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Legal Analysis Regarding The Implementation of The Indonesian Game Rating System (IGRS) in The Protection of Child Consumers in Indonesia

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Abstract: This study examines the implementation of the Indonesian Game Rating System (IGRS) within Indonesia's legal framework, with particular emphasis on the protection of child consumers in the digital gaming industry. While Indonesia's rapidly expanding gaming market has generated significant economic opportunities, it has also increased children's exposure to age-inappropriate digital content. In response, the Government introduced the IGRS as a national game classification system based on age suitability and content descriptors, most recently strengthened through Minister of Communication and Digital Affairs Regulation No. 2 of 2024. This study employs normative legal research using statutory and conceptual approaches to analyze relevant legislation, ministerial regulations, legal doctrines, and documented enforcement practices through descriptive-qualitative analysis and teleological interpretation. The findings demonstrate that the IGRS remains structurally incomplete due to the absence of a Government Regulation establishing a comprehensive legal framework, limited harmonization with Law No. 8 of 1999 on Consumer Protection, and continued reliance on a self-classification mechanism that raises concerns regarding regulatory accountability and legal certainty. Furthermore, the existing enforcement system lacks clear institutional coordination and a proportional enforcement mechanism capable of responding effectively to different levels of regulatory violations. This study concludes that the current IGRS framework has not yet provided optimal legal protection for child consumers. Accordingly, it recommends the enactment of a dedicated Government Regulation, the strengthening of institutional coordination among relevant authorities, and the adoption of a graduated enforcement framework comprising preventive supervision, administrative sanctions, civil remedies, and criminal sanctions as *ultima remedium* to enhance legal certainty, regulatory effectiveness, and child consumer protection within Indonesia's digital gaming sector.

Keyword: Consumer Protection, Digital Games, IGRS.

INTRODUCTION

The increasing accessibility of digital devices in the contemporary digital era has generated a wide range of societal impacts, one of the most significant being the rapid growth of the gaming industry and the expanding number of players worldwide. Ryakala, P (2020) also stated that the Creative Industry (including gaming sector) is generating a large number of job fields. As a result, the gaming sector has emerged as one of the highest-revenue industries in the global economy. According to data from the Indonesian Game Association (AGI), Indonesia constitutes the largest gaming market in Southeast Asia, with an annual market value exceeding USD 1.5 billion and a continuously growing active user base (Allcorrect Games, 2023). This growth has generated substantial economic benefits for business actors while simultaneously accelerating innovation within the technology sector. As Dogruel and Joeckel (2013) demonstrated in their comparative analysis of rating systems in the United States and Europe, the rapid growth of the gaming market across national boundaries has made effective game classification frameworks an increasingly critical instrument for consumer protection regulators worldwide

Notwithstanding these positive developments, the expansion of the gaming industry has also given rise to significant consumer protection concerns. Video game content that is not aligned with the age and psychological development of players may expose users to violent content, mature themes, and the risk of gaming addiction (Khorsandi and Li, 2022). These risks are particularly pronounced among vulnerable consumer groups, especially children and adolescents, whose cognitive and psychological development renders them more susceptible to harmful digital content and possibly causes addiction. Mohammad et al. (2023) stated that video game addiction falls into the category of Internet gaming disorders (IGDs), which have been strongly correlated with motivational control issues and are regularly compared with gambling. An empirical studies further reveal that many consumers, including parents and children, tend to neglect or misunderstand game rating labels when selecting games to purchase or download (Hollett et al., 2022), suggesting that the protective function of a rating system is contingent not only on the accuracy of its classifications but also on effective consumer-facing communication. The World Health Organization (WHO) has also formally recognized Gaming Disorder as a diagnosable condition under the International Classification of Diseases, Eleventh Revision (ICD-11), thereby highlighting the public health and legal implications of inadequately regulated gaming content (WHO, 2019). Recent empirical studies likewise demonstrate that children and adolescents exhibit a higher level of vulnerability to problematic gaming behavior due to developmental, psychological, and social factors, thereby reinforcing the need for age-appropriate regulatory safeguards within digital gaming ecosystems (Khorsandi and Li, 2022).

Previous studies have examined digital consumer protection and game regulation from various perspectives. Novita and Santoso (2021) analyzed the urgency of reforming consumer protection regulations in the digital business era and concluded that the existing Consumer Protection Act (Law No. 8 of 1999) is increasingly inadequate for addressing disputes arising from digital transactions, primarily because it does not specifically accommodate the characteristics of digital products and services. Similarly, Nugraha (2021) argued that the regulation of electronic information and telematics requires a fundamentally different regulatory approach from conventional legal frameworks due to the borderless and highly dynamic nature of digital environments. As it has been stated before, Khorsandi and Li (2022) demonstrated that excessive and unregulated exposure to video games is strongly associated with addictive behavior among children and adolescents, underscoring the necessity of effective, internationally benchmarked rating frameworks such as the Pan European Game Information (PEGI) system and the Entertainment Software Rating Board (ESRB) that provide clear, consistent, and comprehensive content information for consumers. Felini (2015), in a pedagogical critique of the PEGI and ESRB systems, argued that current rating frameworks are inherently limited because they conflate multiple dimensions of content suitability into single categorical labels, making them difficult for parents and caregivers to interpret accurately. Empirical research by Azam (2023) similarly found that while families actively use game age ratings, there remains a severe lack of understanding about the regulatory bodies behind these systems and a persistent mismatch between cultural values and rating criteria a gap that is equally observable in Indonesia's IGRS implementation context. However, these studies do not specifically examine the relationship between the Indonesian Game Rating System (IGRS) and the protection of child consumers as a distinct and legally protected category under Indonesian law.

In response to these regulatory concerns, the Government of Indonesia, through the Ministry of Communication and Informatics, established a video game classification framework known as the Indonesian Game Rating System (IGRS). The system was initially introduced through Minister of Communication and Information Technology Regulation Number 11 of 2016 and subsequently revised through Minister of Communication and Digital Affairs Regulation Number 2 of 2024 concerning Game Classification. Under the IGRS, video games are classified according to age suitability into the following categories: 3+ (Ages Three and Above), 7+ (Ages Seven and Above), 13+ (Ages Thirteen and Above), 15+ (Ages Fifteen and Above), 18+ (Ages Eighteen and Above), and Refused Classification (RC). The latter category applies to games containing pornography, gambling elements, or other forms of content prohibited under Indonesian law. International legal commentators have observed that the IGRS represents a significant step toward aligning Indonesia's digital content governance with global child-safety standards, while simultaneously noting that its practical effectiveness continues to depend heavily on consistent enforcement and industry cooperation (Rajah & Tann Asia, 2025; SSEK Law Firm, 2025).

Despite the enactment of the IGRS, significant legal challenges remain in its implementation. First, no comprehensive regulatory framework governing enforcement mechanisms and sanctions for violations of IGRS provisions has been established at the level of a Government Regulation or higher legislative instrument. Second, the relationship between the IGRS and the consumer protection obligations set forth in Law Number 8 of 1999 on Consumer Protection remains insufficiently harmonized, particularly with regard to child consumers as a vulnerable and legally protected group. Third, oversight of IGRS implementation remains limited, resulting in the widespread circulation of games that either lack official ratings or fail to comply with applicable classification requirements. As Arifin et al. (2021) have noted in the context of Indonesian consumer law reform, the persistence of such enforcement and harmonization gaps reflects a broader systemic challenge in adapting Indonesia's legal infrastructure to the realities of digital commerce, where consumers face significant asymmetries of information and power in their dealings with platform operators. Collectively, these deficiencies undermine the effectiveness of the IGRS as a legal instrument for the protection of child consumers. Comparative research also suggests that effective game rating systems should be complemented by transparent enforcement procedures, independent oversight, and meaningful sanctions to ensure regulatory compliance rather than functioning solely as informational labels (Xiao, 2023).

Accordingly, this study aims to: (1) analyze the legal framework governing the implementation of the IGRS within the Indonesian legal system; (2) evaluate its conformity with the consumer protection principles established under the Consumer Protection Act, with particular emphasis on child consumer protection; and (3) examine potential measures for optimizing IGRS implementation in order to strengthen the protection of child consumers within Indonesia’s digital gaming sector. The novelty of this research lies in its adoption of a child consumer protection-oriented perspective in analyzing the Indonesian Game Rating

System (IGRS), an aspect that has received limited scholarly attention, as well as in its formulation of a normative framework for regulatory reform. It is expected that this study will contribute both to academic discourse and to the development of practical regulatory policies aimed at ensuring that Indonesia's gaming industry better safeguards the interests of child consumers

METHOD

This study employs a normative legal research approach, focusing on the examination of legal norms, principles, and rules governing the implementation of the Indonesian Game Rating System (IGRS) within the framework of child consumer protection. Following Marzuki's (2017) conception of normative legal research, this method was selected because the study seeks to assess the coherence between existing legal norms and the principles that should govern them, as well as the consistency between statutory regulations and broader normative legal standards.

The study adopts two complementary research approaches: the statute approach and the conceptual approach. The statute approach involves a systematic examination of legislation relevant to the IGRS and child consumer protection in Indonesia, including Law Number 8 of 1999 on Consumer Protection, Law Number 19 of 2016 on Electronic Information and Transactions, Law Number 35 of 2014 on Child Protection, Minister of Communication and Information Technology Regulation Number 11 of 2016, and Minister of Communication and Digital Affairs Regulation Number 2 of 2024 concerning Game Classification, along with other relevant regulations. The conceptual approach draws upon prevailing legal doctrines, scholarly opinions, and theoretical frameworks developed within the field of legal science.

The legal materials used in this study are categorized into three hierarchical levels. Primary legal materials consist of applicable legislation, judicial decisions, and official government documents. Secondary legal materials include legal literature, peer-reviewed journal articles, and previous empirical and doctrinal studies relevant to the research topic. These include studies examining the dynamics of consumer legal protection in the digital era, such as Prayuti (2024) and Budiartha et al., (2021), whose analyses of consumer rights and product information obligations under Law No. 8 of 1999 offer a relevant doctrinal backdrop for the present study's examination of IGRS compliance challenges.. Tertiary legal materials comprise legal dictionaries, encyclopedias, and other reference materials used to clarify and support the interpretation of key legal concepts.

Data collection was conducted through systematic and comprehensive library research. The collected legal materials were subsequently analyzed using a descriptive-qualitative method, whereby the materials were systematically described and critically examined before deductive conclusions were drawn from general legal propositions to specific findings. Throughout the analytical process, methods of legal interpretation, particularly systematic interpretation and teleological interpretation, were applied to elucidate the meaning, purpose, and interrelationship of the relevant legal norms.

RESULTS AND DISCUSSION

Legal Framework Analysis of the Indonesian Game Rating System (IGRS) and Its Implementation in the Indonesian Legal System

The IGRS is embedded within a multi-layered regulatory framework. At the legislative level, Law No. 8 of 1999 on Consumer Protection, Law No. 19 of 2016 on Electronic Information and Transactions, and Law No. 35 of 2014 on Child Protection collectively provide the normative basis for protecting child consumers from harmful digital game content. At the ministerial regulation level, MOCIT Regulation Number 11 of 2016 (now replaced) and

MOCDA Regulation No. 2 of 2024 specifically operationalize the game classification mandate. Table 1 below summarizes the key regulatory instruments governing IGRS implementation.

Table 1. Legal Framework Governing IGRS Implementation in Indonesia

Regulation	Year	Key Substance
Law No.8 of 1999	1999	Consumer Protection
Law No. 11/2008 jo. Law No. 19/2016	2008	Electronic Information and Transactions (ITE)
Law No. 35 of 2014	2014	Child Protection from Harmful Content
MOCIT Reg. No. 11 of 2016	2016	Classification of Interactive Electronic Games (Original IGRS)
MOCDA Reg. No. 2 of 2024	2024	Game Classification (Revised IGRS Framework)

Source: Compilation of Statutory Instruments, analyzed by Authors, 2026

Looking at the table above, an analysis of the regulatory hierarchy reveals a fundamental normative gap: the absence of a Government Regulation (*Peraturan Pemerintah*) that comprehensively governs all aspects of the IGRS system, including classification procedures, enforcement mechanisms, administrative sanctions, and dispute resolution mechanisms. This legal vacuum (*rechtsvacuum*) at the Government Regulation level significantly undermines the binding force and legal certainty of IGRS implementation, as ministerial regulations possess comparatively weaker normative authority and enforcement capacity within Indonesia's legal hierarchy. This form of regulatory disharmony mirrors what Astariyani, Hattori, and Hanum (2024) described as a systemic pattern in Indonesian law whereby the absence of detailed provisions in higher-level instruments allows lower-level regulations to deviate in ways that undermine both legal validity and enforcement effectiveness a finding directly applicable to the IGRS's current reliance on a ministerial regulation as its sole normative foundation.

MOCDA Regulation No. 2 of 2024 represents a meaningful improvement over its predecessor, introducing mandatory self-classification requirements for game publishers, content descriptors, and a two year transition period ending in January 2026. However, the regulation relies solely on administrative sanctions, such as written warnings, temporary suspensions, and access restrictions. Without integration into a broader statutory enforcement framework, these sanctions have limited deterrent effect, particularly for international publishers whose primary market exposure extends beyond Indonesian jurisdiction.

A comparative perspective further illuminates the structural weaknesses of the IGRS framework. Unlike Japan's Computer Entertainment Rating Organization (CERO) and China's Game Software Rating Regulation (GSRR), both of which derive their binding force from statutory instruments equivalent to or higher than a Government Regulation, the IGRS continues to rest exclusively on a ministerial regulation (*Peraturan Menteri*). Within Indonesia's statutory hierarchy under Law No. 12 of 2011 on the Formation of Legislation, ministerial regulations occupy a subordinate position relative to Government Regulations and laws. Consequently, they are more vulnerable to inconsistent enforcement, limited budgetary support, and weaker coercive authority over non-compliant business actors. This hierarchical deficiency is not merely formalistic; it has direct consequences for the credibility of sanctions imposed under the IGRS. Administrative penalties issued pursuant to a ministerial regulation do not carry the same legal weight as those grounded in a Government Regulation or statute when challenged before an administrative court.

This normative deficiency becomes particularly salient when examined through Roscoe Pound's conception of law as a tool of social engineering, as elaborated by Sundari, Luthfiyah, and Rahmawati (2024), which positions law as a mechanism for reconciling competing societal interests namely, the commercial interests of game publishers, the protective interests of child consumers, and the regulatory interests of the state. Viewed through the complementary distinction between preventive and repressive legal protection proposed by Almaida and

Imanullah (2021), Although the IGRS is conceptually designed as a preventive instrument that intervenes before harm occurs by classifying game content prior to distribution, its preventive function is structurally weakened by the absence of a corresponding repressive mechanism capable of addressing violations after they occur. A preventive system without a credible repressive backstop risks devolving into a symbolic compliance regime, in which business actors perceive little legal consequence for disregarding classification obligations. This dynamic is consistent with the findings of Novita and Santoso (2021), who observed that Indonesia's digital consumer protection regulations frequently suffer from an implementation gap between normative aspirations and enforceable obligations.

The territorial limitations inherent in the IGRS framework compound this structural weakness. As Nugraha (2021) emphasized, the borderless character of digital environments renders conventional, territorially bound regulatory instruments inherently difficult to enforce against actors operating from outside Indonesian jurisdiction. The majority of games consumed by Indonesian users, particularly children, are distributed through international platforms whose servers, corporate entities, and content moderation policies are governed primarily by foreign law. Consequently, even where the IGRS is the law on paper, its practical reach over non-domestic publishers remains limited absent a binding cooperative or extraterritorial enforcement mechanism, an issue not directly addressed by either MOCIT Regulation No. 11 of 2016 or its 2024 successor.

Author's comparative analysis of the 2016 and 2024 regulatory instruments reveals both continuity and divergence in regulatory philosophy. MOCIT Regulation No. 11 of 2016 adopted a centralized classification model, under which the Ministry itself determined the appropriate rating for each submitted title. By contrast, MOCDA Regulation No. 2 of 2024 shifts toward a self-classification model, requiring publishers to assess and assign ratings to their own products, subject to subsequent ministerial verification. While this approach mirrors international practices, most notably the Entertainment Software Rating Board's reliance on publisher-submitted questionnaires, it simultaneously transfers a substantial portion of compliance responsibility to industry actors whose commercial incentives may not always align with rigorous self-assessment. In the absence of robust independent auditing of self-classification outcomes, this regulatory shift risks reproducing, rather than resolving, the verification deficit that characterized the 2016 framework. Duffy and Derevensky (2022), in their critical review of the ESRB, argued that effective game rating frameworks must continuously evolve in response to emerging content types and distribution models. They further emphasized that age-rating systems should be complemented by robust parental guidance tools to ensure meaningful protection for children. This standard has not yet been fully achieved by the current IGRS framework, despite the regulatory improvements introduced under the 2024 revision.

Furthermore, the IGRS Refused Classification (RC) category, while clearly defined as prohibiting content involving pornography, gambling, and other statutorily prohibited material, lacks an explicit operational linkage to the criminal provisions contained in the Pornography Law (Law No. 44 of 2008) and the anti-gambling provisions of the Criminal Code. The absence of cross-references between the IGRS classification rules and these substantive criminal statutes creates ambiguity as to whether an RC designation alone is sufficient to trigger a criminal investigation or whether separate and independent proof of the underlying offense is required. This ambiguity undermines legal certainty for both regulators seeking to take action against violators and publishers attempting to understand the full scope of their compliance obligations.

Conformity of IGRS with Consumer Protection Principles

An evaluation of the IGRS's conformity with the fundamental principles of the Consumer Protection Act, reveals a mixed picture. From the perspective of consumer rights under Article 4 of the CPA, the IGRS contributes to the fulfillment of: (a) the right to safety, security, and comfort in the consumption of goods and services; (b) the right to choose and obtain products in accordance with the conditions and guarantees promised; and (c) the right to accurate, clear, and honest information regarding product conditions and guarantees. These contributions are significant but only partial, as their effectiveness depends largely on the quality and accuracy of the classification assigned to each game. Andikatama and Turisno (2024) have similarly argued that Indonesian consumer protection law in the digital era is characterized by a persistent gap between its normative aspirations and its practical capacity to protect consumers from the specific risks posed by digital products and services.

From the perspective of the principle of legal certainty (*asas kepastian hukum*), which constitutes one of the fundamental principles of the CPA, the current IGRS framework indicates several deficiencies. Legal certainty requires the existence of clear norms that can be understood and applied consistently. However, the IGRS currently lacks transparent and measurable classification standards, a clear mechanism for consumer complaints regarding misclassification, and a consistent enforcement record capable of fostering predictable compliance among industry actors. Wahyudi, Budiartha, and Ujianti (2022), in their analysis of producer liability for defective products under Law No. 8 of 1999 on Consumer Protection, found that inadequate supervision by the competent authorities constitutes a primary structural factor allowing non-compliant products to reach consumers. This finding is equally applicable to the implementation of the IGRS, where insufficient oversight of digital distribution platforms continues to weaken regulatory compliance and diminish the effectiveness of child consumer protection.

The conformity analysis is further complicated by challenges relating to digital platform governance, as illustrated by the IGRS controversy involving the Steam platform in April 2026. Following public criticism on social media, the Ministry of Communication and Digital Affairs (Komdigi) confirmed that the age ratings displayed for numerous titles on Steam were inaccurate and misleading. For example, a game containing explicit adult content was labeled as suitable for ages 3 and above, while a family-friendly title was incorrectly classified as 18+ (Kompas.com, 2026; Liputan6.com, 2026). Komdigi clarified that the ratings displayed on Steam originated from an internal self-declaration mechanism that had never been verified through Indonesia's official classification process and that the self-declaration system had not yet been integrated with the official IGRS database (UMJ, 2026). This clarification was consistent with the Ministry's broader enforcement posture, under which game publishers distributing unclassified or prohibited content face the risk of platform-level blocking (Readers.id, 2026a). In response to the government's clarification, Valve removed all IGRS labels from its Indonesian storefront on 6 April 2026 (Readers.id, 2026b).

This incident reflects a broader pattern of enforcement challenges documented by Kominfo in relation to non-compliant digital content. In a related enforcement context, Kominfo reported that more than 846,000 websites and digital platforms containing online gambling content had been blocked between 2018 and 19 July 2023 pursuant to Article 27 paragraph (2) in conjunction with Article 45 paragraph (2) of the ITE Law (CNBC Indonesia, 2023; VOA Indonesia, 2023). Within the context of game classification, Kominfo has likewise confirmed that thousands of game applications have been blocked for violating ITE Law provisions relating to gambling mechanics. The Ministry also retains the authority to issue written warnings to distribution platforms, including Google Play Store, Apple App Store, and Steam, or to suspend access temporarily or permanently within Indonesian territory for games that fail IGRS verification or whose publishers refuse to undergo classification. Collectively, these cases demonstrate that although Komdigi possesses formal enforcement authority, compliance verification across digital platforms remains largely reactive and is frequently triggered by public complaints rather than proactive and systematic audits. Consequently, a structural gap persists between the normative authority of the IGRS framework and its operational capacity to ensure consistent cross-platform supervision.

The principle of justice (*asas keadilan*) under the CPA is also inadequately reflected in the current IGRS framework. The absence of a formal consumer complaint mechanism specifically addressing IGRS misclassification means that child consumers, as well as their parents or guardians, have no clear legal avenue through which to challenge a rating or seek redress when a game bearing an inappropriate classification causes harm. Mau (2025), in a comparative study of consumer protection frameworks in Indonesia and the European Union, argued that the absence of accessible consumer redress mechanisms in the digital sector represents one of the principal structural shortcomings of Indonesian consumer law when compared with more mature regulatory systems. This finding further supports the need to strengthen the IGRS by establishing a dedicated complaint and dispute resolution mechanism capable of providing effective legal remedies for child consumers and their guardians. Masturi (2025) further documented that Indonesian consumers in the digital economy face compounding vulnerabilities stemming from the convergence of weak enforcement, low digital literacy, and insufficient coordination among consumer protection institutions conditions that are directly reflected in the governance challenges facing the IGRS. This regulatory gap then constitutes a systemic deficiency that is difficult to reconcile with the principle of justice embodied in the CPA.

Institutional Governance Model for the Implementation of the Indonesian Game Rating System (IGRS)

The effectiveness of the Indonesian Game Rating System (IGRS) depends not only upon the existence of substantive legal rules but also upon a clear institutional governance structure capable of ensuring consistent implementation and enforcement. Although one possible policy option would be the establishment of an independent supervisory authority dedicated exclusively to game classification, such an approach may create unnecessary institutional duplication because several existing public institutions already possess statutory functions closely related to digital governance, consumer protection, and child protection. Accordingly, this study argues that strengthening institutional coordination among existing agencies constitutes a more proportionate and practical regulatory approach. The Ministry of Communication and Digital Affairs (Komdigi) should remain the principal regulatory authority responsible for administering the IGRS because game classification falls within the scope of electronic system governance and digital content regulation. In exercising this function, Komdigi should be responsible for approving classification standards, supervising publisher compliance, conducting regulatory audits, and imposing administrative sanctions where necessary.

Consumer protection functions should be supported by the National Consumer Protection Agency (BPKN), particularly in receiving complaints from consumers concerning misleading classifications, facilitating dispute resolution, and providing policy recommendations relating to consumer rights within the digital gaming ecosystem. Since inaccurate game classifications may constitute misleading information affecting consumers' right to accurate information under Indonesian consumer protection law, BPKN possesses an important complementary role within the enforcement framework. Meanwhile, the Indonesian Child Protection Commission (KPAI) should contribute from the perspective of child rights protection by monitoring the impact of game content upon children, providing recommendations regarding child-friendly classification standards, and coordinating public awareness programs concerning responsible gaming practices. Because the primary objective of the IGRS is to protect children from age-inappropriate digital content, KPAI's participation strengthens the child protection dimension without requiring the establishment of a separate regulatory institution. Through this coordinated governance model, each institution performs functions consistent with its existing statutory mandate while minimizing regulatory overlap. Only if future regulatory evaluations demonstrate that such coordination is insufficient should Indonesia consider establishing a specialized independent supervisory authority dedicated exclusively to the implementation and enforcement of the Indonesian Game Rating System.

Table 2. Institutional Coordination Model for IGRS Implementation

Institution	Primary Function
Komdigi	Regulation, Supervision, Classification Approval, Audits, Administrative Enforcement
BPKN	Consumer Complaints, mediation, Policy Recommendations, Consumer Protection.
KPAI	Child Protection Oversight, Policy Recommendations, Public Education.
Publishers / Platforms	Self-Classification, Compliance, Reporting Obligations

This table demonstrates that the proposed governance model does not require the immediate establishment of a new independent regulatory authority. Instead, effective implementation of the IGRS can be achieved by strengthening institutional coordination among Komdigi, BPKN, and KPAI, each exercising responsibilities that are consistent with their existing statutory mandates. Such a governance structure promotes regulatory efficiency, enhances accountability, and reduces the risk of overlapping institutional authority while ensuring comprehensive protection of child consumers.

Graduated Enforcement Framework of the Indonesian Game Rating System

The implementation of the Indonesian Game Rating System should adopt a graduated enforcement framework that applies different legal responses according to the seriousness of regulatory violations. Such an approach reflects the principles of proportionality and regulatory responsiveness, ensuring that criminal law functions only as a measure of last resort (ultima remedium). The first stage consists of preventive supervision. Regulatory authorities should prioritize education, compliance assistance, routine monitoring, and periodic audits to encourage voluntary compliance by publishers and digital distribution platforms. Preventive measures reduce regulatory violations without immediately resorting to punitive sanctions.

The second stage involves administrative enforcement. Administrative sanctions should apply where publishers or digital platforms fail to comply with mandatory classification obligations, submit inaccurate age ratings, fail to update classification information following significant content changes, or otherwise violate procedural regulatory requirements. Available sanctions may include written warnings, corrective orders, administrative fines, temporary suspension of distribution, content removal, and application blocking depending upon the seriousness and repetition of the violation.

The third stage consists of civil liability. Consumers who suffer losses resulting from inaccurate classifications or misleading information should be entitled to pursue compensation in accordance with Indonesian consumer protection law. Civil remedies reinforce consumer rights while encouraging higher compliance standards among digital game publishers. And lastly, the fourth stage involves criminal law intervention. Criminal sanctions should not constitute the primary enforcement mechanism but should instead operate as ultima remedium. Criminal liability should therefore be limited to intentional and serious misconduct, including deliberately providing false classifications, intentionally distributing harmful content to children without mandatory classification, or repeatedly violating administrative orders resulting in significant harm to child consumers. This graduated enforcement model promotes legal certainty, proportionality, and regulatory effectiveness by ensuring that enforcement measures correspond to the severity of the violation while preserving criminal sanctions for the most serious offences.

Enforcement Stage	Type of Violation	Legal Response
Preventive Supervision	Minor procedural non-compliance or first-time violations.	Education, guidance, compliance monitoring, and regulatory audits.
Administrative Enforcement	Failure to conduct mandatory classification, inaccurate or misleading ratings, failure to update classification information, reporting violations.	Written warnings, corrective orders, administrative fines, content removal, temporary suspension, or application blocking.
Civil Remedies	Consumers suffer material or immaterial losses resulting from inaccurate classifications or misleading information.	Compensation claims and dispute resolution under Indonesian consumer protection law.
Criminal Enforcement (*Ultima Remedium*)	Intentional false classifications, deliberate distribution of harmful content to children without proper classification, repeated serious violations causing significant harm.	Criminal investigation and prosecution under applicable legislation

This table illustrates a proportional enforcement model in which regulatory intervention escalates according to the severity and intent of the violation. Preventive supervision is intended to promote voluntary compliance, while administrative sanctions address regulatory breaches without immediately resorting to punitive criminal measures. Civil remedies safeguard consumer rights by providing compensation for losses, whereas criminal sanctions remain an ultima remedium reserved exclusively for intentional and serious violations that endanger child consumers. This graduated approach enhances legal certainty, supports regulatory effectiveness, and reflects the principle of proportionality within Indonesia's legal system.

CONCLUSION

This study demonstrates that the Indonesian Game Rating System (IGRS), in its current form, remains an incomplete legal instrument for protecting child consumers within Indonesia's rapidly expanding digital gaming sector. Although the enactment of Minister of Communication and Digital Affairs Regulation No. 2 of 2024 represents an important regulatory milestone, the existing framework continues to exhibit significant normative and institutional shortcomings, particularly regarding legal certainty, enforcement mechanisms, and institutional coordination.

This study recommends that the implementation of the Indonesian Game Rating System should prioritize and increase institutional coordination among Komdigi, BPKN, and KPAI. Such an institutional governance model minimizes regulatory overlap while ensuring that regulatory, consumer protection, and child protection functions are exercised according to each institution's statutory mandate. Most importantly, the regulatory framework should adopt a graduated enforcement model consisting of preventive supervision, administrative sanctions, civil remedies, and criminal sanctions as ultima remedium, thereby ensuring proportionality, legal certainty, and effective protection of child consumers.

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