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EGDF response to the Stop Killing Games citizen initiative

About EGDF

1. **The European Games Developer Federation e.f. (EGDF)¹** unites 24 national trade associations representing game developer studios based in 22 European countries: Austria (PGDA), Belgium (FLEGA and WALGA), Croatia (CGDA), Czechia (GDACZ), Estonia (Gamedev Estonia), Finland (Suomen pelinkehittäjät), France (SNJV), Germany (GAME), Italy (IIDEA), Lithuania (LZKA), Netherlands (DGA), Norway (VIRKE Produsentforeningen), Poland (PGA and IGP), Portugal (APVP), Romania (RGDA), Serbia (SGA), Slovakia (SGDA), Spain (DEV), Sweden (Spelplan-ASGD), Switzerland (SGDA), Turkey (TOGED) and the United Kingdom (TIGA). Through its members, EGDF represents more than 2 500 game developer studios, most SMEs, employing more than 45 000 people.
2. **The games industry represents one of Europe's most compelling economic success stories.** Located at the crossroads of the ICT and cultural industries, the game industry is one of the rapidly growing segments of the cultural and creative industries. In 2023, there were around 5 900 game developer studios and publishers in the EU, employing over 91 000 people and running a combined turnover of close to €19bn². In 2024, Europe's games market was worth €26,8bn, and the industry has registered a growth rate of 4% in key European markets³. The European digital single market is the third-largest game market globally.
3. **EGDF underlines the importance of the long-term preservation of games and is pleased to see that this topic is becoming more relevant within Europe and that more than one million European citizens have expressed their interest in playing games even after their commercial exploitation phase.** Games are the leading cultural medium of the 21st century and, therefore, a crucial part of European digital cultural heritage that must be preserved for the upcoming generations by memory institutions. EGDF supports initiatives allowing official national memory institutions to make copies of out-of-commerce works available online for not-for-profit purposes, as long as right holders have the right to object to this at any time.

¹ For more information, please visit www.egdf.eu

² EGDF-VGE 2023 European games industry insights report
<https://www.egdf.eu/wp-content/uploads/2025/08/2023-European-video-games-industry-insight-report.pdf>

³ VGE-EGDF 2023 Key Facts
<https://www.videogameseurope.eu/news/annual-data-report-on-europes-video-games-sector-launched-at-gamescom/>

We need to ensure that closed games continue to be available for players – The EU must increase its investment in overcoming the challenges related to long-term preservation of games and making them available for the public

4. **When a game is closed down, it is a tragedy.** It is a tragedy for game developers who see years of their work vanish. It is a tragedy for the remaining players who cannot continue playing a game they love.
5. **The EU already has a well-functioning regulatory framework for the long-term preservation of games in official game museums and archives (also known as game memory institutions) and clear procedures for making them available to the public; therefore, a new regulatory framework is not needed.** Official game museums and archives also possess the necessary technological capacity and resources to ensure that games comply with EU regulations and the industry's co-regulatory PEGI system for the protection of players. These responsibilities include, for example, maintaining a high level of cybersecurity, protecting player privacy, keeping a game up-to-date with modern technological standards and monitoring in-game communication to remove any illegal and or harmful content and protecting minors.
6. **However, although European games have been played by millions, if not hundreds of millions of people globally, unfortunately, in many EU member states, they are not stored in official memory institutions.** Furthermore, it is important to keep in mind that the cultural significance of games is not limited to digital games themselves. [Finland, for example, has listed Demoscene, which the local games industry is based on, on its list of the National Inventory of Living Heritage.](#)
7. **Consequently, in many EU member states, the first decades of European digital culture are quickly becoming the lost years of European digital cultural heritage.** From the 1980s to the 2000s, games sold through retail distribution channels were stored in physical mediums (e.g. console games and PC games) that are now slowly eroding. Consequently, those games should be quickly transferred to digital archives. Furthermore, from the 2010s onwards, digital games have been increasingly distributed only through digital distribution channels (e.g. mobile games) or streamed entirely from online servers (online games/cloud games). Those games are easily lost forever when the servers are closed down.
8. **In order to ensure long-term preservation of games, the Commission must:**
 - a. **Encourage member states to continue their investment in supporting national video game museums and archives in long-term preservation of games and making them available for the public** within the legal framework set by the EU copyright law.
 - b. **Ensure that any recommendations for the preservation of digital cultural heritage include a chapter on the preservation of born-digital forms of culture like games.**

- c. **Launch specific calls under Horizon Europe program on overcoming challenges related to the long-term preservation of games.** More research and technological standardisation are needed to overcome technological challenges (e.g. how to run the games when the original back-end infrastructure with several different service providers no longer exists) related to the long-term preservation of games with online components and virtual worlds.
- d. **Continue to ensure that copyright exemptions for long-term preservation of games continue to be up-to-date,** enabling, for example, access to third-party services integrated into games for preservation purposes, breaking any patented copyright protection mechanisms and reproduction of games and digital infrastructure they run on (e.g. operating systems) for long-term preservation and research purposes. Furthermore, screenshots and video recordings from the games that are saved by the exemption for the preservation of cultural heritage should always be allowed to be used for teaching the history of game design.

For more information, please contact:

Jari-Pekka Kaleva,

Managing Director, EGDF

jari-pekka.kaleva@egdf.eu