National Cultural Policy submission

Submission by The Critical Game Studies group, Digital Media Research Centre, Queensland University of Technology

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Executive summary

We welcome the opportunity to contribute to the development of a new Australian National Cultural Policy. Dr Ben Egliston, Dr Brendan Keogh, Dr Benjamin Nicoll and Dr Dan Padua form part of the Critical Game Studies research group in the QUT Digital Media Research Centre (DMRC). Their research draws on humanities and social science theories and methodologies to explore videogame production cultures and audience practices.

We write this submission to urge the new National Cultural Policy to appropriately account for the broad significance of videogames to Australian culture. While the economic and technological value of videogames are today well understood, their *cultural* value remain understood in relatively limited ways. Much more could be done to support and enhance Australian videogame developers and audiences as a significant and central part of Australia's cultural sector.

Based on our research, we recommend:
1. That videogames are seriously and holistically included in the new National Cultural Policy;
2. That Australian videogame development is supported and evaluated through performance indicators that consider cultural, not just economic, performance;
3. That the classification and regulation of videogame products are updated to reflect policy frameworks currently applied to other cultural forms.

Videogames as culture

Videogames are not simply high-tech entertainment products; they are a contemporary form of cultural expression and storytelling. Australians of all walks of life regularly play videogames, and it is through videogames that many Australians understand their world, engage with stories, forge social relationships, and express themselves. 17 million Australians now play videogames. Australians of all genders and all ages play videogames.[1]

Yet, despite the popularity of videogames in Australia, and despite the critical and commercial success of Australian videogames, the medium is acknowledged in current cultural policies in only limited ways. Federal and state support in the form of project grants, support and training

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[1] IGEA. 2022. Digital Australia 22.
https://igea.net/wp-content/uploads/2021/10/DA22-Report-SUMMARY-FINAL-17-10-21.pdf

schemes, and enabling the national industry to flourish, but there is room for improvement. Likewise, cultural policies focused on the classification and regulation of videogame content are outdated and inconsistent, despite the fact that videogames are one of the most popular cultural practices in Australia.

As such **we recommend that videogames are seriously and holistically included in the new National Cultural Policy.**

Australian videogame development

Like the film and music industries, the videogame industry consists of both massive, multimillion-dollar companies and small-scale, entrepreneurial endeavors.[2] While the Australian videogame industry includes large commercial studios such as EA Firemonkeys (Melbourne) and Wargaming (Sydney), it is important to recognize that most Australian videogame developers work independently, in small (1-5 person) teams.[3]

Small-scale Australian videogame developers have long produced internationally acclaimed creative works such as *Escape From Woomera* (2004), *Paperbark* (2018), *Virtual Songlines* (ongoing), and *Unpacking* (2021). These videogames tell complex stories about Australian culture, and have contributed to Australia's global reputation as a hotbed of innovative and creative videogame development.[4]

Developers of these videogames have spoken publicly about their creative ambitions. They strive to make videogames that are not simply entertaining but that tell compelling stories and communicate meaningful ideas. Many of these teams do not want to drastically grow following commercial success. While the videogame industry's largest companies are analogous to Hollywood film studios, independent studios such as those cited above are more like music bands, striving for sustainable business models that allow them to keep producing creative work at a similar scale.[5] Australia's videogame industry is thus not simply an offshoot of the technology industry; it is a *cultural* industry that makes important contributions to Australia's cultural landscape. There is an opportunity for Australian cultural policy to more effectively harness and promote these contributions.

While a growing number of Federal- and State-level tax incentives and funding opportunities are now targeting Australian game developers, they remain overly focused on performance indicators of commercial success that are less relevant to Australia's most innovative small-scale producers.

[2] GDC. 2022. State of the Industry survey. https://reg.gdconf.com/state-of-game-industry-2022
[3] IGEA. 2022. Australian Game Development Survey. https://igea.net/wp-content/uploads/2021/12/IGEA-AGD-Survey-Report-2021-22-Final.pdf
[4] Lum, P. 2022. Global success of Cult of the Lamb showcases Australia's video games development talent. The Guardian, 22 August. https://www.theguardian.com/games/2022/aug/22/global-success-of-cult-of-the-lamb-showcases-australian-video-games-development-talent
[5] Keogh, B. 2021. The Cultural Field of Video Game Production in Australia. Games and Culture 6(1). https://journals.sagepub.com/doi/10.1177/1555412019873746

There remains little support for the creative and artistic ambitions of videogame developers in a way that is most likely to produce new innovations, talent, and successful intellectual property.

Thus **we recommend that the vast range of cultural and creative contexts of videogame development are supported and evaluated through performance indicators that consider cultural, not just economic, performance.**

Audiences and regulation

Australia's videogame classification and regulation policies are outdated and inconsistent, and many globally acclaimed videogames remain effectively banned in Australia. While the Classification (Publications, Films and Computer Games) Act 1995[6] and the Guidelines for the Classification of Computer Games 2012[7] allows graphic violence, depictions of sexual activity or drug use that would be acceptable in film media remains strictly prohibited due to exaggerated and simplistic assumptions about interactive media. At the same time, regulation of predatory gambling mechanics and data surveillance remain too limited.

Where the IGEA has called for industry self-regulation of the videogame industry[8], we believe there remains an urgent need for well-informed government oversight. Specific education and regulation - keeping pace with changes in the videogame industry - are needed. For example, we strongly support the regulation of gambling-style 'loot boxes' (as well as the data-driven advertising mechanisms that are used to 'sell' them to audiences within games) in light of their potential for harm to vulnerable populations such as children.[9] We also believe that Australia's classification and regulation policies of videogames should keep in step with international developments concerning data privacy. For example, the United States Federal Trade Commission has imposed fines for developers breaching federal children's information privacy laws[10] - measures seeking to restrict games as a site of unfettered data collection.

Thus **we recommend that the classification and regulation of videogame products are updated to reflect policy frameworks currently applied to other cultural forms.**

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[6] https://www.legislation.gov.au/Details/C2017C00267
[7] https://www.legislation.gov.au/Details/F2012L01934
[8] Au, B. (2021). A modern classification scheme for video games. IGEA. Retrieved from https://igea.net/wp-content/uploads/2021/06/IGEA-Policy-Briefs-Promoting-a-safe-and-responsible-industry-1.1.pdf
[9] Egliston, B., Mavoa, J., and Carter, M. (2021). Sure, video games want to get you hooked on spending but there's no evidence they can manipulate you. The Conversation. Retrieved from https://theconversation.com/sure-video-games-want-to-get-you-hooked-on-spending-but-theres-no-evidence-they-can-manipulate-you-160182
[10] Hyperbeard, Inc. Retrieved from https://www.ftc.gov/legal-library/browse/cases-proceedings/192-3109-hyperbeard-inc