

No Wishes for kids in Brazil: The repercussions of Law 15:111 in Genshin Impact

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INTRODUCTION

Brazil offers a critical Global South perspective on the regulation of gamblified monetization systems in digital games. As one of the largest gaming markets worldwide, Brazil has historically occupied a peripheral position in global regulatory debates dominated by European and East Asian jurisdictions, despite facing comparable social and economic impacts. Law No. 15.211/2025 emerges within a national context shaped by enduring tensions around internet governance, gambling, and state oversight of digital platforms—issues that extend well beyond games themselves. Public debates around the law frequently intersect with broader concerns about online censorship, platform accountability, and the uneven application of regulation across global digital industries. This context suggests that player interpretations of loot box regulation in Brazil are not merely legalistic but politically and culturally situated, offering insight into how regulatory narratives circulate, mutate, and acquire meaning in Global South digital publics.

The Statute of the Child and Adolescent (ECA), sanctioned in 1990, remains a key rights instrument but was created before the rise of the internet, leaving gaps in digital protections. These deficiencies led to Law 15.211/25, the “Digital ECA,” sanctioned on September 17, 2025—a landmark in safeguarding minors online. Senator Alessandro Vieira (MDB-SE), who proposed the bill, called it the “first law of its kind in the Americas.” Digital platforms and product providers must comply within six months, as the law takes effect in March 2026 (Abreu, 2025). It enforces strict age verification, default protective privacy settings, accessible parental controls, bans on loot boxes for minors, restrictions on targeted ads, and oversight by the National Data Protection Authority (ANPD), which can fine up to R\$ 50 million (approximately USD 9.3 million) per violation (Brasil, 2025).

Genshin Impact (MiHoYo, 2020) is one of the games that is affected. Under the new law, its monetization feature “Wishes” qualifies as a loot box and would be banned for minors or in games accessible to them. The game has about 15.2 million monthly users worldwide and around 328,000 in Brazil, growing 2.8% annually (Powell, 2025). Comparing the law to the game’s Terms of Service and Privacy Policy reveals multiple non-compliance issues, including illegal loot boxes, lack of age verification, targeted profiling, and unclear jurisdiction. Online communities have reacted strongly. Players are debating the law’s implications across YouTube, Reddit, and Discord. This research analyzes those discussions using a netnographic approach to identify recurring themes about Law 15.211/25’s impact on *Genshin Impact*.

BACKGROUND

Between 2015 and 2025, research on the intersections between video games, law, and regulation has expanded alongside monetization models that mirror gambling dynamics, such as loot boxes and gacha systems. Scholars (Abarbanel, 2018; Heinisuo, 2022; Xiao, 2021, 2023) highlight that these mechanisms reproduce gambling structures of risk, chance, and reward, raising ethical and legal issues related to transparency and player vulnerability. Studies (Drummond & Sauer, 2018; Macey & Hamari, 2022) describe gamblification as a sociocultural process that normalizes speculative consumption in digital play. While countries like Belgium, China, and Australia have implemented restrictive regulations, Brazil has only recently advanced with the Digital Statute for Children and Adolescents (Law No. 15.211/2025), which restricts loot boxes for minors. Nonetheless, there remains a notable gap in Brazilian research, particularly in game studies, where the cultural and political dimensions of gamblification are still insufficiently explored. Rather than assessing the legality of gacha systems per se, this study examines how regulatory discourse is translated, contested, and re-signified within player communities.

METHODOLOGY

This study adopts a qualitative, two-phase research design combining exploratory legal-textual analysis with community-focused netnography. The first phase was exploratory and diagnostic in nature. We conducted a close reading of Law No. 15.211/2025 and compared its provisions to Genshin Impact’s core mechanics—particularly its monetization systems—as well as to the game’s publicly available Terms of Service and Privacy Policy. This phase aimed to identify potential points of legal friction and ambiguity rather than to assess formal compliance. During this process, we observed an intensification of player-led debates across social media platforms regarding the law’s implications for the game, which informed the focus and scope of the second phase.

Based on this exploratory stage, three working hypotheses guided the subsequent analysis: (1) that player discussions would conflate legal, moral, and political concerns when interpreting the regulation of gacha systems; (2) that discourse surrounding Law No. 15.211/2025 would extend beyond game mechanics into broader debates about internet regulation and state control in Brazil; and (3) that legal ambiguity would contribute to the circulation of partial or inaccurate interpretations of the law within player communities. These hypotheses were not treated as propositions to be tested deductively, but as sensitizing concepts guiding thematic coding.

The second phase employed a netnographic approach focused on Brazilian Genshin Impact communities on YouTube and Reddit. Data consisted of user commentary from two YouTube videos (N = 422 comments) produced by Brazilian content

creators specializing in Genshin Impact and other HoYoverse titles, and four Reddit threads (N = 351 comments) drawn from three subreddits. Threads and videos were selected based on visibility, engagement levels, and explicit focus on Law No. 15.211/2025 and its implications for the game. Data collection was limited to publicly accessible content in Brazilian Portuguese and was conducted using Reddit Scraper and YouTube Data Tool.

The analytical process combined human-led thematic analysis with AI-assisted triangulation. Initial codes were generated manually by the researchers based on close reading and the guiding hypotheses. These codes were then cross-validated using two data-input-based AI systems—NotebookLM and DeepSeek 3.2—following an AI–human triangulation strategy (Bennis & Mouwafaq, 2025). AI outputs were used to test code consistency and identify overlooked patterns, while interpretive decisions remained with the researchers to mitigate model bias and contextual misreading (Nguyen-Trung, 2025; Christou, 2024).

Several limitations should be noted. The dataset privileges highly engaged users and visible discussions, potentially underrepresenting more moderate or disengaged perspectives. Additionally, the analysis focuses on Brazilian online spaces and does not account for cross-national player discourse. Nevertheless, the volume and intensity of engagement observed provide a meaningful snapshot of how regulatory narratives are interpreted and negotiated within Brazilian gaming publics.

RESULTS AND NEXT STEPS

The iterative coding process led to three main themes. The first theme raises concerns about the legal and technical application of the law, focusing on the company's adherence to it and the suitability of the game. Commenters engage in lengthy discussions about the differences between gacha and loot boxes, which could potentially lead to technical legal misinterpretations. A second theme discusses the effectiveness of the law's application, as it still depends, ultimately, on parental supervision, and it would be easy to “bypass the age verification mechanisms.” The third theme is connected to a national discussion about gambling, censorship, and platform regulation in Brazil, considering the law a “smokescreen” to censor platforms and regulate the internet. They contend that the government should prioritize regulating online gambling platforms and sports betting companies. In summary, the initial analysis reveals that the community is engaged with the issue in a way that extends beyond the immediate effects on gaming culture in Brazil; it is also linked to the country's political landscape and its conflicting ideologies concerning online content moderation.

In the next stage of this research, we intend to extend this discussion through a semi-structured interview with legal specialists in gaming regulation, seeking to confirm our preliminary observations and refine our understanding of how the juridical field envisions the unfolding of this scenario. Through this dialogue between law and game studies, we hope to illuminate how regulatory narratives interpret, and perhaps reshape, mechanics of chance and monetization in digital environments. The interviews aim to identify gaps between juridical interpretation and community understandings, rather than to adjudicate legal correctness. Furthermore, we will investigate more deeply how Law 15.211/2025 may affect specific in-game functionalities, such as Genshin Impact's “Wishes” system, and what these changes could imply for developers, players, and digital governance in Brazil. Ultimately, these continuations aspire to enrich the interdisciplinary debate on how legislation, culture, and technology co-produce the limits of play in contemporary societies.

BIBLIOGRAPHY

- Abarbanel, Brett. 2018. "Gambling vs. Gaming: A Commentary on the Role of Regulatory, Industry, and Community Stakeholders in the Loot Box Debate." SSRN Electronic Journal. https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3129811
- Abreu, Raíssa. 2025. "Plataformas têm seis meses para se adaptar ao ECA Digital." *Rádio Senado*. Accessed November 7, 2025. <https://www12.senado.leg.br/radio/1/noticia/2025/09/22/plataformas-tem-seis-meses-para-se-adaptar-ao-eca-digital>
- Bennis, I., and S. Mouwafaq. 2025. "Advancing AI-Driven Thematic Analysis in Qualitative Research: A Comparative Study of Nine Generative Models on Cutaneous Leishmaniasis Data." *BMC Medical Informatics and Decision Making* 25 (1): 124. <https://doi.org/10.1186/s12911-025-02961-5>
- Brasil. Lei nº 15.211, de 17 de setembro de 2025. "Dispõe sobre a proteção de crianças e adolescentes em ambientes digitais (Estatuto Digital da Criança e do Adolescente)." Brasília: Presidência da República, September 17, 2025. Accessed November 5, 2025. https://www.planalto.gov.br/ccivil_03/ato2023-2026/2025/lei/L15211.htm
- Christou, Panayiota. 2024. "Thematic Analysis through Artificial Intelligence (AI)." *The Qualitative Report* 29 (2): 560–576. <https://doi.org/10.46743/2160-3715/2024.7046>
- Drummond, Aaron, and James D. Sauer. 2018. "Video Game Loot Boxes Are Psychologically Akin to Gambling." *Nature Human Behaviour* 2 (8): 530–532. <https://doi.org/10.1038/s41562-018-0360-1>
- Heinisuo, Harri. 2022. *Gacha Monetization Mechanics: Customizable Simulator for Random Draws*. Master's thesis, Tampere University, Master's Degree Programme in Computer Science. <https://trepo.tuni.fi/bitstream/handle/10024/141112/HeinisuoHarri.pdf?sequence=2&isAllowed=y>
- Macey, Joseph, and Juho Hamari. 2022. "Gamblification: A Definition." *New Media & Society* 26 (4): 2046–2065. <https://doi.org/10.1177/14614448221083903>
- MiHoYo. *Genshin Impact*. Shanghai: MiHoYo, 2020.
- Nguyen-Trung, K. 2025. "ChatGPT in Thematic Analysis: Can AI Become a Research Assistant in Qualitative Research?" *Quality & Quantity*. <https://doi.org/10.1007/s11135-025-02165-z>

Powell, Annie. 2025. "Genshin Impact Live Player Count And Statistics." *Icon Era*. Accessed November 7, 2025.
<https://icon-era.com/blog/genshin-impact-live-player-count-and-statistics.135/>

Xiao, Leon Y. 2021. "Regulating Loot Boxes as Gambling? Towards a Combined Legal and Self-Regulatory Consumer Protection Approach." *Interactive Entertainment Law Review* 4 (1): 27–47. <https://doi.org/10.4337/ielr.2021.01.02>

Xiao, Leon Y. 2023. "Breaking Ban: Belgium's Ineffective Gambling Law Regulation of Video Game Loot Boxes." *Collabra: Psychology* 9 (1): 57641.
<https://doi.org/10.1525/collabra.57641>

BIO

Dr. Gabriela Birnfeld Kurtz is an Assistant Professor at the University of the Fraser Valley, Canada. Her research focuses mostly in video games and society, with special focus on gender violence, political discourses and decolonial practices. Her other investigations include social media and society phenomenon, such as data visualization on YouTube Lives for sentiment analysis and toxic discourses.

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