

## Open Letter: Protect the Future of Dutch and European Games

To:

The European Commission, Members of the European Parliament,  
and National Consumer Authorities within the CPC Network

From:

Representatives of the Dutch Games Industry

### **Do Not Undermine One of Europe's Digital Success Stories**

The Dutch games industry reaches millions of players worldwide and supports thousands of creative and technical jobs. It is one of Europe's most vibrant digital sectors – a showcase of innovation, diversity, and international collaboration. However, the Consumer Protection Cooperation (CPC) network has overturned the long-standing interpretation that has guided how in-game currencies are used in games. This sudden reversal risks damaging player experiences, threatening jobs, and even creating new vulnerabilities such as money laundering. The proposed approach is, quite simply, like letting a bull loose in a china shop.

Since 2013, the CPC network has recognized that keeping real-world money separate from gameplay environments benefits players and parents alike – much like using tokens or ride tickets at an amusement park. Last spring, however, the CPC announced that it now considers every use of in-game currency within a game to be a purchase. That means every time a player uses a virtual coin, diamond, or star, the transaction would need to be accompanied by real-money price tags, receipts, and contractual confirmations. Such a rule would severely disrupt the player experience, create unnecessary bureaucracy, and burden parents with constant approval requests. More importantly, it would impose massive technical and economic challenges on studios – especially smaller ones.

The Netherlands is home to more than 600 game studios, employing more than 4000 talented developers, artists, designers, and engineers<sup>1</sup>. Together they contribute significantly to the Dutch creative economy and Europe's global digital competitiveness. Only about 20% of Dutch studios use microtransactions or in-game purchases as part of their business model. Yet these companies are essential to the broader ecosystem. They sustain live operations, create internships and employment opportunities, serve as vital

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<sup>1</sup> <https://dutchgamesassociation.nl/games-monitor/>



hubs of knowledge and innovation in data analytics and online infrastructure and are key supporters of industry events, conferences and education institutions. Their work ensures that many games remain free to play, while optional purchases made by some players finance continued development, updates, and community support. This model has enabled creative freedom and consumer choice without relying on selling personal data to third parties through advertisement – something that Europe should view as a success, not a problem.

Last year, former European Central Bank President Mario Draghi urged Europe to strengthen its digital competitiveness. The video games sector exemplifies that ambition. Yet the CPC's new interpretation moves in the opposite direction. By making gameplay environments legally and technically unworkable, the EU risks creating a fragmented market where European players receive different – and often inferior – versions of games, or where certain titles cannot be offered in the EU at all. Forcing studios to redesign how games handle in-game currencies would require costly re-engineering, often impossible for small and medium-sized developers.

The stated goal of the CPC is to protect consumers – a goal we share. However, existing systems already provide effective and transparent safeguards. Using in-game currencies is simple and comparable to an amusement park ticket book: players know what they are spending, parents can set limits, and if problems occur, there are customer service channels, refund rights, and parental control tools. Further, initiatives like [PEGI](#) (Pan-European Game Information) already set clear standards for transparency and child protection, supported by the [NICAM](#) and recognized across Europe. Surveys consistently show that parents are well-informed about in-game spending and that most families have clear agreements with their children on this topic<sup>2</sup>.

We call on the CPC network, the European Commission, and national authorities to engage with the games industry in constructive dialogue. Let us jointly explore practical and proportionate measures that protect players while preserving the innovation, employment, and cultural value that games bring to Europe. The Dutch games industry is ready and willing to contribute its experience and data to help shape sensible, future-proof policy.

Europe needs more digital success stories – not new obstacles. Do not let misguided regulation put the creation of Dutch games at risk.

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<sup>2</sup> <https://www.rulethegame.nl/88-van-de-nederlandse-ouders-maakt-afspraken-over-gamen-met-hun-kinderen/>

