

NOTICE OF DECISION UNDER SECTION 38(1)

TO: Commissioner of Police

Title of publication: Wicked Camper GCT798

Other known title: Not stated

OFLC ref: 1600234.000

Medium: Vehicle

Maker: The Wicked Cult Limited

Country of origin: New Zealand

Language: English

Classification: Objectionable.

Excisions: None

Descriptive Note: None

Display conditions: None

REASONS FOR THE DECISION

The Office of Film and Literature Classification (Classification Office) examined the publication and recorded the contents in an examination transcript. A written consideration of the legal criteria was undertaken. This document provides the reasons for the decision.

The Nature of the Publication:

The material for consideration consists of images and text that appear on the front, the back and on both sides of a campervan designated as *Wicked Camper GCT798*. The campervan is offered for hire by a business known as Wicked Campers, owned by The Wicked Cult Limited.

While the medium - a campervan - is one that has not until recently been examined by the Classification Office it clearly fits the definition of “publication” under s2(c) of the Films, Videos, and Publications Classification Act 1993 (FVPC Act); “a paper or other thing that has printed or impressed upon it, or otherwise shown on it, one or more (or a combination of 1 or more)

images, representations, signs, statements or words ...” The breadth of the definition indicates Parliament’s intention that the scope of the FVPC Act not be limited to films, DVDs, books and magazines. While a campervan’s status as a publication may not be immediately apparent, it meets the s2(c) definition, as do other unusual mediums previously classified under the FVPC Act. For instance:

- Apparel: OFLC 800513 – *Vestal Masturbation (Cradle Of Filth T-Shirt)*
- Drink Can – OFLC 1101242 - *Miss Svenson's Classroom Detention*
- Playing Cards: OFLC 9501108 - *Hershe Highway*
- Billboard: OFLC 702680 - *Erotica Lifestyles Expo Billboard*
- Card/Jigsaw Puzzle: OFLC 9601115 – *Colt Puzzle Cards*
- Calendar: OFLC 301472 - *Massive FHM Wall Calendar 2003*
- Street Sign: OFLC 9600069 - *"The New Venus Shop" Sign on Karangahape Rd*
- Packing Box: OFLC 9902226 - *'Just' 17 Love Doll*
- Sticker: OFLC 1400015 – *Panty Dropper*

Submission procedure:

The campervan is one of a number submitted as a group for classification. The Classification Office received copies of the material for classification in the form of photographs of all four sides of each campervan. They were submitted for classification on behalf of the Commissioner of Police under s13(1)(ab) of the FVPC Act. *Wicked Camper GCT798* was received on 24 March 2016 and added to the group of vehicles already submitted by the NZ Police.

On 13 April 2016 the Classification Office advised the owner of this campervan of their right to make written submissions on its classification. The Secretary for Internal Affairs, who has an automatic right to make written submissions, was also advised of that right in respect of this and two other campervans. The owner, who had previously advised that they did not have access to the vans under consideration, was provided with copies of the submitted images on this campervan on 07 April 2016. The closing date for submissions was 21 April 2016.

Under s23(1) of the FVPC Act the Classification Office is required to examine and classify the publication.

Under s23(2) of the FVPC Act the Classification Office must determine whether the publication is to be classified as unrestricted, objectionable, or objectionable except in particular circumstances.

Section 23(3) permits the Classification Office to restrict a publication that would otherwise be classified as objectionable so that it can be made available to particular persons or classes of persons for educational, professional, scientific, literary, artistic, or technical purposes.

Synopsis of written submission(s):

Lengthy written submissions were received from both the New Zealand Police, and Ford Sumner Lawyers, the legal representatives for the owner. These submissions have been thoroughly considered and are discussed below.

Synopsis of Submission from Ford Sumner Lawyers

The points most relevant to the consideration of the campervan which is the subject of this decision are the use of humour and sexual references. With regard to publications that deal with sexual references, in paragraph 52.2 the submission refers to the Classification Office's decision on *Vice: The Photo Issue (Volume 3 Number 1)* which contained "potentially disturbing material" under s3(1), 3(A) and 3(B) of the Act, including sex, violence and cruelty. This magazine was classified as Unrestricted: Suitable for mature audiences 16 years and over as "The Classification Office held that individuals are unlikely to be harmed by exposure to the material, the content occurs infrequently and is not strong enough in terms of degree to warrant an age restriction."

With regard to this campervan, the submission considers that:

In comparison, the only mildly sexually suggestive words on Wicked's vehicles include the word "Bukkake" and "blowjob". As in the abovementioned decision, while it is accepted that these words may cause mild offence, the words occur infrequently, are not strong enough in terms of degree, will not cause harm in any way and accordingly don't reach the standard required for an age restriction.

The use of humour is dealt with in paragraphs 53 to 57 of the submission. It is stated that "humour through social commentary and satire is the commanding influence, objective intent and prevailing characteristic" of each van. The content is intended to attract attention through the use of "light hearted quotes, provocative sayings and colourful artistic imagery..." The imagery and text are said to be a satirical commentary using references to popular culture and that this humour and satirical intent is:

...clearly demonstrated within the context of the text and images, both individually and collectively, which is also an effective method of marketing, as it attracts and reflects Wicked's young customer base through its extensive use of popular culture touchstones.

At paragraphs 58 to 63 the submission considers the right to freedom of expression contained in the New Zealand Bill of Rights Act 1990 (NZBORA) and whether any limitation on the availability of the campervans would be a reasonable restriction on that right. The submission states "...painting a vehicle with artistic imagery and provocative phrases is no different from an individual displaying artwork in a gallery..." and that "there is no content on Wicked's vehicles which would be injurious to the public good in any way or form and no objectionable activity is *"promoted or supported"* by the content". A restriction would be an unreasonable limitation on the right to freedom of expression.

The campervan under consideration in this decision is dealt with at paragraphs 104 to 111. Regarding the phrase "Bukkake Ruined my Carpet" on the rear of this van, the submission states:

(Paragraph 109) While it is accepted that the phrase "*Bukkake Ruined My Carpet*" may cause mild offence to some individuals who are aware of its translated meaning, it is simply one word in the context of a whole vehicle that otherwise contains no offensive content ... (paragraph 110) Furthermore, the phrase is used for humorous purposes, and this characteristic prevails over any other potential sexual characteristics that may be interpreted. We further note that this phrase has very limited potential to offend audiences, given that the meaning of the Japanese word "*Bukkake*" is not well known.

The submission concludes that "objectively, it does not meet the standard of objectionable requiring any restriction."

Submission from New Zealand Police

In relation to the text and images on *Wicked Camper GCT798*, the written submission dated 29 April 2016 from the New Zealand Police states that it “includes the slogan “Bukkake Ruined My Carpet!” and goes on to describe the text and images on the other three sides. Regarding this slogan the submission provides various meanings for the Japanese word “bukkake” including its more commonly understood meaning as:

...a sex act performed in pornographic films in which several men will ejaculate on a woman (or another man) in circumstances that are meant to demean the subject. The sex act often depicts the subject in subdued poses and appears popular with consumers who wish to see the subordination of women. The slogan on the rear of publication *Wicked Camper GCT798* “bukkake ruined my carpet!” is indicative of a carpet being stained by the semen of multiple men who have ejaculated on a woman.

The main concern Police have with the slogan on the publication is that it details a very explicit and demeaning sexual act where a woman (or man) is deliberately subjected to a degrading act for the sexual gratification of some men. The act of bukkake appears to be a very misogynistic sexual fetish and the publication expresses the slogan in brightly coloured writing on the rear of the brightly coloured large van that is driven all throughout New Zealand on public roads, causing it to be seen by all in its vicinity; including children and young persons. Referencing such a demeaning sexual fetish on a medium such as a campervan where it is visible to children and young persons (teenagers) could be harmful to the developing sexual identity of, and the understanding of what is considered to be normal sexual behaviour by, those children and young persons.

It is very easy for any person who is not familiar with the phrase “bukkake” to use the internet to search the phrase on a search engine such a [sic] Google. The ability to use a mobile device (cellular phone and tablets) to search the phrase while travelling on a road, increases likelihood of a child or young person being exposed to images of, or information on, the sexual fetish. If a child or young person viewed publication *GCT798* and then conducted an internet search of the word “bukkake” in the Images portion of Google, they would be exposed to extremely graphic images of groups of men ejaculating onto the face of a woman. Such exposure could be harmful to the child or young person’s development and understanding of what is considered normal sexual behaviour.

The submission goes on to discuss the campervan, taking into account the various criteria under s3(4) of the FVPC Act (the dominant effect, impact of the medium, intended audience and any merit, value or importance the publication may have):

The Police submit that the publication *Wicked Camper GCT798* is contained on a brightly coloured large van, which travels in public places all through New Zealand and is likely to attract the attention of children and young persons, many of which will enquire on the meaning of bukkake and, other than asking their parents or guardians for that meaning, many will differ [sic] to the Internet to conduct a search of the meaning.

The Police submit that the publication is injurious to the public good as the publication contains material that describes, depicts, expresses, or otherwise deals with physical conduct of a degrading, dehumanising, or demeaning nature under s3(3)(a)(iii) of the Act. The exposure of such a publication to children and young persons who have not reached a certain age will would [sic] be likely to encourage them to treat or regard others as degraded, dehumanised, or demeaned.

The submission concludes with these statements:

The Police respectfully submit that in these circumstances the right to freedom of expression is justifiably limited under s5 of the NZBORA by the provisions of the Films, Videos and Publications Classification Act 1993.

It is the view of the Police that *Wicked Camper GCT798* should be classified as age restricted under s23((2)(c) of the Films, Videos, and Publications Classification Act 1993.

Description of the publication:

The images in question on *Wicked Camper GCT798* are superimposed on a background of purple and yellow paintwork in swirling patterns on the front and the left side of the vehicle, and red patterns on an orange background on the back and right side.

The front has a large peace symbol centred over the number plate.

The left side has a large image of the bearded face of the American beat poet, Allen Ginsberg. Text over the front wheel in white capitals reads, "Don't hide the madness". Beneath the van's windows, in very large red capitals outlined in white, is the word "Howl", the title of a famous Ginsberg poem.

The right side features an image of the heads and upper bodies of two male figures. One appears young. He is long-haired and is wearing sunglasses, a headband and a t-shirt with a peace symbol design on the front. His raised hand also gives the "peace" sign. The bearded figure behind him is said to represent Charles Manson. His staring eyes give his face a somewhat malevolent look. Text in green capitals, outlined in black, reads, "Make new friends. Join a cult."

The back has text in white capitals, reading "Bukkake ruined my carpet!"

New Zealand Bill of Rights Act 1990:

Section 14 of the New Zealand Bill of Rights Act 1990 (NZBORA) states that everyone has "the right to freedom of expression, including the freedom to seek, receive, and impart information and opinions of any kind in any form". Under s5 of the NZBORA, this freedom is subject "only to such reasonable limits prescribed by law as can be demonstrably justified in a free and democratic society". Section 6 of the NZBORA states that "Wherever an enactment can be given a meaning that is consistent with the rights and freedoms contained in this Bill of Rights, that meaning shall be preferred to any other meaning".

The role of the Classification Office is to determine whether the likelihood of injury to the public good (if any) arising from the availability of a publication outweighs the right to freedom of expression and therefore constitutes a reasonable limitation of this right.

The meaning of "objectionable":

Section 3(1) of the FVPC Act sets out the meaning of the word "objectionable". The section states that a publication is objectionable if it:

describes, depicts, expresses, or otherwise deals with matters such as sex, horror, crime, cruelty, or violence in such a manner that the availability of the publication is likely to be injurious to the public good.

The Court of Appeal's interpretation of the words "matters such as sex, horror, crime, cruelty or violence" in s3(1), as set out in *Living Word Distributors v Human Rights Action Group (Wellington)*, must also be taken into account in the classification of any publication:

[27] The words "matters such as" in context are both expanding and limiting. They expand the qualifying content beyond a bare focus on one of the five categories specified. But the expression

"such as" is narrower than "includes", which was the term used in defining "indecent" in the repealed Indecent Publications Act 1963. Given the similarity of the content description in the successive statutes, "such as" was a deliberate departure from the unrestricting "includes".

[28] The words used in s3 limit the qualifying publications to those that can fairly be described as dealing with matters of the kinds listed. In that regard, too, the collocation of words "sex, horror, crime, cruelty or violence", as the matters dealt with, tends to point to activity rather than to the expression of opinion or attitude.

[29] That, in our view, is the scope of the subject matter gateway.¹

The content of the publication must bring it within the "subject matter gateway". In classifying the publication therefore, the main question is whether or not it deals with any s3(1) matters in such a manner that the availability of the publication is likely to be injurious to the public good.

Matters such as sex

The word "Bukkake" appears on the back of the campervan as part of the statement "Bukkake ruined my carpet!" The word is a clear reference to a sexual practice that the Classification Office regards as highly degrading. Pornographic publications showing the practice have usually been problematic under New Zealand law.

Collins English Dictionary defines Bukkake as "a sexual practice in which several men ejaculate on the face of an individual woman."² Bukkake is usually understood as a group of men standing and masturbating to ejaculation over the face, hair or body, or into orifices such as the eyes, ears or mouth, of a woman positioned beneath the men (although the practice has migrated to gay pornography).

The practice apparently originated in Japan in sexually explicit video pornography as a means of getting around censorship laws and is a sub-genre of Japanese pornography. It now occupies a niche in western pornography alongside other "extreme" subcategories, but it is not clear to what extent it exists as a sexual practice outside of pornography.

Certain publications are "deemed to be objectionable":

Under s3(2) of the FVPC Act, a publication is deemed to be objectionable if it promotes or supports, or tends to promote or support, certain activities listed in that subsection.

The Classification Office has considered all of the matters in s3(2), but none are relevant to this publication.

Matters to be given particular weight:

Section 3(3) of the FVPC Act deals with the matters which the Classification Office must give particular weight to in determining whether or not any publication (other than a publication to which subsection (2) of this section applies) is objectionable or should in accordance with section 23(2) be given a classification other than objectionable.

The Classification Office has considered all the matters in s3(3). The matters relevant to the publication are:

¹ *Living Word Distributors v Human Rights Action Group (Wellington)* [2000] 3 NZLR 570 at paras 27-29.

² <http://www.collinsdictionary.com/dictionary/english/bukkake>

s3(3)(a)(iii) *The extent and degree to which, and the manner in which, the publication describes, depicts, or otherwise deals with other sexual or physical conduct of a degrading or dehumanising or demeaning nature.*

and

s3(3)(c) *The extent and degree to which, and the manner in which, the publication degrades, dehumanises or demeans any person.*

and

s3(3)(e) *The extent and degree to which, and the manner in which, the publication represents (whether directly or by implication) that members of any particular class of the public are inherently inferior to other members of the public by reason of any characteristic of members of that class, being a characteristic that is a prohibited ground of discrimination specified in section 21(1) of the Human Rights Act 1993.³*

As argued in the Police submission, bukkake is an extremely degrading sexual practice. It is based on the ritual humiliation and degradation of a woman by a large group of men, and to the best of the Classification Office's knowledge, it exists mainly as a trope of video pornography. In the Classification Office's experience of publications involving bukkake, it would only be regarded as a mutually pleasurable sexual practice in the context of a form of sexual submission entered into with the consent of all parties. In contrast, its depiction in pornography is almost always problematic, as this negotiation is seldom depicted in any form. Even when bukkake is depicted with no visible coercion involved, it is often portrayed as an act of implicit or explicit aggression, coupled with degrading slurs directed at the woman and dismissive physical conduct towards her.

It is typically shown in a manner designed for male viewers, with the men relatively anonymous and the focus almost entirely on the face of the woman. It requires the woman to be a passive object whose face becomes covered in ejaculate to the point where her dignity is overwhelmed. Forensic psychologist Karen Franklin has described bukkake as symbolic group rape, characterising its primary purpose as the humiliation, degradation and objectification of women

The Classification Office has, in the past, banned publications that depict bukkake. An example is a video file containing a copy of a Japanese pornographic feature, where a drawn-out scene shows 27 unidentified men ejaculating one by one over a woman's face. The woman is treated as an object and deliberately humiliated as an extreme spectacle for the sexual gratification of the viewer, presumed to be male.^[2] This is a reasonably typical portrayal of the practice.

The submission from the owner's legal representatives notes acceptance that "the phrase 'Bukkake ruined my carpet!' may cause mild offence to some individuals who are aware of its translated meaning", but regards it as "simply one word in the context of a whole vehicle that otherwise contains no offensive content." The "humorous purposes" of the phrase prevail over any "potential sexual characteristics". It is further noted that because the meaning of "bukkake" is not well-known, there is "limited potential to offend."

The Classification Office disagrees with this assessment. The text on the back window of the van is an expression of misogyny that degrades and dehumanises women. "Bukkake ruined my

³ The grounds of discrimination prohibited by s21(1) of the Human Rights Act 1993 are sex, marital status, religious belief, ethical belief, colour, race, ethnic or national origins, disability, age, political opinion, employment status, family status and sexual orientation.

^[2] OFLC Ref: 1000856

carpet!” is the type of deliberately offensive joke that derives its humour from its transgressive nature and its insensitivity. By blatantly referencing explicit sexual subject matter on the back of a van it contravenes accepted standards, but is also a joke at the expense of women rather than just a joke. To imply that the most damaging outcome of bukkake is that it ruins the carpet overlooks the humiliation and degradation the practice involves for women, and so derives its humour from being blind to the sensibilities or perspective of women. By using the phrase on the back of a campervan, Wicked Campers shows, and tends to celebrate, a degree of implicit contempt for the concerns of women.

Wicked Campers argue that the reference to bukkake is leavened by “humorous purposes”. However, humour related to detailed, extreme or degrading sexual practices is routinely restricted by the Office. Examples include material delivered by stand-up comedians such as Jimmy Carr and Amy Schumer in publications recently classified R18.^[3] In both cases the reason for the classification was the inclusion of material that described extreme sexual practices. A book promoting itself as a compendium of the world’s most offensive jokes was classified by the Classification Office in 2014 as R18 for similar reasons (*Classic Book Of Rude Jokes*, OFLC 1400040.000, decision registered 8 April 2014). Films and DVDs are regularly restricted on the basis of sexual material without public remark. The issue with this reference is it being published on the back of a camper van for all to see. The impact of the medium is discussed further under 3(4)(b) below.

Publication may be age-restricted if it contains highly offensive language likely to cause serious harm:

Section 3A provides that a publication may be classified as a restricted publication under section 23(2)(c)(i) if it

contains highly offensive language to such an extent or degree that the availability of the publication would be likely, if not restricted to persons who have attained a specified age, to cause serious harm to persons under that age.

"Highly offensive language" is defined in s3A(3) to mean language that is highly offensive to the public in general.

Although the use of the word “bukkake” would cause a high degree of offence to those who are already aware of its meaning, its impact on the general public may be more limited.

Publication may be age-restricted if likely to be injurious to public good for specified reasons:

Section 3B provides that a publication may be classified as a restricted publication under section 23(2)(c)(i) if it

contains material specified in subsection (3) to such an extent or degree that the availability of the publication would, if not restricted to persons who have attained a specified age, be likely to be injurious to the public good for any or all of the reasons specified in subsection (4).

^[3] *Jimmy Carr: Funny Business* OFLC 1600139, *Inside Amy Schumer Series 1 & 2* OFLC 1500697

The Classification Office has considered all the matters in s3B(3), but none are relevant to this publication.

Additional matters to be considered:

s3(4)(a) The dominant effect of the publication as a whole.

First impressions of the campervan are likely to be of bright colours and large and eye-catching text and images. It is likely that the majority of viewers will be unsure of the meaning of the Beat Generation images and text, but will be able to place these in some kind of counter-cultural context. The reference to the practice of bukkake on the back of the campervan has no connection with the other text or images. Reactions will vary from puzzlement or amusement to deep offence, depending on whether the viewer is aware of the meaning of the word and therefore the joke.

s3(4)(b) The impact of the medium in which the publication is presented.

Unlike films, discs and books that contain references to extreme sexual practices, the medium removes agency and control over access from the viewer. The vehicle in its present form is designed to draw attention to a commercial operation and specifically intended to be displayed to a wide public audience. Images on the campervan have the potential to be inadvertently viewed in motion on the road, as well as in car-parks and a variety of off-road situations, including camping grounds. Unlike other portable media (such as t-shirts) the campervan cannot easily be covered or displayed only in restricted areas. In this instance, the strongest material is on the back of the van. Those travelling in a following vehicle will be inescapably confronted with it and may have to follow it for a long time.

s3(4)(c) The character of the publication, including any merit, value or importance it has in relation to literary, artistic, social, cultural, educational, scientific or other matters.

The images and text on the campervan have no particular merit, value or importance in any of the above terms. The references to counter-cultural icons of the 1950s and 60s are relatively superficial and are unlikely to be appreciated by many people.

s3(4)(d) The persons, classes of persons, or age groups of the persons to whom the publication is intended or is likely to be made available.

The publication's humour is aimed at young adults, particularly men, but is presented to all ages indiscriminately.

s3(4)(e) The purpose for which the publication is intended to be used.

Images and text on the vehicle are promotional tools that seek notoriety for business purposes.

s3(4)(f) Any other relevant circumstances relating to the intended or likely use of the publication.

No other relevant circumstances are apparent.

Conclusion:

Wicked Camper GCT798 is classified as Objectionable.

The right to freedom of expression guaranteed by the NZBORA requires any limitation on the availability of a publication to be reasonable and demonstrably justified. The images and text on the campervan *Wicked Camper GCT798* are used to attract the attention of potential customers and have a commercial purpose which is served by public display. As the campervan is predominantly intended for hire by tourists it is more likely to be in public view than private motor vehicles. *Wicked Camper GCT798* has an example of a misogynistic and highly degrading sexual joke on its back panel, where it inescapably confronts following vehicles. The joke involves bukkake, which is the name of a sexual practice most commonly involving the ritual humiliation and degradation of a woman by men. It is unlikely that many viewers will immediately recognise the term. However, satisfying curiosity as to its meaning requires no more than a quick internet search from a smartphone⁴. Parents, who may be highly offended by the material, are likely to find themselves unexpectedly having to explain to young viewers a niche fetish that is extremely degrading to women.

The joke on the back of the campervan evokes comparisons with the adult sexual humour performed by professional comedians for adult audiences. However, viewers of *Wicked Camper GCT798* will inevitably include children and young people who do not have the maturity or experience to deal with sexual material intended for adults, and are likely to be harmed by being confronted with it before they are ready. Such early exposure to knowledge of an extreme sexual practice that humiliates and degrades women is likely to have a negative effect on the development of attitudes to sexuality, including acceptance of male dominance and female submission as the primary sexual paradigm. The text on the back of the van sends a message to teenagers that bukkake is just a bit of a joke. Young viewers do not have the maturity of judgment to recognise the transgressive nature of the material and are likely to conclude that misogynistic humour at the expense of women is acceptable, potentially increasing the likelihood that young men will view this kind of degrading sexual behaviour as normal and that young women will view it as unavoidable.

In this instance, the Classification Office must balance the rights of the owner against the likelihood of injury to the public good. Because of the problematic nature of the text on the back of the campervan it is highly likely that viewing the material would have harmful effects on young viewers. A classification of R18, which is consistent with other publications and would prevent access by children and young people, has been considered. However, such a restriction would have consequences beyond the intended effect: the medium makes it impossible to protect children and young people without preventing the campervan from being publicly available to anyone. The application of any of the available conditions in respect of public display is manifestly impracticable.

In classifying the campervan as objectionable, the Classification Office has also taken into account that those who rent the vans may be unwittingly criminalised if the owner considered that restricting their rental to persons 18 years and over meets the conditions of an R18 classification. While the Office does not necessarily agree that the owner could contract out of their liability in this way, the classification of these campervans as objectionable removes all doubt as to their unsuitability for their intended purpose.

⁴ The Office has verified that quick searches of the type that may be easily performed by passengers (including children) in a following vehicle will very quickly yield a complete definition of bukkake and full range of highly degrading images.

The right to freedom of expression has been considered. The likelihood of significant injury to the public good arising from the availability of the campervan has been identified. In this instance the potential for injury extends from the likelihood of harm to young people's development of sexual attitudes and behaviours to the potential for a harmful influence on the attitudes of adult viewers. Commercial expression is protected by the NZBORA. However it has been limited more readily than some other forms of expression, for example political discourse, in overseas jurisdictions and in New Zealand.⁵ This is not an unusual or excessive limitation of commercial free speech. The promotion of other potentially harmful activities to anyone, such as the advertising of tobacco, is also prohibited.

The business operations of the owner are not impeded to any great extent by the classification. Wicked Campers may wish to apply for a reconsideration of the Classification Office's decision under s42 of the FVPC Act if they can find a way to prevent people under the age of 18 being exposed to the problematic text on the campervan.

Date: 16 May 2016

For the Classification Office (signed):

Note:

You may apply to have this publication reviewed under s47 of the FVPC Act if you are dissatisfied with the Classification Office's decision.

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⁵ Andrew Butler and Petra Butler *The New Zealand Bill of Rights Act: A Commentary* (2nd ed, LexisNexis, Wellington, 2015) at 537.