

**Video Games Classification: a consultation
Response by Zoo Digital Publishing**

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?

Based on our past experiences of having to get product rated by the BBFC this would not be a good decision for two significant reasons. 1) The way that PEGI rate product is quick, reliable and easy to follow. The BBFC process is far from that description and is, to my knowledge, not recognised across European territories. I would also be concerned with the BBFC process due to the length of time it takes as this could impact on release dates, which are difficult enough to maintain at the best of times. 2) the cost of rating product with a BBFC rating is considerably more than PEGI and again, this would impact dramatically on smaller publishers such as ourselves.

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?

I would say that the PEGI only option, even taking into account it is not recognised in say Germany, is by far the best value for money.

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.

I don't believe that the PEGI option would impact developers based outside Europe at all.

Yours,

Barry Hatch
Managing Director
Zoo Digital Publishing