



Cynulliad National  
Cenedlaethol Assembly for  
Cymru Wales

[REDACTED]  
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Please reply to my Cardiff Office, quoting our reference.

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6th August 2008

Dear Sir or Madam,

### Response to consultation

I am writing in response to the Department for Culture, Media and Sport consultation entitled 'Video games classification'.

The rapid development of the video games industry has meant that there are now games on the market capable of feats impossible only a few years ago. There are now games that are able to look almost as realistic as a movie, while giving the depth of feeling, and even occasionally emotion, of a novel.

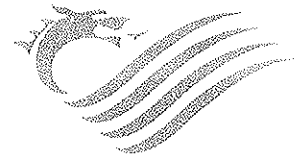
This has meant that the uproar created in the 1990's when the release of 'Mortal Kombat' created such controversy, seems strange when we view them now as unrealistic, slow and with over the top and cartoon-like violence. Meanwhile games that see thousands of people online at any one time attempting to shoot each other with realistic looking and sounding weapons create little backlash. Even the release of 'Grand Theft Auto 4' in April this year happened with little media acknowledgement of the game progression based on murder and drug running.

This development has meant that the way that video games are classified in order to protect children and young people has to be reassessed to take into account these further developments.

GTA4 received an '18' rating from both the BBFC and PEGI. This was an appropriate rating for this game and I am sure that there are few in the industry who would doubt this. But the current situation also allows any game that receives less than an '18+' from PEGI to avoid being classified by the BBFC. The problem that this creates is that a game which may only be determined as suitable for people aged 16+ by PEGI, but as it has no BBFC classification can be legally purchased by children of any age.

Call of Duty 4 is one an example of a game that has fallen through this gap. While it is a game that I would argue is not explicitly violent enough to warrant an '18' classification, I would consider it unsuitable for younger children. Because PEGI did not believe it warranted an 18+

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and instead a 16+ there is now no legal reason why it cannot be sold to any child who wishes to purchase it.

Many children do not purchase games themselves. Younger children simply do not have the money available to them to do so. Most purchases are instead made by parents and family for birthdays and Christmas. Most adults are not familiar enough with video games to make informed purchases on behalf of their children and simply buy whatever is on the list. This is of course not the fault of the video game industry, however adults should be allowed to make informed purchases. I do not believe that the current PEGI system provides the same level of clarity as the BBFC classification system. Adults understand what the BBFC ratings mean. They will have seen 15 and 18 rated movies and understand what to expect, where as most will not have played a 16+ game.

It is for this reason why I favour option two of the proposals in the consultation, the enhanced BBFC system.

As the consultation states, research has found there is a lack of familiarity with the PEGI symbols. If consumers are not aware of what they are purchasing then an informed decision cannot be made and with the PEGI system currently having no legal standing the only way children could be protected would be through informed purchasing. While an enhanced PEGI system may legally prevent children from purchasing unsuitable products, the lack of familiarity would suggest that it would not prevent adults from purchasing them on behalf of their children.

I also believe that the BBFC system is more appropriate for British audiences. The BBFC is a tried and tested system that is trusted by the British populace. What it would also mean is that there would be a standard level across cinema, DVD and video games. The BBFC is also in line with what most people in this country would consider appropriate. The game 'Mass Effect' released in 2007 was given an 18+ by the PEGI, however the BBFC only classified it as a 12. In America this game created a storm of media attention due to the ability of the player to unlock a scene which implied lesbian sexual activity between a human and an alien. In Britain there was no such uproar, probably due to the fact that it was only implied. It would seem strange that this would be granted anything more severe than a 12 when more explicit shows are regularly shown on UK television.

This is just one example, but I believe it highlights the fact that the BBFC is the most appropriate organisation for classifying media within the UK.

I am not of the opinion that any game should be refused classification. This is a form of censorship that is not appropriate. I believe that someone over the age of 18 should be able to make their own decision about what games to play. If the BBFC are allowed to classify games then any game that featured something that is particularly explicitly violent or sexual then there is nothing stopping them from granting them a R18 certificate.

However, I appreciate it is not the situation at present and that this consultation wishes to seek the best mechanism for the refusal of classification and not decide whether it is right or wrong to do so. The weakness of the PEGI system is that it does not allow for the refusal of classification. This power would have to be granted to another organisation which would



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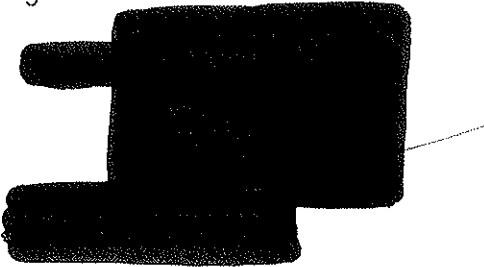
effectively mean that this system becomes very similar to the hybrid system proposed, except without the clarity of the BBFC classification pictograms.

By having another organisation that would also have to vet games that may be considered violent, the work is also being duplicated and money is wasted. If the BBFC option is followed then this would not be necessary as they would be classifying all games, including those consider for rejection.

I am not convinced that any of the proposals will adequately protect children from the problems that could arise from the use of online games. This is not an issue that can be adequately tackled through classification and age restrictions but instead ensuring that parents are aware their own children's use of the internet. Many parents would not allow children unrestricted access to chat rooms and they must be aware that the same problems can be posed by unrestricted access to online computer games. Parents should have access to information regarding the use of video games online and it may be appropriate for another body to take a further look into this.

What the classification system can however take account of is what protection is in place to report those who do abuse the system and what monitoring systems there are in place. Any game that does not meet a minimum standard may warrant a higher level of classification than one that does have monitoring and reporting functions regardless of it's content.

I believe that for these reasons that option two would be the most appropriate for the UK video games market.



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