

Physical Blind Boxes' Compliance with Information Disclosure Requirements in the Chinese Regulatory Context

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INTRODUCTION

Blind boxes are gambling-like physical products that consumers purchase in packaging that hides the item inside, in order to receive randomized content (Xiao 2022). It is conceptually similar to loot box mechanics in video games, turning purchase into a game-like experience of anticipation, guessing, and the pleasure of surprise and collection (Xiao 2022; Zhou et al. 2025). Because consumers pay before knowing which item they will get, blind boxes raise consumer protection concerns, especially around randomness, transparency, and informed decision-making.

In Mainland China, the National State Administration for Market Regulation (2023) issued the 'Guidelines on Rules for Blind Box Business Operation (for Trial Implementation),' which provided a country-wide regulatory framework for blind boxes sales. Articles 9 and 23 of the Guidelines require operators to prominently disclose key information such as probabilities of obtaining different prizes, age restrictions prohibiting sales to minors under 8 and requiring guardian consent for those aged 8 and above, as well as other essential details to ensure consumers are properly informed before purchase. These are highly reminiscent of Chinese video game regulation (Xiao 2020; Zendle et al. 2023).

This study empirically assesses how current blind boxes' packaging practices in Mainland China align with these regulatory requirements. It focuses specifically on

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whether probability disclosures and age restrictions are present, complete, accurate, and visually prominent on physical blind box packaging.



Figure 1: Different Forms of Probability Disclosure Display

METHOD

The study examined 50 physical blind boxes purchased in Mainland China using a convenience sampling strategy with purposive elements, prioritizing popular brands (e.g., PopMart or Labubu fame), well-known IP-based products (e.g., Disney and miHoYo video games, such as *Genshin Impact*), and a diverse mix of lesser-known or emerging products. Each box's outer packaging (as the consumer would have observed at the point of purchase) was coded for the presence of probability disclosures, age restriction information, and other essential details. We also assessed the clarity, location, and visual prominence of these elements.

RESULTS

Among the 50 physical blind boxes examined, 47 products included some form of probability disclosure on the outer packaging, while 3 products provided no probability information. The detailed distribution is presented in Table 1.

Disclosure Completeness & Accuracy	N (%)
Complete & Accurate	
no hidden figures, fixed regular probabilities	12 (24%)
with hidden figures, and total probability=1 when summed	4 (8%)
Complete but Not Accurate	
with hidden figures, but total probability>1 when summed	24 (48%)
with hidden figures, but total probability<1 when summed	1 (2%)
packaging & affixed label probabilities inconsistent	1 (2%)
Not Complete	
	5 (10%)
No Probability Disclosure	
	3 (6%)

Table 1: Probability Disclosure Completeness & Accuracy (*N* = 50). “Hidden figure” refers to rare or secret items not shown on the packaging and often given separate probabilities.

In terms of visual prominence, about half of the boxes placed each item’s probability next to images showing all potential rewards, while the rest placed the information at the bottom of the page or in less visible areas, as detailed in Table 2.

Visual Prominence of the Probability Disclosure	N (%)
1-probabilities of each item alongside on the same page	24 (48%)
2-all probabilities summarized and disclosed at the bottom of the same page as the items	11 (22%)
3-all probabilities summarized and disclosed in the basic information section on separate pages	6 (12%)
4-item list not disclosed but probability described in the text	3 (6%)
5-item list and quantity not disclosed on the package (only listed on the outer carton)	2 (4%)
6-probability disclosure incomplete, only hidden figures disclosed	1 (2%)
7-no probability disclosure	3 (6%)

Table 2: Visual Prominence of the Probability Disclosure (*N*=50)

Age restriction information was found on all 50 products. As shown in Table 3, all products disclosed an age rating of 8+ or above, with 15+ being the most common label.

Disclosures of Age Restrictions	N (%)
8+	7 (14%)
9+	1(2%)
14+	7 (14%)
15+	33 (66%)
16+	1 (2%)
8+ & 15+	1 (2%)

Table 3: Disclosures of age restrictions (*N*=50)

However, guardian consent information was less consistently presented: 32 products included a parental or guardian consent statement, while 18 products only disclosed the age rating.

DISCUSSION AND CONCLUSION

Physical blind boxes in Mainland China show uneven compliance with information disclosure requirements. Most products in the sample provided some probability disclosure, and all products displayed age restriction information. However, the presence of disclosure did not mean that the information was complete, accurate, or practically useful for consumers.

The most prominent problem concerns probability disclosure. Although probability information was commonly available, many disclosures were either incomplete or

inaccurate. In particular, products involving hidden or secret items often created ambiguity about how probabilities were calculated and how consumers should understand their actual chances of obtaining different items. This indicates that some operators may satisfy the requirement to display probability information, while still falling short of providing clear and reliable information to inform consumers. Visual prominence further complicates this issue. As shown in Table 2, fewer than half of the products placed each item's probability next to the corresponding image, while many disclosed probabilities in less visible locations, suggesting that probability information may be formally present but not easily noticed or used by consumers at the point of purchase.

Similar problems are seen in the age restriction disclosures. All sampled products displayed an age rating of 8+ or above, which means that they aligned with the basic prohibition on selling blind boxes to children under 8. However, guardian consent information was not consistently disclosed. The absence of this information may weaken the practical effectiveness of minor's protection.

Overall, this study shows that meaningful compliance depends not only on the presence of disclosure, but also on its accuracy, completeness, visual prominence, and practical readability before purchase. The findings therefore contribute to broader discussions on the regulation of gambling-like products by showing how transparency requirements were implemented unevenly in physical retail contexts in Mainland China. Future regulatory guidelines could benefit from more standardized requirements for probability calculation, hidden items' disclosures, visual placement, and guardian consent labelling.

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