

# Compliance of Gacha Probability Disclosure Regulations: a Comparative Study across East Asia

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## Keywords

Gacha, Loot Boxes, Video Games, Law, regulation and policy, Probability Disclosure, East Asia

## INTRODUCTION

“Gacha” is a monetization model in video games that allows players to use real-world money to purchase random rewards (Koeder and Tanaka 2017). Regulators are concerned about their gambling-like features. Psychology research has found an association between gacha spending and problem gambling (Zendle et al. 2020). However, most gacha cannot be regulated under gambling law due to the rewards lacking real-world monetary value (Nielsen and Grabarczyk 2019). Therefore, a more widely adopted alternative approach to regulating gacha is to provide more transparency (Leahy 2022).

Probability disclosure is one approach widely adopted either by law or in industry self-regulation. In East Asia, Mainland China was the first jurisdiction to legally require game companies to disclose the probabilities of obtaining rewards in gacha (Xiao et al. 2024). Later, South Korea and Taiwan (China) also released probability disclosure regulations (Xiao 2024). However, Japan continues to adapt industry self-regulation to improve the transparency of gacha (Schwiddessen 2018).

Previous studies have investigated the prevalence of gacha and the compliance of probability disclosure regulations in top-grossing video games in Mainland China (Xiao et al. 2024) and South Korea (Xiao and Park 2025). However, the compliance of probability disclosure regulations in the other two jurisdictions in East Asia, Japan and Taiwan (China), remains unknown.

In Japan, the government has already focused on gacha regulation since 2012, when “*kompu gacha*” was declared illegal (Koeder et al. 2018). However, it gradually shifted from government-led to industry self-regulation in the development of the Japanese gaming market (Schwiddessen 2018). As for Taiwan (China), the government requires game companies to disclose the probabilities of obtaining each item in a gacha. In addition, it requires companies to provide a warning message of ‘此為機會中獎商品，消費者購買或參與活動不代表即可獲得特定商品 [This is a chance-based product; the consumer is not guaranteed to obtain any specific product by virtue of purchasing or participating]’ or a similar message to that effect alongside the disclosed probabilities (Consumer Protection Office, Consumer Protection Committee, Executive Yuan 2022).

By examining the compliance with these specific regulations in the Japanese and Taiwanese (China) gaming markets, this study provided insights into the effectiveness of probability disclosure regulations and guided future regulatory efforts to benefit policymakers both inside and outside East Asia.

## **RESEARCH QUESTION**

To what extent game companies comply with gacha probability disclosure regulations in Japan and Taiwan?

## **METHOD**

Two lists of the 100 highest-grossing iPhone games in Japan on 31 August 2025 and in Taiwan on 7 September 2025 were collated from [data.ai](https://data.ai), a leading analytics company that provides consolidated data on app downloads, revenue, and spend. A full-screen gameplay recording for 1 hour and screenshots of all gacha that require real-world money to activate were taken. The presence of probability disclosure for any gacha found, and the accessible method of probability disclosure, were recorded. The presence of kompu gacha was checked for games in Japan, and the presence of warning messages was recorded for games in Taiwan.

A content analysis was conducted for Japan and Taiwan (China)’s results, respectively, and a transnational comparative analysis was applied to the data across Japan, Taiwan (China), Mainland China, and South Korea.

## **PRELIMINARY RESULTS**

The prevalence of gacha, the probability disclosure of any gacha, and the probability disclosure of all gacha from the 100 highest-grossing iPhone games in Japan and Taiwan were displayed in Table 1. Specifically, potential kompu gacha was identified in 5 of 100 games (5%) in Japan. Warning messages were identified in 12 of 93 games including gacha (12.9%) in Taiwan.

## **PRELIMINARY DISCUSSION AND CONCLUSION**

The prevalence of gacha in both Japan and Taiwan is similarly high (90%+), consistent with data from Mainland China and South Korea. Compliance with the gacha probability disclosure regulations in Japan and Taiwan is not optimal. Although the compliance in Taiwan is better than in Japan, the rates in both jurisdictions are far lower than in Mainland China. Particularly by considering the probability disclosure of all gacha, the compliance in both Japan and Taiwan is significantly low. The accessibility and visual prominence of most disclosures should also be improved. Regulators in both regions should act more proactively to address respective non-compliance.

Specifically, in Japan, 5 of 100 games are suspected of containing kompu gacha, and some have been detected changing the rules to avoid enforcement. In Taiwan, most companies failed to provide such a warning message at any required location, even though they had promised to do so in the user agreement. More actions are needed to improve compliance with this unique requirement.

Further approaches to improve companies' compliance with gacha probability disclosure regulations in Japan and Taiwan are necessary to protect customers.

	Prevalence of gacha	Probability disclosure of any gacha	Probability disclosure of all gacha
Japan	91%	85.7%	41.8%
Taiwan (China)	93%	90.3%	40.9%
Mainland China	97%	96.9%	10.3%
South Korea (Xiao and Park 2025)	90%	84.4%	/

**Table 1:** The comparison of gacha from the 100 highest-grossing iPhone games across four jurisdictions. Data from Mainland China can be checked through <https://osf.io/u9wc6>.

## BIO

Xiaoyu Xiong is a Research Assistant at the City University of Hong Kong, interested in pursuing a PhD in female-oriented game studies. She holds a Master of Arts in Global Communication from the Chinese University of Hong Kong and a Bachelor of Arts in Japanese from Renmin University of China. Her research interests include game studies, gender studies, and cross-cultural communication within the context of East Asia, with a particular focus on gender representation (especially otome games) and game compliance in the gaming sphere.

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