

Proposed new mandatory minimum classifications for gambling-like content in computer games

While I support the idea, great care needs to be taken with the definition of “gambling-like” behaviour in order to not cause a large number of acceptable games to be forced to have an unreasonable rating.

This is because many games that have no way to convert real-world money into virtual-world currency (or vice-versa) have mechanics that could be considered “Gambling-Like”.

Even the Pokemon games include a cash reward for winning a battle and a cash penalty for losing one, which could be considered “gambling-like” with a suitably broad definition of the term. But the in-game money cannot be converted into real-world currency.

Likewise, many role-playing games might include mild gambling elements, such as the ability to play dice or cards against opponents for in-game rewards (for example, a western game will often feature playing cards in saloons). However, these elements are only a tiny fraction of the games content, and there is no way to pay real-world money in exchange for more in-game currency.

On the other hand, similar games like Grand Theft Auto 5 **do** have the capability to purchase in-game currency, so should certainly be covered by this legislation.

To be responsible, I believe the following should be considered.

1) To require the R rating, there must be some way of directly or indirectly converting real-world currency into the in-game resource used for the gambling-like behaviour.

1.1) This may in many cases include any game that allows **players** to exchange the resource that is used in the gambling-like behaviour. Grey-markets often appear in games where people sell in-game resources for real-world money, so any game that has the ability to exchange the gambling-related resources (directly or indirectly – see item 3) between players should be considered for the R rating.

1.2) This does not only apply to purchasing ‘credits’ or extra attempts at the gambling-like behaviour – it should also apply to anything that modifies your chances within the gambling-like behaviour, such as improving your odds of winning, the size or rarity of prizes etc.

1.3) The ability to get value **out** of the game is not relevant. All that should matter is that real-world value is exchanged to impact the gambling-like behaviour.

1.4) The asset of value that is exchanged for the gambling-like resource may require an inclusive definition, to cater for digital assets of value such as cryptocurrency, objects won in loot-boxes etc. At the same time, it should be very clear that time spent playing the game is

not considered an asset of value for this legislation, to prevent the potential argument that the time itself is an 'asset of value'.

2) The legislation should ensure to be inspecific in the wording of what is actually gambled with. A generic term such as 'resource' or 'asset' may be applicable, as it would be easy to get around any wording that only forbade virtual **currency**.

3) The legislation should be aware that not all of these conversions may be direct. You might be able to purchase resource A, which can be converted to resource B, which can then be turned into a resource that may be used in gambling-like behaviour. Likewise, the resource that you get **out** of the gambling-like behaviour may not be the same as the resource put **in** to it.