



www.acm.org.za | info@acm.org.za | 072 244 2406 | Fax 0862356700
 53 Clifton Mews, Clifton Hill Estate, 51 Acutt's Drive, Hillcrest, 3610

**ASSOCIATION CHRISTIAN MEDIA (ACM) COMMENTS
 TO THE NATIONAL COUNCIL OF PROVINCES ON THE
 THE FILMS AND PUBLICATIONS AMENDMENT BILL" (VERSION B37B-2015)
 SEPTEMBER 2018**

SUMMARY

While the ideal of protecting children from pornography is supported and the improvements to the bill are acknowledged, the definition of 'hate speech' should not be broader than that of section 16(2) of the Bill of Rights. It is proposed that the definition of 'hate speech' changed to "*advocacy of hatred' means public support for or recommendation of a particular cause or policy made using the internet through speech, gesture, conduct, writing, display or publication that is based on race, ethnicity, gender or religion, and that constitutes incitement to cause harm.*" and that the 'harm' should use the dictionary definition.

INTRODUCTION

The ACM is a non-profit network of Christian media organisations that share a vision of reaching people with the Gospel. The ACM strives to be a unifying force that fosters efficient, effective and sustainable Christian media organizations and a greater representation of the Christian worldview within secular media. The Association of Christian Media's vision is to extend God's Kingdom and inspire, serve and support Christian media in Southern Africa. The ACM currently has over 120 members and our members include radio stations, print media, TV channels, electronic media, content providers, churches and individuals involved in mainstream media.

SCOPE OF COMMENTS

These comments relate mainly to the detrimental affect this policy may have on the positive work that many of our members are engaged in, using online content on internet. The ACM supports the ideal of protecting children from the harmful effects of pornography; however, we must be careful to avoid other problems in the pursuit of this objective.

KEY CONCERNS PREVIOUSLY RAISED

The ACM previously raised four key concerns in our August 2016 submission to the National Assembly Portfolio Committee on Communications, which are summarised as follows:

1. **Streaming:** Broadcasters who also stream do not wish to answer to complaints at two authorities on the same material. Such complaints should go to the Broadcasting

Board

Andile Maposa, Darius Koekemoer, Bongie Moyo-Bango, Gerda Snyman, Karel Verhoef, Nurden Cross, Valerie Govender