



EUROPE'S
VIDEO GAMES
INDUSTRY

Response to the open consultation on the European Climate Pact

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Introduction

1. ISFE shares the European Commission's conviction that addressing climate change is one of the most critical challenges of the 21st century and welcomes the opportunity to contribute to the consultation on the European Climate Pact. The video games sector has taken numerous initiatives to preserve the environment and is continuously striving to improve the energy efficiency of its devices and services. The below ISFE response focuses in particular on sections 1, 2 and 4 of the open consultation.

About ISFE

2. ISFE represents the video games industry in Europe and is based in Brussels, Belgium. Our membership comprises national trade associations in 18 countries across Europe which represent in turn thousands of developers and publishers at national level. ISFE also has as direct members the leading console manufacturers and European and international video game companies, many of which have studios with a strong European footprint, that produce and publish interactive entertainment and educational software for use on personal computers, game consoles, portable devices, mobile phones and tablets.
3. ISFE's purpose is to serve Europe's video games ecosystem by ensuring that the value of games are widely understood and to promote growth, skills, and innovation policies that are vital to strengthen the video games sector's contribution to Europe's digital future. The video games sector represents one of Europe's most compelling economic success stories, relying on a strong IP framework, and is a rapidly growing segment of the creative industries. In 2019, the size of Europe's video games industry was €21 billion and the sector registered a growth rate of 55% over the past 5 years in key European markets¹. Video games have a proven ability to successfully drive new business models. The digital transformation, with the growth of online and app-based gaming, represents today 76% of the industry's total European revenues. Via the launch of new high-performance consoles and the strong growth of mobile gaming, the industry offers players across Europe and in all age groups the possibility to enjoy and engage with video games². Today 51% of Europe's population plays video games, which is approximately 250 million people, and 54% of the players regularly play on consoles.

¹ ISFE Key Facts 2020 from GameTrack Data by Ipsos MORI and commissioned by ISFE <https://www.isfe.eu/isfe-key-facts/> (to be updated in July).

² See also <https://www.isfe.eu/data-key-facts/>

I. Talking about climate change and environmental crisis: awareness and information

4. Improving general awareness of climate-change is essential to ensure broad engagement from the public, national governments, and private businesses. All actors in society should be able to contribute to the debate and provide information and knowledge they deem relevant.
5. Businesses in particular can make valuable contributions as their expertise can provide sector-specific information supporting initiatives which would best reconcile environmental action and sector specificities. Their knowledge is essential to propose solutions that are efficient and technically feasible.

II. Triggering action: pledges and initiatives

6. Many video games studios in Europe take measures to encourage greener behaviour within their working environment. This includes for instance encouraging employees to travel by train instead of to use the plane, investing in call-in facilities to support remote meetings, or favouring the use of renewable materials and energy to perform daily tasks³. Within the French developer and publisher Ubisoft, employees across the company formed 'green committees' to implement local environmental actions for their offices while engaging with the wider company to encourage more environmental protections.
7. Numerous video games studios already use their games to educate players on sustainability and to encourage them to partake in climate-friendly actions. For example, Electronic Arts just released the [Eco-Living Expansion](#) for The Sims 4 where players need to learn how to build sustainable communities, while Niantic encouraged players in Pokemon Go [to go outside to clean up streets and collect garbage](#) on the occasion of the 2019 UN's International Mother Earth Day.
8. In addition, the video games sector already publicly committed to climate-friendly actions in past years to integrate environmental responsibility and sustainability in its activities. ISFE believes the Pact could be useful in supporting and amplifying the following initiatives:
 - a. In September 2019, video games companies, including ISFE members, joined the [Playing For The Planet Alliance](#) on the occasion of the UN Secretary-General's Climate Action Summit. Backed by the United Nations, members of the Alliance made concrete commitments ranging from green activations in games to reducing their emissions and plastic usage⁴, as for instance in the case of Microsoft, reducing supply chain emissions by 55% by 2030⁵. The commitments involve:
 - Corporate carbon footprint reductions and a collective shift to green energy
 - Insertion of green nudges into games
 - Commitments to offset emissions (from internal operations and gamers' devices)
 - New circular economy design and recycling offerings to control plastic and e-waste
 - Achieving more together

³ For instance, as part of its [Sustainability Program](#), Electronic Arts committed to deploying 100% compostable products (paper towels, toilet paper, food and beverage containers) at many of its strategically important locations.

⁴ A full list of members and their commitments can be reached at <https://playing4thepanel.org/private-sector/>

⁵ In January, Microsoft went even further by [announcing its commitment](#) to be carbon negative by 2030.

- b. Following the adoption of the EcoDesign Directive in 2009 ([Directive 2009/125/EC](#)), leading console manufacturers (Microsoft, Nintendo, and Sony) agreed with the European Commission to further improve the energy efficiency of games consoles. The self-regulatory measures proposed by the console manufacturers were shown to generate greater energy saving than through the alternative adopted regulatory measures. Their engagement is codified under the [Games Consoles Voluntary Agreement](#) (VA), and includes concrete provisions related to energy and resource efficiency (including reparability and recyclability) which are applicable for both current and future generations of games consoles⁶. Over the lifetime of current generation consoles⁷, Signatories of the Agreement estimate energy savings to exceed 48.2TWh, which is equivalent to Portugal’s annual energy production⁸.
9. The Pact could constitute a forum where the sharing of information and promotion of initiatives could encourage many stakeholders, including businesses to partake in environmental action through similar initiatives.
9. Such a forum could also link relevant events and initiatives taken by participating stakeholders, demonstrating the broad interest and engagement across Europe of all involved in the Pact. Those could foster awareness-raising on climate change and its impact, facilitate the exchange of experiences among participants and towards the public, and stimulate actors to commit to voluntary commitments.

III. Encouraging broad participation and inclusiveness through voluntary commitments

10. ISFE believes the Pact should welcome actors from the widest range of fields to promote a holistic response to climate change. Participation must however remain on a voluntary basis and not translate into further mandatory commitments imposed by authorities without taking into account each sector’s specificities. Leading by example as demonstrated through initiatives such as Playing for the Planet or through large communities as those that exist in the video game sector can be powerful and have impact.
11. Involving public figures from various backgrounds as “ambassadors” and extensive information campaigns would allow for the effectiveness and the success of the European Climate Pact towards citizens to be increased.
12. The video games sector is deeply engaged in sustainability efforts and would welcome the recognition of global sector-wide initiatives such as the Playing for the Planet Alliance and of course the European Games Console Voluntary Agreement. The European Commission should further clarify which form the Pact would take in practice, and whether or not further commitments under the Pact would take the form of mandatory requirements from participants.

END

⁶ More information on the Games Consoles Voluntary Agreement can be found at <https://efficientgaming.eu/>

⁷ PlayStation 4, PlayStation 4 Pro, Xbox One, Xbox One S, Xbox One X

⁸ Estimate verified in the European Commission’s independent consultants’ study published in 2019 on <https://efficientgaming.eu/>