1/ General questions.

1. **Definition.** The definition proposed by the Commission encompasses the passive and active use of media only. Regarding the former aspect, one could argue that even in a passive mode media literacy includes the ability to continually question the validity of the information provided. This being said, ISFE is more sensitive to another gaping hole, **interactivity**, a perspective that is central to the industry we represent. Indeed, this defining feature of interactive software has been the key driver of this industry’s success over the past 30 years. In this respect, whereas the wording “ability to communicate competently in media available on a personal basis” fits the phenomena that are blogs and social networks, it fails to do justice to computer and videogames. Alternative wording along the lines of “ability to interact with game content and other players of a game and also to create content in a game context” would achieve a more adequate characterization of game literacy.

2. **Targets and goals.** Recommendation 1466 of 27 June 2000 of the Council of Europe provides proper inspiration in this respect. Article 14 of this recommendation reads:

   14. The Committee of Ministers should also call on governments and the appropriate authorities of member states to:

   i. encourage the elaboration and the development of media literacy programmes for children, adolescents and adults;
   ii. promote the elaboration and the development of teacher training programmes in the field of media education;
   iii. involve educational bodies, parents' organisations, media professionals, Internet service providers, NGOs, and so on, in an active dialogue on these issues;
   iv. examine ways of sustaining an offer of educational programmes by the different media that is satisfactory in both quantitative and qualitative terms, and of promoting media education in them.

   According to the Council of Europe, the target audience should be the general public with no exception, children, adolescents and adults. In the same ambitious vein, ISFE argues that the goal should go beyond making them aware of the need to become media literate, it should aim to make them eager to do so.
**Why?** Assuming that you don’t own a car and that you are a careful pedestrian, you run little chance to get in trouble due to car traffic. The same does not hold true in the Internet world: you may have no intent or ability to create and spread content on the Internet and still get hit by spam or by these not so funny messages that pretend to originate with you. You therefore need to protect yourself and your own repute. Media education is the answer, as spelled out by Article 8 of the above mentioned Recommendation which reads:

Media education can be defined as teaching practices which aim to develop media competence, understood as a critical and discerning attitude towards the media in order to form well-balanced citizens, capable of making their own judgements on the basis of the available information. It enables them to access the necessary information, to analyse it and be able to identify the economic, political, social and/or cultural interests that lie behind it. Media education teaches individuals to interpret and produce messages, to select the most appropriate media for communicating and, eventually, to have a greater say in the media offer and output.

Back to the transportation metaphor, cars and planes share a common feature with media: they make more and more use of information and communication technology (ICT). A big difference though is that media are arguably more ubiquitous than cars and planes and certainly more likely to shape minds. As a consequence, intimacy with media is more of a compelling public policy goal if governments care about putting Europeans, citizens and consumers alike in a position not to be hurt by and to make the most of these incredibly powerful tools. Media literacy is the answer, and it has to be made available to all, young and older, affluent and poor, healthy or impaired, etc.

**How?** Illiterates will feel hampered at every step of their daily life due to their inability to make sense of signals sent to them using the alphabet, or to send out such signals themselves; likewise media illiterates are unable to make sense of signals sent by way of digital media or to take advantage of such media. The same way governments have long identified people’s ability to read and write not only as a key driver of nations’ wealth but as a basic human right, likewise the interactive software industry strongly supports the principle that everybody should be given an education to use media in passive, active and interactive modes. In other words, while Article 8 of Recommendation 1466 acknowledges the need to help people “have a greater say in the media offer and output”, ISFE would suggest another word for it: empower people to use and produce media as they like. This is in line with the suggestion made by Dr Arthur I. Pober in the course of the public workshop held by the Commission on November 8, 2006 to the effect of “putting individuals in control”.

Not only do we support this principle, we contribute to such an education in no small fashion. From an educational standpoint, interactive software will provide users with problem-solving tasks that have an inherent intellectual or educational value, unlike the more passive forms of entertainment provided by traditional content¹. John C. Beck, senior research fellow at the Annenberg

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Center of the Digital Future, University of Southern California, puts it that way:
“Gamers have amassed thousands of hours of rapidly analyzing new situations, interacting with characters they don’t really know, and solving problems quickly and independently. Admittedly, they have gained that experience in a simplified world focused almost entirely on themselves. But that world has also emphasized tangible results and given them constant, critical feedback. Isn’t such a world in essence a well-designed training environment – especially compared to watching TV, shopping, or many other activities that digital games have probably displaced? Even compared to team sports, aren’t the skills they are learning more directly relevant to professional work?” (in “Got Game” Harvard Business School Press)
An increasingly common view in education circles is that today’s media-savvy kids are tomorrow’s lifelong learners. Moreover, many child psychologists agree that PC and video games enhance a sense of community among players, adding a social development aspect to the value of games.

3. **Media production.** These skills are as indispensable a companion to media understanding as writing skills are to reading. What drives players into a game is the ability to play against a machine or other players, not so much the look and feel of the setting. Drawing on this experience, the most fun and productive part of media literacy is the ability to make a personal difference, to leave one’s own footprint, much more than to absorb information or entertainment.

4. **Where to be educated?** The Mediappro study ([www.mediappro.org](http://www.mediappro.org)) identified a growing gap between tools used at school and those used in all other environments (at home or friends’ places, on commuting, etc). This should not be so, as this gap contributes to build up a feeling of estrangement among teenagers relative to their school environment. Quite the opposite: schools should be able to accommodate all platforms used by the younger generation to access media, hence to reach out to the world around them. Ireland’s Fis program ([www.fis.ie](http://www.fis.ie)) as demonstrated at the public workshop held by the Commission on 8 November 2006 is just another brilliant example of what can be accomplished in this respect. It is worth noting that the presenter highlighted problem-solving and enhanced self-esteem – two recognized virtues of computer games - among other proven benefits of this experiment in movie-making.

The need to make the favourite platforms of the younger generation available at school and used as a teaching tool there is all the more acute in the case of games so as the other prime source of education, i.e. parents, is not so familiar with them, due to a generation effect. Parents are therefore more in need of education about interactive software than able to give it themselves.

This being said, media literacy should be addressed outside schools as well, as suggested by education expert Andrew Burn (see July conference proceedings p 42). Prof. Burn points to UK’s Film Education as a good template for the game literacy sub-set of media literacy to emulate.
5. **Ways and means.** We think that game literacy warrants to be taught as a specialist subject. However, preliminary probing with the teaching community show that a number of teachers would appreciate being enabled to teach history, geography, etc by incorporating a game engine into their methodology.

6. Not applicable

7. **Funding.** ISFE sees media literacy as a natural for public-private partnerships. In light of our answer to Question 4, access to teachers and parents is instrumental to successful media literacy programs. In most countries, governments would hold the keys to these two communities that lie at the very heart of such endeavours. Assuming industry is given proper access, we, together with teachers, would gladly contribute to shaping the substance to be taught. Incidentally, it is worth noting that an embryonic step in this direction has been taken in France through a joint-venture between ISFE and Calysto (references).

8. Not applicable

9. Not applicable

10. Not applicable

2/ **Commercial Communication literacy**

11. Not applicable

3/ **Media literacy for audiovisual works**

12. Not applicable

4/ **Media literacy in the online environment**

13. With the financial support of the European Commission (Safer Internet Programme), ISFE is developing a complement to the successful PEGI self-regulation (see [www.isfe-eu.org](http://www.isfe-eu.org)). The underlying concept is to provide European parents with information likely to inform their decisions regarding their children’s access to online gaming. For lack of an ability to encapsulate the ever-changing content of online games into a fixed rating, the PEGI Online Working Group designed a set of rules directly inspired by the PEGI system and guaranteeing that signatories to these rules are committed to protect minors the PEGI way. These rules, enshrined into a PEGI Online Safety Code (POSC), will provide European parents with information regarding how their children are protected when they play online through gateways carrying the PEGI Online label.
Another layer of information will be provided to parents by an educational website dedicated to spreading constantly updated, easy-to-read information about the many forms of online gaming and the various levels of risk to minors associated to the respective category of online games.

14. Copyright, that part of the legal system which protects intellectual property, the creation of the mind, is the central foundation of many industries today. The interactive software industry is no exception. Information is indeed king but if the mental endeavour which underpins this industry is to continue to develop respect for copyright must likewise grow, especially amongst the young. ISFE and its membership is continually involved in education of the public in this regard and therefore feels that awareness of copyright must be an integral part of any media literacy programme.

13. Not applicable