SUBMISSION ON THE INQUIRY INTO THE HARM YOUNG NEW ZEALANDERS ENCOUNTER ONLINE

Submission presented by

NZGDA NEW ZEALAND
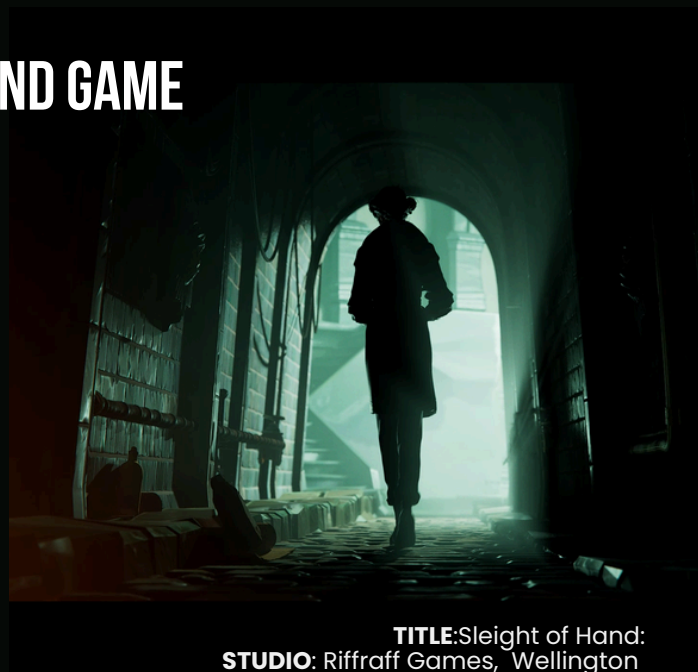GAME DEVELOPERS
ASSOCIATION

FOREWORD

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The New Zealand Game Developers Association (NZGDA) welcomes this inquiry and appreciates the opportunity to provide input. We support measures to protect young people online but strongly recommend that **video games be treated as distinct from online services such as social media platforms**. Video games offer structured, purposeful, and often creative digital engagement, and should not be conflated with the risks and open-ended interaction models typical of social media.

We also urge the Committee to ensure any new regulatory proposals are **targeted, proportionate, and evidence-based**, to avoid unintentionally restricting access to safe, beneficial, and widely enjoyed digital experiences such as video games.

ABOUT NZGDA AND THE NEW ZEALAND GAME DEVELOPMENT SECTOR

The NZGDA is the peak industry body for game developers in Aotearoa. Our sector is one of the country's fastest-growing digital export industries, generating over **$548 million in international revenue annually** and employing **more than 1,100 people** in high-skill, high-wage creative technology roles.

TITLE: Sleight of Hand:
STUDIO: Riffraff Games, Wellington

New Zealand-made games are played and celebrated around the world, including titles like DREDGE, Into the Dead, Path of Exile, Icarus and Wanderer. These games are the result of a thriving ecosystem that includes education, entrepreneurship, and a global export focus.

VIDEO GAMES ARE NOT SOCIAL MEDIA

Unlike many online social media platforms, which operate on engagement-driven and user-generated content models, games are designed experiences, crafted by teams of developers, artists, and engineers with a specific purpose in mind. They are subject to platform-specific rules, age guidelines, moderation tools, and commercial oversight.

We urge the Committee to clearly distinguish between video games and social media platforms when considering online harm and regulation. While social media is often based on algorithmically amplified user-generated content and continuous engagement, video games focus on gameplay, structured interaction, and defined experiences.

Key differences include:

- Communication in games is optional, limited in scope, and often designed to support gameplay coordination. It is not the core function of the medium.

- Game content is produced and curated by developers, not users. This results in a safer and more controlled experience.

- Most games involve session-based progression, with clear start and stop points. This contrasts with the persistent, infinite-scroll nature of social media.

- In-game moderation tools, session timers, and parental controls are widely available across platforms and consoles.

These features mean that video games present significantly lower risks of exposure to harmful content, cyberbullying, and exploitation compared to open social media environments.

TITLE: Cosmorons
STUDIO: Blind Squirrel Game, Aucklands

BENEFITS OF GAMES FOR YOUNG PEOPLE

Video games play a positive and often educational role in the lives of many young New Zealanders. The recent NZ Plays survey found:
- 58% of parents say their children's schools use games to teach
- 88% of adults think games help students learn science and reading
- 89% of adults believe games improve thinking skills for players of all ages
- Games are increasingly used in classrooms to teach coding, problem-solving, teamwork, and design thinking. Platforms like Minecraft Education and Roblox Studio are integrated into primary and secondary education settings. Game-making also opens doors into careers in the creative and digital industries.
- Moreover, games are often a social and inclusive outlet, particularly for young people living with disabilities or in rural areas, where in-person connection may be limited. Many developers working in the industry today were inspired to pursue their careers through playing and making games in their youth.

Title: Abiotic Factor
STUDIO: DeepField Game, Dunedins

BENEFITS OF GAMES FOR YOUNG PEOPLE

The video game industry is committed to player safety and wellbeing. Most platforms offer robust tools that allow parents and caregivers to:
- Limit access to age-inappropriate content
- Set screen time limits
- Monitor or restrict in-game communication
- Manage in-game purchases
- In-game environments also include features such as:
- Reporting and blocking tools
- AI-assisted moderation
- Session controls and opt-in social features

These measures are designed into the core of modern gaming platforms and reflect international best practice in digital safety. The industry also supports public education to help whānau navigate games in healthy and informed ways.

POLICY RECOMMENDATION: EXEMPT VIDEO GAMES FROM SOCIAL MEDIA REGULATION

We are aware that some policy proposals, including age restrictions on social media use, risk unintentionally sweeping up unrelated platforms such as video games.

We recommend that:

- Video games be explicitly excluded from any definition of "social media" in future legislation or regulation concerning under-16 online access

- New Zealand learn from the Australian approach, where games were exempted from the Online Safety Amendment (Social Media Minimum Age) Act in recognition of the lower risk and existing regulation of games

- Any future regulation differentiates between digital engagement types, recognising that blanket policies may cause unintended harm to creative and educational industries

TITLE: Flintlock, Seige of Dawn
STUDIO: A44 Games Game, Lower Hutt

CONCLUSION

Video games should not be treated as social media. They are distinct in purpose, design, and risk profile. Regulation that targets the real harms of social media must not undermine the significant economic, educational, and cultural value that games provide to Aotearoa and its young people.
We welcome the opportunity to speak further to this submission and support efforts to build a safer and more empowering digital environment for all rangatahi.