

Who Owns Gaming?: Analyzing Gambling's Semantic Displacement of Digital Games in Philippine Cultural Policy

Jean Carl Nathaniel E. Supan

Saint Paul Seminary Foundation

Silang, Cavite, Philippines

jeansupan00@gmail.com; jesupan@up.edu.ph

Keywords

semantic displacement; gaming governance; Philippine cultural policy; PAGCOR; nondecision-making; gaming-gambling convergence; digital game development

EXTENDED ABSTRACT

Scholars tracking gaming-gambling convergence may assume once-separate activities are now bleeding into one another through loot boxes, gacha mechanics, and skin betting. In this framework, hybrid products escape traditional safeguards by evading strict legal definitions of gambling (Leahy 2022). The Philippine case inverts this entirely.

In Philippine statutory law, the word "gaming" belongs to a single state actor: the Philippine Amusement and Gaming Corporation (PAGCOR). Established under Presidential Decree (PD) No. 1869 and amended by Republic Act (RA) No. 9487, it holds a monopoly to "regulate and license all games of chance," alongside "sports gaming pools (basketball, football, lotteries, etc.)" — naming basketball and football directly within gambling's founding vocabulary.

By 2025, PAGCOR had labeled its 32.117 million registered online gambling users as "Filipino electronic gaming players" (Ager 2025). During the same period, 96% of Filipino internet users were playing video games (Statista 2025).

I conceptualize this institutional lock-in as semantic displacement: the structural exclusion of a stakeholder group from policy recognition because the vocabulary needed for their identity is already legally occupied. Building on Freeden's (1996) decontestation and Radaelli's (2023) semantic space occupation, I argue that semantic displacement operates structurally, not intentionally. PAGCOR did not deliberately target digital game developers. Instead, because the state defaults to "gaming" as a synonym for gambling, local creators are effectively silenced in policy discourse.

Domestic trade organizations like the Game Developers Association of the Philippines (GDAP) systematically omit "gaming" from their vocabulary, using "game development" or "digital interactive media" instead. This functions as a form of nondecision-making (Bachrach and Baratz 1962), where entrenched institutional agendas suppress novel challenges by confining discourse to familiar, safe boundaries. Consequently, this narrows the space available to non-gambling developers.

I ground this in a qualitative document analysis of 28 Philippine government legal instruments spanning 1907 to 2025, read as active tools of governance (Asdal and Reinertsen 2022). It revealed that Philippine law built four parallel definitional tracks for "game" without ever constituting the term itself. These include (1) a dominant gambling track that entered statutory vocabulary through PD No. 1869 in 1983, (2) a professional sports track governed by the Games and Amusements Board since Executive Order No. 392 in 1951, (3) a school sports track anchored by the Palarong Pambansa (National Games) Act of 2013, and (4) a proposed folk-heritage framework via House Bill (HB) No. 7103. None of these accommodate digital games.

Two 2025 bills confirm this is not a hypothetical. House Bill (HB) No. 5812 names "gaming" as one of three enumerated forms of online gambling, alongside betting and wagering. HB No. 4732 defines "electronic games" outright as "virtual games of chance." While pending, both reveal the framework: gambling is primary, gaming its subordinate.

Hence, HB No. 3751's explanatory note explicitly states the "need to distinguish esports from gambling through official regulation and institutional recognition." Similarly, every esports bill filed since 2022 (HB Nos. 5401, 7411, 3751, 5608, and Senate Bill No. 2121) routes around the word "gaming" entirely. The Philippine Creative Industries Development Act (RA No. 11904) also calls digital games "Digital Interactive Media." This is nondecision-making again: debate that stays confined to safe boundaries because the boundary, gambling as the default category, was fixed before anyone arrived with standing to contest it.

To be sure, modern game design relies heavily on randomized loops, ranging from the gacha systems in *Genshin Impact* (miHoYo 2020) to the procedural card mechanics in roguelikes such as *Balatro* (LocalThunk 2024).¹ This is not only a foreign concern: *PinPow*, an unreleased Filipino roguelike, builds its loop around RNG-driven mechanics (Rodriguez 2026). Similarly, *Tambakan Taktiks*, a deck-building roguelite reimagining a traditional barangay game², layers card combat with dice-based chance (Bantilan 2026). Both are within PD 1869's "games of chance."

Exposing this semantic displacement does not mean I advocate for converging games and gambling. Where overt gambling already demands urgent regulatory attention, keeping the two sectors institutionally distinct remains the more practical path. However, institutional divergence alone does not resolve chance-based monetization risks within video games; it merely relocates the problem. Addressing these risks requires proactive institutional evaluation of the kind the Pan-European Game Information (PEGI) system or the Entertainment Software Rating Board (ESRB) already performs.

These findings carry implications far beyond the Philippine context. Most research on gaming and gambling regulation examines how different jurisdictions monitor convergence mechanisms (Xiao 2023). The Philippine case reveals a deeper layer: the fundamental assumption that gaming and gambling are independent categories requiring separate frameworks, was never institutionally achieved in the first place. This offers a necessary recalibration of Anglophonic and European convergence frameworks. At the same time, the primary regulatory challenge here is not policing an eroding border between two distinct industries. Rather, it is to build the foundational conceptual infrastructure necessary.

BIO

Jean Carl Nathaniel E. Supan is a Master of Arts (MA) Communication student at the University of the Philippines Diliman and a member of the Communication faculty at

Saint Paul Seminary Foundation. His research focuses on video game studies, critical theory, postcolonialism, and Philippine cultural policy. He is a member of the Philosophical Association of the Philippines (PAP), the Philippine Association of Communication and Media Research (PACMRI), the International Communication Association (ICA), and the Digital Games Research Association (DiGRA). He is also a novice game developer, currently working on his own video games.

FUNDING

This research received no external funding.

CONFLICTS OF INTEREST

The author declares no conflicts of interest. The author has no current or prior employment, investments, paid expert roles, or research support associated with the gambling or gaming industry. This study involved document analysis of publicly available legal instruments and secondary news sources, did not involve human subjects, and therefore did not require ethics review.

ENDNOTES

1. The *Balatro* case is directly informative here. Shortly after its February 2024 release, the Pan-European Game Information system (PEGI) reclassified the game from 3+ to 18+ for "prominent gambling imagery," temporarily pulling it from sale in several territories. Publisher Playstack successfully appealed in February 2025, and the game was reclassified at 12+, with PEGI acknowledging that its fantasy context distinguished it from actual gambling. The episode illustrates that the gaming-gambling definitional boundary operates not only at the institutional and policy level, as the Philippine case demonstrates, but at the product classification level in real time, across jurisdictions that nominally treat gaming and gambling as separate categories.

2. A barangay is the smallest unit of local government in the Philippines, roughly equivalent to a village, ward, or neighborhood district. The term also carries a broader cultural meaning, referring to traditional community life and the informal games historically played within it.

BIBLIOGRAPHY

- Ager, Maila. 2025. 32 Million Adult Filipinos Are Gamblers, Pagcor Records Show. INQUIRER.net, August 14. <https://newsinfo.inquirer.net/2095743/32-million-adult-filipinos-are-gamblers-pagcor-records-show>
- Asdal, Kristin, and Hilde Reinertsen. 2022. *Doing Document Analysis: A Practice-Oriented Method*. London: SAGE Publications.
- Bachrach, Peter, and Morton S. Baratz. 1962. Two Faces of Power. *American Political Science Review* 56 (4): 947–952. <https://doi.org/10.2307/1952796>
- Bantilan, Erwin. 2026. Filipino-Made Games Turn Local Stories into Playable Experiences. *GamingPH.com*, May 15. <https://gamingph.com/2026/05/filipino-made-games-turn-local-stories-into-playable-experiences/>
- Freedon, Michael. 1996. *Ideologies and Political Theory: A Conceptual Approach*. Oxford: Clarendon Press.
- House Bill No. 3751. 2025. 20th Congress of the Republic of the Philippines, First Regular Session. https://docs.congress.hrep.online/legisdocs/basic_20/HB03751.pdf
- House Bill No. 4732. 2025. 20th Congress of the Republic of the Philippines, First Regular Session. https://docs.congress.hrep.online/legisdocs/basic_20/HB04732.pdf

- House Bill No. 5812. 2025. 20th Congress of the Republic of the Philippines, First Regular Session.
https://docs.congress.hrep.online/legisdocs/basic_20/HB05812.pdf
- LocalThunk. 2024. *Balatro*. Multi-platform Game. London: Playstack.
- miHoYo. 2020. *Genshin Impact*. Multi-platform Game. Shanghai: miHoYo.
- Radaelli, Claudio M. 2023. Occupy the Semantic Space! Opening up the Language of Better Regulation. *Journal of European Public Policy* 30 (9): 1860–1883.
<https://doi.org/10.1080/13501763.2023.2181852>
- Rodriguez, Doby. 2026. Indie Games to Look Out for at PGDX 2026. *Inquirer Technology*, July 25. <https://technology.inquirer.net/148042/indie-games-to-look-out-for-at-pgdx-2026>
- Statista. 2025. Global Gaming Penetration Q2 2025, by Country. <https://www.statista.com/statistics/195768/global-gaming-reach-by-country>
- Xiao, Leon Y. 2023. Breaking Ban: Belgium's Ineffective Gambling Law Regulation of Video Game Loot Boxes. *Collabra: Psychology* 9 (1): Article 57641.
<https://doi.org/10.1525/collabra.57641>