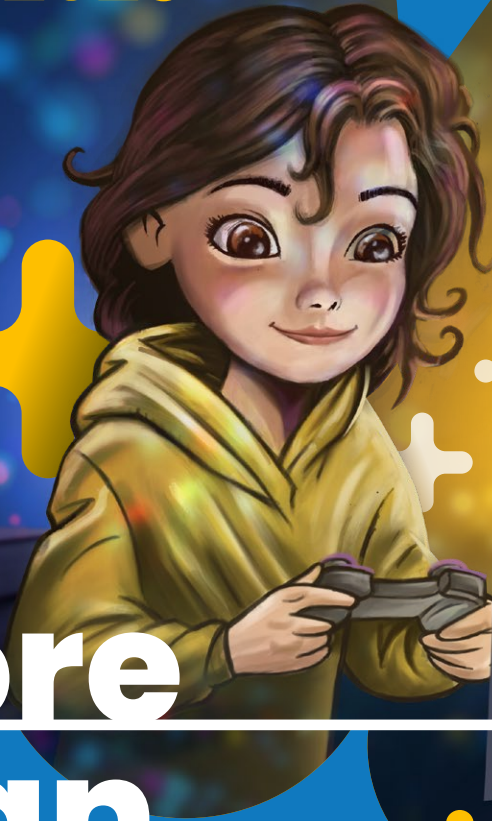


VideoGamesEurope

Manifesto 2024-2029



More than a game

VIDEOGAMESEUROPE⁺

Foreword

Over the course of the 2019–2024 mandate, the EU focused on a major overhaul of digital policy with the ambition of making Europe fit for the digital age – to drive innovation and promote economic growth.

In that five-year period, Europe's video games industry grew 16%. In terms of our economic contribution, Europe's video games industry is worth 24 billion Euros and employs 110,000 skilled workers throughout the continent. In terms of the role our sector plays in society, 53% of Europeans play our games, 46.7% of players are women and girls and the average age of a player is 32. Our games provide hours of entertainment, but they also provide young people with important digital skills. We know that girls who play video games are three times more likely to go on to study STEM¹.

Europe may not be the home of the major video game platforms, but it is a thriving territory for content creation. Many renowned video games have been developed in Europe, for example: Anno series (Ubisoft, Germany), Assassin's Creed (Ubisoft, France), Baldur's Gate III

(Larian Studios, Belgium), Cities: Skyline (Paradox Interactive, Sweden), Cyberpunk 2077 (CD Projekt, Poland), The Horizon Series (Guerrilla Games, Netherlands), Just Dance (Ubisoft, France), Microsoft Flight Simulator (Asobo, France), Minecraft (Mojang Studios, Sweden), Ori and the Blind Forest (Moon Studios, Austria), Stray (BlueTwelve Studios, France) or The Witcher 3 (CD Projekt, Poland), to name but a few.

With success and popularity come responsibility. Our co- and self-regulatory tools for responsible gameplay and minor protection features are best-in-class. The Pan European Game Information System (PEGI), celebrated 20 years in 2023, and is the European trust label for parents and guardians with children who play games.

But PEGI is more than a label, it is also one of the most successful European examples of industry self- and co-regulation with an enforceable Code of Conduct. To complement the PEGI system, the industry is leading innovation in easy-to-use parental and player tools to manage playtime, access to age-appropriate content, purchases and privacy.

The 2019–2024 mandate has also brought video games to the fore, with an increasing recognition of the cultural, societal and economic opportunities they bring to the EU, as illustrated by the recent Council Conclusions on Video games and the European Parliament resolution on esports and video games. [The outlook of the EU economy beyond 2030](#), published in March by the Commission, highlights digitalisation as one of its key drivers and Web 4.0 as a major technological transition bringing a seamlessly interconnected, intelligent and immersive world. The video game sector has unprecedented experience of creating and managing responsible virtual worlds, and video game technology is already benefitting many sectors in their projects and innovation paths.

For the 2024–2029 mandate, our sector calls on Europe's policy makers to recognise video games as a sector on its own merits, with specific needs and requirements. This is important to unlock future potential growth that will be crucial to support Europe in attaining more sustainable growth and to support technological and digital transition.

¹ University of Surrey, Dr Anesa Hoseni "Girls' video gaming behaviour and undergraduate degree selection: A secondary data analysis approach" www.sciencedirect.com/science/article/abs/pii/S0747563218304862



Our Vision

Over the next mandate, we believe our sector will continue to punch above its weight across Europe if we have the right policies and support to inspire creativity, provide skilled jobs and growth, provide entertainment for millions of Europeans, and contribute to Europe's climate goals.

We hope to tell our story and to promote an understanding of our unique and extraordinary industry, one that inspires society and allows us to continue to play a crucial role in Europe's digital and creative economy.

Our vision for Europe's on-going digital transition is focused on three key groups: our members, the video game companies, the 110,000 people in Europe working in the industry and half of Europe's population who play games.

Our Asks from the EU

Make Europe the best place to create and invest in games

01

Protect the status of video games as a unique combination of technology and creative works. Do not make the EU a global outlier by trying to force video games into sectors where it does not belong.

02

Maintain an open and competitive market: any form of additional or EU levy, tax or fee on the distribution of video games would

disincentivise investment, chill innovation, and distort the Single Market.

03

Adapt the Creative Europe programme and extend the General Block Exemption Regulation (GBER) to video games. Make them both fit for the video games sector and its unique needs.

Continue the self- and co-regulation success story

04

Recognise the value of the PEGI system and of self- and co-regulation to address consumer and

business concerns in a fast and efficient manner, keeping in step with the ever-evolving digital landscape. Self- and co-regulation are an important complement to existing regulations.

05

Adopt our proposals to ensure transparent and fair purchases of in-game content, delivering clarity and certainty for players, consumers and parents. Work with us on ambitious education programmes to accompany parents in their awareness and use of parental tools to manage video Gameplay.

06

Give companies a fair opportunity to assess how they should comply



with the unprecedented amount of new regulations. Assess if those regulations are fit for purpose, and do not produce unintended consequences. EU policy makers should monitor and avoid any fragmentation of the EU Single Market.

Create, attract and invest in skills and talent

07

Invest in education at the EU and Member State levels to tackle the digital skills gap. Build networks of excellence, promote life-long learning, encourage girls to join STEAM programmes, and upskill teachers.

08

Adopt strategies at the EU and Member State levels to attract and retain the best global and diverse talent.

09

Use Horizon programme funding for a project mapping the video game workforce, the availability of relevant education programmes, and the skills gaps that still exist, to help the sector's success and growth.

Support innovation - You can make IP fun too

10

Uphold a strong framework for enforcement of intellectual property law to support innovation.

11

Adapt NACE codes to give the EU the tools to have a full picture of the economic value of our intellectual property intensive industry.

12

Protect the EU acquis through careful coordination of ICT standardisation activities in international fora.

Download





Make Europe

**the best
place to
create and
invest in
games**

01+

Protect the status of video games as a unique combination of technology and creative works. Do not make the EU a global outlier by trying to force video games into sectors where it does not belong.

Video Games Europe calls on EU policy makers to embrace the creative and innovative force of games and to recognise the sector's uniqueness.

We welcome the recent Spanish Presidency Conclusions on video games and the European Parliament report on esports and video games which both acknowledge video games as complex unique works, that contain both software and non-software elements (sound recordings, video recordings, scripts and pictures) as established by the CJEU in its landmark 2014 case². This involves the application of two separate copyright legal regimes.

Too often video games have been seen as a sub-category of the audiovisual sector, or via attempts to



impose audiovisual-like regulation on the sector, by statements that the sector is "unregulated", or again that esports (competitive video gameplay) become a sub-category of the sports sector. Such ill-fitted positions are of concern for Europe's video game companies: should these materialise, instead of unlocking the potential

and the innovative capacity of games, it would lock the sector into models that are not adapted to how games are developed, published, distributed and licenced. It would send a signal to the rest of the world that the EU is not the right place for game development and investment.

02

Maintain an open competitive market: any form of levy, tax or fee on the video games industry would disincentivise investment and distort the single market.

Supporting the open internet and connectivity is crucial for innovation and is one of the main principles that has allowed the European digital single market for video games to flourish over the past decade.

As the importance of connectivity will continue to grow, Video Games Europe believes that there should be more coordination at EU level in the field of spectrum allocation. 5G and 6G will be important for EU citizens to access a number of services, and it will be important to support services such as cloud gaming.

The introduction of taxes, whether these are in the form of network fees, or other levies would not be of benefit to consumers or to the online ecosystem in general.

Network fees would be incompatible with the principle of net neutrality adopted in the Open Internet Regulation. They



would also impose a burden on video game publishers to carry out a legal obligation, such as those in the Digital Content Directive which require security updates for content providers to be distributed via the internet. It would also prevent companies from improving the player experience.

New technologies such as the cloud have the potential to make a significant reduction in the carbon footprint generated by access/

delivery of content such as video games. Imposing pecuniary contributions from content producers based on the amount of data transferred when using their services could lead to the unintended consequence of encouraging such producers to favour physical deliveries of their products. This would have a detrimental impact not just in terms of energy consumption but overall sustainability and climate initiatives.

03

Adapt the Creative Europe programme and extend the General Block Exemption Regulation (GBER) to video games. Make them both fit for the video games sector and its unique needs.

Despite being one of the most successful and resilient creative sectors in Europe, public financing incentives can be important, for smaller studios as well as for the ecosystem, as these help to support the continued growth of the sector, focusing on innovation and entrepreneurship.

Member States may have different approaches to how they support the local sector, and not all focus on public funding but on other measures driving competitiveness, such as trade missions focussing on exports, or innovation or research programmes.

As regards EU funding instruments, the video game sector needs:

- ✦ **Better visibility of existing funding opportunities**, starting with a dialogue on how to ensure that EU public funding matches the needs and priorities of the sector. We invite the

Commission to work with the industry ahead of shaping new programme objectives and funding proposals with the aim of increasing the quality of applicants and to ensure that projects that are publicly-funded correspond to the needs of the industry. We call on the Horizon programme for better communication with the sector where budgets are substantial.

- ✦ **A tailored approach** instead of an audiovisual subsector approach in the MEDIA programme. Creative Europe's MEDIA strand focuses on the challenges of the audiovisual sector, which are not adapted or relevant to the video game sector. Instead, innovation, entrepreneurship and access to finance should be the focus, matching the strong creative and innovative capacity in game development.

- The innovative capacity of a game should be more prominent in the criteria for funding: games are complex unique works in which the interactive artistic element and the technology both play a role in the success of the game.
- There should be a focus on skills, talent development, marketing, localisation, and the building of an audience for future funding.

- ✦ **A dialogue with the sector** should take place ahead of the next Creative Europe programme cycle.

A review of the General Block Exemption Regulation, including video games as a category of their own, would provide flexibility for Member States to support their local industry. The existing tax credit system has proven successful in promoting growth in various countries, such as Canada, the UK, France, Ireland, and Italy.



Continue the
success-story
of self and
co-regulation

04+



Recognise the value of the PEGI system and of self- and co-regulation to address consumer and business concerns in a fast and efficient manner, keeping in step with the ever-evolving digital landscape. Self- and co-regulation are an important complement to existing regulations.

- ✚ Our sector has one of Europe's most successful examples of self- and co-regulation: the Pan European Game Information System (PEGI). Set up at the request of the EU institutions in 2002 to protect consumers, young people in particular, through the labelling of video games by age group, this led to the well-known labels PEGI 3, PEGI 7, PEGI 12, PEGI 16 and PEGI 18. These labels inform consumers at the point of purchase which games are appropriate for which age groups. 40,000 games have so far been labelled by PEGI.
- ✚ 20 years on, the PEGI system is used in 40 countries and is an incredible example of successful self-regulation. Over the years, some countries have enshrined

the system in their national law³.

- ✚ The age labelling system is supported by a Code of Conduct, to which PEGI signatories (the developers or publishers of the games that receive a PEGI age label), are contractually bound. The Code includes important minor and consumer protection provisions, including on online safety and rules around the purchase of in-game content. In the event of non-compliance with the Code of Conduct, the PEGI Enforcement Committee can impose corrective actions and sanctions. Read more about PEGI here: <https://pegi.info>
- ✚ The Games Console Voluntary Agreement (GCVA) is another example of the sector's ability to develop

efficient co-regulatory instruments. The GCVA was implemented in 2015 in collaboration with the European Commission and is reviewed every two years. It introduces mandatory resource and energy efficiency requirements for video game consoles. The GCVA has proven to be an effective self-regulatory measure – delivering on its objectives and benefiting the environment while safeguarding console performance and optimal Gameplay experience for users. By way of example, there has been up to a 50% reduction in power consumption driven by GCVA requirements. This demonstrates its ability to be flexible enough to adapt to new innovations quickly and in a cost-effective manner.

05

Adopt our proposals to ensure transparent and fair purchases of in-game content, delivering clarity and certainty for players, consumers and parents. Work with us on ambitious education programmes to accompany parents in their awareness and use of parental tools to manage video gameplay. Improved enforcement capacity of NRAs of the existing EU legal framework is preferable to the adoption of new laws or regulations.



✚ **Digital Fairness is fundamental for consumers and video game players.**

Members of Video Games Europe and EGDF have taken clear measures that support players, parents, guardians and consumers. Our proposals are [here](#).

✚ **Video Games Europe's members that adhere to the PEGI system,**

take their responsibility towards players and consumers extremely seriously. Since autumn 2023, the PEGI Code of Conduct has included new rules on purchasable in-game content such as loot boxes and in-game currency. Lawmakers

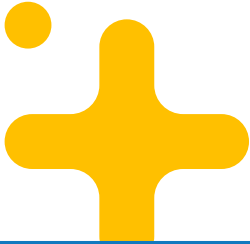
should acknowledge the sector-specific enforcement of PEGI's Code of Conduct which includes sanctions as an important complement to existing and new regulations, especially as insufficient enforcement of EU consumer protection law is regarded as undermining the effectiveness of the existing framework³.

✚ **We believe that guidance offers more flexibility for authorities than hard law to address new digital practices.** It can help businesses to determine ex ante whether the practices that they are considering are compliant.

✚ **To support national authorities in their enforcement roles,** the video game sector is on hand to provide details on our products and services to ensure authorities are updated and informed on new technological developments in the sector.

³ The Commission's "Behavioural Study on Unfair Commercial Practices in the Digital Environment" adopted as one of its conclusions that the "effectiveness of the existing EU legal framework may be undermined by insufficient public and private enforcement" and that "this should be remedied by improving the resources and powers of enforcement authorities and by the use of collective redress..."

06



Give companies a fair opportunity to assess how they should comply with the recent slew of regulations. Assess if those regulations are fit for purpose or if they have produced unintended consequences.

Between 2017 and 2022, European legislators imposed a total of 850 new obligations on companies, representing more than 5,000 pages of legislation and adding an extra burden on companies⁴. While not all of these apply to the video games sector, this regulatory inflation imposes major reporting and compliance costs on businesses, including on Europe's 5,500 video game companies, many of which belong in the SME category.

The avalanche of new regulations has produced unintended consequences for Europe's video games sector, leading to legal uncertainty. Video games sit across the digital and technology and creative sectors. It is therefore important that policymakers understand the complexity of video



games in order to avoid introducing legal uncertainty through legislation that overlaps with existing or ongoing proposals, potentially contradictory rules, or proposals that are not fit for purpose. This includes for example with technological or product requirements formatted for other

sectors or services. This issue underlines the value of self- and co-regulatory systems, such as PEGI for European video games companies, as it continues to prove itself as a progressive and adaptable foundation tailored to the sector.

⁴ Business Europe 'Message to European Political Parties Ahead of 2024 EP Elections'



Create,
attract
and invest
in skills
and talent

07



Develop education strategies at the EU and Member State levels to tackle the digital skills gap. Build networks of excellence, promote life-long learning, encourage girls to join STEAM programmes, and upskill teachers.

- ✦ **We call for an EU project to build a network of excellence of EU public education institutions**, with a dynamic offer of courses designed with industry input to match future recruitment needs and to encourage diversity in the workforce.
- ✦ **We call for EU programmes to promote non-formal education to support the talent ecosystem:** funding for vocational training courses for the already-employed workforce. The development of games is subject to

constant innovation and technological advances. This is why the existing workforce requires regular training to keep pace with new technologies.

- ✦ **We need these measures to bridge the digital skills gap**, to provide digital equipment and connectivity for teaching and learning as a priority.
- ✦ **We call on the EU to facilitate the sharing of best practices** among Member States and other organisations, focusing on
 - promoting girls enrolling in STEAM programmes, and

- promoting teacher upskilling which is necessary as teacher shortages are particularly severe in science, technology, engineering, mathematics (STEM)⁵ which impacts the ability to teach digital skills.

- ✦ **Video Games Europe stands ready to share its experience and resources** on how to use games in the classroom to direct students towards STEAM programmes and to create a skills impact assessment for teachers. Learn more [here](#).

08



Adopt strategies at the EU and Member State levels to attract and retain the best global and diverse talent with people and policies in focus.



✦ **The EU must facilitate remote work for EU and non-EU workers:** while the proposed Talent Mobility Package and its Talent Pool Platform allow for the matching of jobseekers with job offers, and would serve as a one-stop shop for information on immigration procedures and visa obtention, the EU needs efficient migration policies to attract talent to the EU. For example, it should boost the talent partnership facility with

more countries and allow for a swift adoption of the updated Single Permit Directive. There should also be family-friendly policies to support relocation of workers. More Member States should consider following:

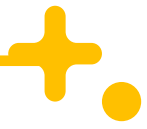
- Sweden's example in attracting and retaining international talent through a new residence permit for highly-skilled third-country nationals and reinforced control measures to tackle

abuse of migration routes.

- Estonia's e-visa/residency schemes⁶.

✦ **Member States should further reduce the gender employment gap** by introducing policies supporting work-life balance, extended parental leave, and childcare systems.

⁶ Estonia beyond borders: <https://e-estonia.com/estonia-beyond-borders-a-glimpse-into-the-global-village/>



09

Use the Horizon programme funding for a project mapping the video games workforce, the availability of relevant education programmes, and the skills gaps that still exist.



- ✦ **European video games studios are dependent on access to local talent**, and many struggle with recruitment at all levels, but most significantly in senior roles.
- ✦ **If Europe wants to continue to lead in video games development**, a long-term strategy addressing the talent

pipeline must be put into place. Such a strategy needs to start with a mapping of the video games workforce, the availability of relevant education programmes and identification of skills gaps.

- ✦ **Supporting a substantial and qualitative talent pipeline for our industry**

is also strategic for the European needs of digital skills and a digital workforce: the high level of digital skills and expertise in the video games workforce is attractive for other sectors (tech sectors but also those in digital transformation).



Support innovation

**You can
make IP
fun too**

10

Uphold a strong framework for enforcement of intellectual property law across legislative proposals.

- ✦ **A strong IP framework and enforcement of IP is of utmost importance**, as IP is the very essence of video game creation. A game can take many years to develop and can involve several thousands of contributors. The IP and its protection is the basis for investing in that development process as well as driving the return on investment.
- ✦ **Innovative licensing models lead to new economic activities such as esports**, which rely on video game IP to promote, host, broadcast, and create content around the competitions. Video game IP and game technology moves



across borders, not just to other creative content sectors. It extends into many other sectors, with opportunities for additional licensing and virtual environment use cases in sectors like education, urban & transportation planning, car design and even training astronauts at the European Space Agency.

- ✦ **It is important that the EU and international IP acquis and principles are upheld across legislative proposals**, whether that is the Right to Repair, the Data Act, the AI Act, or the Digital Services Act.

11



Adapt NACE codes to give the EU the tools required for a full picture of the economic value of our IP intensive industry.



- ✦ **NACE Codes⁷ are currently under review.** There are multiple NACE code categories in which video game developers and publishers can register, resulting in a fragmented and inaccurate basis for data collection.
- ✦ **We call for clear categories for video games companies,** including for esports.

- ✦ **The importance of NACE codes is evident:** the NACE codes constitute the main element in the methodology of the EUIPO to assess how IPR intensive industries contribute to the economic performance of the EU.
- ✦ **To achieve harmonised data on the number of companies, employees, revenues, new company registrations,** to measure

the economic health, growth and innovation capacity, coherent and clear NACE codes are necessary. These will support a better understanding of the sector's contribution to the European economy.

⁷ NACE Codes are the codes for company registration used for statistical purposes in the EU.

12

Protect the EU acquis through careful coordination of standardisation activities in international fora.

✦ Standardisation is a question of strategic importance for the EU and its future competitiveness.

The video game sector notes that other regions in the world have put dedicated strategies in place as regards standardisation in ICT and other areas within international standards organisations, such as ISO, IEEE, ITU, and other organisations.

✦ Standards-setting activities and ICT specifications can have an impact on the ability of companies in Europe to innovate and create new IP. ICT standardisation proposals can impact copyright, creative expression, licensing management and choice of technologies.





Our Actions



**Our
Commitment
to Online Safety
and Protecting
Children's
Rights**



**Our Climate
Commitment**



**Diversity,
Equality and
Inclusion**



Our Commitment to Online Safety and Protecting Children's Rights

Every child has the right to be respected, protected and empowered online and offline. Children have the right to play, to create and to actively participate in the community through digital inclusion. Importantly, children have the right to protection and privacy.

With more than 53% of Europe's population playing video games across all age

groups, and with playing video games being a popular pastime for children, the sector committed early on in its history to a safe gameplay experience that works for both parents and their children.

Developed over a period of more than twenty years, the video game sector has a solid framework to prioritising safe online

gameplay, based on its commitment to keep online gameplay interaction free from illegal content and content that may be inappropriate for children.

Various actions and tools have been in place for many years, providing best practice examples for other sectors. Together, these tools constitute a safety-by-design approach:

Age-appropriate content in line with the **PEGI age rating** criteria

We have player and parental portals that can:

- **Restrict communications** with others
- **Block access to games** based on PEGI age rating
- **Limit time spent** playing
- **Block or limit purchases** of in-game content

In-game reporting tools that can proactively filter and moderate text chats.

Pan-European and national **information and communication campaigns** are run yearly and available in local languages



We have an enforceable PEGI Code of Conduct:

the Code stipulates that online gameplay environments should be free from unsuitable content and conduct, and that reporting, muting and blocking tools must be in place.

Community guidelines are in place for each game

Read more about our commitment to fun and responsible play here:

videogameseurope.eu/responsible-gameplay



Our Climate Commitment

The video games industry shares the European Union's belief that addressing climate change is one of the most pressing challenges of the 21st century. As a result, it has taken numerous environmental initiatives and is working to improve the energy efficiency of its devices and services.

- ✦ Video games are intangible value creations that contribute to energy efficiency, reduce waste and are less carbon-intensive than many other sectors.
- ✦ Video Games Europe works with the United Nations Environment Programme on projects such as Playing for the Planet and the Green Game Jam. Video games have a unique global reach and an opportunity to educate, inspire and raise thought-provoking questions through gameplay and innovative storytelling. More and more games include content related to climate change and this is something that is positively welcomed by players.



- ✦ Innovations, tech, interdisciplinary and creative working methods, and engaging interactive storytelling as well as pedagogical approaches that are developed within the games industry have a positive spillover effect to other industries and society as a whole and are contributing to building a more sustainable future in a wide range of sectors.
- ✦ New technologies such as the cloud, encourage the development of innovative business models in the video games industry (i.e. cloud services such as

PlayStation Now, or the Xbox Game Pass), and are beneficial in the long-term optimisation of energy consumption. Cloud technology allows players to experience video games without having to download them, therefore limiting the amount of data transferred rather than expanding it. A good example is Microsoft Flight Simulator (Asobo Studio, Microsoft, 2020), which features 37,000 airports, 2 million cities, 1.5 billion buildings, 2 trillion trees, and 117 million lakes, originating from satellite imagery which altogether represents more than 2.5 petabytes of data.

Read more about our climate commitment here:

videogameseurope.eu/games-in-society/climate-commitment



Diversity, Equality and Inclusion

✦ **The video games industry is committed to sharing best practices** and showing how these can drive more equality, diversity and inclusion throughout the workforce and ecosystem. Our members, across Europe and globally, engage in a variety of projects driving DEI initiatives.

✦ **It is essential that the industry strives to reflect gender equality in its workforce and in video games themselves.** According to national surveys, 23.7% of workers in the video game sector are women, and the number is increasing year on year. We are encouraged by recent

data in some countries showing a significant increase of women in new hires in the workforce. In 2022, 44% of new recruits in Sweden were women. As a comparison, in the ICT sector, women currently represent 17% of the workforce.

✦ **Through our collaboration with [Women in Games](#),** we support their Guide “A Level Playing Field” which includes best practices and is a hands-on guide for studios on how to create an equal and inclusive workplace.

✦ **Accessibility is extremely important for our industry.** Our members invest significantly in adaptive controllers for consoles allowing impaired players to play just like any other player. Others have opened their patent pools for other developers to use and provide guidance to developers.



Read more about what we do here:
videogameseurope.eu/games-in-society/our-diversity-pledges

Our Members

Video Games Companies



National Trade Associations



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- EU transparency Register ID: 20586492362-11

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