Simulated Gambling

The definition of simulated gambling might need to be made clearer.

The game **Pokemon** gives you an in-game currency reward for defeating a player, and you lose currency for losing against them. Is this 'simulated gambling'? If so, Australia is going to be an international laughing-stock if this is put through.

A western-themed game may contain a saloon where you can play dice or poker to win. This is a tiny fraction of the game, and something completely optional for the player, and there's no way to convert real-world money into in-game money. Is this sufficient to give the game an R rating?

Likewise, you can earn items and money by playing card-games in titles such as The Witcher and Final Fantasy. These are again optional events and a tiny piece of a much larger game. Are these also sufficient to change these PG games into R18?

The "Borderlands" series – which already has an M rating – have slot machines you can play to win prizes. Another purely optional element of a much larger game, and it again is all with in-game currency that can not be purchased.

Many, many games feature chance as a core mechanic and have currencies. Is "Dicey Dungeons" a gambling game? Does the computer edition of the Game of Life count as a chocolate wheel and get slapped with an R rating?

Should you perhaps investigate a cut-off for the percentage of the expected play-time of the game? IE. if there's a 40-hour long game and you're not made to gamble or play cards for any of that time, does it need an R rating? Perhaps if the **primary mechanic** of the game is gambling it should be R-rated? Perhaps if the currency lost can't be restored by going to a previous save? What about if less than 5% of the game is spent performing the simulated gambling?

I think your definition should be **much** clearer before you proceed.