

Video Games Classification: a consultation Response by Ubisoft

Ubisoft is a videogames developer and publisher, headquartered in Paris, with offices in 36 countries around the world. The UK is a key territory for Ubisoft where it has two offices: sales and marketing, based in Surrey and a game development studio in Newcastle. Ubisoft employs more than 170 people in the UK and actively recruits design, programming and business talent here for both local offices and overseas. We create games for all major platforms including Nintendo Wii, Nintendo DS, PlayStation 3, Xbox 360, PSP and PC. The product range includes titles across the age-rating spectrum, but with a high volume of 3+ PEGI rated offerings, specifically designed for children and young people.

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?

Our games are developed all around the world, including the UK to France, Italy, Spain, Romania, China, North Africa, India, the USA and Canada. We are very conscious of creating appropriate content for our audiences – which range from 6+ Petz game players on Nintendo DS, to 25 year-old combat game fans on Xbox 360. PEGI allows us to have a unified rating system that satisfies most of EMEA, making development and delivery far more efficient. The additional cost of satisfying a multitude of different ratings schemes in different territories would not only increase administration it could have a significant and we believe unnecessary impact on development time, efficiency and cost.

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?

All games in the UK currently go through a PEGI assessment whether or not they subsequently require BBFC certification under current regulations. The second layer of regulation that the BBFC currently represents is, we believe, unnecessary if PEGI is given the full support of the UK government and carries its own legal weight. It is not solely about the

cost, although for a large publisher this is significant - not just in fees but in administration, production and distribution. We also feel that one rating system, which succinctly explains what game content is all about and is both instantly recognisable, and available Europe-wide, (bearing in mind the amount of cross border trade, and the amount of UK nationals who travel abroad) is desirable.

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 stated above, Ubisoft develops games all over the world. We welcome standards and regulation by which we can measure our commitment to providing appropriate content to appropriate audiences, but we would expect the weight of regulation to be geocentric – that the EU is committed to having the majority of its member states using the same quality standards and striving to seek parity across the EU zone. For the UK to choose a *video* ratings system simply because it exists, rather than an already well recognised *videogames* ratings system is a sign of a country that is retreating from the modern, connected age we live in rather than embracing it and moving forward. In the USA the Motion Picture Association film ratings happily stand apart from the Entertainment Software Rating Board, while in Japan the Motion Picture Code of Ethics Committee (*Eiga Rinri Kitei Kanri linkai*) is clearly distinguished from the Computer Entertainment Rating Organisation (*Tokutei Hieiri Katsudō Hōjin Konpyūta Entāteinmento Rētingu Kikō*). We see no reason why an EU state should seek to do something different, rather than strengthening an already robust PEGI.

Yours Sincerely,

Rob Cooper
Managing Director
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