



interactive games & entertainment association

# Submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts

Submission on the Cultural and Creative Activity  
Satellite Accounts Methodology Refresh  
Consultation Paper

May 2023

*We acknowledge the Traditional Custodians of Country throughout Australia and their continuing connection to the land and sea. We pay our respects to all Aboriginal and Torres Strait Islander peoples, their cultures and to their elders past, present and emerging.*

## Introduction

The Interactive Games & Entertainment Association (IGEA) is the industry association representing and advocating for the video games industry in Australia, including the developers, publishers and distributors of video games, as well as the makers of the most popular gaming platforms, consoles and devices. IGEA also organises the annual Games Connect Asia Pacific (GCAP) conference for Australian game developers and the Australian Game Developer Awards (AGDAs) that celebrate the best Australian-made games each year. IGEA has over a hundred members, from emerging independent studios to some of the largest technology companies in the world. A full list of our membership is available on [our website](#).

We welcome the opportunity to provide a submission on the Cultural and Creative Activity Satellite Accounts Methodology Refresh consultation paper. Our submission is divided into two parts. The first part highlights artistic and cultural significance of the video games industry, while the second part addresses the Consultation Paper feedback questions.

## Artistic & Cultural Significance of Video Games

Video games and interactive entertainment are cultural and artistic outputs that in the past have been underappreciated and under recognised from a policy perspective, which has also been reflected in their omission from governmental research and data-gathering priorities. However, this is being rectified and the Australian Government has recently introduced or announced investment policies leaning into the support and growth of the video games industry:

- Screen Australia's **Games: Expansion Pack** funding for Australian game developers in 2021-2 and 2022-3.
- The **Digital Games Tax Offset** bill which remains before the Senate.
- Recently announced **Australian Federal Budget** funding included \$12.0M over four years (\$3.0M p.a.) for Screen Australia to support Australian game development.

These are welcome investments and policy decisions for the video games industry, indicating an increased awareness of the culturally and artistically rich gaming industry, which for many years has passed under the radar.

Video games are a powerful way to promote a cultural dialogue, particularly through Australian game development. Australian games provide a unique showcase of local art and culture, and they deserve to be recognised and celebrated. Further, as our Digital Australia 2022 research shows, 9 out of 10 Australian households have at least one device on which games are played,<sup>1</sup> pointing to the widespread popularity of video gaming in Australians' lives. The future of digital storytelling is ultimately one through games, presenting an influential and unavoidable artistic and cultural force. Embracing this future and putting the Australian video games industry on the map, should be a forefront consideration for policy makers.

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<sup>1</sup> Digital Australia 2022 Final Report, Page 9 available via [DA22-Report-FINAL-19-10-21.pdf \(igea.net\)](#)

## Satellite Accounts Methodology Refresh

A review of the Cultural and Creative Activity Satellite Accounts Methodology is welcome, particularly in light of the growing video games industry in Australia.

### **1. How do you currently use the cultural and creative activity satellite accounts and estimates?**

The IGEA does not currently use cultural and creative activity accounts and estimates due to the limited output relating to video games and interactive entertainment. If in future the account and estimates include more video games industry related data and information, we welcome the opportunity to use and engage with these resources.

### **2. Are there further studies in the cultural and creative literature relevant for this analysis?**

IGEA recommends considering our annual publications on the state of the Australian Game Development Industry. These are available online via [Game Development Industry Archives - IGEA](#). Further, IGEA publishes a biennial report, Digital Australia, which provides empirical data on who plays video games, how and why they play and attitudes towards video games in Australia. These are available online via [Digital Australia Archives - IGEA](#).

### **3. What are your thoughts on the proposed new trident framework? Do you think this will address current issues and provide better estimates of cultural and creative activity?**

IGEA welcomes the trident framework, which provides for a broader consideration of cultural and creative activities. This framework will ensure that video games are captured as either cultural and creative products in a cultural and creative industry, or as an embedded or support activity. The framework will ensure that a wide range of video games and interactive entertainment products are treated as cultural and creative products or activities.

### **4. What are your thoughts on the scope of proposed layers, domains and categories of cultural and creative activity?**

The suggested domains model includes core creative arts, other core creative industries, wider cultural industries and related industries. Within the concentric circles model outlined by the Department, we understand that 'video and computer games' are considered to be a 'wider cultural industries', on par with sound recording, television & radio, heritage services, publishing and print media. Both creating and playing video games are highly artistic and cultural processes and experiences, especially when these games are developed in Australia. We therefore recommend categorising video games within 'core creative industries' when linking the trident framework to the concentric circles model.

IGEA welcomes capturing industries at a product level, ensuring that industries that are not traditionally considered cultural and creative are included in the satellite account. However, IGEA is concerned about the categorisation of cultural and creative products in the context of video games. The video games industry creates a broad range of games, ranging from education and training to entertainment-based games. IGEA would recommend that further clarification on any characteristics required to be considered a creative or cultural product.

### **5. What are your thoughts on the scope of industries and occupations included in the proposed definition of cultural and creative sector?**

*What products, industries or occupations are still not captured in the proposed definition of cultural and creative activity?*

In the proposed list, video games are included in the same category as poker machines and coin/disc operated games.<sup>2</sup> We are concerned about this categorisation, as video and computer games are completely separate from the gambling industry. Whilst the output category includes just 'video and computer games', we are concerned about poker machines being labelled under the same domain as video games. The video games industry in Australia provides an artistic and entertainment-based experience and categorising video games and poker machines together risks harming many local creators. While we appreciate the model's inclusion of games, we strongly emphasise that any future data collection or categorisation of video games should be entirely separate from poker machines.

*Do you have suggestions on which products, industries or occupations should be included, excluded or modified?*

On the occupations list, 'Multimedia Specialist' (or alternatively, an Electronic Game Developer)<sup>3</sup> and 'Web Developer' are included in the proposed occupations identified as cultural and creative.<sup>4</sup> The Multimedia Specialist occupation is vital to capturing the games industry workforce, as it covers a range of game-related roles, such as (Senior) Rendering Engineer or (Senior) Graphics Engineer. For an accurate depiction of the cultural and economic impact of the video games sector in Australia, including 'multimedia specialist' as an occupation in the account is a welcome inclusion.

Whilst the inclusion of multimedia specialist is appreciated, IGEA has recently contributed to the Australian Bureau of Statistics' questionnaire consultation on the Australian and New Zealand Standard of Classification (ANZSCO), where we suggested the creation of a standalone occupation of 'Game Developer'. Recognising this standalone occupation will improve data gathering around the local development industry, providing invaluable information that can inform the support of the video games industry, and allow for an understanding of a need for a strengthened skilled visa pathways.

Further, in relation to collecting other points of data, IGEA believes collecting household final consumption expenditure (HFCE) (cultural and recreation activity), particularly in relation to video games, would further assist our understanding of the far reach video games have as a cultural and artistic product. Our research indicates that the Australian video game consumer market is valued at close to \$4 billion (as of 2021).<sup>5</sup> The economic impact of video games warrants collecting further information about the household expenditure generated from the industry. Whilst the IGEA facilitates critical research in the size of the Australian video games consumer market, BCARR has a wide range of statistical resources that can improve data collection and analysis within the video games industry.

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<sup>2</sup> Cultural and Creative Activity Satellite Accounts Methodology Refresh (Consultation Paper, February 2023), Appendix C - Proposed IOPC list of cultural and creative activity, Page 30 available via [Cultural and Creative Activity Satellite Accounts Methodology Refresh-Consultation paper \(infrastructure.gov.au\)](https://www.infrastructure.gov.au/cultural-creative-activity/satellite-accounts/methodology-refresh-consultation-paper)

<sup>3</sup> [1220.0 - ANZSCO - Australian and New Zealand Standard Classification of Occupations, 2013, Version 1.3 \(abs.gov.au\)](https://www.abs.gov.au/1220.0-ANZSCO-Australian-and-New-Zealand-Standard-Classification-of-Occupations-2013-Version-1.3)

<sup>4</sup> Cultural and Creative Activity Satellite Accounts Methodology Refresh (Consultation Paper, February 2023), Appendix E-Proposed occupation identified as cultural and creative, Page 38 available via [Cultural and Creative Activity Satellite Accounts Methodology Refresh-Consultation paper \(infrastructure.gov.au\)](https://www.infrastructure.gov.au/cultural-creative-activity/satellite-accounts/methodology-refresh-consultation-paper)

<sup>5</sup> IGEA, Australian Consumer Video Games Sales 2021 Snapshot available via [Australian Video Game Consumer Sales Remain Robust - IGEA](https://www.igea.org.au/australian-video-game-consumer-sales-remain-robust-igea)

## Conclusion

Video games have long been a way to express and communicate art. We welcome the opportunity for video games and interactive entertainment generally to be included in a satellite account categorising arts and culture, recognising the craft and creativity in creating video games.

Finally, we look forward to participating in further consultation, including the stakeholder workshops. For any further questions or information about our submission, please contact IGEA's Policy Officer Sarah Deeb at [sarah@igea.net](mailto:sarah@igea.net).

## **Any questions?**

**For more information on any issues raised in this submission, please contact IGEA's Policy Officer, Sarah Deeb, at [sarah@igea.net](mailto:sarah@igea.net).**

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**Game Connect Asia Pacific: [@GCAPConf](https://twitter.com/GCAPConf)**

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