Proceedings, conclusions and recommendations from the third

GAMES POLICY SUMMIT

Malmö, Sweden, 26 May 2026

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Contents

Cover photo: Öresund bridge, since 2000 connecting Denmark and Sweden, Copenhagen with Malmö, looking west at dawn. Credit: Øresundsbron.

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ABSTRACT AND EXECUTIVE SUMMARY

This report synthesises the proceedings of the third edition of the Games Policy Summit, held at the Nordic Game Conference in Malmö on 26 May 2026. Convened under the moderation of Professor Malte Behrmann of Gisma University of Applied Sciences, Berlin, the summit brought together representatives of the European Commission, national trade associations, academic institutions, public funding bodies, industry researchers, cluster managers and game developers from across Europe to address the most pressing strategic questions facing the European games sector.

The day's deliberations were organised around three thematic sessions:

- intellectual property, European markets, and digital sovereignty;
- public funding in the age of artificial intelligence, with particular attention to discoverability and local cultural perspectives;
- and European values in European games, including the protection of democratic autonomy, the structural requirements of sustainability policymaking, and the role of games in civic education.

A keynote opening was delivered by Bastien Remy of the European Commission's video games unit, marking the first occasion on which a Commission official addressed the Games Policy Summit in an official capacity.

Across the three sessions, a coherent set of concerns emerged.

- The European games industry remains constrained at both ends of its value chain by non-European infrastructure, with middleware and engines on one side, distribution platforms on the other.
- Within Europe, public support remains fragmented; funding architectures designed for adjacent creative sectors translate poorly to games;
- and the discoverability of European titles within commercially mediated ecosystems has become a structural problem that no individual studio can solve. The accelerating absorption of information-seeking behaviour by large language models threatens to deepen this crisis significantly in the immediate term.

At the same time, the summit identified several concrete and actionable opportunities: the consolidation of games as a distinct sector within the forthcoming Agora EU programme from 2028 to 2034, the development of creator-controlled metadata standards as a foundation for non-commercial discoverability, the dissemination of games industry capabilities to non-entertainmant domains and the establishment of intellectual property retention as an explicit criterion in public funding decisions.

1. INTRODUCTION

The third Games Policy Summit took place against a backdrop of intensifying geopolitical pressure, an investment winter that has now persisted for several years, accelerating consolidation among non-European technology platforms, and the rapid emergence of artificial intelligence as a force reshaping both the production and the distribution of interactive media.

The European games industry, having weathered the post-pandemic correction and the loss of approximately 35,000 jobs across the sector in the preceding two to three years, finds itself in a position of strategic vulnerability that is also, paradoxically, a moment of unusual political visibility. Policymakers at European, national, and regional levels have begun to engage with the industry's structural challenges with a seriousness that was largely absent during the years of growth.

The summit was convened to inform this policymaker engagement by gathering practitioners, researchers, and policymakers in a setting designed to favour candid, substantive exchange over set-piece advocacy. Held on the first day of Nordic Game, Europe's largest games developer conference, the summit benefited from the presence of senior figures from across the European and global games ecosystem.

The day was opened at the beginning of the second session by Erik Robertson, owner and director of the Nordic Game conference, who welcomed participants and noted the increasing centrality of policy questions to the industry's daily working life. Professor Malte Behrmann, curating, moderating and finalizing the proceedings, framed each session and guided the discussion. The first session was moderated by Jari-Pekka Kaleva. Three substantive sessions of approximately ninety minutes each were held, with each session comprising four short presentations followed by an extended plenary discussion.

Methodology

The format of the summit was conversational rather than declarative. Speakers were each given an approximate eight minutes for their presentations, preserving the bulk of each session for collective discussion. This structure was designed to facilitate exchange between speakers and the floor, and to allow the cumulative substance of each session to develop organically rather than along pre-determined lines.

The selection of speakers was made by the moderator in consultation with the Nordic Game leadership and with reference to a set of thematic priorities identified through prior consultation with European trade associations, academic institutions, and policy bodies. The speakers represented a deliberate breadth of perspectives: institutional, commercial, academic, and civic; from member states across the European Union and from neighbouring jurisdictions. A representative from the European Commission was present throughout the day, which permitted unusually direct engagement between practitioners and policymakers.

This report has been produced from a full audio transcript of the proceedings, edited for clarity and condensed where speakers' remarks were extended by technical interruptions or by exchanges peripheral to the main argument. Where speakers offered formal presentations supported by slides, the structure of those presentations has been preserved. Where the plenary discussions ranged across multiple themes simultaneously, the editors have organised the material thematically while preserving the substance of the exchange. Floor contributions are referenced anonymously, in line with the convention announced by the moderator; presenter contributions are attributed by name.

The reader should note that the conclusions are not endorsed collectively by the participants, but only reflect the views expressed as recorded and interpreted by the editors.

The report concludes with a synthesis of the principal challenges and proposed solutions identified across the three sessions, again organised thematically to support policymakers and industry stakeholders when considering how to respond to the issues raised. An appendix lists the speakers.

2. SESSION 1: CREATION OF IP, EUROPEAN MARKETS AND DIGITAL SOVEREIGNTY

The first session of the summit addressed what may be the foundational set of questions facing the European games industry: how does the sector create and retain intellectual property of lasting value; how does it operate within a European market that remains structurally fragmented; and how does it respond to its near-total dependence on non-European technological infrastructure?

The session opened with a keynote by Bastien Remy of the European Commission, followed by four panel contributions addressing global market trends, the craft of building durable intellectual property, cross-sectoral financing models, and the strategic case for European digital sovereignty.

2.1. Presentation by Bastien Remy

Bastien Remy opened the Games Policy Summit 2026 with the first official intervention by the European Commission at this annual summit. He represents the Commission service responsible for support to the video games industry. He situated his remarks within Creative Europe and the broader monitoring work of the Commission, while noting that legislation relevant to games - copyright, cybersecurity, the Digital Services Act and related instruments - are handled by different colleagues.

Remy began by summarising the state of play of current support. Under Creative Europe, yearly support to developers has been raised to roughly ten million euros, and a parallel envelope finances horizontal tools and services for the sector. He cited projects on the distribution of games in Africa and on the streaming of esports as examples. Since the budget line for horizontal tools was opened to video games, the sector has performed notably better than the traditional audiovisual industries in attracting funding, which Remy attributed to the higher density of innovation in games. He also reminded the audience that the EU Parliament and several Member States have repeatedly called on the Commission to publish a dedicated policy agenda for the games sector. Such a paper, while not binding, would help frame games from a competitiveness and economic angle. He confirmed that reflection on such a strategy is ongoing, with a horizon of next year.

He then turned to the two major points of his presentation: AgoraEU and access to markets.

On AgoraEU, Remy explained that this is the intended successor programme to Creative Europe (2021–2027) and will cover the period 2028–2034. AgoraEU is a single programme bringing together, among others, the audiovisual sector, support to non-governmental organisations and support to cultural fields, live performances and translations. Negotiations are under pressure, given the budget constraints and the competing priorities of defence, innovation and other strategic policies.

What’s on today: AgoraEU

Proposal of the Commission: an increased budget from the Creative Europe one (now €8.6 billion) to support NGOs, media and culture.

- What’s in for games: Unlike in 2019, video games are singled out. And among many objectives, the *‘support to the development and prototyping of European video games and immersive content, including through market testing, promotion and discoverability, audience-driven strategies and distribution across all platforms’.*

- And the decision-makers? Member States broadly agreed with the Commission proposal and the Parliament is defining its position now.

The Commission has proposed an increase of the overall envelope; the precise sectoral allocations are not yet defined. The most important change, in his view, is that video games are now explicitly mentioned as a specific sector requiring support at European level. The Commission has proposed to extend the support beyond prototyping to market testing, promotion and discoverability (not production per se), focusing on where the EU would add value.

He also mentioned the European Competitiveness Fund - a separate, much larger pot that addresses strategic technologies.

He further mentioned that funding for business-to-business projects already exists within the programme architecture, including for events that bring investors and developers together. On venture capital, he noted that the Commission has pooled money with a private investor (via the MediaInvest equity investment tool) with around twenty-five game studios in Northern Europe expected to be supported and further announcements due around Gamescom. On the interface between the games industry and the banking sector, work is ongoing to help banks better value intellectual property in order to bridge the present gap. On the Digital Fairness Act, the internal Commission discussion is well under way.

Finally, on access to markets, Remy announced that a separate study is in preparation, focused on Korea and Japan as the third and fourth largest games markets worldwide. He asked the room what should be researched: the preparation of trade missions, support for finding localisation partners, or better consumer data on Japanese and Korean players etc.

2.2. DISCUSSION (Q&A) on European Commission presentation

The discussion that followed was wide-ranging and at times pointed. Several themes emerged: synergies between the games sector and other European programmes; the discoverability of European games; investment readiness and the early-stage gap; the role of dominant non-European platforms; and the boundaries of public support.

Zoltán Seeker (SFC, serious games) opened the discussion by pointing to the potential for synergies between AgoraEU and Pillar 2 of Horizon Europe, in particular Cluster 3 on civil security. He noted that games have proved efficient dissemination tools in Horizon projects on disaster preparedness and argued that recognising games as a possible synergy in the clusters would be a low-hanging fruit for policy.

Malte Behrmann then raised the question of discoverability. After twenty years of advocacy for funding programmes, those programmes now exist and many European games are being produced, yet European gamers do not necessarily take notice of them. He proposed a public register of every publicly funded game, six months ahead of launch, containing only the hard facts: the release date, a trailer, a description and the relevant conference appearances. Such a register could be maintained on a European scale, drawing on national, regional and Commission funding, and should be designed as a durable institutional infrastructure rather than as a two-year project. APIs could allow further use, including for AI-driven search. Rémy reacted that the Commission finances around forty games a year and tracks them but questioned whether the public funding origin would be a selling argument for influencers or marketers. Behrmann clarified that the proposed register is not a marketing tool but a business-to-business infrastructure: pure factual data, equally accessible to all, which would not disturb the existing PR market.

A representative of a German university venture lab intervened with a structural problem statement. The German market has, in his view, two problems: an early-stage gap and a later-stage gap. The early-stage gap is paradoxical, since Germany has a good funding system but very few private investments. He pointed to the federal EXIST programme as a strong template for early-stage incubation, which can grant up to one million euros over two years to a team, but is not open to the creative industries. The vocabulary used in that field - investment readiness rather than financing or prototyping - should be transposed to gaming, with games as a possible pilot in the EU-INC discussions. Another participant disagreed with the assessment of EXIST. The programme is essentially limited to people who have recently finished university, which excludes a large share of those who in practice found and run companies. Remy enquired why software had been excluded in the first place. Behrmann recalled that after the dot-com crash, the German federal government concluded that software was not suited to innovation funding; the whole software field, not only games, was excluded, and only hardware start-ups were eligible. The restriction was relaxed only recently for software.

A further speaker confirmed that several teams from the games industry have indeed accessed EXIST funding but typically run into the university requirement. The German colleague returned to argue that EXIST is a proven idea with a poor design, and that the right response is to redesign it for the creative industries with a focus on marketing and entrepreneurship, scale it across Europe and aim at institutionalisation rather than project-based support.

A representative of a serious-games developer then raised issue of the the gap that often remains between publicly funded projects and the market. Outside Europe, leading games are financed with private capital, and European projects with public support frequently still need help to stand on their own commercially. She suggested that the Commission organise investor pitches, for social-impact investors, who are harder to find.

Another participant suggested approaching Steam directly at policy level so that European games could be featured on the platform. Participants concurred on the difficulty in spending European public money on non-European platforms.

The discussion broadened to investment readiness. One participant agreed that the Commission's focus on this dimension is correct but warned that what investment readiness means depends heavily on the business model of the company. Many European studios do not exhibit a linear growth curve and are therefore unattractive to traditional project financing. He argued for an audience-first design, where data such as median playtime, community resources and Discord activity would signal the kind of traction that downstream investors look for.

Another speaker intervened on the precarious situation of mobile and free-to-play models, which he saw as further threatened by the Digital Fairness Act. He cited estimated losses of around five billion euros in investment in the sector between 2020 and 2025 and noted the shift of capital towards artificial intelligence.

A speaker from EIT Culture and Creativity in Helsinki added that the EIT instrument has been built for technological innovation, and that the present challenge is to learn how to adjust both European and national instruments designed for other industries to the reality of the creative sectors.

The discussion closed on production funding and on the question of whether dedicated investor events organised by the Commission would help. Remy recalled the existing business-to-business funding for industry events. Behrmann questioned, from personal experience, whether investors place trust in games carrying a public-sector recommendation, and noted that social-impact investors tend to keep a low profile. A representative of EIT Culture and Creativity reported on cooperation with EBAN, the European Business Angels Network, and the list of around four hundred investors active or interested in the creative field and underlined that investors themselves need to be educated about the sector before this dialogue can be deepened.

2.1. Presentation by Johanna Nylander

Johanna Nylander of the Swedish Games Industry Association opened the first panel with a deliberately sobering assessment of the regulatory and public discourse environment facing the European games industry. Where Remy had outlined the positive trajectory of Commission support, Nylander drew attention to a cluster of structural threats that, taken together, risked fundamentally altering the conditions under which game developers operate globally.

Key Points:

<u>1. Regulatory accumulation:</u> Nylander catalogued a dense and poorly co-ordinated accumulation of European legislative instruments affecting the sector, including the Digital Fairness Act, the Consumer Protection Cooperation network's scrutiny of in-game design practices, the Digital Services Act, the Digital Markets Act, the AI Act and its implications for training data, and emerging debates around game preservation that could impose indefinite maintenance obligations on developers.

<u>2. Global fragmentation:</u> Age verification requirements, time-limit regimes, and social media restrictions are proliferating jurisdiction by jurisdiction, each representing an additional compliance burden for studios whose market is inherently international. The WTO moratorium on customs duties for digital services is no longer operative, creating a real risk that digital goods will begin to attract local tariffs.

<u>3. ISO standards and participation:</u> Growing demands for industry participation in ISO standards processes are placing smaller studios and less-represented countries at a structural and financial disadvantage.

<u>4. Three forms of public pressure:</u> Nylander identified moral panic centred on screen time, addiction, and dark design patterns; fear-driven coverage of in-game content; and a more diffuse "lecturing" tendency among players, media, academics, and developers themselves regarding how games ought to be made.

<u>5. Industry vulnerability:</u> Smaller studios are consistently the most vulnerable to regulatory change, and the industry's collective memory and relational networks are among its most important defensive assets.

Regulative threats from public discourse

Moral Panic – How to use games
- “Screen Time”
- “Dark Design”
- "Addiction”

Fear – What happens in games
- Radicalisation & Recruitment
- Disinformation
- CSAM

Lecturing – How games should **be created**
- Design choices
- Monetization
- AI
- Characters & themes
- Discontinuation
- Culture tests

Conclusions: Nylander concluded that the global market for games will not sustain itself unaided but can be preserved with concerted effort. The path forward lies in better data, stronger communities, and more coherent ecosystems, and above all in a more confident assertion that games derive their legitimacy from being enjoyable rather than from being merely useful.

2.2. Presentation by Christian Fonnesbech

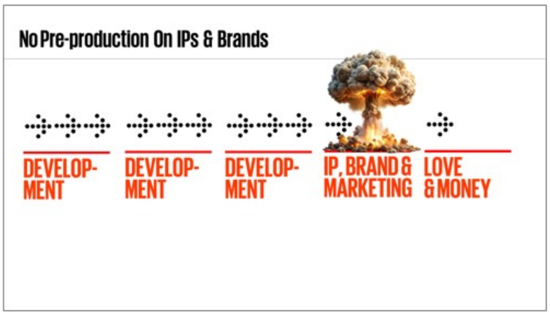
Christian Fonnesbech, founder of Leverage, a consultancy that has worked with between forty and fifty studios and publishers over seven years on intellectual property and franchise development, offered a structurally clear argument. His central contention was that the European games industry, and European funding and support structures, systematically misunderstand where durable intellectual property comes from and what it requires.

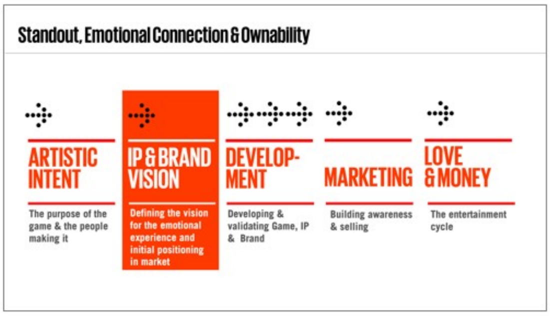
Key Points:

1. IP as an ownable asset: Fonnesbech opened with the example of IO Interactive, which spent twenty years building a studio of two hundred employees and four game series. When the company was sold, a single character accounted for sixty-five per cent of its entire value. Intellectual property is an ownable asset to which millions of people have an emotional relationship; without that asset, a studio's underlying value is much narrower.

2. The pattern of IP panic: Most developers spend three to four years making a game and then experience three months of brand and IP panic when they discover that they have made another game indistinguishable from every other game in its category. By that point, the structural decisions that would have enabled differentiation to have already been made.

Europe Needs To Build IP – Not Just Protect It



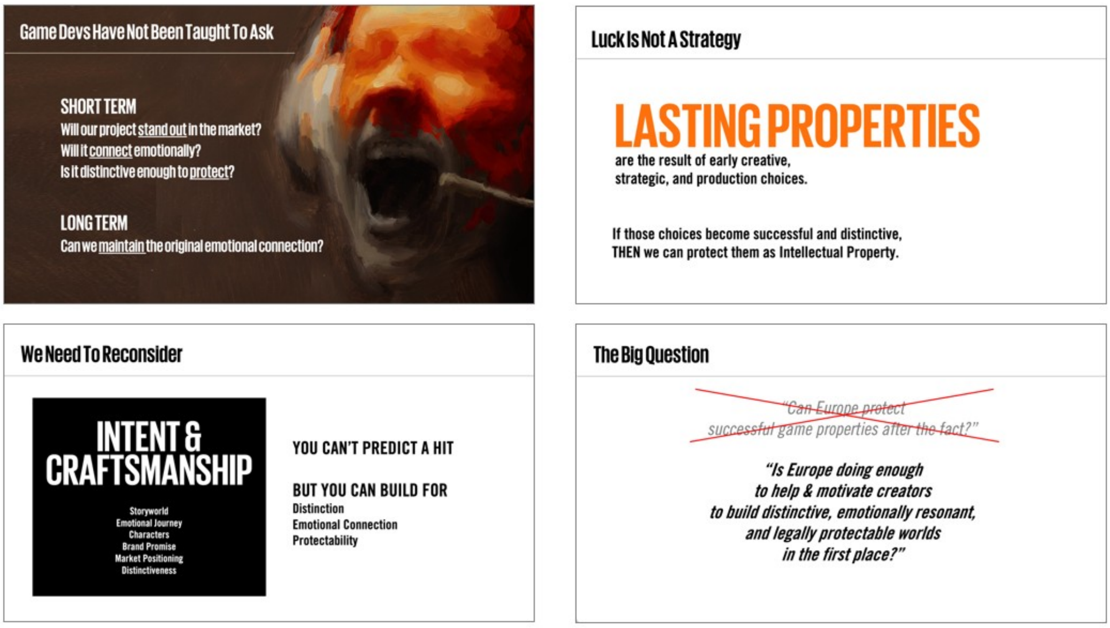


<u>3. The diagnostic problem:</u> European funding and education systems treat gameplay mechanics and technology as legitimate, teachable, fundable crafts. The elements that constitute ownable IP, including character, story world, emotional journey, and brand identity, are treated as matters of intuition. Developers are never asked, as a condition of funding or as part of their training, whether their game will stand out, whether it will create an emotional connection, or whether there will be anything to own at the end of the process.

<u>4. The cross-media opportunity:</u> Leverage has begun working with Story Kitchen in Hollywood, the production company behind the Sonic films, illustrating both the potential of games IP to travel across media and the sophistication of the transatlantic creative economy in exploiting that potential.

<u>5. The prescription:</u> The European Union should treat IP development as a craft. That means teaching it, incentivising it, and making it an explicit criterion in funding decisions. The question for public funders should not be whether Europe can protect successful game properties after the fact, but whether Europe is doing enough to enable developers to build emotionally resonant and commercially distinctive IPs in the first place.

Europe Needs To Build IP – Not Just Protect It



Conclusions: Fonnesbech's core argument was that the European games industry's relationship to intellectual property creation is one of systematic underinvestment in the craft of building durable creative assets. Luck is not a strategy. The correction requires a deliberate, fundable, and teachable approach to IP development from the earliest stages of a game's conception.

2.3. Presentation by Thierry Baujard

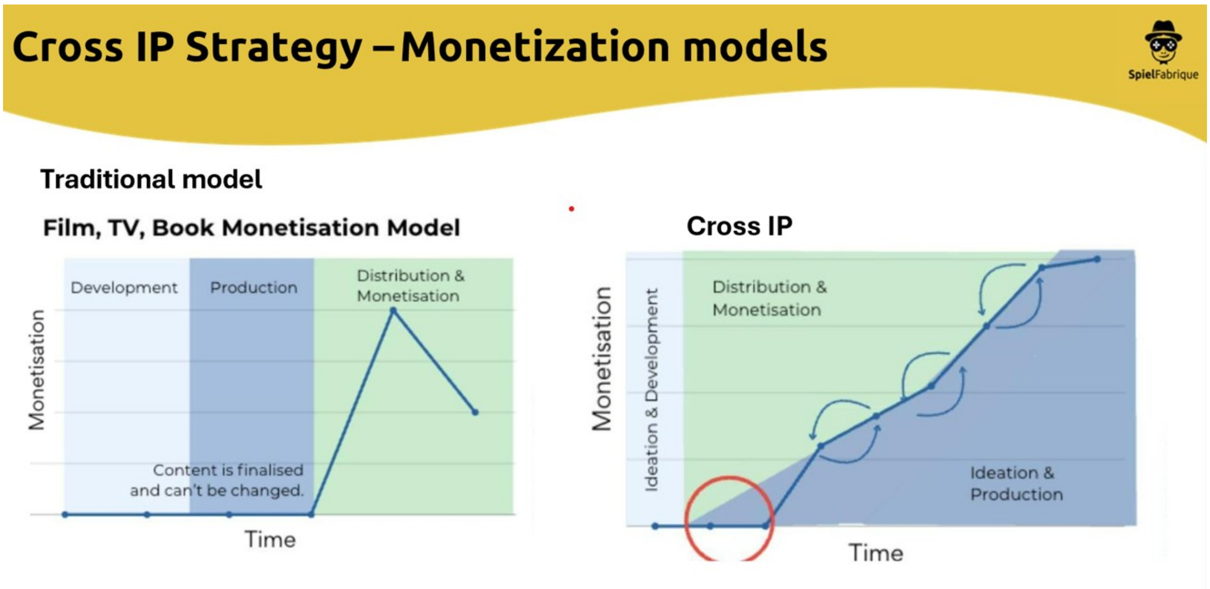
Thierry Baujard of Spielfabrique brought a perspective on what he described as the emerging opportunity of cross-sector intellectual property collaboration. Spielfabrique, a games accelerator, has launched in 2026 a dedicated cross-IP acceleration programme.

Key Points:

1. Growing cross-sector interest: A significant and growing number of professionals from adjacent creative industries, including music, cinema, and webtoons, are approaching the games sector with genuine curiosity and a desire to collaborate. This interest reflects in part the games industry's capacity to connect directly with end consumers, a channel that intermediary-heavy sectors find increasingly difficult to replicate.

2. The cross-IP acceleration programme: Spielfabrique has assembled twenty teams drawn from across Africa, India, North America, and Europe, comprising ten game production teams and ten animation companies. The programme is structured around three market-facing events: the European Film Market in Berlin in February, the MIFA animation market in Annecy in June, and Gamescom in August.

3. Financing innovation: Spielfabrique has partnered with IPR VC, one of the largest film and entertainment funds in Europe with investments including A24, to explore a financing model in which investment is directed at the intellectual property itself rather than at any single medium's production process.



4. Inversion of traditional structure: In the traditional model, development, production, and distribution proceed sequentially and largely in isolation. The cross-IP model inverts this, seeking to generate revenue flows across multiple creative formats simultaneously so that each strand of a project supports the others.

5. Implications for public funding: The role of public money alongside private investment in this new architecture, and the question of how audience development should inform financing decisions, remain under active development.

Conclusions: Baujard's contribution framed the growing interest of other creative sectors in games not merely as a commercial opportunity but as a signal of the games industry's centrality to the broader creative economy. The industry's response to that interest will be consequential for its long-term position.

2.4. Presentation by Malte Behrmann

Malte Behrmann's presentation reframed the preceding discussions within a wider political and structural argument about European digital sovereignty. Speaking as both a researcher developing a formal research project on this theme and as a long-standing practitioner in European games policy, Behrmann opened by situating the discussion in the context of Germany's first dedicated Ministry for Digital Affairs and State Modernisation and of what he described as a qualitatively new volatility in the global geopolitical environment.

Key Points:

1. The structural double bind: The European games industry operates within a framework defined on two sides by non-European actors. On one side, the middleware and engine market

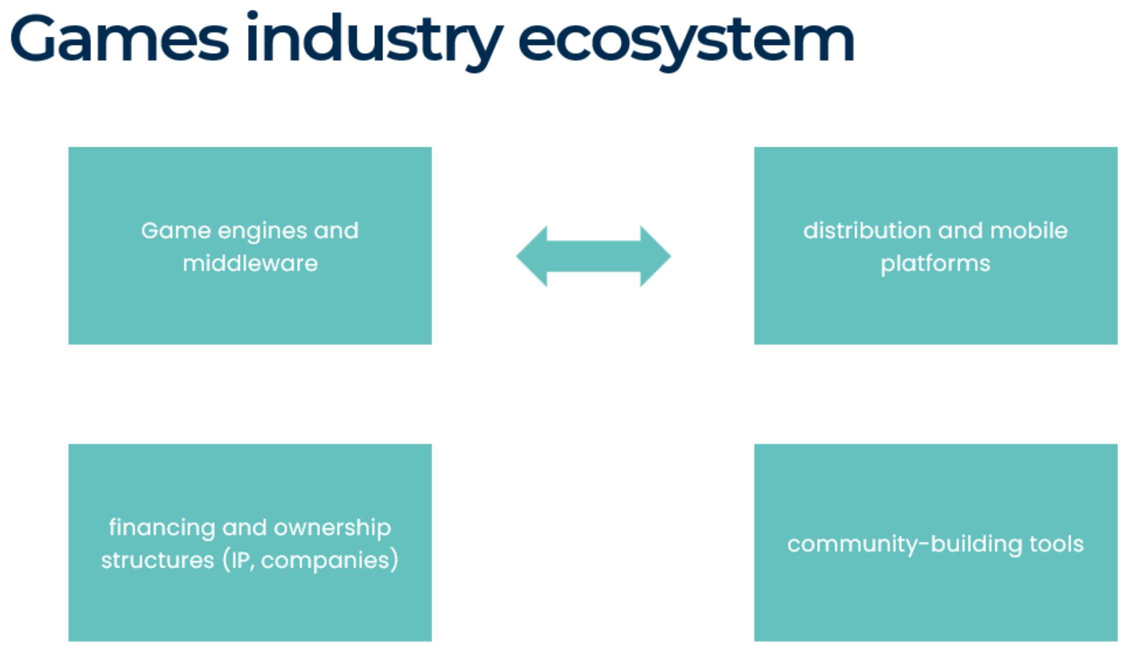
is dominated by Unity and Unreal, both American products today. On the other, the distribution layer is dominated by non-European platforms, with Steam holding a near-monopoly position on PC, by the consoles and with Android and iOS controlling the mobile space entirely. European developers occupy the space between these two walls without meaningful influence on either.

2. The DMA as an essential instrument: The Digital Markets Act, properly enforced, is the most important legislative instrument available for changing the structural dynamics of the market. Implementation remains contested, but the DMA should be understood not as a regulatory burden but as a tool for breaking up vertical monopolies and walled gardens. The presence of US government representatives in Commission discussions about enforcement is, Behrmann argued, a matter requiring urgent political attention.

3. Consumer power: The shift in German public attitudes toward American brands, illustrated by Coca-Cola and McDonald's campaigns that now deliberately avoid American associations, creates an opportunity to inform end users about market structures and to encourage adoption of European alternatives where available.

4. The digital services tax: A French-style digital services tax applied in Germany would yield approximately one billion euros annually in Germany alone, sufficient to fund both a games fund and a film fund, with the cost borne entirely by large non-European platforms rather than by consumers. Every EU member state should introduce such a tax without delay, rather than waiting for a global agreement that will not materialise.

5. IP retention as a funding criterion: Public funding programs should give preferential treatment to projects that commit contractually to retaining their intellectual property within a specific country or within the European Union. This would strengthen developers' negotiating position vis-a-vis publishers and create systemic incentives for European value retention.



Conclusions: Behrmann's argument was that European public policy must move from defensive recognition of the platform problem to deliberate construction of an alternative ecosystem. The goal is not autarky but a European games ecosystem that retains meaningful control over its own infrastructure, intellectual property, and commercial relationships: an ecosystem capable of operating as a peer rather than a dependent in the global digital economy.

2.5. Session 1 Plenary Discussion: Building a European Games Ecosystem

The plenary discussion ranged across early-stage financing, discoverability, the question of IP retention, market access to Asia, and the political economics of platform dependence. Contributions came from the panel and from delegates with direct experience in funding, acceleration, investor relations, and trade policy.

Discussions and Key Points:

Early-Stage Financing and the EXIST Model. A delegate working in a university venture ecosystem identified a dual structural failure in European early-stage financing: the absence of investment readiness at the earliest stages of company formation, and the absence of co-financing mechanisms for studios that have achieved initial traction but cannot yet attract private capital at scale. Germany's EXIST programme, providing up to one million euros over two years for early-stage ventures, was discussed as a model whose underlying logic was sound but whose restriction to university graduates excluded a substantial portion of the game development community. Someone argued that entrepreneurship in creative industries should not be confined to those with university degrees. A European-level programme with inclusive eligibility criteria and a focus on marketing and entrepreneurship competencies alongside creative development could address both the early-stage problem and the longer-term challenge of internationalisation. Bastien Remy noted that the clearest justification for early-stage intervention is that competitive conditions are the most distorted at that point.

Discoverability and a European Games Register. Behrmann proposed the creation of a centralised, institutionally maintained register of all games receiving public funding at national, regional, or European level, made publicly available six months prior to each title's release. The register would contain title, release date, trailer, and description, and would serve as a neutral, open-data resource accessible to press, influencers, and industry professionals. The proposal generated broad interest, with one delegate offering technical infrastructure from comparable work in other sectors. The practical consensus was that technology was not the constraint; data standardisation, ongoing curation, and institutional will to sustain the resource beyond a single project cycle are the challenges.

The Steam Question. Delegates rejected the proposition that public European money should be used to fund promotion on a non-European, privately owned platform. Remy distinguished between using Steam's infrastructure as a development metric, including wish-list data and community engagement as indicators of audience interest, and using public funds to purchase promotion on the platform.

IP, Audience, and Public Funding. Fonnesbech maintained that the industry's periodic successes with IP did not vindicate a model based on luck, and that the film industry's hundred years of practice in emotional storytelling offered a model for what games should develop as a teachable craft. Nylander offered a counterpoint that the games industry's capacity for continuous reinvention is itself a structural advantage. Remy acknowledged the force of the argument but noted the practical difficulty for a public funder of assessing “emotional quality” as a funding criterion. Fonnesbech responded that the film industry had managed to do so for a century without abandoning the enterprise.

Asian Markets. The Commission's proposed Japan and Korea trade mission study generated some of the most practically grounded contributions. Nylander described Sweden's recent trade mission to Japan, observing that the strongest impression on the Japanese delegation was not the quality of individual games but the cohesion of the Swedish games community. Behrmann advised, drawing on his experience working in the Korean industry in the 1990s, that the most productive approach was to cultivate curiosity rather than to arrive with a commercial proposition. A delegate from a Finnish serious games company emphasised that the process required years rather than months. Another noted the importance of “bridge builders” with roots in target markets who have subsequently built careers in Europe.

The Digital Services Tax. Behrmann's proposal generated sharp and engaged exchange. The French scheme, in operation for approximately five years, provides a viable model; the German equivalent would yield approximately one billion euros annually. The argument that the tax should await global agreement was, in Behrmann's view, already disproved by experience.

2.6. Conclusions and Recommendations:

The plenary identified the following as the most pressing actions arising from the session:

- Inclusion of an early-stage financing instrument at European level, with eligibility criteria not restricted to university graduates and with a focus on entrepreneurship as well as creative development.

- Development of a publicly maintained register of European games receiving public funding, serving as a non-commercial discoverability resource.

- Treatment of intellectual property development as a teachable, fundable craft within European funding architectures, with IP retention as an explicit criterion in funding decisions.

- Introduction of a French-style digital services tax in each EU member state, with revenue directed to European creative industry funding.

- Rigorous enforcement of the Digital Markets Act, with particular attention to the structural relationships between European developers and the dominant non-European distribution platforms.

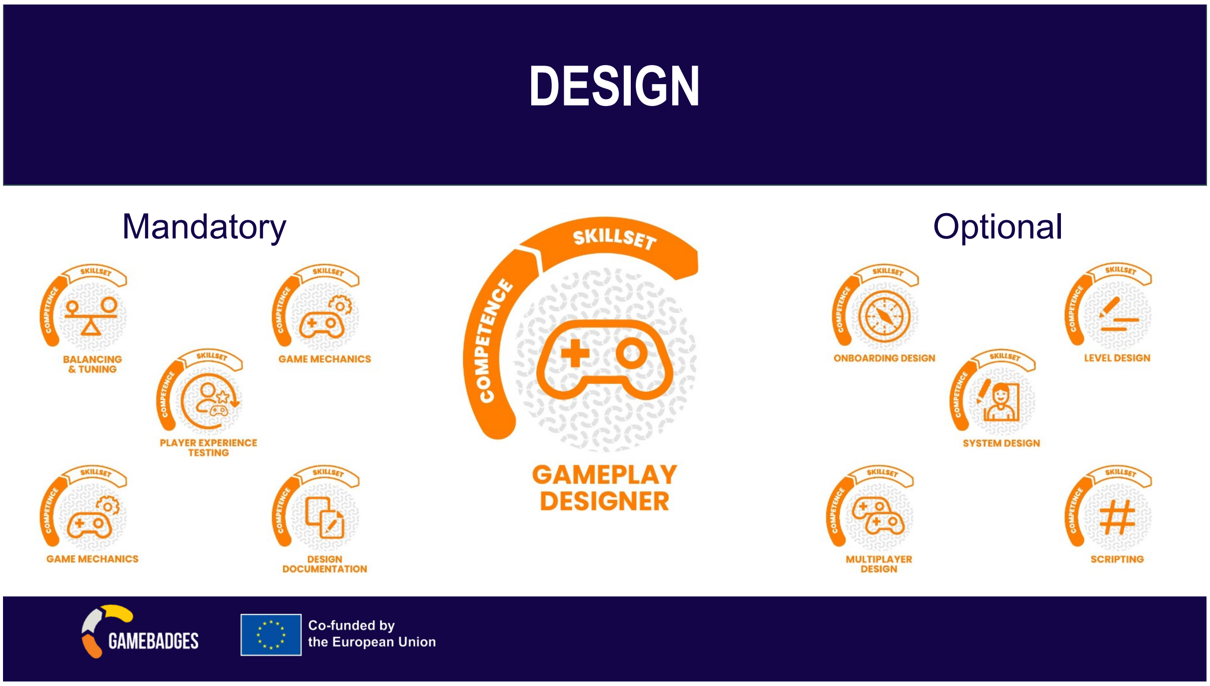
- Engagement with Asian markets through sustained relationship-building rather than commercial deal-making, supported by Commission-led trade missions designed for that purpose.

3. SESSION 2: PUBLIC FUNDING IN TIMES OF AI, DISCOVERABILITY AND LOCAL PERSPECTIVES

The second session of the summit was thematically more diffuse than the first, but the contributions converged on a common concern; the question of who controls the information through which games and the games industry are understood, represented, and accessed, whether by individual players, by public funders, by policymakers, or by the broader cultural sphere. Erik Robertson, founder and owner of the Nordic Game conference, offered a brief welcome at the opening of the session and summarised the thematic coherence in terms of taking hold of the narrative used to discuss games at different levels.

3.1. Presentation by Ria Gynther

Ria Gynther of Metropolitan University of Applied Sciences in Finland presented the Game Badges project, a European Union-funded initiative developed in partnership with nine organisations across multiple European countries.



Key Points:

<u>1. The Game Badges competence map:</u> The project's stated ambition is to create the first open badge ecosystem specifically designed for the games industry, a standardised and publicly accessible framework through which professional competencies in the sector can be defined, verified, and communicated.

<u>2. Structure of the framework:</u> At the core of the project is a competence map comprising nine top-level categories including art, business, audio, and programming. Beneath these are forty-

three distinct skill sets, beneath which sit one hundred and thirty-nine individual competencies, each defined at three levels of proficiency; Bronze for junior practitioners, Silver for independent professionals, and Gold for the most senior specialists.

3. The verification mechanism: The open badges function as a verification layer. When a practitioner has demonstrated the mandatory competencies for a given skill set, they receive both the individual competency badges and an overarching skill set badge that employers can specify as a requirement in recruitment processes.

4. Practical intent: The framework is designed to reduce the burden of bespoke skills assessment on companies, to give individuals a portable record of their capabilities, and to create a shared professional language that can facilitate cross-border mobility within Europe.

5. Industry collaboration: The project has been built in sustained collaboration with industry practitioners through hundreds of interviews, ensuring that the framework reflects what people in the industry actually do and value rather than what academic frameworks might assume.

Conclusions: Gynther's project addresses what was identified across the session as a foundational obstacle to the industry's development; the absence of a shared professional language. The framework's openness to use, comment, and contribution, together with its grounding in industry consultation, gives it the prospect of becoming a genuinely useful infrastructure for cross-border mobility and recruitment.

3.2. Presentation by Lars Haard

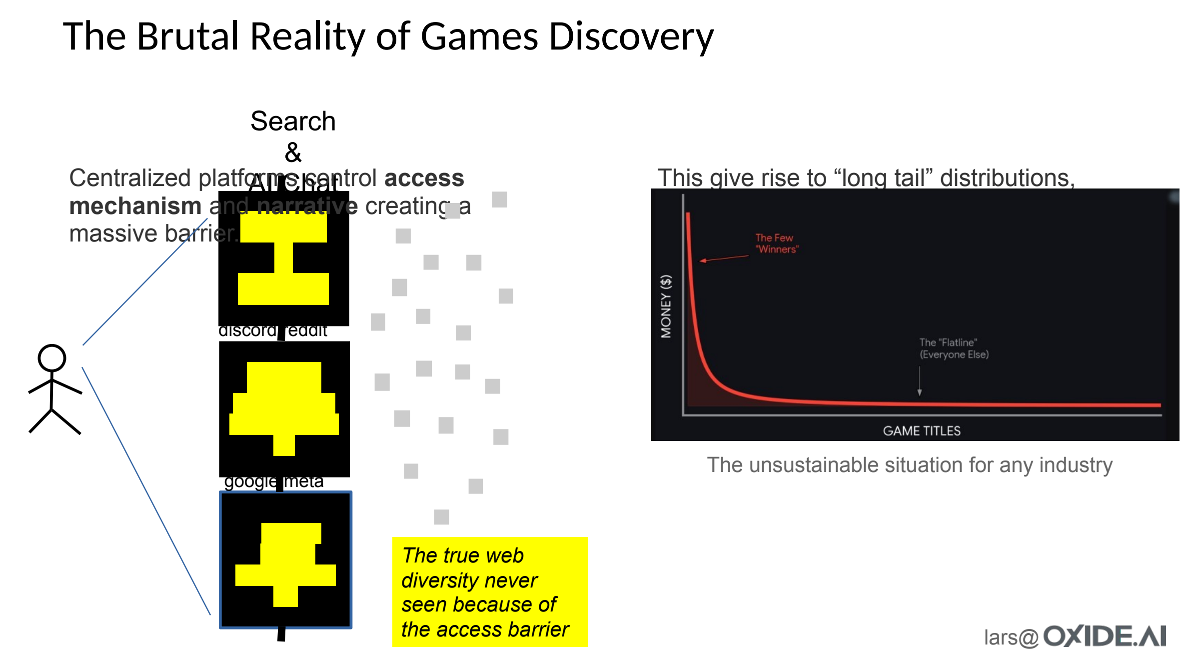
Lars Haard, Head of AI at Oxide AI in Malmo and a former games developer who began his career on the Commodore 64, offered a diagnosis of the discoverability crisis that was both technically specific and structurally pessimistic. His presentation was delivered in part without slides following a technical failure, but the argument was clear.

Key Points:

1. The structural problem: The mechanisms through which games are found by players have ceased to reflect the actual diversity of what is produced. A world of creative craft has been supplanted by a world defined by algorithmic manipulation, attention hacking, and the exploitation of cognitive biases.

2. The long-tail distortion: The platforms and gatekeepers that mediate between creator and consumer present a picture shaped by the capacity to pay for visibility, to optimise for algorithmic preference, and to exploit the structural properties of recommendation systems. The result is a long-tail distribution in which a small number of highly capitalised productions capture most of the attention.

3. The root cause as a technology problem: The access mechanisms through which players discover games have been captured by a small number of actors with strong commercial incentives to maintain their gatekeeping function. The problem is structural and technical, not a matter of individual studios needing to market better.



<u>4. The Source of Truth proposal:</u> Haard proposed a creator-controlled metadata infrastructure through which game developers can publish accurate, complete, and legally anchored information about their games without that information being translated, distorted, or monetised by intermediaries. The infrastructure, governed by a nonprofit entity, would define strict terms of service, enabling creators to block AI scrapers and to control how their metadata is indexed.

<u>5. The AI threat:</u> Websites have already lost approximately thirty per cent of their traffic in the preceding year as large language models intermediated information access. A world in which AI systems generate complete discovery experiences without reference to authentic creator-produced data is a world in which the independent games sector effectively ceases to exist as a viable creative proposition.

<u>Conclusions:</u> Haard's argument is that the discoverability problem is a data infrastructure problem, and that the solution requires wresting control of that infrastructure from commercial actors whose interests are fundamentally misaligned with those of creators. The urgency is high; the transformation now under way will, within a very short time horizon, render later intervention significantly more difficult.

3.1. Presentation by Simon Lovind

Simon Lovind spoke from the position of someone who had spent the preceding year and a half building a new kind of institution; NIMBY, the Danish Institute for Game Development, established under the Danish cultural ministry with the specific mandate to promote and develop games as a form of cultural expression.

Key Points:

1. The foundational case: Games are among the most significant cultural expressions of our time. The case can be made on quantitative grounds, including reach, consumption frequency, and economic scale, and on qualitative grounds, including the psychological and social value of games and the role of play in child development.

2. Persistent obstacles to recognition: A sizeable minority of public opinion simply does not accept the cultural premise; serious public discourse around games remains largely absent, with coverage confined to niche media.

3. The Danish imprint problem: The Danish imprint on Danish games consumption is very small. Striking research finding; forty-five per cent of Danish children aged nine to eleven play Roblox every single day, primarily as a social activity. Yet Danish game development produces almost no social games of the kind that would serve this motivational need. The gap between what Danish players want and what Danish developers produce is both a cultural problem and a structural one.

4. Three institutional roles: To the games industry, NIMBY acts as a catalyst, providing funding that enables creative and responsible game development. To policymakers and public institutions, NIMBY acts as a knowledge producer and communicator, generating and disseminating the evidence base that justifies sustained public investment. To the Danish public, NIMBY acts as an advocate for Danish games.

5. The strategic shift: The shift from being a funding body pointing outward toward an internationally focused industry to being an advocate for a domestic audience has been the most significant change in NIMBY's self-understanding, and the one with the most far-reaching implications.

Conclusions: Lovind's contribution illustrated the practical work of building a cultural institution for games at national level. The Danish model is exportable in principle, but its specific commitments and the strategic shift it represents require careful institutional construction and sustained political support.

3.2. Presentation by Timo Ylikangas

Timo Ylikangas presented an structurally ambitious argument; that the European games industry's persistent difficulties in attracting public and private investment are not primarily a reflection of the industry's intrinsic weaknesses, but of a fundamental mismatch between how the industry is categorised by funding systems and what the industry actually is and does.

Key Points:

1. Reframing the sector: The games industry should be understood not primarily as a producer of entertainment products but as a custodian of a set of skills, tools, and techniques termed “interactive technologies” that are directly applicable to some of the most pressing challenges facing contemporary societies.

Core Challenge – Interactive Compute Layer (ICL):

Europe is systematically underinvesting in a foundational technology layer - **interactive and simulation systems -** due to outdated classification as “entertainment.”
This misclassification creates a **persistent capital inefficiency** at the exact moment when these technologies are becoming critical to f.ex.:

- defense readiness
- industrial competitiveness
- workforce training
- digital sovereignty

Result:

- Underfunding at early stages
- Fragmented scaling pathways
- Missed infrastructure-level returns
- Europe is pricing infrastructure as content.

ICL is a horizontal capability stack enabling f.ex. real-time simulation, interaction, and scenario modeling - comparable to cloud infrastructure (2005–2015) and AI/ML platforms (2015–present)
Interactive technologies are not a niche sector...

2. Application domains: These include defence readiness and simulation, industrial competitiveness through digital twinning, workforce training, extended reality applications, and the development of shared situational awareness in complex operational environments.

3. The structural opportunity: The technological capabilities developed in the games industry, including real-time rendering, spatial computing, complex simulation, human-computer interaction design, and procedural content generation, are precisely the capabilities being sought by defence, healthcare, industrial, and educational sectors.

4. The workforce question: Approximately thirty-five thousand people had been laid off from the games industry in the preceding two to three years. From one perspective this represents a crisis; from another, it represents a reservoir of highly skilled practitioners who could find rewarding work in adjacent sectors while retaining their connection to the creative and technical culture of games.

5. The systemic failure: Public and private funding for games remains confined to a small number of culturally or commercially defined channels, leaving most potential application

areas outside the scope of available support. Early-stage, genuinely disruptive ideas are particularly poorly served because the ticket sizes involved are unattractive to investors operating at scale.

Conclusions: Ylikangas concluded that Europe is technically well equipped to lead in interactive technologies but lacks the systemic thinking to deploy that capability effectively. Games, he argued, are the optimal instrument for building the human capabilities that complex societies will require collaborative, adaptive, cross-disciplinary, and action-oriented.

3.3. Session 2 Plenary Discussion: Information, Infrastructure, and Identity

The plenary discussion engaged with the cross-cutting tensions between cultural specificity, technological infrastructure, and the strategic identity of the games sector.

Discussions and Key Points:

Cross-Innovation and the Silo Problem. The discussion opened with a question to Ylikangas; how, practically, could public funding support the kind of cross-sector innovation he was describing? His response was that the problem was not the absence of funding mechanisms but the failure to rethink their architecture. He described his current project's approach as one of “exploding” existing frameworks and rebuilding from first principles. Bastien Remy contributed that the forthcoming European Competitiveness Fund was explicitly designed to support technologies with cross-sectoral spillover effects.

Defence Sector Engagement and Cultural Resistance. The mention of defence applications generated the most contested exchange of the session. Many events are arranged with dual use in focus but it was said that very few game developers attend, likely for cultural reasons. Timo Ylikangas offered a counter-narrative based on his attendance at dual-use events between 2016 and 2021, claiming that there were no openings for the games industry. Another participant reported, that following an earlier iteration of this discussion at Nordic Game, he had raised the topic at the general assembly of a national trade association and encountered significant resistance, subsequently learning that certain games companies held exclusive arrangements with defence contractors and had no interest in a transparent industry-wide debate. There was agreement that, beyond cultural reasons, the lack of engagement from the games industry with the defence sector is a dissemination problem, which needs someone to speak for the games industry to, in this case, defence and military sectors. Simon Lovind offered a cultural counterpoint that military applications are not art or culture, and that if the spillover has great value, it should then be possible to get more support for the core, the source of this spillover. Remy concluded the exchange by drawing a precise distinction between supporting the games sector as a cultural industry and supporting interactive technologies for their spillover effects.

The Discoverability Infrastructure. The most sustained exchange concerned Haard's proposal. A delegate pressed on the fundamental tension; if every tool that achieves scale eventually becomes subject to the same dynamics of monetisation and gatekeeping, how does a nonprofit architecture resist that trajectory? Haard's response was technical but strategic; the key lies in the structure of data ownership. If the origination of game metadata resides with the creator, and if the nonprofit controls only the pointers to where the authoritative data resides and under what terms it may be used, the result is a distributed rather than centralised system, structurally more resistant to capture.

Local Audiences and the Roblox Finding. A delegate posed a question to Lovind; in growing a local audience for Danish games, was the primary challenge marketing or product? Lovind's answer was both. The Roblox data illustrated the point. Research into Danish children's play habits showed that the dominant motivation was social. Danish developers produced almost no social games. The gap was not one that marketing could bridge; it required a rethinking of what kinds of games Danish cultural institutions should be incentivising.

Shared Language and Industry Identity. Gynther returned to a theme that had been present throughout the session; the absence of a shared professional language as a structural obstacle. The games sector is characterised by terminological fragmentation and by the relative youth of its professional norms, which makes it difficult for those outside the industry to understand what practitioners actually do.

3.4. Conclusions and Recommendations

The plenary closed with brief reflections from each panellist. Gynther expressed hope that the diversity of perspectives illuminated different angles on common problems. Lovind drew the sharpest conclusion; the fundamental task is to research, understand, and communicate the reality of local game culture with sufficient rigour that public authorities cannot continue to treat it as marginal. Ylikangas offered a formulation that served as a coda for the session; games are a capability layer, not merely a product category. When they are categorised as technology, they are dismissed as mere culture; when they are categorised as culture, they are dismissed as mere technology. The path forward requires holding both characterisations simultaneously.

Recommendations arising from the session:

- Development and adoption of the Game Badges competence framework as a cross-border infrastructure for skills mobility and recruitment.

- Construction of a creator-controlled, nonprofit-governed metadata infrastructure to provide a foundation for non-commercial games discoverability, with strict legal protections against scraping and algorithmic distortion.

- Sustained national institutional investment in games as a cultural form, modelled on or adapted from the Danish NIMBY framework, with explicit attention to building domestic audiences as well as supporting export development.

- Reframing of games within EU strategic funding architectures to recognise the sector as a capability layer with applications across multiple non-entertainment domains, while supporting the dissemination of games industry capabilities to these domains, including defence.

4. SESSION 3: EUROPEAN VALUES AND EUROPEAN GAMES

The third and concluding session of the summit addressed questions that are at once foundational and urgent; what European values actually mean for an industry operating in a geopolitically volatile environment; how democratic commitments should be defended when investment from undemocratic regimes penetrates the creative sector; what structural mechanisms are required to make sustainability a meaningful rather than merely rhetorical objective; and how game-based learning can be embedded in formal educational systems to serve genuine civic purposes.

4.1. Presentation by Kati Uusi-Rauva

Kati Uusi-Rauva, a cultural anthropologist and games producer working within EIT Culture and Creativity, opened the session by approaching the question of European values from the perspective of a researcher trained to examine what values are, where they come from, and how they function in communities.

Key Points:

<u>1. The definitional starting point:</u> Values are how communities articulate what matters to them, the conceptual vocabulary through which priorities are named and made actionable.

<u>2. Europe's particular complexity:</u> Europe presents an immediate definitional complication. It is a continent of extraordinary linguistic and cultural diversity, with twenty-four official EU languages and many more living languages, including the eight Sami languages of the Nordic region. This diversity is itself a European value, but it has historically prevented the emergence of a shared European identity.

3. The layered structure of value influences in the games industry: The cultural background of individual practitioners sets a foundational orientation. The values and expectations of players shape design choices. The competitive environment imposes pressures, and investor value frameworks constrain choices.

4. The EU's formal value commitments: Human dignity, freedom, democracy, equality, the rule of law, and human rights are not merely rhetorical declarations but active choices that materialise in regulatory frameworks. The General Data Protection Regulation, the Digital Services Act, and the AI Act are expressions of a European value orientation. The PEGI age-rating system is an example of self-regulation within the games industry that gives concrete form to values around the protection of minors.

5. Active value choice: In a period defined by economic uncertainty, AI disruption, and geopolitical turbulence, the value base of the games industry is being contested and renegotiated. The industry's decisions about whether to support scalable commercial ventures or to nurture independent makers below the threshold of visibility are conscious value choices.

Conclusions: Uusi-Rauva's contribution provided the conceptual foundation for the session, making the case that values function actively in funding decisions, regulatory choices, and institutional design, and that the moment requires explicit and intentional engagement with what European value commitments mean for the games sector.

4.2. Presentation by Jari-Pekka Kaleva

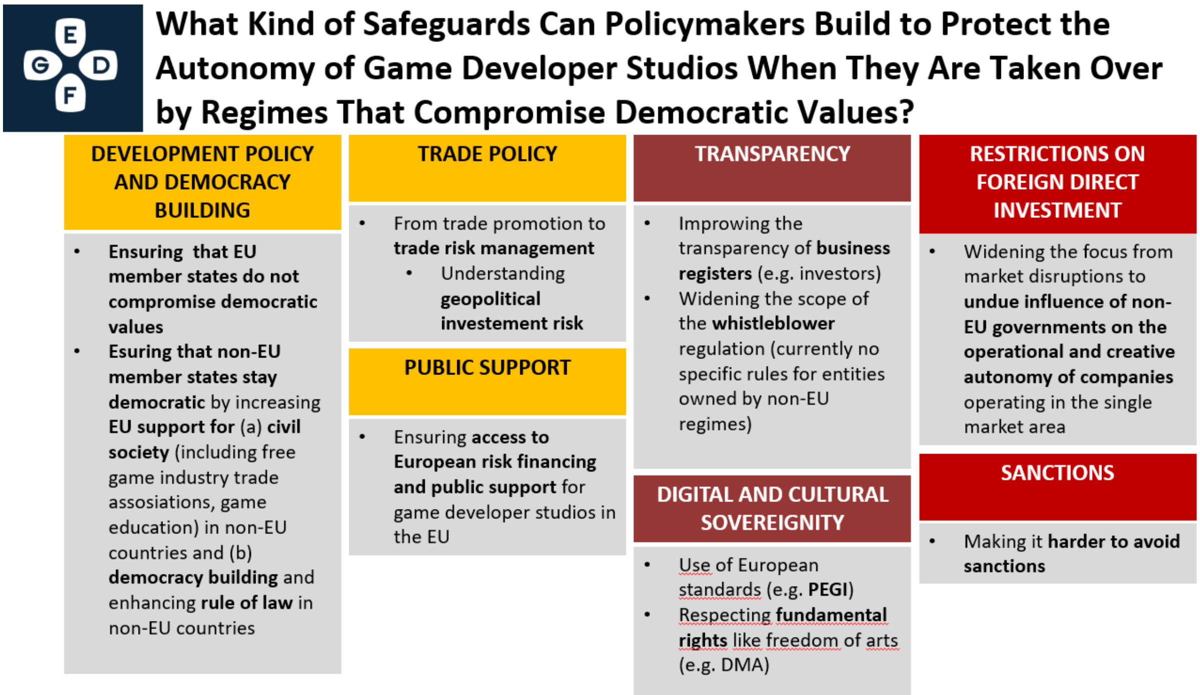
Jari-Pekka Kaleva, representing the European Games Developer Federation, addressed what he described, with dry understatement, as one of the easier topics of the day; what safeguards can policymakers build to protect the creative and operational autonomy of game development studios that are acquired by investors from regimes that compromise democratic values?

Key Points:

1. The internal democratic question: The problem is not primarily an external one. Hungary has been the site of sustained democratic backsliding within the EU itself; Slovakia is a cause of active concern; France and Germany face electoral dynamics in which the maintenance of democratic norms cannot be taken for granted.

2. Geopolitical investment risk: There is no longer such a thing as neutral money. Investment from any country with a specific geopolitical orientation carries risks that may not be immediately visible but can become acutely consequential. European policymakers who promote trade and investment from states with authoritarian governance structures have an obligation to be transparent about the risks attached.

3. Transparency in business registers: European registers vary significantly in the degree to which they make ownership structures visible. In many jurisdictions it is not possible to identify who has invested in a company or to trace the origin of capital. There are historical reasons for this opacity, but the current strategic environment requires a different calculus.



4. The authority gap: There are no specific provisions that would enable authorities to intervene when foreign investors use their stake in a studio to restrict artistic freedom, impose content criteria, or compromise creative autonomy. This gap should be addressed directly.

5. Three further policy instruments: The mandatory application of PEGI as a condition of market access, including on platforms that currently apply United States standards, would establish a clear European norm. The Digital Markets Act, properly enforced, would strengthen studios' freedom of expression on major platforms. The framework for screening foreign direct investment, which currently focuses on market disruption, should be extended to cover operational and creative autonomy.

Conclusions: Kaleva's argument was that the defence of democratic values within the games industry is not primarily a question of declarations but of specific policy instruments capable of being deployed when the conditions arise. The current sanctions regime against Russia, demonstrably circumventable, illustrates the gap between principled commitment and practical effect.

4.3. Presentation by Andre Bernhardt

Andre Bernhardt, General Manager of Spielfabrique running STRATEGIS, a Horizon Europe-funded project supporting the European games industry in realising its potential as a driver of sustainable innovation, presented the most clearly empirically grounded contribution of the session. His analysis was built on research conducted between 2024 and 2025 comprising two structured industry workshops and a policy innovation survey of forty-five respondents across approximately twelve European countries.

Key Points:

1. The central paradox: Ninety-five per cent of respondents agreed that sustainability in the European games industry is a shared responsibility between industry and policy. When asked to assess how well policymakers and SMEs are working together, only four per cent said collaboration is working effectively; thirty-eight per cent said it is not working at all.

2. The diagnosis: This is not a problem of goodwill. Both sides want collaboration to succeed. It is a problem of structural conditions. Goodwill without appropriate mechanisms produces exactly the result the data shows; broad agreement and no movement.

3. Gap one - the shared evidence base: Thirty-eight per cent of respondents cited quantitative evidence as essential to justify investment in sustainability, but no industry-wide key performance indicator framework exists for sustainability outcomes in games. Studios cannot obtain funding without demonstrating impact, but they cannot build the data infrastructure to demonstrate impact without funding. Only policy intervention can break the loop.

4. Gap two - funding architecture: Seventy-nine per cent of respondents cited lack of financial resources as their primary barrier. This is not primarily a question of total funding available; it is a question of structure. National funding caps prevent studios from combining EU-level and member-state grants. Studios working on cross-border European projects literally cannot access money that exists.

5. Gap three - discoverability infrastructure: No recognised genre category, platform badge, or editorial classification exists to identify games with a sustainability orientation. Players who wish to support such work cannot find it. Impact investors who wish to fund studios producing it have no reliable mechanism for identifying them. This is not a marketing problem; it is an infrastructure problem.

Conclusions: Bernhardt closed by posing two questions to the room; what would a minimum viable KPI framework for sustainability look like, and who should be responsible for creating it? And should there be an environmental label or equivalent category for games, designed to prevent greenwashing while solving the discoverability problem?

4.4. Presentation by Zoltan Szekely

Zoltan Szekely, co-founder of SFC, a nonprofit startup studio operating in defence, AI, and disaster response, brought a background spanning EU law enforcement policy, the European Space Agency's business incubator, and legal and political science to a presentation that was, at its core, a practical account of how game-based learning can be embedded in formal education to address one of the most concrete challenges of the current moment; civilian preparedness for disasters.

Key Points:

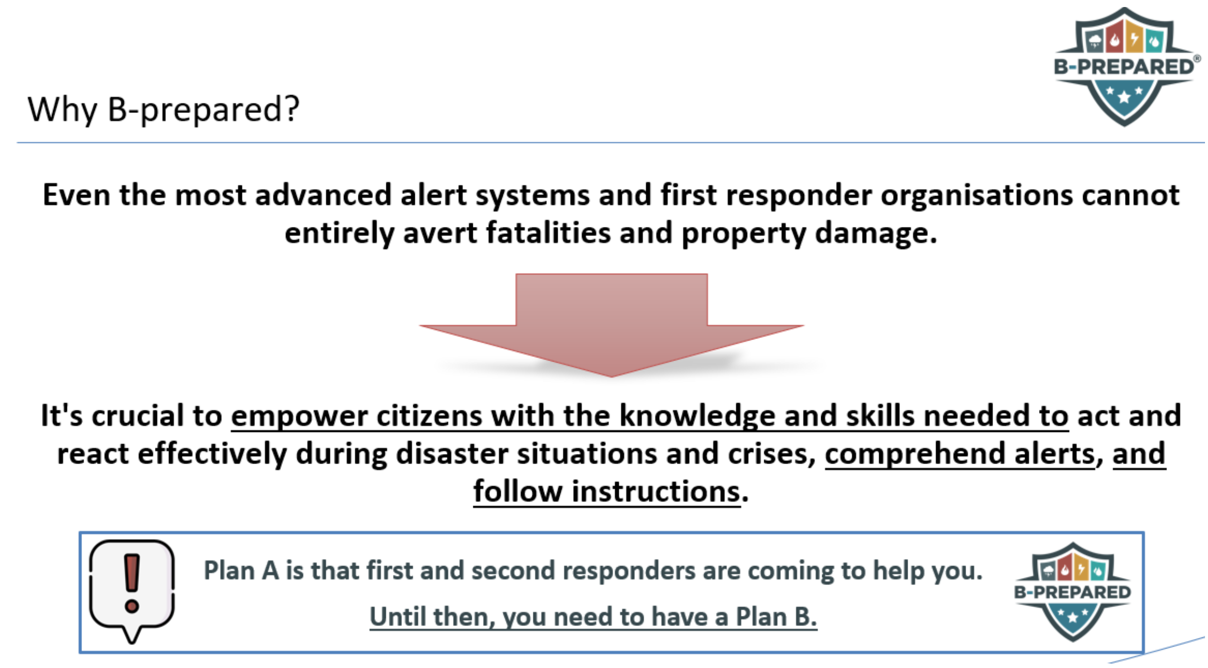
1. The originating tragedy: The floods of 2021 killed almost one hundred Germans and approximately fifty Belgians. Analysis revealed that all alert systems had functioned as intended; when the alerts reached citizens, virtually no one knew what to do. Two hundred and fifty people died not because the warning failed but because the preparedness failed.

2. The B-Prepared ecosystem: The response consists of three interconnected elements. Disasterpedia is an open collaborative knowledge platform for disaster preparedness content. A virtual reality game, also available in a flat-screen version, places users in a high-realism simulation of a disaster scenario. The mobile game “I Am Prepared” is a gamified learning application combining walking exercises, mini-games, augmented reality elements, and CPR training, available in all twenty-four official EU languages.

3. The learning management system: All three elements connect to a learning management system that aggregates data on how players train and learn and translates that learning into a quality-of-life-years indicator that makes it possible to demonstrate to policymakers the measurable health and resilience benefit of game-based preparedness training.

4. The pedagogical argument: Modern citizens do not have free time in the traditional sense; when they do, they tend to use it for passive content consumption or gaming. The mobile game exploits this reality, embedding preparedness learning in the kind of low-commitment, high-engagement interactions that already characterise daily digital behaviour. The VR component's effectiveness has been validated through physiological measurement, including galvanic skin response.

5. The proposed EU directive: SFC is formally submitting a proposal for a European directive that would require disaster preparedness to be included in formal primary and secondary education curricula across the EU, with game-based learning as an integral component. The Japanese model, in which disaster preparedness is a systematic element of school education, is the reference point.



Conclusions: Szekely's contribution illustrated how the games industry's capabilities can serve a concrete and urgent civic purpose. The open API and ecosystem design of B-Prepared make integration straightforward for any developer with a disaster-relevant game. The model points toward a broader category of public investment in games as instruments of civic capability.

4.5. Session 3 Plenary Discussion: Values, Funding, and the Identity of Games

The plenary discussion addressed the precision required of democratic commitments, the operationalisation of values in funding criteria, the disputed boundary between cultural and instrumental purposes, and the meaning of innovation as a funding objective.

Discussions and Key Points:

Disaster Preparedness and Civic Infrastructure. The discussion opened with the moderator noting that serious games focused on emergency response have a longer European history than is sometimes recognised. Uusi-Rauva described a recent incident in Finland; a drone approaching Finnish territory triggered an emergency alert instructing citizens to remain indoors. The consequence was a near-total cessation of essential services. The alert reached citizens but produced a response as disruptive as it was protective, because citizens had no framework for calibrating their response. Szekely confirmed that the B-Prepared API documentation is public and that he personally undertook to issue access credentials to any developer with a relevant game.

Defining Democracy. Behrmann pressed for greater definitional precision. The term “democracy” is deployed with insufficient rigour in public discourse; the same word is applied to Hungary, to countries where separation of powers is under threat, but elections remain contested, and to states described as non-democratic without clear criteria being articulated. Kaleva's response drew a distinction between the legal framework, which identifies certain acts as incompatible with democratic governance regardless of electoral outcomes, and the more contested terrain of political characterisation. He argued that the absence of perfect criteria should not prevent action; the appropriate response is not to wait for consensus before defending values but to make informed decisions with full awareness of complexity.

Values as Funding Criteria. Simon Lovind noted that Danish cultural funding employs criteria of cultural value and offers a relevant reference point. Uusi-Rauva observed that Finland's sustained commitment to supporting Finnish language and cultural production illustrates how value-based funding decisions can be made consistently and defensibly over long periods. Kaleva offered the most precise account of how European funding frameworks currently approach this question; most instruments do not attempt to define European values in positive terms for content assessment; they define a set of negative exclusions, including content promoting terrorism or pornographic content, and leave the positive space open to freedom of expression. Values are not static; new generations reinterpret and develop them. Funding systems that try to specify in advance what “European values” look like in creative works risk producing the cultural dirigisme that the commitment to freedom of expression is meant to prevent.

Public Interest Versus Artistic Autonomy. Szekely argued that public money for games should prioritise projects serving demonstrable public interest or policy objectives, given the games medium's reach. Kaleva immediately countered that games as a cultural medium have inherent value not contingent on serving any greater good, and that some of the most significant contributions to the medium's development have come from work that is deliberately non-instrumental. The exchange illustrated a genuine tension within the field that no simple formula can resolve.

Innovation as Value. Uusi-Rauva challenged the casual use of “innovation” as an almost automatically positive value in creative industry funding discourse. She drew a distinction between invention, the creation of something new, and innovation, which in her definition requires that the novelty be accepted and adopted by users or a community. The implication for funding criteria is significant; if public support is justified in terms of innovation, recipients must demonstrate not merely that they have done something new but that what they have done has resonance and uptake.

Closing Statements. Bernhardt suggested that sustainable game development, reducing the resource intensity of production and extending the useful life of games, is a contribution that the industry can make even without resolving the larger structural questions. Szekely emphasised the leverage that games provide as a cultural medium for building civic resilience. Kaleva reiterated his call for informed decision-making; the choices ahead are difficult and often without any clear right answers, but they must be made with full awareness of what is at stake. Uusi-Rauva expressed her hope that the transition to the AgoraEU funding period from 2028 would be accompanied by a genuine refreshment of European values in relation to games.

4.6. Conclusions and Recommendations

The session's recommendations:

- The European Games Developer Federation should pursue concrete policy proposals to extend the foreign direct investment screening framework to cover operational and creative autonomy of acquired studios, and to address the Power of Attorney directive gap regarding content interference.

- The mandatory application of PEGI as a condition of market access on all platforms operating in the European Union should be pursued through consumer law instruments.

- A minimum viable KPI framework for sustainability in games should be commissioned at European level, ideally co-created across member states, industry associations, and academic consortia, with the Sustainable Game Alliance as a foundational partner.

- Cross-border funding caps that currently prevent studios from stacking EU-level and member-state grants should be addressed through policy clarification rather than new funding.

- A European directive establishing the inclusion of disaster preparedness in formal primary and secondary education curricula, with game-based learning as an integral component, should be supported, building on the B-Prepared ecosystem and its open API.

- Public funding frameworks should continue to define values primarily through negative exclusions rather than positive content requirements, preserving freedom of artistic expression while excluding content incompatible with fundamental European legal commitments.

5. SUMMARY, WITH OVERALL CONCLUSIONS AND RECOMMENDATIONS

The three sessions of the Games Policy Summit 2026 generated a substantial set of identified challenges and proposed solutions, clustering across three broad thematic areas; the structural relationship between European developers and the non-European infrastructure on which they depend; the architecture of public funding and its capacity to serve the actual needs of the European games sector; and the values and identity that should inform European policy choices in this domain.

5.1. IP, European Markets and Digital Sovereignty

5.1.1. Identified Challenges

The European games industry operates within a value chain that is structurally defined at both ends by non-European actors. Middleware and engine markets are dominated by Unity and Unreal; distribution is dominated by Steam on PC and by Android and iOS on mobile. European developers occupy the space between these walls without meaningful influence on either. The Digital Markets Act, while representing an important regulatory instrument, faces implementation challenges that include lobbying pressure from outside the European Union.

Public funding for intellectual property development treats gameplay mechanics and technology as legitimate teachable crafts but treats character, story world, emotional journey, and brand identity as matters of intuition. The result is systematic underinvestment in the elements of game development that generate durable, ownable assets.

Public European money is routinely directed toward promotion on non-European platforms, transferring value out of the European creative economy. Intellectual property generated through publicly funded projects frequently migrates to non-European parent companies, severely curtailing the public return on investment.

Early-stage financing for games studios remains inadequate. Programmes such as Germany's EXIST, while structurally sound, exclude practitioners without university credentials and are not adapted to the specific needs of creative sectors.

5.1.2. Identified Solutions

Public funding architectures should treat intellectual property development as a teachable, fundable craft with explicit funding criteria addressing character, world, emotional journey, and brand identity alongside mechanics and technology.

Intellectual property retention should become an explicit criterion in public funding decisions, with preferential terms for projects that contractually commit to retaining IP within a member state or within the European Union.

A French-style digital services tax should be introduced in each EU member state without waiting for a global agreement, with revenue directed to European creative industry funding. Modelling for the German case indicates approximately one billion euros annually.

Rigorous enforcement of the Digital Markets Act should be a political priority, with particular attention to the structural relationships between European developers and the dominant non-European distribution platforms.

A European-level early-stage financing instrument should be established with eligibility criteria not restricted to university graduates and with a focus on entrepreneurship and creative development.

Trade engagement with Japan and Korea should be conducted through sustained relationship-building rather than transactional deal-making, supported by Commission-led missions designed for that purpose.

To summarise, we need:

- A French-style digital services tax in every EU member state, with revenue directed to European games industry funding.
- IP retention as an explicit criterion in public funding decisions.
- Rigorous Digital Markets Act enforcement, particularly regarding the platform-developer relationship.
- A European early-stage financing instrument with inclusive eligibility criteria.
- Treatment of IP development as a fundable craft within European funding architectures.
- Commission-led trade engagement with Asian markets, oriented toward relationship-building rather than commercial transaction.

5.2. Public Funding, Discoverability and Local Perspectives

5.2.1. Identified Challenges

The discoverability of European games is structurally compromised by the commercial mediation of all major access mechanisms. Long-tail distribution effects ensure that highly capitalised productions capture most of the attention while the vast majority of European titles, including those of the greatest artistic merit, remain effectively invisible. Websites have lost approximately thirty per cent of traffic in the preceding year as large language models filter information access.

The European games industry lacks a shared professional language. The same job titles denote substantially different roles across different companies and contexts, complicating recruitment, cross-border mobility, and external communication.

National cultural production frequently fails to reach domestic audiences. Danish data illustrates this; forty-five per cent of Danish children aged nine to eleven play Roblox daily, primarily as a social activity, yet Danish developers produce almost no social games. The structural gap is one that marketing cannot bridge.

The games industry is consistently misclassified by funding systems. When categorised as technology, it is dismissed as mere culture; when categorised as culture, it is dismissed as mere technology. The result is that the industry's applications across defence, healthcare, industrial competitiveness, workforce training, and civic capability remain outside the scope of major investment channels.

5.2.2. Identified Solutions

A creator-controlled, nonprofit-governed metadata infrastructure should be developed as a foundation for non-commercial games discoverability. The infrastructure should enforce strict legal protections against scraping and algorithmic distortion and should serve as the data foundation for any number of derivative access mechanisms.

The Game Badges competence framework, or an equivalent open framework, should be adopted across European games industry hiring and educational systems to establish a shared professional vocabulary.

National cultural institutions for games, modelled on or adapted from the Danish NIMBY framework, should be established or strengthened in member states. Their explicit remit should include the development of domestic audiences as well as export support.

A publicly maintained register of European games receiving public funding should be developed, with neutral, open-data access to title, release date, trailer, and description information, made available six months before each title's release.

The games sector should be reframed within EU strategic funding architectures, including the European Competitiveness Fund, to recognise its capability layer characteristics with applications across multiple non-entertainment domains.

Dissemination of games industry capabilities to non-entertainment domains, including defence, should be supported.

To summarise, we need:

- A creator-controlled, nonprofit-governed metadata infrastructure as the foundation for European games discoverability.
- The Game Badges framework, or equivalent, adopted as the European professional competence standard for the sector.

- A publicly maintained register of EU-wide publicly funded games (by EU and/or member states) to support neutral discoverability.

- Institutions for games on the Danish model, with mandates including domestic audience development.

- Reframing of the games sector as a capability layer within EU strategic funding architectures.

- Dissemination of games industry capabilities to non-entertainment domains.

5.3. European Values and the Identity of Games

5.3.1. Identified Challenges

The defence of democratic values within the European games industry faces challenges both within and outside the European Union. Democratic backsliding within EU member states has reached a point where industry associations must develop concrete commitments rather than abstract ones. Externally, the geopolitical risks attached to investment from undemocratic regimes are inadequately recognised in trade promotion activities and in the screening of foreign direct investment.

Sustainability collaboration between policymakers and the games industry has broken down despite near-universal agreement on its necessity. The breakdown is structural rather than attitudinal; the absence of a shared evidence base, the inflexibility of funding architectures, and the absence of discoverability infrastructure for sustainability-focused games together prevent collaborative action.

Foreign direct investment screening currently focuses on market disruption and does not address the operational or creative autonomy of acquired studios. The relevant directive contains no specific provisions enabling intervention when foreign investors use their stake to restrict artistic freedom or impose content criteria.

Citizens across Europe lack basic disaster preparedness. Alert systems function but produce poorly calibrated responses because preparedness training is absent from formal education in most member states. The casualties of the 2021 floods are a recent and concrete illustration.

5.3.2. Identified Solutions

The foreign direct investment screening framework should be extended to cover the operational and creative autonomy of target companies, making it possible to require contractual guarantees of investee company independence.

The relevant directive should be amended to include specific provisions enabling authorities to intervene when foreign investors use their stake to restrict artistic freedom or impose content criteria on game development.

The mandatory application of PEGI on all platforms operating in the European Union should be pursued through consumer law instruments, establishing a clear European norm for content regulation regardless of platform origin.

A minimum viable KPI framework for sustainability outcomes in games should be commissioned at European level, co-created across member states, industry associations, and academic consortia. National funding caps preventing the combination of EU-level and member-state grants should be addressed through policy clarification.

A European directive establishing the inclusion of disaster preparedness in formal primary and secondary education curricula, with game-based learning as an integral component, should be supported. The B-Prepared ecosystem, with its open API and EU-wide language coverage, provides a foundation.

Public funding frameworks should continue to define values primarily through negative exclusions rather than positive content requirements, preserving freedom of artistic expression while excluding content incompatible with fundamental European legal commitments.

To summarise, we need:

- Extension of FDI screening to operational and creative autonomy.
- Amendment of the relevant directive to address content interference by foreign investors.
- Mandatory PEGI across all platforms in the European market.
- A European KPI framework for sustainability outcomes in games.
- A European policy on game-based disaster preparedness in formal education.
- Funding architectures that combine negative content exclusions with positive freedom of artistic expression.

5.4. Setting Policy Priorities

The recommendations generated across the three sessions of the summit cluster into several broad categories that together describe a coherent agenda for European games industry policy in the coming period. These categories are presented below in approximate order of strategic priority, though their implementation will necessarily proceed in parallel rather than sequentially.

5.4.1. Immediate Priorities

Four actions emerge as having both the greatest strategic significance and the greatest urgency:

First, the consolidation of games as a distinct sector within the AgoraEU programme from 2028 to 2034. This is the immediate political opportunity identified by Bastien Remy in the opening session.

Second, reframing of games within EU strategic funding architectures to recognise the sector as a capability layer with applications across non-entertainment domains, including through the European Competitiveness Fund, supported by dissemination of these capabilitiues.

Third, the rigorous enforcement of the Digital Markets Act, with particular attention to the structural relationships between European developers and the dominant non-European distribution platforms. The DMA's effective implementation is foundational to any other measures aimed at supporting European creative independence.

Fourth, the introduction of national digital services taxes modelled on the French scheme. This is technically straightforward, politically achievable member state by member state, and would generate revenue sufficient to fund substantial European games industry support without further demands on public expenditure.

5.4.2. Medium-Term Structural Priorities

A second cluster of recommendations addresses structural conditions that require sustained institutional construction:

The establishment of national cultural institutions for games in additional member states, modelled on the Danish NIMBY framework, with mandates that explicitly include the development of domestic audiences.

The development of a creator-controlled, nonprofit-governed metadata infrastructure for European games discoverability.

The adoption of the Game Badges competence framework or an equivalent shared professional vocabulary across European industry and education.

5.4.3. Sustained Policy Priorities

A third cluster addresses the ongoing policy work required to consolidate European positions over time:

The extension of foreign direct investment screening to cover operational and creative autonomy of acquired studios, and the amendment of the relevant directive to address content interference.

The development of a minimum viable KPI framework for sustainability outcomes in games, co-created across member states, industry associations, and academic consortia.

The pursuit of mandatory PEGI application across all platforms operating in the European market.

The treatment of intellectual property development as a teachable, fundable craft within European funding architectures, with IP retention as an explicit criterion in funding decisions.

The development of a European directive on game-based learning for disaster preparedness in formal education.

5.4.4. Suggestions for Actions in Practice

The actions proposed by the summit cluster, as in previous editions of the event, into the themes of regulation and the establishment of a level playing field in global competition; coherent and appropriate funding systems, with particular attention to new entrants and to the discoverability of European production; and the explicit recognition of European games industry’s value at the political level, both for its cultural contribution and for its broader strategic, technological, commercial, and soft power potential.

The 2024 Games Policy Summit identified the European Audiovisual Observatory, operating since 1992, as a potential model for an equivalent institution serving the video games sector. That suggestion remains relevant and has acquired additional force in the context of the discoverability infrastructure proposals advanced in this year's summit. A European Games Observatory, established on the model of the Audiovisual Observatory but with the data infrastructure design considerations identified by Lars Haard, could provide both the market and legal information layer and the metadata foundation that the European games ecosystem currently lacks.

The Nordic Game Program, operating from 2006 to 2015 with the explicit ambition of building games-centric funding architecture not based on legacy film or general cultural support models, remains the most directly relevant historical precedent for the new instruments now required at European scale. Its documentation and analysis could serve as a foundation for the design of AgoraEU support to the games sector and be considered as a model for any successor or complementary instruments developed at member state level.

APPENDIX: LIST OF SPEAKERS

Bastien Remy, European Commission
Andre Bernhardt, Spielfabrique
Thierry Baujard, Spielfabrique
Malte Behrmann, Gisma University of Applied Sciences, Berlin
Christian Fonnesbech, Leverage
Ria Gynther, Metropolitan University of Applied Sciences, Helsinki
Lars Haard, Oxide AI
Jari-Pekka Kaleva, European Games Developer Federation
Simon Lovind, NIMBY - Danish Institute for Game Development
Johanna Nylander, Swedish Games Industry Association
Erik Robertson, Nordic Game Resources AB
Zoltan Szekely, SFC Nonprofit Startup Studio
Kati Uusi-Rauva, EIT Culture and Creativity
Timo Ylikangas, NOVIA Univeristy of Applied Sciences / Nordic Game Ventures