ■ 18





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'Strong language throughout. Strong violence with blood detail injury. Strong sexualised imagery.'

(Consumer advice for *Everything Everywhere All At Once* on IFCO's website)



Everything Everywhere All At Once
Director: Dan Kwan, Daniel Sheinert





'Frequent use of strong language. Contains scenes of intense strong violence with graphic injury detail. Very disturbing scenes. Reference to sexual assault. Depiction of suicide.'
(Consumer advice for *Barbarian* on IFCO's website)



Barbarian
Director: Zach Cregger

18



Classification Team

Director of Film Classification (Acting) George Sinclair

George Sinclair was appointed as Acting Director in February 2022. He also represents Ireland on the Council of PEGI, the Pan European Games classification system

Part-Time Assistant Classifiers During 2022

Zélie Asava PhD in Film Studies

Mark Brennan Journalist

Niamh McCole PhD in Film Studies

David Power TV Producer

Martin Scanlon Barrister

Office Staff during 2022

Aoife O'Connor Theatrical Co-ordinator

Brian Moran – Home Entertainment Co-ordinator

Andrew Millea – Licences Co-ordinator

New Director Appointment

During 2022, a public competition for a new Director of IFCO was initiated through the Public Appointments Service. The successful candidate, **Dr Ciarán Kissane** took up office on March 6th 2023. A native of County Laois, Dr Kissane has worked in media regulation for almost 30 years and has extensive experience in content classification, strategic planning and organisational development.



IRISH FILM CLASSIFICATION OFFICE