



## **STATEMENT ON THE HEARING ON PROTECTION OF MINORS**

Brussels 8<sup>th</sup> of July 2009

Ladies and Gentlemen,

EGDF represents currently 600 development Studios and related businesses in more than ten European countries. Developers were reluctant to enter the space of protection of minors in the old days, when developers developed games and publishers published them. Majority of publishers did not come from Europe, and neither did any of the big console systems. But with online games the situation has dramatically changed – for the first time many European developers have a direct touch to consumers, and we, the European Game Developers became part of the end consumer market.

This happens at a time, when more and more member states follow the Commission by perceiving games not only as a key stone in technological and business-related innovation, but also as culture. And there is a link between cultural perception and perception of minors.

Let me underline first that this is an enormous opportunity for Europe. Suddenly European companies rise up on the market and become a relevant participant in the game. While we experience a shift from offline games to the online games (supported by the financial crisis) the stake of Europe is grown economically, technologically and culturally.

The online shift happens now and it is good for Europe.

European content is an important innovation driver and culturally more substantial. Concerning Games online games are more piracy proof and not so vulnerable than other media.

This development leads to the fact, that we are today involved with diversified wings of the DG INFSOC. We see the communication of the commission on an important step to watch an open discussion on these issues, especially innovation, cultural diversity and – of course – protection of minors. But it is only a beginning; not all the developments in the market are always reflected and weighted in the right way (e.g. free to play games – item selling and not advertisement), but it is a part of the base of discussion so far on a specific code of conduct and not other means.

When we talk about violence, we want to know more exactly what we mean by that. A study from Tampere University from 2004 has highlighted, that only few minors, who play games, are interested in violence as such, but more were interested in immersive gameplay that – as our life – can sometimes be violent.

This positive development is a result of network neutrality and we are thankful to EU-parliament and Commission, which has taken a firm stand. We saw filter systems being installed for the war on terror (deep package inspections), and now against child pornography (all very honourable and legitimate reasons). We will have again a debate on piracy.

Where does this lead? Violent game filters? What's next?

We think Network Neutrality will be an important element in this context and Internet regulation should therefore been handled with great care and reluctance. We should not destroy the great success of online games in Europe with a regulation, which can be easily misused to leverage market privileges from offline to online. In its very heart the Internet should stay free from hard regulations in Europe to the best of Europe and Europe's interactive content producing SMEs. Every day we prevent Internet regulation not to happen, is a day we have won for the innovation in Europe!

But we must be realistic. Concerns of protection of minors are more and more voiced. For the time being we – the developers - have been involved with PEGI only indirectly, because we were not part of this system – but only publishers and console manufacturers. I think we want to address these concerns - maybe not the fanatic part of it –but in general I think we should not run away.

An interesting development has been happening in Germany – a country where I come from – where the USK system in its latest reform has opened up institutionally to GAME, the developer organization. This is a very modern trait. Concerning PEGI and the discussion how to implement it and to broaden it in the constituency of online games, this could be an interesting model. It is true, that developer organisations question themselves, why they should support at length a system beyond their control, or some organisations, which are more or less in the control of non-European forces.

My proposal of today is therefore to open the PEGI system institutionally in a similar way the German USK system did it. This could be the right answer to the higher role developers from Europe play in the changing game market. This would lead to more trustworthy PEGI, as the developer organisations are deeply rooted in the creative industries of the European member states and not perceived as something "foreign", as are sometimes the members of ISFE in some countries. PEGI would become more credible as developer organisations are often highly regarded in the parliament, and eventually PEGI could become even more European. As a consequence the constituency of PEGI could be broadened.

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