Proceedings, conclusions and recommendations from the second

GAMES POLICY SUMMIT

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Nordic game
GAMES POLICY SUMMIT

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Table of Contents

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Executive Summary:
The final recommendations of the Games Policy Summit

Strengthen Technological, Artistic, and Operational Sovereignty in the European Games Industry
Secure essential access to talent, funding and intellectual property rights to empower European game developers in maintaining creative control and fostering resilience within the digital single market. Support self-publishing studios to govern their own destinies and safeguard innovation. Modernise digital taxation frameworks to ensure multinational digital platforms contribute fairly to Europe's creative economy, preventing revenue loss and promoting a sustainable ecosystem. Reform tax incentive schemes to lower barriers for smaller developers, reduce abuse risks such as overlapping tax credits and prevent offshore intellectual property transfers that undermine Europe's cultural and economic interests. Additionally, regulate foreign investment rigorously with robust shareholder agreements to protect operational sovereignty aligned with European values, particularly in light of geopolitical tensions.

Enhance Discoverability, Audience Development, and Market Integration for European Games
Shift public funding priorities beyond mere production towards marketing, community-building, and platform readiness, helping studios reach and cultivate audiences effectively across Europe's linguistically and culturally diverse markets. Develop platform features enabling users to discover games by country or cultural origin, increasing visibility and cultural recognition. Promote open and transparent distribution channels that empower European studios to connect directly with consumers. Expand localisation support and market intelligence services to facilitate regional and global market entry, boosting the international presence of European game productions.

Recognise and Fund Games as Innovative, Cultural, and Civic Technologies
Broaden public funding frameworks to explicitly include games alongside AI and VR, reflecting their status as innovative, creative technologies worthy of cultural investment. Foster partnerships between academia, industry clusters, and developers to encourage artistic risk-taking and innovation. Recognise games as digital civic spaces that promote dialogue, critical thinking, and social inclusion, with adequate mental health and moderation support for developers facing harassment. Support initiatives positioning games as tools for education, inclusion, and democratic participation, especially for vulnerable groups including children.

Build and Support Pan-European Creative Ecosystems and Collaborative Networks
Develop cross-border innovation initiatives that support new business models, incubation, and skills development tailored to the creative industries' diverse needs. Forge strong partnerships among policymakers, industry stakeholders, and academia to ensure alignment with sector realities. Promote collaborative co-production models that enable studios to pool expertise, share risks, and access diverse public funding streams. Invest in tools and frameworks that measure not only economic but also social and cultural impacts, fostering community-rooted and co-created outcomes.

Streamline Public Funding, Defence Procurement, and Policy Frameworks for Inclusive Growth
Simplify and clarify public procurement pathways in sectors such as defence, healthcare, and emergency response, enabling innovative game developers, particularly SMEs, to access contracts and contribute to public service innovation. Enhance technical literacy within public institutions and foster public-private partnerships to streamline these processes. Reform statistical and sector classification systems (e.g., NACE codes) to better capture the diversity of the games industry, improving data accuracy and policy relevance across EU member states. Balance direct public funding with innovative fiscal incentives to avoid dependency culture, ensuring that funding models encourage market viability alongside cultural and artistic innovation.

Invest in Early-Stage Innovation, Evidence-Based Learning, and Ethical Deployment

Finance tools and services that facilitate early audience testing and iterative game design, improving creative outputs and market fit prior to full release. Support the ethical development and deployment of serious games and simulation technologies in public service training sectors such as defence, healthcare, and emergency preparedness. Promote the integration of virtual and augmented reality tools that enhance skills and readiness without replacing real-world experience, while upholding high ethical standards.

Foster Child-Centric, Rights-Based Digital Participation Policies

Shift from risk-focused to rights-based digital participation policies inspired by the UN Convention on the Rights of the Child, promoting safe, meaningful access to digital culture and gaming for young people. Embed this framework within broader cultural and civic engagement strategies, positioning games as inclusive platforms that empower children and vulnerable communities to engage safely and creatively.

1. Introduction

1.1. Welcome and Opening Remarks

The second edition of the **Games Policy Summit** was formally opened by **Malte Behrmann**, who chaired the summit. He welcomed attendees, happy to see both familiar and new faces. He acknowledged and referred to this organic development as "evolution in action".

1.2. Introduction – Malte Behrmann

Mr Behrmann introduced himself as a professor based in Berlin, Germany. Originally from Bavaria, he has been active in the games industry for over two decades. His background includes:

- Serving as the **CEO of the German Game Developer Association** for seven years

- Later acting as **Secretary General of the European Game Developer Federation (EGDF)**

In these roles, he lobbied at the European level, foremost to ensure that games were recognised as a cultural medium, and also worthy of public funding. In 2013, he chose to step back from extensive travel and accepted a professorship in Berlin. Alongside his academic work, he works as a **lawyer and consultant for indie game developers**, particularly in the Berlin region. His practical legal experience informs his policy advocacy work. Mr Behrmann emphasised that his involvement in the summit and related policy efforts reflects a long-standing commitment to strengthening the European games ecosystem.

1.3. Remarks by Erik Robertson

Before formally launching the day's sessions, Mr Behrmann invited **Erik Robertson**, Director and Founder of the **Nordic Game Conference**, to share a few words.

Mr Robertson introduced himself with characteristic humour, referring to himself as a "failed game developer" who transitioned to industry support roles over 20 years ago. He described the **Games Policy Summit** as one of the most meaningful achievements of his career. He expressed optimism about the summit's increasing influence on European games policy. Mr Robertson noted that, alongside the **Games Policy Summit**, two other significant gatherings were taking place:

- **The Games Capital Summit**, a high-level investment forum where 12 selected studios pitch to over 20 venture capital investors

- **The Exec Summit**, a long-standing meeting of industry decision-makers from the Nordic region and abroad, focusing on leadership, HR, and strategic development

These groups were to join the Policy Summit later in the day for drinks and informal networking, providing a rich opportunity for cross-sector dialogue.

Mr Behrmann closed with a reflection on the roots of European games advocacy. Around 20 years ago, he, Erik Robertson, and Fred Hasson, a third colleague from the UK (then still a member of the EU) co-founded the **European Game Developer Federation**. That shared foundation continues to inform their commitment to shaping games policy today. He concluded by thanking attendees for their participation and support, reaffirming the long-term goal of building a strong policy framework for Europe's games industry. The opening session concluded with gratitude to the speakers and a transition into the day's programme.

1.4. Introduction to event format

Malte Behrmann opened the seminar by outlining the schedule and structure for the day. He explained that there would be three sessions in total: Session 1 would be shorter than the following two, lasting approximately one hour and fifteen minutes. Sessions 2 and 3 would be longer in duration. This

adjustment in timing was due to logistical considerations, as more participants were expected to arrive gradually throughout the day. Consequently, a larger number of presentations were scheduled for the later sessions to ensure broader audience participation.

Malte clarified that the format of the sessions would differ from more conventional conferences. Each session would include four to five short interventions or presentations, delivered consecutively and without immediate discussion. A consolidated discussion period of approximately forty-five minutes following the interventions, allowing time for broader conversation across all topics covered. The format assumes a professional audience well-versed in such events. Malte encouraged participants to note down or mentally retain any questions, as discussion would take place after all interventions in a session had concluded. He stressed that all participants were equal in the discussion and invited everyone to contribute their insights and questions during the designated time.

It was announced that the entire seminar would be audio recorded. Malte explained that the recording would not be made public but rather used internally as a basis for drafting the final written report of the summit. This notification was made in accordance with data protection regulations, ensuring that all attendees were fully informed and consented to this procedure.

2. Session 1: Visibility of European games in times of turmoil

Malte Behrmann noted that this session arose from the summit's call for papers, which had included a special emphasis on the visibility and international presence of European-made games, particularly in challenging geopolitical or market conditions.

2.1. Olivier Mauco, European Video Game Observatory: Video games, battleground of the culture wars - How to make video games visible and concrete for the industry and consumers thanks to politics?

Olivier Mauco shared findings from two recent studies conducted under the framework of the European Video Game Observatory. This initiative was established to analyse the unique characteristics of the European games sector and foster collaboration between public and private stakeholders at the European level. Participants were invited to access further information online.

Olivier talk focused on the concept of "culture wars" in the games industry—ongoing conflicts driven by opposing values on issues such as violence, representation, identity, and morality. He framed this phenomenon as evolving over three major periods, each increasingly impactful on public discourse and the industry itself.

BREAKDOWN OF METACRITICISMS FOR GAMES THAT HAVE BEEN THE SUBJECT OF CULTURAL BATTLES

■ negative   ■ mixed   ■ positive

Game	negative	mixed	positive
STELLAR BLADE	349	273	6600
BLACK MYTH WUKONG	940	563	5800
STAR WARS OUTLAWS	1200	368	1300
ASSASSIN'S CREED SHADOWS	503	62	546
THE LAST OF US PART II	68100	8900	87400
DRAGON AGE VEILGUARD	5000	634	2400
MASS EFFECT 3	1400	564	2500

The first period, beginning in the 1990s, saw moral panics around violence in games, often fuelled by media and political figures. Tragic events such as the Columbine school shooting led to accusations—most notably from politicians like Hillary Clinton—that violent video games were to blame. While the industry developed defensive strategies, the association of games with violence and addiction continued for years.

The second wave centred on the Gamergate controversy, which arose roughly a decade ago. This conflict exposed deep divisions within the gaming community between more conservative and progressive players. At its heart were debates over the representation of women, industry ethics and the independence of games journalism. The impact was significant, prompting many studios to adopt policies promoting diversity, equality, and inclusion.

Today, a third phase is underway. Olivier and his team analysed reactions to five major game launches in early 2024, focusing on Assassin's Creed: Shadows. The game's trailer, featuring a Black samurai character, sparked a wave of online backlash, including claims that the game was historically inaccurate and disrespectful. This reaction, however, was largely driven by a small but highly vocal minority. Social media analysis revealed that less than 1% of users generated over 17% of total engagement, with many aligned to far right or anti-DEI (Diversity, Equity, and Inclusion) ideologies. These users often framed their criticism around "anti-woke" rhetoric, claiming such games were inherently flawed and politically motivated.

Olivier demonstrated how these groups not only coordinated to influence public opinion but also engage in review bombing on platforms like Metacritic, significantly distorting reception and sometimes lowering review scores by up to 60%. These campaigns, he argued, are not about the quality of games but about spreading political narratives under the guise of critique. Their actions have a tangible effect on studios, including harassment of developers, damage to morale, and altered communication strategies. In some cases, individuals have withdrawn from public platforms entirely due to sustained abuse.

Adding to the complexity is the declining influence of traditional games journalism. With professional reviews carrying less weight, studios increasingly depend on influencers and user-driven commentary, which are more vulnerable to ideological manipulation. This shift in taste-making mirrors broader cultural trends where user ratings on platforms often override expert opinion.

Mauco concluded by highlighting the importance of a shared European (and Canadian European) response to these challenges. While the financial impact of such culture wars is difficult to quantify, their effects on team wellbeing, public discourse, and industry confidence are substantial. He called for greater awareness and more robust support mechanisms to counter the volatility introduced by ideological backlash and digital harassment. The presentation ended with thanks and applause, setting the tone for the broader discussion to follow later in the session.

2.2. **Rebecca Harris, University of Greater Manchester:** Engaging global audiences in policy dialogue through digital games.

Rebecca Harris opened her talk by questioning traditional assumptions about digital games being merely recreational. Increasingly, she argued, games are evolving into channels of civic communication—sometimes intentionally so. Rather than envisioning the next frontier of public dialogue in physical spaces or consultation platforms, she proposed that games may serve as digital public spheres, capable of engaging large and often hard-to-reach populations.

Through research undertaken in the BRAVE project and the "Play to Act" initiative, her team explored how games can integrate light-touch civic prompts. One such example reached over 934,000 players in 228 countries and territories, including users in politically restricted settings. These prompts, embedded subtly into gameplay, invited players to express views—for example, by participating in a climate policy survey. While these engagements were ambient and non-intrusive, they revealed significant public sentiment. Such signals, Rebecca explained, matter precisely because they are accessible, optional, and feel safer to users than formal platforms.

Yet, this development presents urgent questions. If games are becoming de facto civic spaces, what responsibilities should they carry? Without calling for regulation, Harris suggested it is time to treat digital play spaces as civic infrastructure. This includes considerations around legitimacy, civic design, and governance of the data they generate.

She issued a caution, however: a click or a tap during gameplay is not automatically a form of civic participation. One of the key risks is mistaking presence for genuine engagement. Players answering a policy prompt may not identify the interaction as political, and civic legitimacy demands more than mere numbers—it requires intent, understanding, and feedback. Many policymakers interpret digital interaction too generously, risking distorted conclusions about public sentiment.

To address this, she posed two questions for policymakers: how can we design for deeper engagement while respecting the nature of play? And how can we distinguish meaningful civic input from mere background activity?

To advance these ideas, Harris introduced the DIBBL framework—Dynamic-Based Learning—a model her team is developing to support structured, reflective engagement in games. Unlike simple surveys, DIBBL games introduce real-world dilemmas, value conflicts, and the opportunity for deliberation.

She illustrated this through three case studies. In the UK, a game developed with Waterwise encouraged households to explore various water-saving behaviours, prompting reflection on fairness and responsibility. In Vienna, a mobile game engaged over 300 students in discussions about green jobs—bringing youth into employment policy deliberation in a way that was both scalable and inclusive. In Cyprus, a serious game was co-designed to explore rooftop greening in urban areas, with 97 participants role-playing various stakeholders in live sessions. The game not only provided insights for policy but also demonstrated to urban planners how participatory game design could be used in planning processes.

From these examples, Rebecca drew three core design lessons: games should be designed with communities, not just for them; feedback loops must be transparent so that players know how their input is used; and a range of participation levels should be made available, from brief interactions to deeper, structured engagement. She emphasised that effective civic design must respect player autonomy while creating the opportunity for reflective involvement.

Rebecca concluded by urging policymakers to treat digital platforms not as commercial entertainment venues but as civic infrastructure. To build democratic resilience in a digital age, we must go beyond data collection and actively cultivate meaningful public voice. Games, she stressed, are not a substitute for democratic institutions—but they are already an integral part of democratic life, especially for those disengaged from traditional forms of participation. Ignoring this reality would be a missed opportunity, if not a warning.

2.3. **Lars Hård, Oxide.AI:** Discoverability: Why search engines and platforms don't work for the players nor the developers

Lars Hård brought the first session to a close with a presentation from a business and technological perspective, focused on the deep structural problems surrounding discoverability in the games industry. A former game developer for the Commodore 64 who later transitioned into artificial intelligence and data science, Hård drew on decades of experience to frame the challenges facing developers and audiences today.

He began by describing the severe limits of current discovery mechanisms. In earlier days, search engines offered relatively neutral access to information. However, the rise of SEO manipulation, predictive analytics and advertising-driven incentives has rendered modern search increasingly opaque. Platforms such as Google, with their complex and proprietary ranking algorithms, now operate as black boxes that often prioritise monetisation over relevance.

This problem is compounded by social media, which, while prevalent in games marketing, tends to trap users within algorithmically curated bubbles rather than exposing them to new or diverse content. Even more concerning, Lars argued, is the rapid rise of AI-driven chat interfaces. These systems scrape vast quantities of data and apply machine learning models that flatten differences and prioritise the average. The result is a dilution of originality, as AI-generated outputs tend to normalise rather than celebrate diversity. He warned that such systems pose a serious threat to creative discoverability.
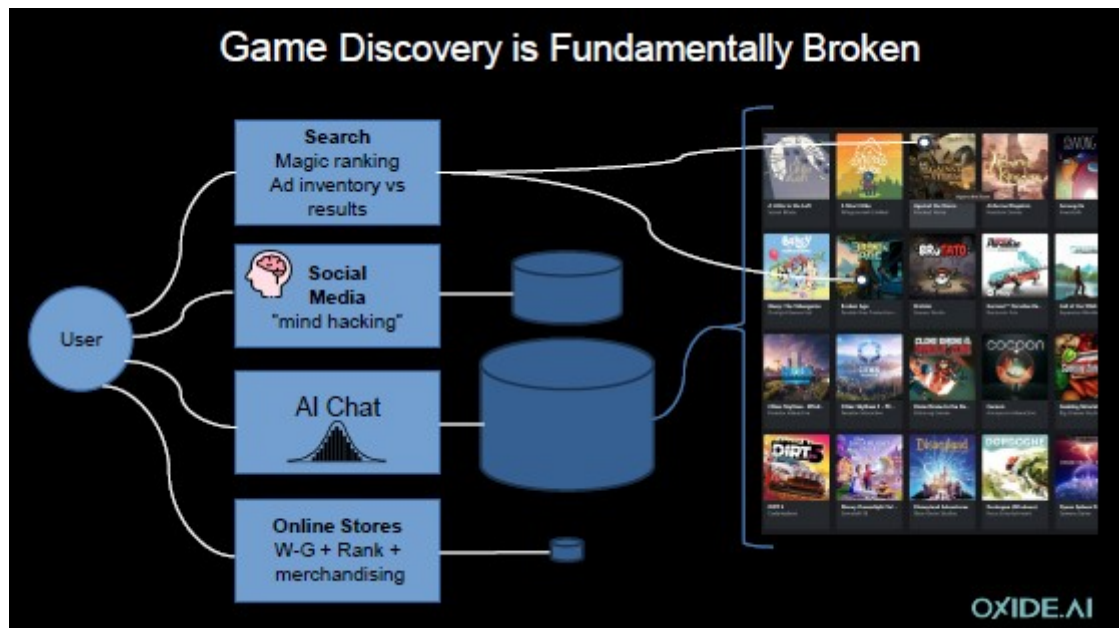
Online stores, often viewed as primary marketplaces for games, are similarly flawed. Most operate as walled gardens with their own proprietary algorithms. Their logic is typically driven by merchandising rather than merit or innovation. As a result, visibility and revenue are increasingly concentrated among a small number of titles, with the rest languishing in obscurity.

Lars then introduced the concept of the long tail—a market structure in which a few top titles dominate the majority of revenue while the vast remainder go largely unnoticed. Drawing on his tenure as Director of Data Science at eBay, he noted that this phenomenon is common across industries but is being rapidly exacerbated in games by AI-enabled content production. AI can now replicate successful game models at scale, increasing content volume and further diluting discoverability. According to recent industry figures, 90% of revenue is concentrated in as few as 135 titles—a deeply unsustainable dynamic.

Despite this bleak outlook, Lars argued that AI can also be part of the solution. Instead of centralised, opaque platforms controlling discovery, we could envision systems where individuals use AI as personal assistants to help them find content according to their own preferences and values. For this to work, developers would need new tools to describe their games more richly and meaningfully. Likewise, discovery infrastructure would need to be rebuilt around the needs of users, not the incentives of platforms.

He emphasised that achieving this transformation would require substantial investment and policy support. It would also require cultural change within the AI and game development communities. The promise, however, is significant: greater diversity, restored visibility for smaller studios, and a healthier creative ecosystem.

Lars concluded by warning that if these issues are not addressed, the games industry risks becoming not only financially exclusionary but also creatively hollow. He issued an invitation to attend his extended session on Thursday, where he would explore these issues—and potential solutions—in greater technical detail.

2.4. **Kristian Roberts, Nordicity:** Exploring the market failure around vertical slices: How governments can support self-publishing and support sustainable companies

Kristian, a Canadian economist specialising in the video games industry, delivered a presentation focused on the systemic challenges facing independent developers in the current climate, especially regarding **self-publishing** and **market visibility**. Speaking informally and with a touch of humour, he began by acknowledging some technical difficulties with his slides, describing his visual material as an "impressionistic modern artwork" due to formatting issues.
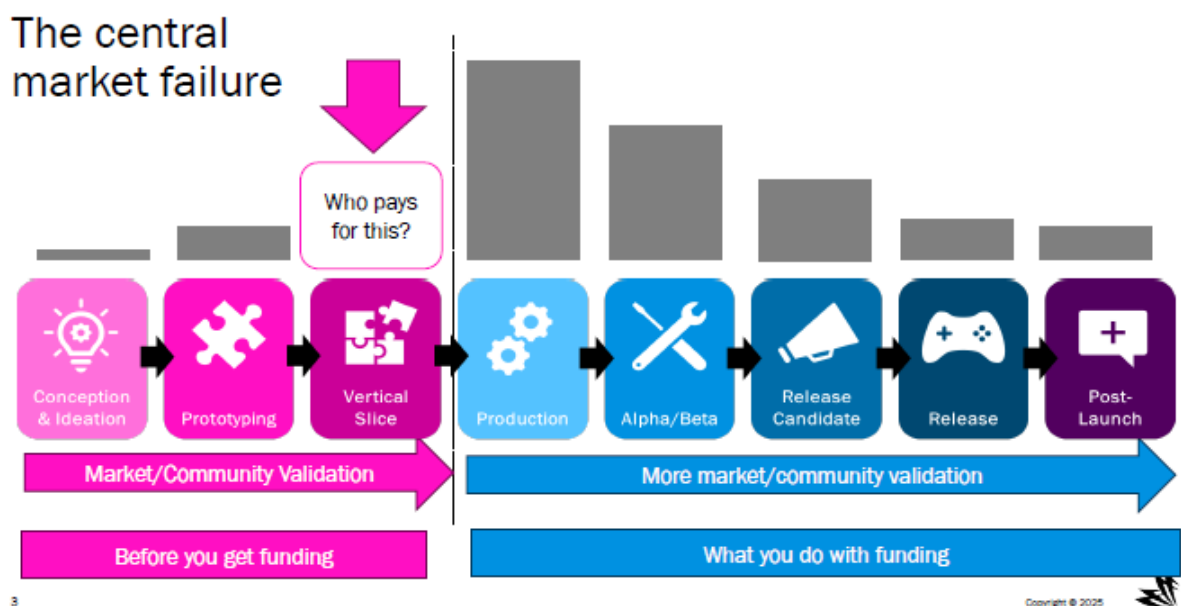
Kristian opened by contextualising the broader economic conditions under which game developers now operate. Venture capital investment in games saw a surge during the COVID-19 pandemic but has since returned to pre-pandemic levels—around $1.5 billion annually. At the same time, the number of games released on Steam has more than doubled over the last seven years. This oversaturation means that each new release competes not only with contemporaries, but with all titles still active on the platform. Concurrently, the cost of labour in the sector has risen significantly—by approximately 43% over the same period.

These three intersecting trends—reduced investment, increased competition, and higher costs—have created a challenging environment for developers seeking to reach audiences. Moreover, the so-called "democratisation" of development (with more global studios creating more games) only intensifies the challenge of discovery. Developers are not only competing with their local peers but with an ever-expanding international pool of titles.

Kristian then turned to the rise of **self-publishing** as both a necessity and a symptom of this market condition. He explained that while games used to be evaluated primarily as products, the real bottleneck now lies in **marketing**—not production. In this new landscape, it is not enough to develop a quality game; developers must also generate **community validation** and demonstrate **market potential** before they can attract funding or secure distribution. This requires skills in community management and communications, which many independent developers neither possess nor can afford.

He identified this as a **policy failure**: developers must now fund and manage complex marketing operations well before any revenue is generated, yet public support mechanisms often ignore this

critical phase. The essential question becomes: **who pays for early-stage audience development**? Without structural support, developers face significant barriers even in proving their game's market relevance.

To illustrate this point, Kristian outlined a simplified chart of game production costs, where the early stages—traditionally supported by public funding or publishers—now also demand pre-emptive marketing spend to secure further backing. The crux of his argument was clear: **marketing is now the primary risk developers must mitigate**, and existing support mechanisms are not keeping pace with this reality.

Kristian concluded with a brief overview of best practices and common missteps in games funding policy. He advised against treating marketing as an afterthought or funding prototypes without mechanisms to support market validation. He emphasised that public programmes—whether focused on culture, innovation, or business—must prioritise **audience reach**. Without an audience, games cannot fulfil any cultural or economic ambition.

Finally, he cautioned that while his insights reflect the general state of the industry, local contexts may differ. Policies must be tailored to the specific strengths and weaknesses of regional ecosystems. For some, the problem may indeed lie in production or innovation, but in most cases, the **real barrier to success is market visibility**.

Kristian ended with a wry remark: his presentation, in its condensed and average form, might well have been delivered by an AI—but it remains a valuable starting point for deeper discussion.

2.5. Open Discussion: European Games Ecosystem and Discoverability Challenges

The open discussion session commenced with a light-hearted but pertinent observation about the changing global dynamics, noting the shift from Europeans resisting Canadian input in gaming policy to now recognising common challenges and allies. This change in tone set the stage for a rich and engaging conversation on policy, discoverability, and the state of the European games industry.

The first speaker introduced himself as a political scientist with a background in game economics and game communication. He described his company's dual focus: developing games (including those for public institutions and advertising) and conducting market research. He stressed the importance of building a European-level ecosystem, particularly in light of global challenges. He highlighted the need to shape a European games market that reflects and promotes shared values.

Following this, a participant raised a question regarding discoverability tools and their potential to become gatekeepers or black boxes. The concern was whether tools designed to assist users might end up manipulating them or distancing developers from players. The response emphasised the role of architecture and user-centric data ownership. Rather than controlling information, the aim is to empower creators to describe their games in detail, allowing AI tools to facilitate meaningful and personalised discovery. The speaker argued that by restoring control to developers over how their work is described, manipulation is minimised and users are better served.

A representative from the European Commission then offered several reflections. He noted the extreme concentration of player time on just a few games, with 85% of playtime centred on six titles. He referenced ongoing reflections on discoverability and user acquisition at the European level and the possibility of future funding to support these challenges. The idea of branding games as "European" was tested in a recent large-scale survey, but results indicated this label alone did not increase consumer interest. Despite this, the Commission remains open to exploring new strategies in collaboration with industry stakeholders.

A question was then raised about how governments can develop the industry expertise needed to craft effective support programmes. The answer, coming from a Canadian perspective, was pragmatic: hire people from the industry. Funding initiatives are only as good as the people running them. He emphasised the importance of meaningful engagement with game developers and the risk of programmes failing if managed by those with backgrounds in unrelated sectors like film or accounting.

Another intervention focused on the assumption that the primary role of government should be financial support for the industry. It was argued that cultural sovereignty and national identity are also legitimate policy goals. In this view, market fit might be secondary to cultural expression, complicating the narrative that all support should be justified in economic terms.

The moderator then posed a provocative question: has the decline in interest in narrative games been driven by a backlash against perceived "woke" content? The response suggested that this was not the case. Culturally rich, narrative-heavy European games continue to find success. However, the broader ecosystem has changed, particularly with the influence of AI-driven discoverability and social platforms shaping younger players' tastes. The path from childhood gaming experiences to adult preferences now tends to bypass traditional narrative games.

This led to further reflections on how recommendation systems, AI, and influencers affect game discovery, and how platforms like TikTok are overtaking traditional search engines in importance. The conversation turned towards the implications of these trends for how games are marketed, experienced, and even created.

The European Commission representative again stressed that they are working to better understand these dynamics through industry dialogue and research. Despite limited resources, they are committed to supporting the sector. It was also noted that governmental regulation continues to lag behind the realities of the industry.

Several contributors highlighted the dual nature of games as both cultural products and commercial entertainment. There was consensus that discoverability is only part of the equation. Games must also be designed with an audience in mind. Whether as a cultural work or commercial product, success relies on creators understanding and reaching their audiences.

The Swedish industry representative echoed this view, praising Europe's strength in creating globally appealing games. However, she emphasised that no matter the cultural or educational ambition, a game must be enjoyable to succeed. If a game isn't fun, it simply won't be played.

A challenge was then posed to the idea that the discoverability problem can be solved. With the flood of AI-generated content and increasing saturation, is it even necessary or desirable to produce more games? Shouldn't some games simply disappear if they fail to connect with an audience? This led to a deeper reflection on what constitutes a successful game and whether our metrics and support systems are fit for purpose.

The final stretch of discussion saw contributions on localisation and global reach. It was noted that many games at the prototype stage overlook large markets like China, which could offer significant opportunities if better supported through translation and research. Others raised the point that experience-based commerce, like TikTok Store, may reshape how games are discovered and consumed, creating further new challenges and opportunities for developers.

One speaker stressed the need for a user-centric model of discovery, one in which players define what they are seeking and AI helps them navigate towards games that resonate with their preferences. Without this, the risk is a deluge of AI-generated games that are bland, repetitive, and uninspiring, ultimately eroding the motivation to play.

In conclusion, the panellists offered brief final remarks. One highlighted the need to reconsider how we value games in a post-free-to-play world, where users are used to paying for access or cosmetic items, but not the game itself. Another emphasised that rules, if applied thoughtfully, can help create more meaningful engagement between developers and users. The Canadian speaker urged that all efforts—policy, support, AI tools—should focus on helping creators connect with their audience. Without this, hope is the only business model remaining, which is unsustainable.

The final word went to the discoverability expert, who underlined that solving the discoverability crisis is a policy issue. If we want to protect the richness and human creativity of the games industry, we must prioritise the connection between creator and audience.

The discussion closed on a hopeful note, with broad agreement that the challenges facing European game developers are substantial but not insurmountable. Cooperation between policy makers, industry, and technologists is essential if Europe is to maintain its cultural voice and competitiveness in the global games market.

The session adjourned on time, with thanks to all speakers and participants.

2.6. Conclusions

The session on the **visibility of European games in times of turmoil** generated several concrete policy recommendations, informed by economic, technological, and cultural insights. The overarching concern was how to support the discoverability, visibility and sustainability of European-made games in a saturated and increasingly politicised global market.

First, speakers repeatedly underscored the need for **tailored public support mechanisms** that address the current bottleneck in the games sector: *audience development*. Kristian Roberts highlighted that while production funding remains crucial, marketing and community validation have become the primary risk and cost factor for small and mid-sized studios. Existing funding models must therefore evolve to **include early-stage marketing, audience testing, and platform readiness** as core components, rather than afterthoughts. Without these, even culturally or technically strong games risk obscurity.
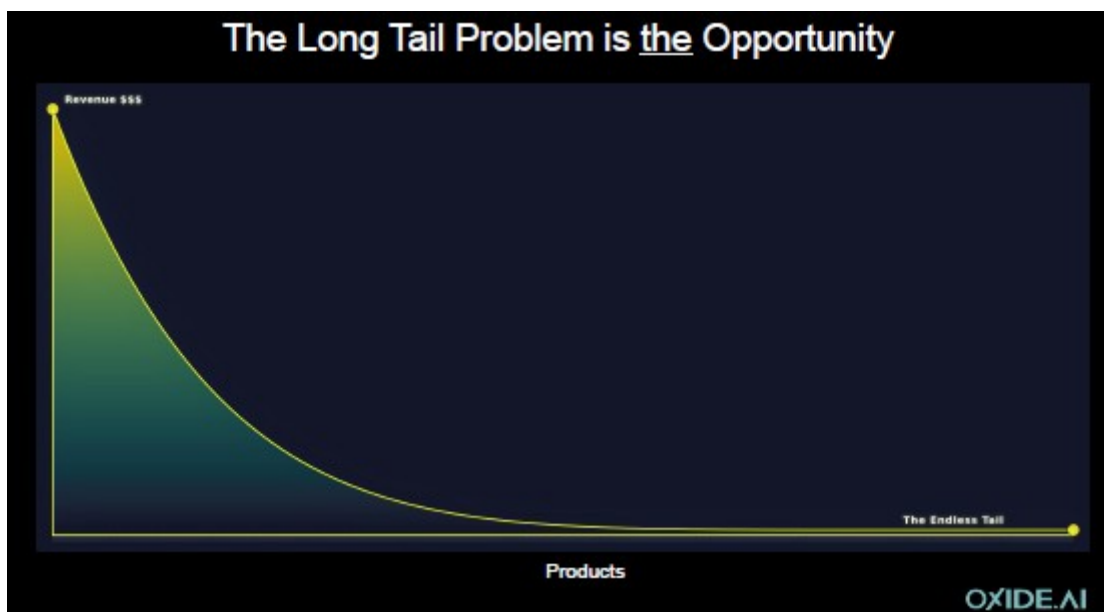
To counter the negative effects of ideological backlash and harassment—especially seen in politically charged responses to diverse representation in games—Olivier Mauco called for a **shared European response**. This includes **awareness-building campaigns**, **mental health support for developers**, and

possibly **European coordination on content moderation tools** to counter review bombing and misinformation. While not advocating for regulation, Mauco stressed the importance of providing safe, structured environments for public debate and expression within games and online communities.

Rebecca Harris proposed a reimagining of games as **digital civic spaces**, with the implication that **policymakers should begin treating games as infrastructure**—places where public opinion is formed and expressed. She recommended frameworks like DIBBL (Dynamic-Based Learning) that design games for reflective civic engagement, not just entertainment. However, she cautioned that **not all digital interaction is meaningful engagement**, and that policymakers must resist reading too much into raw metrics. Instead, **user intent, context, and feedback loops** should inform how civic participation through games is measured and valued.

Lars Hård focused on the technological architecture of discoverability, arguing that **current platforms and recommendation systems fail both users and developers**. He proposed policy incentives for **decentralised, user-controlled discovery systems**, including funding for AI tools that serve player interests rather than platform revenue. Developers, he argued, need **richer metadata and taxonomies** to describe their games—possibly supported by a European standardisation effort—which would allow better matching between games and audiences without opaque algorithmic bias.

From the open discussion, several additional recommendations emerged. One is to **build policy expertise by hiring professionals from the games industry**, avoiding the misfit of policies designed by those from unrelated sectors. Another is to **rethink success metrics**, acknowledging that visibility alone does not define a valuable game—cultural, educational, and artistic contributions must also be considered. It was also suggested that **localisation support and market intelligence**, especially for non-European regions like China or Latin America, could enhance the global reach of European titles.

Finally, there was a consensus that while AI-generated content may increase saturation, the solution is not to restrict creation but to **empower discovery**. By shifting focus from platform-driven to **user-centric discoverability**, Europe can preserve both cultural diversity and creative innovation. This calls for **cross-sector collaboration between cultural ministries, innovation bodies, and economic development agencies**, all aligned with the unique needs of the creative digital economy.

2.7. Recommendations

- **Integrate audience development into public funding schemes**
  Shift existing support beyond production to include marketing, community-building, and platform readiness, helping European studios reach their audiences effectively.

- **Support safe civic engagement through games**
  Treat games as digital civic spaces by fostering game design that encourages dialogue and critical thinking, and by offering mental health and moderation support for developers facing harassment.

- **Promote decentralised, transparent discovery systems**
  Invest in user-controlled recommendation technologies and metadata standards that allow players to find games based on personal interest rather than opaque platform algorithms.

- **Fund tools for early audience testing and feedback loops**
  Encourage iterative design and audience insight by financing tools and services that allow studios to understand user reactions before full release.

- **Enhance cross-sector collaboration and policy literacy**
  Employ experts from the games industry in policy design and ensure collaboration between cultural, technological, and economic agencies to reflect the interdisciplinary nature of games.

- **Expand localisation and market intelligence support**
  Offer resources for localisation and regional market entry, especially beyond Europe, to increase the global reach and visibility of European games.

- **Develop new success metrics beyond commercial visibility**
  Recognise cultural, educational, and artistic impact in evaluation criteria for funding and recognition programs, not just commercial performance or download numbers.

3. Session 2: Support strategies for game development in Europe

The second session was moderated by Oskar Wemmert, a seasoned game developer with over twenty-five years of experience, today advocating for game developers and public funding in Sweden. He introduced the panel and proceeded with the session format, inviting each panellist to speak for eight minutes.

3.1. **Jari-Pekka Kalevea, EGDF:** Strengthening the technological and artistic sovereignty of European game developer studios

Jari-Pekka Kaleva, Managing Director of the European Games Developer Federation (EGDF), opened the session. He explained that EGDF comprises 24 trade associations from 22 European countries, aiming to foster a digital single market for game development across Europe. Their mission, after extensive debate, focuses on creating a resilient European games ecosystem that supports artistically autonomous, cross-platform, self-publishing studios. This approach reflects a European compromise that is currently central to policy discussions in Brussels.

Jari-Pekka emphasised three core focus areas critical for strengthening European sovereignty in the games industry: access to talent, access to funding, and access to routes atop the value chain. He outlined the current debate around technological, cultural, artistic, and operational sovereignty. Regarding artistic sovereignty, he stressed the fundamental importance of intellectual property control, a longstanding issue in the industry. Maintaining control over IP allows developers to retain creative freedom over their games. Self-publishing was also highlighted as vital; controlling distribution enables studios to govern their own fate within the ecosystem.

Discoverability remains a significant challenge, with existing ad markets broken and requiring huge investments to reach audiences. Jari-Pekka suggested that platforms should at least enable users to search specifically for European games by country, although he did not favour the idea of a formal European label for games. Access to talent was another pressing concern, with the industry experiencing a long-standing shortage of skilled professionals. While the current situation has somewhat improved due to reduced turnover, there is a risk of shortages returning as the sector grows.

Funding was underscored as critical, particularly cultural funding, which supports risk-taking and innovation in games as an artistic medium. Public funding enables pioneers to push boundaries and experiment with new ideas, which is essential for the industry's creative freedom. He warned against threats from foreign actors and hate groups that could undermine this freedom.

ARTISTIC SOVEREIGNTY	TECHNOLOGICAL SOVEREIGNTY	OPERATIONAL SOVEREIGNTY
CONTROL OVER IP	ACCESS TO DATA	KNOW YOUR INVESTORS
SELF-PUBLISHING	ACCESS TO TOOLS	SHAREHOLDER AGREEMENTS
DISCOVERABILITY	ACCESS TO TALENT	
ACCESS TO TALENT	ACCESS TO FUNDING	
ASCCESS TO FUNDING		
FREEDOM OF ARTS		

On technological sovereignty, Jari-Pekka pointed out the necessity of data access for AI development, quality assurance, and player support. He noted the importance of the Digital Markets Act and related regulations in ensuring fair access to data. He also raised concerns about future access to cutting-edge AI tools, questioning whether Europe could maintain competitiveness if restricted from such technologies or if other regions develop superior tools.

Operational sovereignty was the final theme, focusing on the fact that much of Europe's games industry is owned by companies based outside Europe. This raises risks, especially given the increasing national government scrutiny of these companies' activities in countries like China and the United States. European studios must be empowered to uphold European values such as diversity and inclusion while negotiating with investors. Jari-Pekka emphasised the importance of knowing the origins of investment funds and advised caution with politically or ethically risky capital sources. He concluded by highlighting the need for strong shareholder agreements that maximise operational freedom for European creators.

3.2. **Björn Flintberg, RISE:** How to Tap into Public Funding Without Selling Your Soul

Following Jari-Pekka, Björn Flintberg from the Research Institute of Sweden (RISE) spoke, joined by his colleague Gabriella Kalteneckar. RISE is a government-owned research organisation supporting Swedish industries to remain globally competitive, akin to Germany's Fraunhofer Institute. Björn and Gabriella have focused on the video games sector for the past three to four years, seeking to foster interconnectivity among Swedish game clusters, liaise with government agencies, and produce research publications on the industry.

The paradox of innovation in Games

Entertainment / Innovation?

• Public funding still favors "serious" over "fun."

• Entertainment games are often excluded despite tech and export value except in specific funding spaces.

• Researchers and studios must often twist their vision to fit policy expectations to tap into this money.

Question:
How can strategic adaption be a door-opener instead of a sell-out and what does it do to games legitimacy?
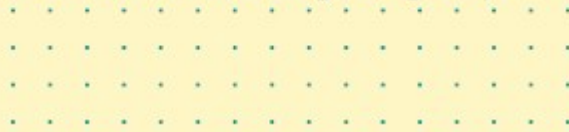
Björn addressed the challenge of securing public funding for games without compromising creative integrity. He acknowledged a persistent misconception that educational or 'serious' games cannot also be engaging or artistic, which has historically limited direct research funding for game development. Instead, funding was often accessible only when games were tied to other sectors like health or climate change. He questioned why, despite the game industry's proven innovation in technology and creativity, funding bodies still struggle to treat games as a natural partner alongside AI, VR, and deep tech.

Björn pointed out the existence of 'game tech' companies—consultancies rooted in the gaming industry—that work beyond traditional game development. He suggested that more could be done to tap into funding streams intended for technology innovation while preserving the unique creative identity of games. He urged developers not to 'sell their soul' by diluting their creative vision merely to secure funding, but rather to find ways to align their projects with funding calls tactically. Effective storytelling and clear framing of a game's value can open doors, especially when supported by data or research.

He highlighted the importance of collaboration within industry networks, clusters, and academic institutions to navigate funding processes, especially for smaller studios that may lack the resources or expertise. Björn also noted that sometimes only a specific element of a game—such as its approach to intellectual property or community engagement—may fit the criteria for certain funding opportunities.

He lamented that, although games are increasingly recognised as a cultural and creative phenomenon at the European level, they remain somewhat marginalised in technology-focused funding spaces. Games, he argued, are more than products: they are also methods for problem-solving through creative frameworks, with potential applications across various complex domains.

As an example, Björn cited the Swedish game "Bumi: Next Stop Earth," which deals with climate awareness and environmental restoration. The game demonstrates how serious themes can be effectively integrated into engaging gameplay without sacrificing artistic ambition. He also referenced a recent report produced with his colleague Marlene, highlighting similar examples.

Björn concluded by encouraging a broadening of horizons to access tech-related funding, stressing the value of games as a tool for innovation and communication.

3.3. **Kati Uusi-Rauva, Director EIT Culture & Creativity North:** EIT Culture & Creativity, the pan-European innovation support: how to best serve the whole ecosystem while serving individual industries and companies

The session was introduced by Kati, who began by sharing her background as a cultural anthropologist and her early career experience as a game's producer in the late 1990s, at a time when mobile gaming concepts were being tested long before the advent of modern smartphones or proper mobile devices such as Palm Pilots. Although she has spent the last twenty-five years working primarily in broader business support roles for creative industries, games have always held a special place in her heart.
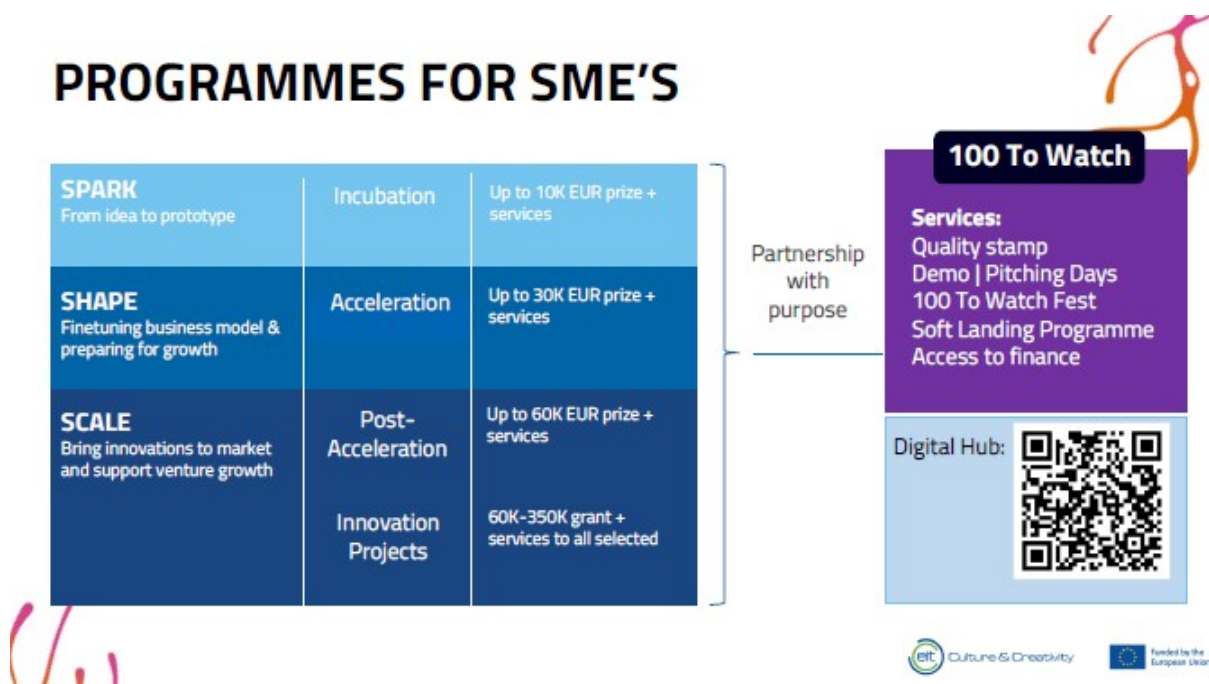
Kati currently leads the Northern Office of EIT Culture and Creativity, a newly established initiative aimed at supporting creative industries across Europe through business creation, innovation, and skills development. She outlined the mission of the initiative, which is to enhance the competitiveness of Europe's cultural and creative sectors at a continental level by building a comprehensive ecosystem that spans multiple countries. This involves not only fostering collaboration and innovation but also gathering, analysing, and sharing information and data produced by the various creative sectors throughout Europe to better understand the ecosystem.

Kati explained that the initiative's timeframe is ambitious, with a vision extending over seven plus seven years, having just entered its first year following the initial grant awarded last December. She acknowledged the significant challenges ahead but expressed optimism about the programme's potential impact. The goal is not simply to create more data but to understand and map the existing creative industries across Europe in a way that supports sustainable livelihood building and business development.

One key focus is broadening the understanding of innovation within the creative industries. Kati emphasised that innovation in this context is not always technology-driven; it can involve new business models, monetisation strategies, or content-related approaches that do not directly involve content production itself. She noted that EIT's role is to support the surrounding ecosystem of creative industries rather than direct content creation.

Kati reflected on her experience, admitting that working with EIT, which traditionally focuses on sectors such as health, logistics, and energy, has required her to step back and rethink what innovation means within cultural and creative fields. She invited feedback and open discussion as the initiative

continues to launch and test its services, recognising that this is the first time such a comprehensive programme is being attempted for Europe's creative sectors.

Cultural and societal impact, she pointed out, is deeply intertwined with creative industries. Games and other creative outputs have the potential to positively transform communities and society at large, though they can also present disruptive challenges. The EIT Culture and Creativity programme is striving to build a unique community and ecosystem, leveraging a growing partner network as its key asset.

Alongside ecosystem building, the initiative supports innovation projects for companies and consortia, co-funds university activities focused on skills development, and actively engages with European-level policy discussions. Collaboration with other programmes such as the New European Bauhaus and other EIT knowledge and innovation communities is also underway, with a view to deepening these partnerships over time.

Kati then described the five priority industry areas currently targeted by the initiative: games, fashion and textiles, cultural heritage, audiovisual media (including music), and architecture. She noted the wide variation in dynamics among these sectors and the challenge in understanding their distinct needs at both national and European levels. The list of industries is expected to evolve, with further sectors likely to be added in future, such as design.

She highlighted the inclusion of the European Games Developer Federation as a strategic partner, underscoring the initiative's commitment to maintaining direct dialogue with industry practitioners to ensure services are grounded in the realities of the field.

To support companies, EIT Culture and Creativity has developed an incubation, acceleration, and post-acceleration programme. While the initiative directly manages some aspects, particularly acceleration stages, it also seeks to collaborate with industry-specific incubators at the grassroots level to refine and expand business creation methodologies across Europe.

As a practical resource, Kati encouraged attendees to join the initiative's digital hub, which is open and free to anyone interested in following the latest developments and networking opportunities within EIT Culture and Creativity.

In closing, Kati expressed a deep appreciation for Europe's rich cultural diversity and heritage, underscoring its importance as an asset to be cherished and supported. She reiterated the initiative's commitment to nurturing this diversity as it builds and strengthens the continent's creative industries.

3.4. **Thierry Baujard, Spielfabrique UG:** Why we need this vision in the European Eco system: Co-production model / Public funds disparities across Europe / Platform levy / Sustainability criteria in public funding

Thierry Baujard, co-founder of Spielfabrique UG, opened by greeting the audience and noting his familiarity with many attendees. He provided a brief introduction to his organisation, which has been active for around eight to nine years, operating from Düsseldorf and Berlin but working across Europe and beyond. Spielfabrique specialises in professionalisation programmes for independent game studios throughout Europe. One of their flagship initiatives is the EVA acceleration programme, run in partnership with Arctic Game and supported by the European Commission. Each year, the programme admits approximately twenty to twenty-five studios; in 2025, it included twenty-one studios from fourteen countries, all participating in a six-month acceleration course.
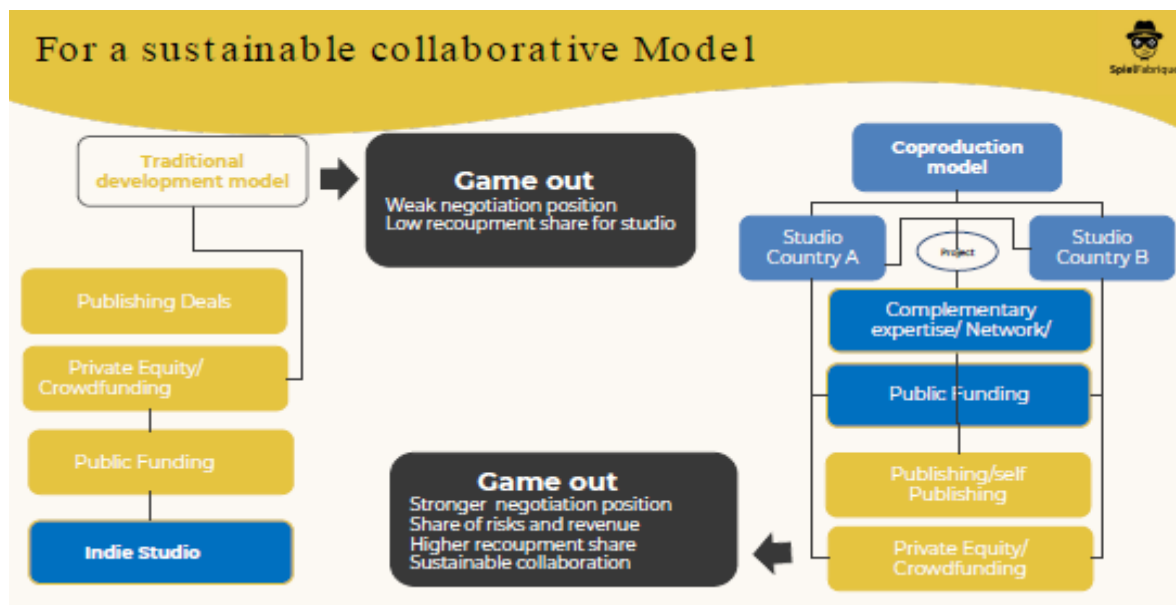
Thierry further explained that Spielfabrique hosts a range of initiatives across Europe, including a co-production market, which he intended to focus on during this session. Beyond gaming, the organisation is increasingly involved in cross-sectoral projects, fostering collaborations between gaming and other creative industries such as music, literature, and film. He cited partnerships with Europe's largest book fairs in Frankfurt and Bologna to promote the intersection of games and literature, as well as projects with film producers venturing into games. One notable project, Kino Games, supported by the European Commission, explores the concept of playing games in cinemas. This initiative currently operates in six cinemas across Europe and includes testing various business models alongside a film festival. Such projects exemplify the growing need for collaboration within gaming and between gaming and other cultural sectors, given the increasing complexity and competitiveness of markets.

Thierry stressed that today's focus was on the co-production model within the European game industry, a topic of rising interest, particularly from smaller countries. He recounted a recent engaging panel discussion on co-production held in Strasbourg, which attracted significant attention.

He then outlined the different types of financing available to game studios, depicted on a slide: sales revenue, revenue sharing with publishers, public subsidies, private equity, and debt. He pointed out that obtaining debt financing remains exceptionally difficult for gaming companies, with few banks willing to invest, and that venture capital is similarly challenging to access.

Thierry shared a map developed for the European Observatory, illustrating the availability and diversity of public funding across European countries. Countries coloured green offer well-developed, diverse public funding, while many others—depicted in blue or grey—lack public financial support altogether. This disparity poses a serious challenge for studios, particularly those in countries without such funding schemes, making it extremely difficult to develop prototypes or initiate projects. He gave Sweden as an example of a country with significant funding gaps, despite being a strong game development nation.

Public support for video game development in Europe – different levels of pub policies
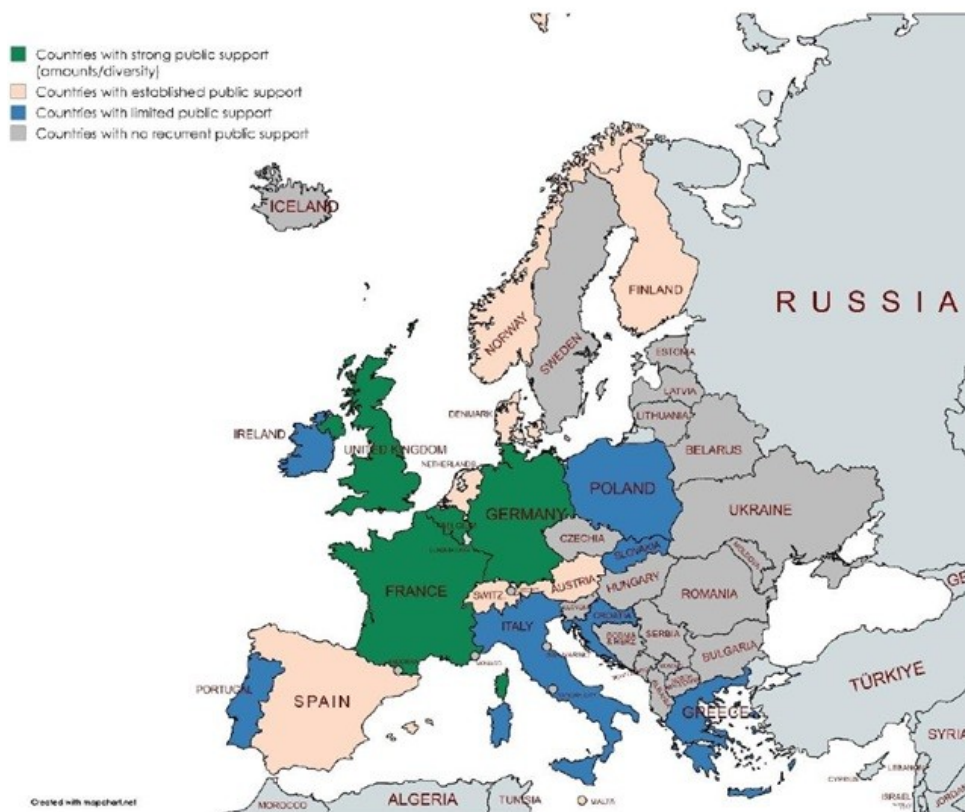
The co-production model, Thierry explained, is essentially a framework whereby multiple studios collaborate to share risks and revenues, work complementarily by pooling expertise and networks, and potentially access different sources of public funding across countries. While the term "co-production" may be misleading—since "co-development" means something different—no better term has been found despite seven years of discussion. The model is intended to provide studios with greater negotiating power when seeking finance from publishers or private investors and to foster sustainable collaborations beyond one-off projects. The aim is to move towards longer-term, resilient partnerships that can weather the increasing competition in a market crowded with new studios and self-published games.

Thierry acknowledged that implementing co-production is challenging, despite support from organisations like CNC in France and Arte in Strasbourg. While some collaborations have been successful, the overall process remains difficult. Nonetheless, he remains convinced that co-production offers a promising path for studios to grow, complement each other's strengths, and secure a stronger market position.

He concluded by highlighting the lack of awareness among studios about funding options beyond their local subsidies. To address this, Spielfabrique developed Indieplaza, a flexible, European Commission-supported database that maps available funding schemes across countries, allowing studios to compare and identify potential sources. Despite considerable interest, many studios still do not actively track funding opportunities outside their home countries, and attendance at funding-focused panels is often low.

To encourage wider use, Indieplaza launched a modest subscription model in January, charging just €15 per year to maintain accessibility. The database currently lists approximately 200 funding options

and continues to be updated regularly. Thierry invited attendees to consider subscribing, emphasising the value of the resource.

3.5. **Malte Behrmann, Game Farm GmbH:** Direct public funding vs. Tax incentives & resilience: Connecting the European Gamer with the European Developer
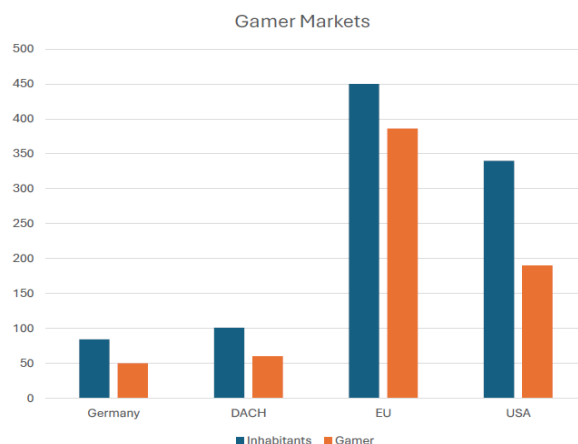
Malte Behrmann of Game Farm GmbH began his session by admitting that, although acting as a moderator, he is quite opinionated and intended to use this opportunity to express his views freely during the limited time available.

He focused on two major topics currently under debate, particularly in Germany but with relevance across Europe: the merits and drawbacks of direct public funding for game developers compared with tax incentives. He observed that the German discussion in many ways reflects broader European concerns.

Regarding direct public funding, Malte explained that this model involves giving money directly to developers. This approach allows for tailored support to specific projects and is often accompanied by project management structures and public oversight mechanisms, which help ensure that funds are used appropriately. It also potentially encourages intellectual property (IP) creation by providing bonuses or additional funding to studios that generate valuable IP, an approach common in research funding.

However, he noted significant downsides. One problem evident in Germany's public funding scheme, initiated in early 2019 and currently disbursing around €50 million annually, is the emergence of a "taker" mentality among some developers. These studios move from one funded project to the next without necessarily striving for market success or engaging with players, which limits the funding's broader market impact. The subsidy logic tends to encourage budgeting based on available subsidies rather than market viability, which restricts the overall effectiveness of the investment.

Malte then turned to the tax incentive model, contrasting it with direct funding. Unlike direct grants, tax incentives provide financial relief to investors rather than directly to developers. This model is easier to administer and reduces government oversight but requires developers to front the money

themselves and then receive tax relief retrospectively. This up-front financial requirement poses a significant barrier, especially for smaller studios or those without substantial capital.

Another challenge with tax incentives is the reduced control over project execution, especially in international co-productions where coordinating accountability is more complex. While tax incentives promote greater entrepreneurial responsibility—developers must succeed or face financial difficulties—there are notable disadvantages. Relief only applies to taxable income, excluding many smaller or early-stage developers who operate at a loss and therefore cannot benefit. This limitation excludes a significant portion of the industry from accessing support.

Malte also raised concerns about the high potential for abuse and fraud within tax incentive schemes, particularly in cross-border co-productions with countries like Canada. He described scenarios where multiple jurisdictions offer overlapping tax credits, leading to situations where the total tax relief exceeds the original investment. Fraudulent claims often emerge only years later during tax declarations, long after projects have concluded, and by then enforcement and accountability are weak.

Finally, tax incentive schemes often fail to retain intellectual property within the domestic industry, with IP rights frequently transferred offshore to tax havens, undermining national cultural and economic benefits. This is a well-documented issue in Canada's system and a cautionary example.

Moving on to the European market context, Malte emphasised the importance of focusing on European gamers. He disagreed with prior views that downplayed the need to connect European producers and gamers directly. Instead, he argued for more measures to improve the placement, availability, and cultural visibility of European games to European audiences. Unlike the US market, where gamers and producers are more closely connected, Europe's fragmented market requires open distribution platforms and effective communication strategies that respect the continent's cultural diversity.

He briefly mentioned US tariffs on hardware and board games and touched on international trade theories that recognise mutual benefits for trading partners, hinting at ongoing debates about digital taxes, such as the French digital services tax, but noted time constraints prevented deeper exploration.

3.6. Open Discussion: Support strategies for game development in Europe

The session was opened with an invitation to participants to share their thoughts. The first intervention came from Aris Tufexis, representing Open Impact, a consulting company based in Italy specialising in impact assessment. Aris addressed the second and third speakers, asking if they employed any structured methodologies for assessing the impact of their products and programmes.

Aris responded first, explaining that their organisation has been conducting several pilot projects focused on societal impact and transformation initiatives. These projects often involve public decision-makers and aim to explore new methods of involving creatives in community-building and policymaking, particularly within national economic life. Aris offered to share relevant links and mentioned plans to develop a resilience plan for companies—a standardised template to help organisations in the creative and cultural sectors build sustainability and strength. This plan is intended for both commercial and publicly funded organisations. Aris acknowledged that much is still in development, with more initiatives underway.

The third speaker supplemented this by noting that their organisation does not typically develop impact studies outside of specific projects. They highlighted the broader challenge of measuring impact within the cultural and creative sectors, which differ fundamentally from traditional sectors measured by utility and output. For example, while the impact of a tool such as a hammer can be quantitatively measured, the experiential or societal impact of cultural products—such as theatre performances or video games—is far harder to assess. They argued that existing social and funding

systems are not designed to capture the true value of creative industries, making it imperative to collaborate on developing new tools that translate cultural value into measurable terms accepted by mainstream systems.

Aris reflected on this point, expressing agreement and emphasising the need to better communicate the value of creative work and foster wider appreciation of the creative industries. The possibility of future collaboration on these issues was mentioned.

The discussion then turned to the engagement of video game companies with innovation funding initiatives. It was noted that so far, participation by gaming companies in pilot accelerators has been limited, with only a handful of companies attending. Innovation calls earlier in the year attracted many applications, particularly from Nordic countries and game companies, though funding decisions were still pending. It was acknowledged that while the organisers are still learning how to best address the gaming industry's needs, opportunities exist in cross-industry collaboration and multidisciplinary innovation.

IPE, connected to this work, explained that the European Games Developer Federation (EGDF) joined the EIT Culture and Creativity initiative to lead a group focused on games. The aim is to tailor calls to industry needs and provide better advance notice for companies and educational institutions to prepare projects, thereby increasing engagement. However, they noted structural challenges within the EIT, which was originally established when the gaming industry played a much smaller role. The EIT leadership lacks representation from the games sector, resulting in games often being viewed as peripheral rather than central to EIT's mission. Efforts are ongoing to improve this situation, but it remains a gradual process.

Another speaker from Finland compared this to previous experiences with the Tekes innovation centre, emphasising that many structures are built for industries very different from creative sectors. They outlined that EIT Culture and Creativity is a European Commission-funded body run from Budapest but operated by a consortium of private companies across seven countries. This hybrid public-private arrangement presents both challenges and opportunities for cooperation and resource utilisation in ways that benefit the creative sector.

Brian from Denmark contributed by questioning why "innovation" often seems a hurdle in funding systems. He noted that developers frequently perceive innovation funding as cumbersome or restrictive. He also raised the question of why culture itself is not universally regarded as innovation, especially when some countries like France explicitly link culture to defence and sovereignty. Brian expressed hope that initiatives like EIT Culture and Creativity might expand accelerators and make innovation support more accessible.

This prompted further reflections on the structural challenges of European funding. It was highlighted that countries outside the European Union are advised not to benchmark their systems on EU funding rules because of fundamental separations between research and development (R&D) and cultural production enshrined in agreements such as the OECD's Frascati Manual. Since video games combine technological innovation, R&D, business innovation, and cultural production, existing frameworks struggle to accommodate all aspects adequately. There was a call for a renewed public support framework at the EU level that recognises global competitiveness rather than merely ensuring fair competition within the Union.

Another participant reinforced the point by contrasting the Frascati Manual, which focuses on R&D, with the Oslo Manual, which is broader and more open to different types of innovation including process and methodological innovation. They argued that European funding systems are largely built on legacy industries such as coal, steel, and manufacturing, and therefore are ill-suited to creative industries. They stressed that culture and creativity are at the heart of all innovation, and without them, other innovations would not exist.

Adding to this, a cultural researcher clarified that in cultural research, innovation is understood as an invention that is successfully adopted and used by audiences or markets. Hence, the emphasis is on innovation with impact rather than invention for its own sake, a distinction important for public funding accountability.

A Canadian participant offered a precise clarification about tax incentives for the games industry, noting the distinction between refundable and non-refundable tax credits. Most tax credits used in Canada, France, and the UK are refundable, functioning as labour cost rebates and not requiring companies to owe income tax. This contrasts with some European perceptions, particularly in Germany and Sweden, where tax credits are often understood only as deductions against owed taxes. The Canadian example illustrates how tax credits can effectively subsidise industry labour without requiring companies to be profitable or pay tax.

This provoked discussion on the cultural and systemic challenges in adopting such models in European countries. Some attendees expressed scepticism about whether cash rebates or refundable tax credits would be understood or accepted in countries like Germany or Sweden due to entrenched beliefs about taxation.

The conversation shifted to the topic of digital taxation, particularly a French initiative that sought to impose a minimum tax on large technology companies such as Google and Microsoft. Although initially passed into law in France, it was never implemented due to opposition from Germany and the UK, and broader international negotiations at the OECD level. The recent political developments in the US and ongoing trade tensions with the EU make this a continuing and complex debate. While the idea of a digital tax is supported by some as a countermeasure to US tariff politics, it faces significant pressure from American tech companies lobbying within Europe.

01	02	03	04
US Tariffs – affect mostly hardware, board games and boxed games	International trade has only winners ? Is this true ? Local production an culture	Price question is indirectly relevant – platform models	Platform: Tax inequality in EU - French model of digital tax – international minimum tax
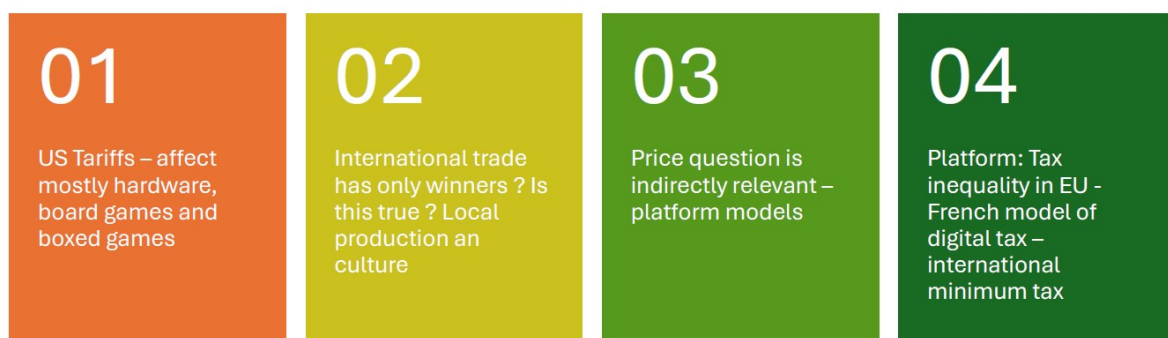
The discussion included insight into the OECD's two-pillar approach to minimum taxation, which is already partly implemented in the EU. Concerns remain about how minimum taxation frameworks might affect R&D and cultural tax breaks important to the games industry's competitiveness in Europe. The EU has developed several digital taxation models but progress depends on unanimous member state agreement. Given current trade tensions, there is a possibility the EU might adopt measures targeting US digital platforms, which would have far-reaching consequences for European game developers reliant on American cloud services and advertising networks. This presents a difficult balancing act for industry representatives in shaping policy positions.

A representative of Sweden Game Arena highlighted their work with numerous startups and addressed the challenges around funding in the gaming sector. They posed a critical question regarding the source of funding for early-stage development, specifically the vertical slice or preproduction phase. They noted the difficulty startups face in securing financing at this stage and remarked that although small policy adjustments might help, these are essentially adaptations to a fundamentally flawed system.

A subsequent speaker agreed that the system is indeed flawed but emphasised a pragmatic approach. They suggested two paths: either accept the scarcity of dedicated funding and work within the available frameworks—which are often unsuitable for early stages—or seek alternative funding avenues. They noted that some companies have succeeded in launching games without traditional funding, while others might have benefited from it. The speaker stressed the importance of not compromising the core vision of a project to fit funding models and acknowledged that only a small percentage of games might conform to existing funding structures. However, they pointed out that games hold potential beyond entertainment, such as innovations in user interfaces, community management, and technology development. They advocated partnering with institutions like science parks and universities to navigate administrative hurdles, citing an example of a game company using grant funding for crime scene simulation, which, though not a traditional game, used game engines innovatively. They also mentioned various studios that had received early-stage venture funding and underscored that successful cases help raise policymakers' awareness of the gaming industry's broader technological and cultural impact.

Another participant concurred with the systemic mismatch in funding instruments, particularly critiquing innovation funding frameworks like EIT's focus on technological readiness levels (TRLs). They explained that calls targeting TRL 6 to 9—from prototype to market readiness—can exclude creative innovations that do not fit typical tech language. They shared an example from Finland of a small-scale micro-investment model called Digi Demo, which provides modest funding (5,000–20,000 euros) for concept development and prototyping. Despite the small amounts, this approach was praised for its effectiveness in fostering early-stage innovation, giving creators confidence, and serving as a gateway to further funding or partnerships. The anecdote about a seemingly whimsical application involving birds and pigs illustrated how innovative ideas might initially be misunderstood but later recognised for their technological potential.

The discussion briefly touched on tax incentives and current economic challenges like layoffs, which present opportunities for the industry. It was also noted that the TRL framework does not align well with game development stages, as no company typically advances beyond a low stage under this model, limiting its practical use.

A question was raised by a Norwegian developer who highlighted strong public funding for games in Norway and queried the definition of "strong" public support, requesting examples. The reply acknowledged Norway's well-established system but noted recent changes and compared it with France's robust funding ecosystem. The French model was described in detail, including the role of the CNC (National Centre for Cinema and the Moving Image), which channels funds from cinema ticket taxes rather than state budgets into gaming. France also benefits from tax credits, cash rebates for smaller studios, public bank investments, and guarantee schemes that aid access to debt funding. The combination of these diverse funding sources was cited as a reason for France's strong support. It was also mentioned that funding "strength" can sometimes appear ambiguous due to varying classification colours used in analysis.

Moving towards conclusions, one speaker reflected on the administrative burdens in grant applications, comparing the gaming sector to news media, where intermediary organisations handle administration to reduce pressure on recipients. However, concerns were raised about middle actors potentially taking excessive cuts, reducing funds that reach developers. The role of large venture capital funds receiving public risk financing was also questioned, as their risk-taking may not increase and they might not focus sufficiently on gaming. Some new funds dedicated to the games industry were acknowledged, but the overall impact remains uncertain and requires careful consideration.

Another contributor discussed the idea behind acceleration programmes established years ago, aimed at selecting companies capable of accessing funding through structured projects over several months. Such programmes help identify suitable recipients and manage fund distribution effectively.

In a final round of reflections, speakers emphasised the need to persistently address funding and policy challenges from multiple perspectives. They stressed the importance of advocating for new policy initiatives and flexible funding systems that better accommodate creative industries. One noted the innovative spirit within the gaming community, especially in terms of collaboration, which is often overlooked. The dense, supportive networks found in Finland's game development scene were highlighted as a model other creative sector might emulate.

A European perspective was offered, affirming that diversity in funding instruments across EU member states fosters experimentation and innovation. Nevertheless, ongoing discussion is necessary to determine which models work best locally and what support is needed at the European level to secure technological, artistic, and operational sovereignty.

A cautionary note came from a German participant, who warned about a natural tendency for the largest recipients to dominate funding, calling for vigilance and countermeasures to ensure funds reach game developers directly rather than investors. They also underscored the need to strengthen the connection between European developers and European gamers, noting the dominance of non-European platforms like Steam and mobile app stores in distribution. The suggestion was to focus more on Europe's substantial consumer base rather than striving primarily for global markets, which is often an unrealistic and distracting policy objective. The seminar concluded with thanks to the panel for their insightful contributions and a note that further discussions would continue later in the day.

3.6. Conclusions

The session emphasized a comprehensive set of policy recommendations aimed at strengthening the European games industry by addressing sovereignty, funding, talent, market access, and regulatory frameworks. Jari-Pekka Kaleva of the European Games Developer Federation highlighted the imperative to reinforce technological and artistic sovereignty through targeted policies securing access to talent, sustainable funding, and control over intellectual property. Policies must support self-publishing capabilities to ensure developers retain control over their creations and economic destinies. To overcome discoverability challenges in fragmented digital markets, measures should encourage platform features enhancing visibility of European games by country, while balancing complexities of formal labelling systems. Furthermore, technological sovereignty requires guaranteed fair and open access to essential data and AI development tools to maintain Europe's competitive edge. Operational sovereignty concerns underline the need for regulatory frameworks scrutinizing foreign investment and enforcing shareholder protections that align with European values to safeguard independent studio operations amid geopolitical risks.

Björn Flintberg's insights stress the need for policy reforms recognizing games as innovative cultural technologies deserving public support comparable to AI and VR sectors. Funding frameworks should be recalibrated to dismantle biases marginalizing "serious" or educational games, encouraging projects that blend artistic ambition with social impact. Policymakers should facilitate multi-sector collaborations and simplify access to diverse funding streams, fostering ecosystems where creative and technological innovation coexist. Support for cluster development and academia-industry partnerships should be prioritized to help studios navigate complex funding landscapes.

Kati Uusi-Rauva highlighted the importance of policy initiatives that go beyond direct production support to nurture sustainable business models and ecosystems for cultural and creative industries. Long-term, collaborative, pan-European innovation programs should be incentivized to foster cross-border cooperation, incubation, acceleration, and skill development aligned closely with industry realities. Policies must be adaptable to sectoral diversity and incorporate stakeholder feedback to refine support mechanisms, promoting sustainable livelihoods and innovative monetization strategies.

Thierry Baujard emphasized policies encouraging cooperative studio networks that share risks, pool expertise, and improve negotiating power. Policy should address uneven distribution of public funding by promoting transparent, accessible, and cross-border financing solutions. Centralized multilingual funding databases should be supported to increase funding awareness and reduce fragmentation.

Malte Behrmann's critique revealed the necessity of nuanced policies balancing direct public funding and tax incentives. Direct funding should incentivize commercial viability and IP creation while avoiding dependency. Tax incentives require careful regulation to prevent abuses like double-dipping and offshore IP relocation. Fiscal policies must lower barriers for smaller and early-stage studios. Importantly, discussions acknowledged the complexities surrounding digital taxation—given the dominance of non-European distribution platforms and multinational tech companies, effective digital tax policies are essential to ensure fair taxation of digital revenues and to support the European creative economy sustainably.

The broader discussion exposed fundamental gaps in measuring cultural and societal impacts, suggesting policy frameworks must develop new metrics capturing creative industries' unique value beyond economic output. Innovation funding programs should be diversified and flexible to support early-stage experimentation and technological readiness.

Finally, policies should strengthen the connection between European developers and home audiences. Supporting indigenous game production through open distribution platforms and targeted communication can leverage Europe's substantial consumer base, reduce reliance on non-European platforms, and reinforce cultural visibility and economic sustainability within Europe.

In summary, effective policy requires a multi-dimensional strategy integrating funding reform, talent development, technological and operational sovereignty, market access enhancement, fair digital taxation, and impact evaluation—coordinated through pan-European collaboration and adaptive governance to nurture a resilient, innovative, and culturally vibrant European games ecosystem.

3.7. Recommendations

- **Strengthen Technological and Artistic Sovereignty**
  Secure access to talent, funding, and intellectual property rights to empower European game developers. Support self-publishing studios to maintain creative control and foster resilience within the digital single market.

- **Enhance Discoverability of European Games**
  Develop platform features allowing users to search for games by country to improve visibility in a fragmented market. Carefully assess the introduction of formal European labelling to avoid market distortion and support organic growth.

- **Recognise Games as Innovative Cultural Technologies**
  Expand public funding frameworks to include games alongside AI and VR as deserving of cultural and technological support. Promote collaboration between academia, industry clusters, and developers to encourage risk-taking and artistic innovation.

- **Build Pan-European Creative Ecosystems**
  Support initiatives that foster new business models, incubation, and skills development across borders. Forge strong partnerships with industry stakeholders to ensure programmes address the diverse needs of creative sectors.

- **Protect Operational Sovereignty in the Games Industry**
  Implement regulatory oversight on foreign investment to safeguard European studios' independence. Enforce robust shareholder agreements aligned with European cultural and geopolitical values.

- **Reform Tax Incentives and Digital Taxation**
  Adjust tax relief schemes to reduce barriers for smaller studios and prevent misuse such as overlapping credits and offshore IP transfers. Modernise digital taxation policies to ensure fair contribution from multinational platforms to Europe's creative economy.

- **Strengthen Connections Between Developers and European Audiences**
  Promote open distribution platforms and targeted communication strategies to leverage Europe's linguistic and cultural diversity. Foster greater cultural visibility and market access for indigenous game productions.

4. Session 3: European Games and the rest of the world

The session was introduced with a note on the long and intensive day of discussions, which had necessitated an extended break. The final segment was titled "Games in the Rest of the World," chosen to reflect the range of diverse perspectives and proposals it would present. The chair noted that while the day had focused primarily on policy, finance, and development frameworks, this concluding session would offer broader thematic variety.

4.1. **Johanna Nylander,** Swedish Games Industry**: Industry studies enabling by models, data and NACE-codes.**

Johanna Nylander began by referencing her earlier point in the day that games should be "fun and global", but explained that she would now turn her attention to a less glamorous, though critically important, subject: data.

She opened with a light exchange about a mix-up over which slides were to be used—highlighting the confusion between materials submitted the previous year and the current year's presentation—but quickly pivoted to her core topic.

Johanna emphasised that robust, accurate data is essential for understanding the games industry, shaping effective policy, and making strategic decisions. Without such data, others—particularly policymakers and media—may misrepresent or misconceive the realities of the industry. She offered the recent wave of media headlines concerning layoffs in the gaming sector as an example. While the headlines created an impression of contraction, her team's data in Sweden showed underlying growth in smaller companies. These nuances, she argued, can only be identified through diligent collection and analysis of industry-specific data.

She then explained the two main types of data typically gathered: survey data and public data. Survey data is useful for mapping new sectors and trends, but public data—particularly statistics derived from standardised classification codes—is what policymakers rely on most. This led into a detailed discussion of **NACE codes** (statistical classifications of economic activities in the EU), their Swedish counterpart (SNI), and the broader international system (ISIC).

For the games industry, two NACE codes are particularly relevant:

- **58.21** Publishing of computer games, which explicitly names the industry.

- **62.01** Computer programming activities, where the actual development work usually falls.

Johanna noted that the dual nature of these codes causes confusion. Game companies may also be found under other codes such as toy manufacturing (32.40), artistic creation, or IT consultancy, making accurate statistical mapping difficult. This dispersion leads policymakers to understate the scale or importance of the sector.

She recalled efforts by Swedish Games Industry, EGDF, and Video Games Europe to advocate for more precise industry coding, only to be told that the sector is too small to justify its own codes—a claim she disputed, arguing that poor data visibility creates a vicious cycle.

Johanna illustrated this with a Swedish case study: a joint report produced with the CCI (Creative and Cultural Industries) umbrella organisation, under a government mandate. The report mapped cultural and creative industries across the NACE/SNI classification system. They found these industries were fragmented across 95 out of 821 SNI codes at the fifth (most specific) statistical level, especially clustered around the fourth level—analogous to European NACE codes.

Despite this fragmentation, the report revealed that the Swedish creative and cultural industries are substantial: around **SEK 650 billion** in annual turnover (approximately **€60 billion**), comprised of **140,000 companies** and **around 250,000 employees**. This placed the sector on par with other major industries—demonstrating it is far from niche or marginal.

In concluding, Johanna stressed the urgent need for more comprehensive, accurate, and unified data collection and reporting. Only by presenting coherent, well-evidenced industry portraits can the games sector ensure informed policymaking and appropriate recognition.

During a brief exchange following the presentation, the chair clarified that Sweden's population is approximately **10 million**, with around **9,000 people** employed in the video game industry specifically. This underscored the significance of the sector within a national context.

4.2. **Andre Tiwari, Old Salt Games:** In times of war: Gamification of training for military and first responders

The session then moved to a presentation, whose slides successfully appeared after minor technical issues. Before beginning, Andre Tiwari acknowledged the late hour and thanked participants for their energy and patience. His topic focused on the **gamification of training** for military personnel and first responders.

Andre began his presentation by introducing himself as a veteran of the United States military, where he served for fifteen years both as an enlisted soldier and as an officer. His career included training as a weapons technician, firefighter, and staff planning officer. At the height of his service, he was responsible for the training and operational readiness of approximately 3,000 sailors and marines across five warships. He had taken part in deployments in both peacetime and wartime, including directing firefighting operations at sea under real conditions.

The "DICE" method of selection

Dangerous
High risk to personnel or equipment

Infrequent
Rarely occurs due to cost or risk

Critical
The skills involved are critical to the mission or role

Expensive
Costly to replicate or train traditionally

Following his military career, Andre relocated to Sweden and has since worked in the video games industry, spanning roles in AAA studios and start-ups. One of the start-ups he worked with focused on "serious games," creating simulations for training police forces in active shooter situations, preparing firefighters, simulating room-clearing operations, and even developing ethical hunting simulations for commercial use.

He addressed the audience with a powerful statement: the influence held by those working in games—particularly those involved in training and simulation—could be the deciding factor between a first responder returning home safely or not. He stressed that this was not hyperbole but a statement of fact; the tools and approaches available today could materially affect outcomes in life-or-death scenarios.

To assess whether a scenario is suitable for gamification, Andre introduced the DICE method, an acronym used to evaluate potential training applications:

> **D**angerous: Is the task hazardous to personnel or equipment?
>
> **I**nfrequent: Is it rarely practised, leading to skill decay between training sessions?
>
> **C**ritical: Is flawless performance essential every time the task is executed?
>
> **E**xpensive: Does the operation involve high-cost resources or consequences if errors occur?

If a scenario meets all four criteria, he explained, it is an ideal candidate for gamified training—both from a performance and cost-efficiency perspective. Andre focused next on the use of virtual reality (VR) and augmented reality (AR) as the most effective technologies for training under DICE conditions. He explained that these tools could "hijack the nervous system" by simulating conditions that feel physically and emotionally real. Visual and auditory inputs can rapidly trick the brain into believing it is in genuine danger, thereby inducing physiological reactions such as increased heart rate, altered breathing, and adrenaline spikes.

Once in this heightened state, the training objective becomes twofold: first, decision-making under pressure, and second, execution of complex procedural tasks in the correct sequence. These simulations can replicate the chaos and confusion of real emergencies—essential for professions such as policing, emergency medicine, firefighting, and military service, where split-second decisions are made under duress. He provided a striking example from law enforcement, where studies show that police officers miss up to 60% of shots taken at distances closer than a few metres. This counterintuitive statistic results from training that is typically conducted on calm, orderly shooting ranges, a stark contrast to the noise, confusion, and emotional stress of real encounters. Simulated environments can help bridge this gap, training officers to perform effectively while overwhelmed.

However, Andre issued an important caution: VR and AR should never be seen as holistic training solutions, but only as supplemental tools. Some critical aspects of physical experience simply cannot be replicated in digital environments. He pointed out that no-one learns to swim without entering water, and similarly, the feeling of intense heat and instinctual fear inside a burning building cannot be simulated, however advanced the technology.

He concluded by reinforcing the value of combining digital training with real-world practice and the need for careful planning and context-specific application. His presentation was warmly received.

Following his remarks, the session chair took a moment to reflect on the importance of such discussions. The inclusion of defence-related gamification topics in the seminar programme was a deliberate choice, motivated by the rapidly shifting global context. Where such discussions may have seemed remote or theoretical several years ago, they are now of immediate relevance, and the organisers felt it vital that the game development community engages with these realities.

4.3. **Emma Westerlund, Novia University of Applied Sciences:** Reimagining Education: Collaboration between the gaming industry and other sectors of society/academia/other industries, future competencies and cross-border cooperation

The final presentation in this session was delivered by Emma, who spoke from the perspective of an academic and educational designer. She began with a light-hearted reflection on her own alignment with the games industry. Though her career has been in education, she has always been drawn to breaking rules and rethinking established systems—something she now recognises as a shared trait with the gaming sector.

Her career path, driven by a desire to question conventional formats in higher education, eventually led her out of her role as a senior lecturer and into the space of educational design. In this role, she has had the freedom to experiment with new ways of delivering learning and to engage with research and development projects involving the games industry, regional development, and educational innovation.

Through this work, she observed a recurring tension in the relationship between academia and the games industry. She described it as "chilly," with mutual perceptions of the other being outdated or uncooperative. Academics, she noted, often see the games industry as stubborn and unwilling to collaborate, while industry figures view academia as slow, bureaucratic, and out of touch.

The true purpose of arts education is not necessarily to create more professional dancers or artists. It is to create more complete human beings who are critical thinkers, who have curious minds, who can lead productive lives.

Emma argued that this mutual suspicion is unnecessary and counterproductive. She called for deeper collaboration, particularly in recognising the complementary strengths of each side. Academia, she insisted, should not focus solely on technical skills but on cultivating ways of thinking—critical, adaptable, and system-level perspectives that equip students to thrive in a fast-changing industry.

She acknowledged that formal education could not keep pace with every technical requirement of the industry. Instead, universities should aim to produce capable, versatile individuals who develop specialised skills through close collaboration with industry. To do this effectively, universities need to become more flexible and student-tailored, stepping away from rigid formats and embracing diversity in how and what they teach.

Emma also pointed to a broader division in the seminar's framing—between the European centre and "the rest of the world"—and encouraged attendees to reconsider such binary distinctions. There is significant potential for international and cross-sector collaboration, and the current moment demands new ways of thinking and working together.

She invited participants to see universities not merely as traditional learning institutions, but as experimental laboratories—places where games developers and educators can jointly explore innovative ideas, supported by alternative funding models and institutional infrastructure. She encouraged dialogue, urging the audience to share their perspectives on the skill gaps they perceive in new entrants to the games industry, particularly those involving systems thinking and the "bigger picture."

Emma concluded by stressing the need for mutual change, not one-sided adaptation. Academia, in her view, must evolve to remain relevant and effective. She closed warmly, saying she hoped to make friends in the industry and to continue these important discussions beyond the seminar.

4.4. **Marléne Tamlin, Dataspelsbranschen:** Code, Children's rights, Creativity

Marléne Tamlin, Head of Sustainability at the Swedish Games Industry, opened her presentation by highlighting the broad remit of sustainability within the organisation. Her previous work has spanned a variety of issues, including diverse talent recruitment and a recent affiliate project focusing on the climate impact of the industry. Her remarks, however, focused on an upcoming initiative centred on children's rights.

UN Convention on the Rights of the Child

[...]the right of the child to rest and leisure, to engage in play and recreational activities appropriate to the age of the child and to **participate freely in cultural life and the arts**.

[...]the right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or **through any other media of the child's choice**.

Tamlin began by referencing several media headlines that have painted gaming in a negative light—claims that excessive screen time causes health issues, that gaming platforms are breeding grounds for extremist recruitment, or that gaming leads to children disengaging from school. These narratives, she argued, are deeply damaging. Not only do they dissuade parents—who are often the purchasers of games for their children—but they also risk influencing public policy and regulation.

As an example, she pointed to recent developments in Sweden, where the national curriculum has been revised in a way that effectively removes digitalisation from schools. This, she warned, poses a direct threat to future talent entering the industry, as well as to companies engaged in developing educational games. She also mentioned ongoing regulatory issues in the EU, particularly around the

Consumer Protection Cooperation (CPC) framework, as part of a broader challenge the industry must address.

To frame a constructive response, Tamlin introduced three conceptual pillars borrowed from climate discourse: footprint, handprint, and voice. She suggested that these could be applied meaningfully to the gaming sector's responsibilities with respect to children and society.

Starting with the footprint, she emphasised that the industry must recognise and minimise the risks associated with gaming. This includes ensuring age-appropriate content - supported by the PEGI rating system - and addressing concerns over excessive time or money spent in games. Parental controls exist and should be promoted more effectively, while community management plays a key role in maintaining healthy and respectful environments. The industry is already working to combat abusive behaviour and predatory activity targeting minors on gaming platforms, though more can and should be done. Sharing best practices and improving industry-wide standards are necessary steps forward.

Next, she turned to the handprint - the positive contributions games make to individuals and society. This, she noted, is often left out of the headlines. Games bring joy, relaxation, and friendship. Contrary to common concerns, most young people do not withdraw from friends to play games; they find their friends through games. The industry creates social spaces, not solitary traps. It is vital, she argued, to highlight these benefits and educate decision-makers, especially to counterbalance the prevailing discourse that frames gaming as inherently harmful or addictive. The public - and particularly parents and politicians - must be reminded that games are created for enjoyment, creativity, and connection, not as tools for exploitation.

Finally, Tamlin introduced a third and equally important dimension: voice. Here, she invoked the UN Convention on the Rights of the Child, which affirms a child's right to participate freely in cultural life and the arts, and their right to seek, receive, and impart information and ideas of all kinds, through any media of their choosing. In this context, gaming and digital participation are not merely leisure activities - they are democratic rights. Banning or restricting access to games under the guise of concern for screen time, she suggested, is often a lazy solution by adults who are unwilling to engage meaningfully with the digital lives of young people.

She challenged the simplistic demonisation of screens, proposing that such fears may serve as a convenient distraction from the real sources of anxiety among the youth—namely, climate change, war, and economic instability. Rather than confronting these weighty issues, society often prefers to shift the blame onto digital technology and restrict children's access to it.

In conclusion, Tamlin called for a balanced approach. The industry must continue to minimise its risks (footprint), celebrate and communicate its positive impact (handprint), and advocate for children's rights to participate in and express themselves through gaming (voice). Moreover, she urged the industry to explore how its platforms can support young people in articulating their own needs and perspectives. She closed her remarks by affirming the essential role of games in both cultural life and personal development, particularly for children, and the responsibility the industry has in ensuring that this role is protected and understood.

4.5. **Aris Tufexis,** Open Impact: Measuring the multidimensional cultural and social impact of games to foster inclusion, creativity, and community engagement across diverse audiences.

Aris Tufexis, representing Open Impact, a consultancy focused on impact assessment in the social and cultural sectors, delivered a compelling presentation on the evaluation of the cultural and social value

of games within the context of the European Union-funded *iGain* project under the Horizon programme.

Tufexis began by noting that his background lies somewhat outside the conventional games industry space. His work revolves around assessing the impact of public policies, particularly in the domains of welfare, education, social solidarity, and local development. He also lectures at the University of Milan-Bicocca. With this foundation, he and Open Impact are tasked with a central role in measuring the impact of games developed within the *iGain* project.

The *iGain* project brings together a consortium of diverse partners, including cultural institutions, technology developers, and researchers. Its aim is to establish a platform for **co-creation of games** that connect culture, creativity, and inclusivity. The consortium includes partners from Estonia, the Netherlands, Italy, and Greece. Cultural institutions such as museums are pivotal in this process, as they initiate and facilitate co-design sessions in which members of local communities—often from vulnerable or underrepresented groups—collaborate to create "game design documents." These are then handed to developers, who turn them into playable digital experiences.

The presentation focused on the **challenges and methodology of assessing impact** within this initiative. Tufexis emphasised the conceptual complexity of "impact", especially when dealing with **blended value**—a combination of economic, social, and environmental outcomes. To address this, Open Impact employs a methodological framework rooted in **Theory of Change** and **impact mapping**, with the objective of identifying specific outcomes in advance and tracking how well the project delivers on them.

A central premise of this assessment approach is a **deep engagement with the ecosystem**: mapping stakeholders, understanding their networks, and collaboratively defining relevant indicators of success. The assessment framework for *iGain* includes **seven main outcome areas**, **nineteen specific outcomes**, and **forty-eight indicators**. These were briefly presented and include:

- **Learning and capacity building**: Participants acquire new skills through co-design and gameplay.

- **Knowledge exchange**: Individuals and institutions from vastly different sectors connect and share ideas.

- **Network development**: Long-term collaborations are forged, with the potential to attract new funding or partnerships.

- **Collaborative development**: Institutions like museums may integrate the resulting games into their public offerings.

- **Technological innovation**: The co-design model contributes to the development of human-centred technology.

- **Social inclusiveness**: Vulnerable and marginalised groups are included directly in the creative process.

- **Community cohesion and relationships**: Games as social platforms may promote bonding, dialogue, and participation.

Tufexis underlined that while this framework is still in a **forecasting stage**—as the project is only now beginning its implementation—its ambition is not simply to prove that games can deliver impact, but to understand **how**, **when**, and **where** they do. Importantly, success is not defined by achieving every forecasted goal. Indeed, gaps or failures in expected impact are valuable findings in themselves and help inform better future policy.

From a data standpoint, the assessment will use a **multi-method approach**, incorporating qualitative interviews, surveys, database analysis, network analysis, and metrics based on key performance indicators (KPIs). This will allow the findings to be linked to broader statistical and policy frameworks—potentially feeding into official reporting mechanisms.

Ultimately, the goal of *iGain* is to provide **policy recommendations** based on empirical evidence of how games function at the intersection of cultural, social, and educational domains. Tufexis raised an important set of questions that will shape these recommendations: Can we regard games as **techno-cultural artefacts** and **social infrastructures**? Do they foster cultural innovation and cohesion? Or might they, in some contexts, contribute to isolation?

In addressing these questions, the project hopes to influence **intersectoral policy development**, creating better alignment between the game sector and other public and cultural institutions. The policy guidance will aim to address the structural barriers and gaps that have been discussed throughout the seminar—particularly those relating to inclusion, education, and social cohesion.

Tufexis closed by affirming that games hold genuine potential not only as entertainment but as tools for civic, educational, and cultural engagement. Through *iGain*, the project aspires to substantiate that claim with rigorous evidence, thoughtful design, and cross-sector collaboration.

4.6. Open Discussion Session: "Games in the Rest of the World"

The concluding session of the seminar opened with a moderated open-floor discussion, inviting reflections, comments, and questions from participants and panelists. The discussion centred around the application of games and game technologies in fields beyond entertainment, particularly in defence, simulation, training, and the broader societal implications of game design.

Timo initiated the discussion by offering a detailed overview of existing uses of gamified simulations in European security services. He delineated three tiers: gamified training sessions, scenario-based simulations, and full-scale simulators. As examples, he cited smoke diver training at Skövde University (Sweden), high-speed chase simulations for the Finnish police, and firearms training technologies. In Finland, he added, even medics in the military are now trained using gamified simulations. He mentioned the UK's "JHub" initiative (2018), a collaborative platform where 50 game

developers and 50 military specialists co-designed hijack scenario solutions. His point underscored the existing infrastructure and collaboration between defence and gaming sectors in parts of Europe.

PEGI

Violent content
Overspending time
Overspending money
Aggressivity and hate speech
Grooming and radicalization

Community and friends
Entertainment and relaxation
Development and learning

A respondent from the audience challenged the continued relevance of the term 'serious games', noting that it risks marginalising the wider cultural potential of games. Drawing a comparison with the evolution of video as a medium—from film to TikTok—the speaker argued that games, too, have evolved beyond rigid classifications. They suggested that insisting on such labels might inhibit innovation and public understanding. Instead, they advocated treating games as a broad medium, equally valid across cultural, educational, social, and entertainment functions. The speaker also cautioned against drawing parallels between entertainment games like Call of Duty and real-world military training, stressing that the two differ vastly in objectives and outcomes.

Another speaker noted that as early as 2006, experts were calling for a shift from 'serious games' to 'applied games'. They reiterated that one of the greatest emerging opportunities for individuals with game development skills lies in applying those skills to non-traditional contexts such as education, healthcare, defence, and urban planning.

Jari-Pekka remarked on the structural business differences within the games ecosystem. While entertainment and indie games follow a business-to-consumer model, applied games typically fall into business-to-business or business-to-public sector models. Health and military games, in particular, often depend on public procurement processes. He asked the panel whether they had experience navigating such bureaucratic procurement systems, especially in the military domain.

A panelist responded by acknowledging the immense difficulty of entering military procurement channels. Describing the process as a "nightmare of bureaucracy and red tape", they advised developers to partner with established organisations already embedded in the system, as this can grant access to contracts and bypass administrative bottlenecks. They noted that this convenience often comes at a cost—external organisations tend to retain a significant share of the profits in exchange for facilitating access. This led to the acknowledgement that European policymakers should be more engaged in supporting game developers in such processes.

Another audience member asked about the feasibility of incorporating haptic feedback in firefighter simulations, highlighting a limitation in current simulation fidelity. The panelist confirmed that haptics is a frequent but technically complex aspiration in simulation development. However, advances in 3D printing and prototyping are making these developments increasingly viable. They suggested that a collaborative ecosystem involving subject matter experts, hardware innovators (such as 3D printing labs), and institutions with procurement access would best facilitate progress in this area.

A cautionary note was raised regarding public sector initiatives with large technology budgets but little technical literacy. The panelist shared instances where government clients commissioned ill-conceived projects that did not align with actual technological capabilities. In one case, they even declined a contract, stating that no meaningful value could be delivered under the proposed conditions. This prompted calls for better dialogue and mutual understanding between public sector funders and tech-savvy implementers.

Another speaker reflected on their experience designing a driving simulation game. They observed that the challenge in such simulations was not mechanical but cognitive—training users to manage simultaneous streams of information under stress. The speaker broadened this reflection to a more philosophical question: What exactly are games teaching us—and our children—today? They proposed that we explore how games train consumption habits, attention patterns, and decision-making, suggesting that this area deserves deeper research, especially in light of public debates on screen time and youth behaviour.

A participant inquired about the response from Swedish authorities regarding the invocation of children's rights—specifically, the UN Convention on the Rights of the Child—in defence of digital play. Marléne Tamlin (Dataspelsbranschen) replied that there had been no formal response yet, but momentum was building. Discussions were underway with organisations such as Save the Children and UNICEF. She acknowledged that changing public and institutional perspectives would take time, but remained hopeful that a sustained effort could realign policymaking with children's right to digital culture.

A colleague added that, within the games industry, the trend towards stricter age verification measures and 'age gating' could unintentionally result in the exclusion of children from valuable cultural participation. While such measures may seem an expedient way to comply with EU consumer regulations, they risk marginalising young players. The speaker suggested that decisions about access should remain with families, not be dictated solely by regulators or developers.

There was a consensus that the definition, purpose, and reach of games are evolving rapidly—and that regulatory frameworks, public discourse, and institutional practice must keep pace. Participants called for greater collaboration across sectors, more inclusive terminology, stronger institutional support, and an increased presence of game developers in public sector procurement processes. The discussion reaffirmed the central theme of the seminar: that games are not merely cultural artefacts but also tools for education, training, communication, and societal development.

Jari-Pekka Kaleva added a brief comment emphasizing the importance of children's rights in digital spaces. He recommended looking at the EU Kids Online initiative and similar global projects, which are research-based and have developed digital rights papers. While these initiatives do not specifically target games, their frameworks and policy recommendations address many of the issues under discussion, such as whether to restrict or empower children in digital environments.

Jari-Pekka then reflected on the ongoing, long-standing dialogue among civil society, industry, and policymakers around children's rights and digital media. He noted the fragmentation in these discussions, with some groups focusing primarily on child protection and others on privacy. At the practical level, this creates challenges for the games industry, which must balance children's right to access culture with their right to privacy—a complex and difficult issue. He highlighted a recent legal design panel at the Digital Dragons conference discussing regulatory challenges in game design, stressing that constitutional theories on balancing rights are often far removed from game development realities. Kaleva encouraged projects like this one to engage deeply with these difficult questions to bring added value to the industry.

He shared his political experience, noting that individual public officials' personal opinions—often influenced by their own parenting experiences—play an outsized role in shaping gaming policies. This

personal dimension can lead to emotionally charged and unpredictable policy debates, complicating efforts to organize rational, evidence-based regulations.

Following this, another speaker described their ongoing project, which currently focuses on educating decision makers and parents through a network and an online resource called "Ask, Talk, Play." They emphasized that while their project is still small and cannot yet delve into all legal and practical details, its aim is to promote informed conversations and to gather and share guides from other organizations. Funding applications are underway to expand this work into a formal report. They stressed the need to address both the changing public opinions over time and the immediate legal practicalities.

Other participants contributed additional perspectives. One mentioned that EU institutions, supported by Video Games Europe, are conducting surveys and collecting data that have improved regulators' understanding of the gaming sector, although there is still progress to be made. Another shared an anecdote about Kino Games' initiative to host parent-child gaming sessions in cinemas, which helps parents understand their children's gaming habits.

A participant reflected on historical debates dating back to the 1980s, noting that despite repeated hearings and discussions, the industry has not evolved significantly regarding concerns about excessive consumption and the tension between free-to-play models and children's attention. They also pointed out that Europe's public sector has not invested as heavily as the U.S. in using games and simulations for public and industrial transformation, affecting market development and consumer protections.

One contributor observed that protection of minors within game policy is deeply intertwined with market power and shares, making it a complex field influenced by multiple interests beyond just child protection. Another participant highlighted the need to better connect game policy with adjacent cultural sectors, particularly museums, which already address many overlapping themes like education, social impact, and digital engagement. This cross-sector collaboration is seen as a valuable area for growth.

Emma, representing academia, explained that her institution has been collaborating with the game industry for over a decade, acting as a "playground" for experimentation and development. She noted a general fear among academics when working with industry experts, stemming from a sense of knowledge imbalance. However, she emphasized that collaboration is improving, especially in Nordic countries, where relationships between universities and developers are relatively strong compared to the rest of Europe.

The session concluded with closing remarks from several panellists. They underscored the importance of data-driven policymaking, the need for continuous measurement and evaluation, and the ongoing effort to foster dialogue between academia, industry, policymakers, and civil society. There was a call to rethink educational approaches and to engage openly in rebuilding education systems with input from the games sector. Panellists expressed gratitude for the opportunity to discuss these complex issues and the hope to continue collaboration in future events.

Finally, a representative from the European Commission thanked the organizers and participants. They noted that the Commission values reports and dialogue from the industry, as these improve understanding and enable more informed policymaking. They reiterated the importance of data and expressed openness to continuing discussions during the conference mingle.

4.7 Conclusions

The presentations by Johanna Nylander, Andre Tiwari, and Emma Westerlund offer a compelling case for more intelligent, responsive, and integrated policy approaches to the evolving games industry. A

common thread across their contributions is the urgent need to refine how the sector is understood and supported—both statistically and institutionally—across Europe.

Johanna Nylander underscored the fundamental importance of robust and accurate data. Without better tools for mapping the sector—particularly through more appropriate NACE and national classification codes—the games industry risks being misrepresented or marginalised in policymaking. She highlighted how current data systems fail to capture the true scale and diversity of the sector, citing Swedish examples where game companies are scattered across more than 90 classification codes. This lack of visibility not only distorts public perception but also leads to underinvestment and weak policy responses. Johanna advocated for a coherent European approach to data collection, including standardised survey methodologies and public statistics tailored to the creative digital economy.

Andre Tiwari brought a different yet deeply complementary perspective. Drawing on his military experience, he presented the case for recognising 'serious games'—especially those used in simulation training for first responders and defence personnel—as vital components of public infrastructure. He argued convincingly that when training scenarios are dangerous, infrequent, critical, and expensive, gamified simulations offer unparalleled benefits. Tools such as virtual and augmented reality can safely mimic high-stress environments and improve decision-making under pressure. However, he warned that digital training must supplement, not replace, real-world experience. This points to a policy need for targeted investment in blended learning environments, ethical standards for simulation use, and public-private partnerships in crisis preparedness.

Emma Westerlund addressed a different but equally significant dimension: the strained relationship between academia and the games industry. She called for a mutual reimagining of roles, suggesting that universities can become agile experimental spaces if supported by suitable policies and funding models. Instead of mirroring industry's every technical demand, higher education should cultivate systems thinking, adaptability, and collaborative capacities in students—qualities that will remain valuable amid ongoing change. She urged policymakers to see beyond traditional sector boundaries and encourage cross-sector collaboration, especially in light of global challenges that require more integrated responses.

Taken together, these contributions point towards a policy landscape that is overdue for modernisation. There is a pressing need for better data, more flexible education models, and a broader recognition of the games industry's civic, cultural, and economic significance. European and national institutions would do well to engage with these insights as they consider how to support an industry that not only entertains, but also educates, trains, and innovates in critical areas of public life.

The seminar continued with a rich and multifaceted exploration of the broader social and cultural impact of games, with speakers highlighting both current challenges and forward-looking initiatives. Marléne Tamlin from the Swedish Games Industry discussed the sector's evolving approach to sustainability, now encompassing children's rights as a core concern. She criticised negative media portrayals of gaming that influence parents and policymakers, warning of their long-term effects, such as Sweden's recent curriculum changes that downplay digital education. Marléne proposed a framework based on the concepts of footprint, handprint, and voice to rethink gaming's role in society. While the industry must mitigate risks such as age-inappropriate content and excessive gaming (the "footprint"), it should also champion the benefits games bring in terms of joy, social interaction, and creativity (the "handprint"). Most importantly, she called for recognition of children's rights to digital participation, invoking the UN Convention on the Rights of the Child, and critiqued the tendency to scapegoat screens rather than addressing deeper societal anxieties like climate change or economic precarity.

Aris Tufexis of Open Impact followed with an in-depth presentation on the iGain project, an EU-funded initiative to measure the cultural and social value of games through co-creation with vulnerable communities. Working with museums and developers across several European countries, iGain

supports the creation of games that foster inclusivity, creativity, and education. Aris outlined a complex but rigorous assessment framework to track outcomes ranging from skill acquisition and community engagement to technological innovation and social cohesion. He emphasised that gaps in anticipated impact are as valuable as successes, offering lessons for future policy and programme design. The ultimate goal is to inform intersectoral policy that better aligns the games sector with broader cultural and social goals.

The final open discussion, titled "Games in the Rest of the World", encouraged participants to reflect on the application of games beyond entertainment, including in defence, healthcare, and public services. Participants debated the usefulness and limitations of the term 'serious games', advocated for a more nuanced understanding of games as a medium, and called for stronger support structures to help developers access complex procurement systems. Concerns were raised about inadequate public-sector technical literacy and the risk of well-funded but misguided projects. Haptic technology, cognitive training, and the psychological dimensions of gameplay were also discussed. A key thread throughout was the tension between regulatory goals—such as age restrictions—and children's right to participate in cultural life.

The conversation returned often to the role of policymakers, with several panellists calling for greater evidence-based dialogue between industry and government. Projects like "Ask, Talk, Play" were cited as valuable initiatives for educating both parents and decision-makers. Jari-Pekka Kaleva stressed the fragmented yet critical discourse around children's rights, privacy, and access in digital contexts, noting the disproportionate influence of personal beliefs in shaping policy. Participants acknowledged the need to better connect the gaming sector with adjacent cultural fields, such as museums, and to bridge gaps between academia and industry. In closing, panellists reiterated the vital importance of games not only as entertainment but as cultural tools with civic, educational, and societal value. The seminar ended with a European Commission representative affirming the institution's interest in ongoing dialogue and data-driven policymaking.

4.8. Recommendations

- **Establish Standardised and Inclusive Sector Classifications**
  Reform and harmonise statistical frameworks like NACE codes to more accurately reflect the diversity of the games industry, enabling better data collection, visibility, and policy alignment across EU member states.

- I**nvest in Evidence-Based, Blended Learning Infrastructure Including defence Applications**
  Support the development and deployment of serious games and simulation tools for training in public services such as healthcare, emergency response, and defence. Policies should promote the integration of virtual and augmented reality tools that enhance preparedness while ensuring ethical use and supplementing—not replacing—real-world experience.

- **Streamline Military and Public Sector Procurement Pathways for Game Developers**
  Simplify and clarify procurement processes in defence and other public sectors to enable innovative game developers, including SMEs, to access contracts. This requires improving technical literacy within public institutions and fostering public-private partnerships.

- **Support Agile and Cross-Sector Academic Partnerships**
  Promote funding models and regulatory frameworks that allow universities to collaborate flexibly with the games industry while maintaining critical distance and focusing on transferable skills, systems thinking, and innovation.

- **Recognise Games as Cultural and Civic Media**
  Acknowledge the educational, social, and cultural impact of games in public discourse and policy. Encourage initiatives that position games as tools for inclusion, creativity, and democratic participation—especially for children and vulnerable communities.

- **Create Child-Centric Digital Participation Policies**
  Shift from risk-obsessed narratives toward a rights-based framework rooted in the UN Convention on the Rights of the Child, supporting safe, meaningful access to digital culture and gaming for young people.

- **Develop a Co-Creation-Based Impact Assessment Framework**
  Support tools and funding that measure not just economic but also social and cultural outcomes of games, with a focus on collaborative, community-rooted development processes.

Appendix: Games Policy Summit participants

Amund Haugen Steinbakken	Innlandet fylkeskommune
Andre Tiwari	Old Salt Games
Aris Tufexis	Open Impact
Björn Flintberg	RISE - Research Institutes of Sweden
Brian Martin Nielsen	Kaiju Creation
Cécile Vulliemin	Swiss Arts Council Pro Helvetia / SwissGames
Daniel Wilén	Arctic Game
Diana Fehr	MuseoSpace
Dr. Ellen Koban	MFG Baden-Württemberg
Emma Westerlund	Novia University of Applied Sciences
Erik Robertson	Nordic Game
Felix Bradshaw	PlanetPlay
Florian Masuth	medianet berlinbrandenburg e.V.
Gabriella Kalteneckar	RISE - Research Institutes of Sweden
Geert Nellen	Mighty Diamonds
Hrvoje Mitic	Croatian Game Development Alliance (CGDA)
Isak Wahl	Snow Leaf Studios
Jari-Pekka Kalevea	EGDF
Jean Gréban	WALGA
Jenny Bertling	Stockholm Business Region
Jenny Brusk	Science Park Skövde/Sweden Game Arena
Johanna Nylander	Swedish Games Industry
Jude Ower	PlanetPlay
Kati Uusi-Rauva	EIT Culture & Creativity North
Kristian Roberts	Nordicity
Lars Hård	Oxide AI
Luca Cannellotto	Pro Helvetia Swiss Arts Council / SwissGames
Luís Leça	INOVA+ (Games for Culture Cluster - GCC)
Mafalda Trigueiro	INOVA+ (Games for Culture Cluster - GCC)
Makrina Viola Kosti	CERTH
Malte Behrmann	Game Farm GmbH

Marcus Toftedahl	Sweden Game Arena / Science Park Skövde
Margarete Schneider	Gamecity Hamburg
Marléne Tamlin	Dataspelsbranschen | Swedish Games Industry
Mikkel Thomassen	NIMBI - Danish Institute for Game Development
Oliver Miescher	Swiss Arts Council Pro Helvetia / SwissGames
Olivier Mauco	European Video Game Observatory
Oscar Wemmert	Dataspelscentrum
Pille Runnel	Igame/ Estonian National Museum
Rebecca Harris	University of Greater Manchester
Romain Lenoir	Capital Games
Simon Egenfeldt-Nielsen	Serious Games Interactive ApS
Simon Løvind	NIMBI Denmarks Institute for Game Development
Thierry Baujard	Spielfabrique UG
Timo Ylikangas	Nordic Game Ventures & UAS Novia
Vania Castagnino	Sweden Game Arena // Science Park Skövde
Ville Autio	Centria University of Applied Sciences