



CE Europe Ltd

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To:
Video Games Classification
Department for Culture, Media and Sport

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**Video Games Classification:
a consultation response by CE Europe Ltd**

CE Europe is part of the Capcom group. Capcom is a leading worldwide developer, publisher and distributor of interactive entertainment for game consoles, PCs, handheld and wireless devices. Founded in 1983, the company has created hundreds of games, including best-selling franchises *Resident Evil*, *Street Fighter*, *Mega Man* and *Devil May Cry*. Capcom maintains operations in the U.S., U.K., Germany, France, Tokyo Korea and Hong Kong, with corporate headquarters located in Osaka, Japan. CE Europe employs 50 people in the UK.

We are a member of ELSPA and we fully support the submission that they are making to this consultation in favour of Option 3. We agree that the UK should now adopt PEGI and PEGI Online as the single age rating system for games.

As games are increasingly available and played online, the UK should take the opportunity to update and future-proof its age rating system. A UK-only rating is out of step with what is happening elsewhere in Europe. PEGI and PEGI Online provide pan-European coverage and represent a safe, successful and strong system for classifying age-related content.

Over recent months PEGI has undergone further significant improvements which clarify the ratings and make it easier for parents and children to understand game content. We believe these improvements add to the protection PEGI offers to children playing online. PEGI is also "future-proof", since it has the flexibility, scalability and efficiency to allow it to cope with enormous increases in online gaming that the industry expects to see in coming years.

PEGI also delivers better understanding of the game-playing experience and the ratings challenges this presents. Finally, from the perspective of my business, PEGI's widespread coverage and acceptance offers greater opportunities for us to publish high quality games across the large European market.

We agree with the detailed arguments contained in the ELSPA submission. However, I wanted to add some further detail on the specific questions you ask as they relate directly to my company:

Q26: What are the likely implications (including costs) for games producers of having a BBFC classification system that does not automatically translate across to some other European countries?

The greater the number of parallel age rating agencies, all with slightly differing submission requirements, the greater the burden of complexity for our company. A separate UK-only classification system will also increase the chance of delays getting our titles to market

Q41: Do you think the PEGI-only option would be more or less costly to the games industry than both the current system and the hybrid system and if so what evidence do you have of this?

Given the multiplatform nature of the majority of our releases and the fact that PEGI charges per platform while the BBFC will accept one submission as representative of all platforms, the costs of an average BBFC submission are similar to the costs of an average PEGI submission. However since the current system of submitting higher-rated games to both PEGI

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and the BBFC incurs both charges, a PEGI-only system would clearly be less costly in terms of simple fees.

The true cost of the system is in the potential delays in getting our products to market with the requirement for multiple parallel age ratings, as well as the increased use of staff resources to create, collate and submit materials for multiple submissions

Q44: It would be helpful to have your views on whether the PEGI option would affect games developers based outside Europe, such as those in Japan or US; namely, how this option might affect them and the extent, if any, to which it may affect them.

As a multinational games company we are attempting whenever possible to hit worldwide release dates for our games. As ratings are required in order to submit our games for platform holders' QA before we can release them, the comparative complexity and difficulty of obtaining ratings in the "PAL region" is one of the main sources of delay to our submissions. Anything which could streamline UK and European age ratings would therefore be a boon to Capcom as a whole, not just our European subsidiary.

Yours sincerely,

Michael Pattison
Senior European Marketing Director

