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Valve Corporation
Bellevue
WA 98004
US

Appeal to Valve Corporation to increase efforts to hinder distribution of pornographic games to their under-aged users on Steam.

Dear Valve Corporation.

As of May 2023, Steam is one of the largest distribution platforms for games on the PC worldwide. Because of its widespread popularity, a considerable size of the user base will in all likelihood consist of young users.

Gaming is also popular among children and teenagers in Norway. A survey by the Norwegian Media Authority suggests that **3 out of 4** children play video games (Barn og Medier, 2022).

In the [Steam Subscriber Agreement](#) it is noted that “Steam is not intended for children under 13”. And according to the user terms one may not create an account on the Steam platform if the user is under the age of 13.

In short: In compliance with the user terms, it would be appropriate to state that the user base may consist of users from age of thirteen and up.

With a massive library of gaming-content Steam offers games across all age groups. In one end you may find games that has the lowest PEGI-rating of 3, and in the other adult-only titles.

The platform also has several parental-settings to hinder young users to access content that may not be age-appropriate.

- An age-gate for NSFW-content (not suitable for work), where one must enter one's birthdate (easy to bypass).
- Option to filter out Store-content in settings/preferences for general mature content, gore, nudity, adult sexual content etc. (easy to bypass).
- Parental setting: Family library sharing and Family view to curate access to content only approved by adult (harder to bypass, if set up properly by parent or guardian).

The Steam platform in comparison to other major gaming platforms allows in their policy what may be considered pornographic games. Other major gaming-platforms prohibits this type of content.

As an example, [Epic Games](#) states in their policy that they prohibit the following content:

- Products that contain prohibited content (hateful or discriminatory content, pornography, and illegal content) are not eligible for distribution on the Epic Games Store.

Microsoft Store has a similar policy:

- Your product must not contain or display content that a reasonable person would consider pornographic or sexually explicit.

Playstation Store and Nintendo eShop in a similar manner, will not contain this type of content in the same manner as Steam does.

Steam also has limits to content that may be published on their gaming-platform:

- Sexually explicit images of real people.
- Adult content that isn't appropriately labeled and age-gated.

Our appeal to Valve Corporation is to further increase measures that prohibits users of a young age to access what may be considered as pornographic games.

Here are some examples to be considered of games available on the Steam platform:

Fresh Women: Your journey will be filled with comedy, drama, and lots of sex (the developer's description of the game).

- This game includes images and animations that include full body nudity including visible genitals, sexual intercourse, oral and anal sex. The content is computer animated, but displays realistic video-content of all the examples mentioned above, and more.

Brothel Simulator II: Brothel Simulator II is a simulation game in which you manage your own brothel. Your objective is to maximize profits by keeping customers entertained and coming back for more (the developer's description of the game).

- We have not viewed this gaming content in great detail. But the store-page images and videos promoting the game, seem to draw a likeness to mainstream pornographic content.

Other examples from the Steam platform could be *The Lust City*, *Love Season*, *Lust theory* etc.

Our appeal is not directed at this content directly: Whether this content may or may not be problematic on its own. This is not a matter to be considered here. Our appeal is directed for increased measures to hinder users from the age of 13 - 17, that may be considered to be a part of Steam's user base, to access this type of content.

Most pornographic online-sites has an adult only (18+) warning label of some kind. In the Norwegian penal code laws concerning pornographic content is directed at the distributor, not the user or child itself. In the penal code § 317 it is illegal for anyone to distribute pornographic content to users under the age of 18.

Steam has several measurements to create barriers for users to access pornographic content including an age gate where one must enter one's date of birth to access this type of content. This is very easy to bypass – by entering a fake birthdate etc.

Another measure on Steam must be actively set up by parents and guardians themselves. Namely the *Family View* which will lock access to any game-content or the store itself, before needing approval of the parents.

However, a Norwegian [study](#) done in 2020, shows that parents often fail to use parental settings on childrens devices. 7 out of 10 parents for children aged 13 and up, do not use these types of parental controls “actively”. This study was done amongst 10 427 participants, where a portion of these where parents of children ages 13 and up (Skjermet Barndom, 2020).

In this regard, family settings that must actively be set up by parents or guardians, may be considered not to be enough, as many guardians fail to actually put these options to use.

The Norwegian organization Save The Children has also done extensive research into the effects of [pornography on children](#). Among several things, pornography is considered to give children a faulty view on sex and sexuality, where this type of material often contains disproportional relations to women and men, unrealistic body-influence, rough sex, etc.

Please note that our appeal is not criticism of pornographic content itself, but the area of contributing to the availability of this content for young users.

In sum we would ask Valve Corporation to further take actions to hinder users between the age group 13 – 17 to access material on Steam that may be pornographic, adult-only content.

We thank you for looking into this matter further.

Yours sincerely,



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Barnevakten is a Norwegian non-profit and independent foundation that conveys facts and provides advice regarding children's and young people's media use. Our vision is that children and young people must use the media in a safe and conscious way. Read more about us here: barnevakten.no/about-us

This appeal has also been forwarded to, not excluding other, relevant recipients:

- Ministry of Children and Families
- The Norwegian Media Authority
- The Media Council (Denmark)
- Korus Øst
- Bergens Tidende
- Common Sense Media
- Lightup Norway