

## THE DISCONTENTS OF THE PAN EUROPEAN GAME INFORMATION (PEGI): A VISUAL LAW ANALYSIS

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### Abstract

This article explores the practical application of visual law and legal design in the context of consumer protection and video games, and it examines the Pan European Game Information System (PEGI) and its limitations in the classification of video games. While PEGI effectively translates regulatory concerns into an accessible and standardized visual format, its content-based approach oversimplifies the complexity of the video game medium while also overlooking how the human-machine interaction takes place. With this in mind, this article proposes a shift towards a PEGI-grounded classification system that focuses on “gameplay bricks”: the rules and mechanics that shape the game environment. By integrating principles and insight from visual law and legal design, this model aims to enhance clarity, accessibility and understanding of the legal message behind an icon or indicator. In this context, legal design ensures that the rule/mechanic structure is translated into visual indicators and icons that have the capacity to empower consumers to make informed decisions. This approach thus aligns with the policy objectives that constituted the cornerstones of the very existence of PEGI.

**Keywords:** video games; PEGI; video games rules; indicators; rating gameplay.

### [A] INTRODUCTION

Over recent decades, video games have evolved from a niche media activity into a dominant cultural and economic force, reshaping the concept of interactive entertainment. Such growth has introduced complex dynamics, as video games not

only entertain but also immerse players in interactive environments that challenge traditional media. Subsequently, video games have raised critical questions about their regulation, particularly concerning the exposure of children and young people to potentially harmful content, including violence, gambling and other explicit themes.

In Europe, the Pan-European Game Information (PEGI) system emerged as a response, providing age ratings and content descriptors designed to address regulatory challenges and guide consumer decisions (PEGI nd).

While PEGI has succeeded in translating regulatory concerns into accessible visual formats, its reliance on content-based classification oversimplifies the dynamic and interactive nature of video games. This article thus argues for a (VL) and legal design (LD) analysis that might trigger a rule-based classification system that accounts for the mechanics and rules governing gameplay, referred to here as “gameplay bricks”. This analysis is structured into three sections: the first analyses the current PEGI framework, the second applies VL and LD to its visual elements while the third proposes a game rule-based classification model empowered by VL and LD insights. The analysis is supported by figures, including PEGI age indicators (Figure 1), content descriptors (Figure 2), a diagram illustrating the architecture of gameplay bricks (Figure 3), and newly proposed indicators for “Game” and “Play” bricks (Figure 4).

## [B ] VIDEO GAMES, CONTENT CLASSIFICATION AND AGE RATING

During recent decades, video games have transformed from a niche media entertainment activity into a global cultural and economic powerhouse worth more than video films and music combined (BBC News 2019). As a pure media practice, advancements in digital technology have enabled video games to offer increasingly immersive and interactive experiences, attracting a diversified audience ranging from children to adults. Furthermore, as cultural artifacts (Greenfield 1994), video games’ narratives, mechanics and interactivity were—and still are—crucial in offering new forms of engagements characterized by social, economic, cultural and ethical significance (Muriel & Crawford 2018). However, such cultural significance has also brought some challenges, particularly concerning the interaction and related exposure of children and young people to controversial content such as violence, sex themes (Dill-Shackleford & Ors 2005) and other sensitive material. Subsequently, the alleged harm that previous content could have caused to minors (Przybylski 2019) has triggered the attention of governments and political institutions; officially declaring the entrance of video games into the



Figure 1: *The PEGI Age Labels.*



Figure 2: *The PEGI Content Descriptors*

media regulation agenda (Dogruel & Joeckel 2013). Indeed, in the early 1990s, probably prompted by the release of controversial games such as *Mortal Kombat* (Midway Games, 1992) and *Doom* (id Software, 1993), the US Congressional hearings initiated by Joseph Lieberman pressured the gaming industry to self-regulate (Crossley 2014), with the subsequent establishment of the Entertainment Software Rating Board (ESRB), a self-regulatory organization assigning age and content ratings for consumers in Canada, the United States and Mexico (Funk & Ors 1999).

In Europe, similar concerns led to the establishment of the PEGI system. PEGI is a voluntary, self-regulatory system that was introduced following consultation with industry stakeholders and civil society to unify information about and classification of video games within a standardized European framework (European Commission 2008). PEGI fulfils its mission through age rating, which provides guidance for consumers to help them to purchase the most appropriate video games for children and young people (PEGI nd). With such purpose, as of 2022,

PEGI operates with eight content descriptors (violence, bad language, fear/horror, gambling, sex, drugs, discrimination, in-game purchase/paid random items) resulting in up to five age ratings (3, 7, 12, 16 and 18) (Ezat Azam 2023).

PEGI ensures age classification for video games across both physical and digital distribution channels. For physical distribution, publishers complete a content assessment form detailing elements like violence or explicit language, generating a provisional rating reviewed by the Netherlands Institute for the Classification of Audiovisual Media for younger audiences and the Games Rating Authority for higher age categories. Administrators approve or adjust the rating, granting publishers a licence to display the appropriate PEGI icons and descriptors. On the other hand, for digital distribution, PEGI integrates with the International Age Rating Coalition, streamlining the rating process for developers by requiring them to complete a single questionnaire covering content and interactive elements, which instantly generates ratings compliant with local standards across participating territories.

PEGI's classification includes—in line with television content—both descriptive and evaluative aspects (Felini 2014). While the descriptive rating focuses on identifying the genre and content,

including specific types of images or scenarios, the evaluative rating, in contrast, assesses whether the media content is appropriate for children within a specific age range (Felini 2014). In this sense, PEGI's ratings serve as a public declaration by the European Union (EU), aiming to translate regulatory concerns into accessible visual formats while also supporting parents or legal guardians in making informed decisions about the purchase of interactive audiovisual media (European Commission 2008). However, such twofold classification structures can be problematic.

First, based on the dual nature of PEGI's rating system, it seems possible to highlight a preference for descriptive ratings over evaluative ones (Price & Verhulst 2002). By providing information about the content, descriptive ratings empower parents and children and young people to assess video games based on their unique perspectives and needs, encouraging informed decision-making and promoting media literacy (Price & Verhulst 2002). Also, this approach recognizes parents' role in assessing their children's maturity while mediating their experiences. On the contrary, by simply indicating the targeted age-group of a video game, the evaluative rating seems to deprive parents of their role while denying opportunities to develop media literacy. Second,

the evaluative rating exclusively follows the outcome of the descriptive assessment (Felini 2014). By doing so, the evaluative rating (the recommended age label) is determined by the assessment and identification of potentially harmful content such as violence or sexual themes (the in-game content label). This might result in an oversimplified classification that does not account for the different ways players engage with and interpret interactive media, also undermining parents' capacity to make informed decisions. For instance, *Street Fighter* (see Figure 3 below) is rated 12 for its depiction of violence, bad language and inclusion of in-app purchase. The violence in *Street Fighter* is stylized, cartoonish and exaggerated, which might be perceived as less impactful due to its arcade nature. In contrast, *Among Us* (See Figure 4 below) is rated 7 for its depiction of violence and the inclusion of in-app purchase. The violence in *Among Us* involves themes of deception and betrayal, requiring players to lie and manipulate other players. Despite that, *Among Us* has a lower PEGI rating, even though it could have a more complex impact on players, particularly younger ones, due to the presence of manipulation themes.

The analysis of PEGI's system and its dual rating approach highlights how the system has managed to

simplify regulatory concerns into accessible visual formats. However, its oversimplification and related undermining of parents' decision-making and media literacy might constitute a favourable breeding ground for an examination of PEGI's visual and structural design, exploring its capacity to effectively communicate legal concerns while empowering video game users.

### [C] A VISUAL LAW ANALYSIS OF PEGI

Given these circumstances, a new perspective could enhance the effectiveness of PEGI. Indeed, VL and LD offer an opportunity to rethink how PEGI labels and indicators, as a form of legal information about consumer protection and age-appropriate content, are visually presented, thereby improving their accessibility and impact. Born as an initiative of Stanford University Law School, LD is focused on making the law more accessible to people, aiming to simplify legal communication while shifting its focus to recipients, such as consumers (Hagan 2017). While LD aims to make the legal system work better for people (Hagan 2020), VL represents its visual manifestation (Poto & Parola 2024). As a framework that seeks to explore visual legal communication practices (Brunschwig 2014), VL uses visual elements such as images, infographics and labels to make legal communication clearer



(Poto & Parola 2024). Together, VL and LD evolved from tools addressing law firms' clients' needs for broader approaches adapted to achieve important goals such as legal education, research and society empowerment (Hagan 2019). Under these circumstances, PEGI offers an opportunity to apply principles of VL and LD to legal communication, addressing societal concerns about protection of children and youth and guiding consumers in the context of video games.

PEGI heavily relies on visual codes—delivered by age and content indicators—to communicate regulatory information. From an LD perspective, age indicators simplify the legal message to the end-user while pairing distinct colours (Figure 1) with numeric values. By doing so, PEGI encourages a user-centric approach because it enables a quick understanding of whether or not a video game is appropriate for a specific player. Through VL perspectives, age indicators transform consumer protection concerns into symbols. Specifically, the use of colour coding where green is perceived as “safe” and red is perceived as “restricted” make the age restrictions identifiable. On the other hand, content descriptors (Figure 2) serve a different purpose. Indeed, from an LD perspective, these descriptors serve to complete the legal message. Together, the two aspects form the visual

bricks of a state–consumer legal communication where age and content indicators empower the user to make informed decisions. From a VL point of view, the use of black-and-white artworks ensures visual clarity while also reducing—as in the case of colours for age indicators—the cognitive effort required by the end-user to interpret the message. Moreover, clarity of content descriptors is enhanced by the use of symbols universally associated with a given theme (dice for gambling or a fist for violence).

As previously observed, PEGI aligns with some LD and VL principles. For instance, PEGI transforms regulatory concepts into tangible and actionable tools with the purpose of protecting consumers. By doing so, PEGI presents legal standards as public(consumer)-focused products (Brunschwig 2014). PEGI uses semiotic codes to translate legal information and make it accessible through recognizable symbols and colours (Kress & van Leeuwen 2006), thus reducing the cognitive effort while enabling quick decision-making (Hagan 2017). Also, by providing clear and transparent age and content ratings, PEGI empowers the recipients of a specific legal communication (Hagan 2017). Lastly, PEGI facilitates a co-operative relationship between the public and the law where consumers can directly engage

with legislators' concerns about access to video games.

If it is true that PEGI aligns with several principles of LD and VL, it is also true that PEGI reveals certain limitations. Indeed, as previously mentioned, static visuals and simplified classifications diminish consumer trust and informed decision-making. These challenges highlight opportunities for improvement, where the principles of VL and LD could shape a more dynamic, transparent and user-centric PEGI system.

## [D] IMPROVING PEGI

To address PEGI limitations, video game classifications could move beyond the mere focus on their—negative—contents and consider other types of elements. Indeed, a new viable starting point might be represented by game rules, rather than game contents. In this sense, it is possible to identify “gameplay bricks” as elements whose different combinations address the different rules and goals of video games. They can help to classify video games in accordance with the very rules or goals of the game (Djaouti & Ors 2008). Gameplay bricks can be categorized into two elements. First, “game” bricks are those rules linked to the achievement of the game's objectives. These rules are defined by a trigger tied to specific game elements and influencing the game output. For instance, a game brick in *Street Fighter 6* may involve

health bars of the two fighters as a trigger; when one fighter's bar reaches zero, the game triggers the victory condition associated with the bar reaching zero. Second, “play” bricks are more tied to the game environment, rather than game objectives. Therefore, these rules focus more on how the players' input can shape the game elements while enriching the game experience. In *Street Fighter 6*, an example of a “play” brick is player's input triggering a taunt animation. In this case, a player's input has no influence over the outcome of the game, but instead targets the game environment adding expression and creativity to the gameplay. Under these circumstances, it might be argued that rules and objectives can be useful tools for video game classification. Indeed, by addressing rules and objectives, the classification approach would reflect those core mechanics and experiences that feature in a game and suggest the right interactions for the right audience. On the contrary, content-based classification simplifies the complexity of interactive media while overlooking the different types of interactions between players and video games (Caroux & Ors 2015). Therefore, a rule-based classification aligns more with the inherent structure of games, where rules shape the boundaries, goals and possibilities of the in-game world (Suter & Ors 2018). By doing so, a ruled-based classification system

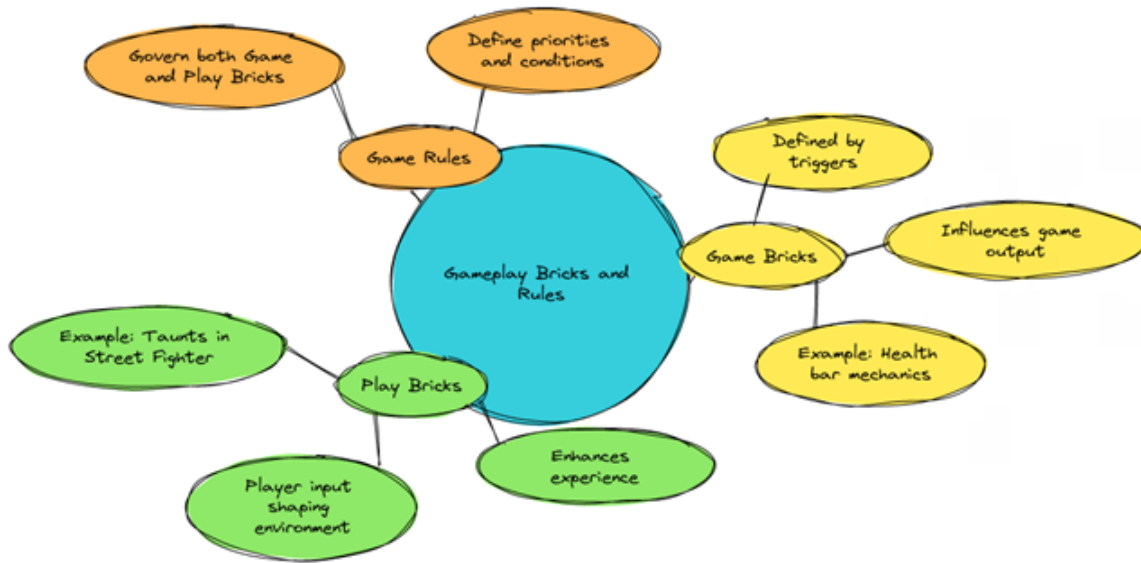


Figure 3: Gameplay Bricks diagram—Created with AI assistance, curated by the author.

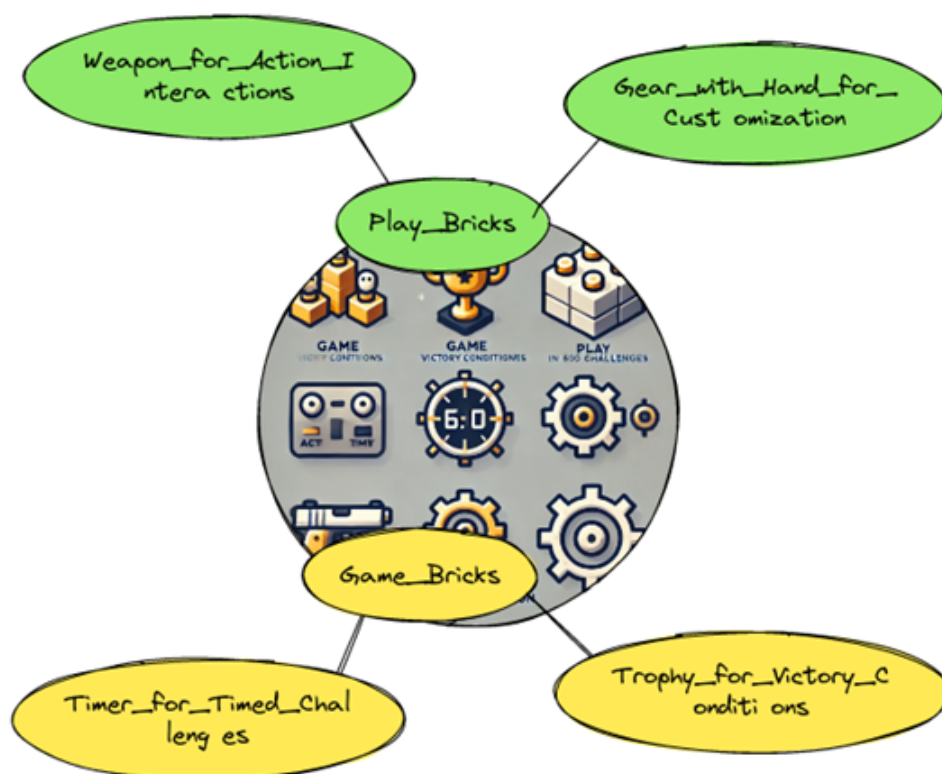


Figure 4: Gameplay Bricks indicators—created with AI assistance, curated by the author.



would improve rating accuracy while offering an understanding of video games as interactive and rule-driven systems (Siang Ang 2006). In this sense, Figure 3 aims to visualize the previous concept.

However, in the context of this article, a shift from content-based to rule-based classifications requires guidance from LD and VL insights. Since LD emphasizes a user-centred legal communication, a rule-based classification could be developed around visual indicators conveying the nature of gameplay bricks (see Figure 4). For instance, LD could help the recipient of the message to visualize how rules impact the interaction between the player and the game. In the case of the *Street Fighter 6* boxed game, indicators might show “game” bricks (eg a timer indicating timed rounds or a trophy indicating the victory condition) and “play” bricks (eg a weapon indicating shooting or a gear wheel with a hand indicating players’ capacity to customize aspects of the game). Furthermore, these indicators might be colour-coded, such as gold for “game” bricks and blue for “play” bricks. Also, to enhance consumer’s understanding of the label, a combined message (text and image) could be included, showing examples of how a player’s interaction shapes the gameplay (eg “Victory is Achieved when the opponent’s health bar is depleted—see gold trophy

indicator”). From a VL perspective, the focus is translating the abstract concept of video game rules into concrete visual legal rules (Mik 2020). Subsequently, it would be crucial that previous gold and blue indicators were standardized to make them recognizable (Hagan 2017). Again, minimalistic design paired with multimodal explanation would ensure a high degree of user understanding (Compagnucci & Ors 2021). Finally, standardized and universally interpretable indicators might reduce risks of cultural misinterpretation of symbols, ensuring that the legal message is understood consistently across different jurisdictions (Dogruel & Joeckel 2013).

The revisitation of gaming classification under LD and VL by incorporating rules and mechanics might represent a viable evolution of the current PEGI system. Indeed, this approach aligns with scholars’ proposals for a multifactorial video game classification (Felini 2014). In such a model, while VL and LD would shape the visual components and ensure the correct reception of their legal message, positive gaming content and players’ skills would contribute to a clearer, more comprehensive classification system. This approach would not only guide informed decision-making and introduce children to video game consumption responsibly but also

prevent inconsistencies or double standards (Wutz 2024).

The proposed enhancement of PEGI through a rule/mechanics-based classification system, informed by VL and LD, also aligns closely with the policy objectives that underpin PEGI's mission. Indeed, the incorporation of rules and mechanics within a clear visual framework can protect children and young people while preserving developers' freedom of expression (European Commission 2008). Also, the standardized colour-coded indicators would support the objective of improving media literacy (European Commission 2008). In this case, the visual tools designed under LD principles would guide the public's attention towards games mechanics, rather than contents, enhancing the understanding of what a game really is (Filimowicz 2023). Finally, refining PEGI's visual (LD and VL) and structural (game and mechanics) indicators would ensure consistency and interpretability supporting the Pan-European Code of Conduct while developing a new—more diligent—video game verification system.

## [E] CONCLUSION

This article has analysed the PEGI's history, functioning and limitations of its content-based classification system while proposing a rule/mechanics framework informed by LD and VL. While it is true

that the current PEGI system visually standardized and addressed concerns towards video game consumption, it is also true that PEGI oversimplifies the elements of such consumption. The article has focused on “gameplay” bricks as rules and mechanics that shape the game environment in order to propose a more responsive classification system.

In the context of this proposal, the new PEGI would incorporate LD principles as clear indicators with a user-centred approach, making legal concerns accessible and intuitive while promoting informed decision-making. From a VL perspective, the system would ensure that the legal message is transparently and accurately delivered while minimizing cultural visual differences.

Such a rule-based approach also aligns with PEGI foundational objectives, such as the protection of children and young people, the improvement of media literacy and developers' freedom of expression. The integration of rules/mechanics into a visually oriented framework made by LD and VL would allow PEGI to address the interactive nature of video games while acting as a tool for consumer protection and responsible gaming consumption.

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