



Ad Standards Community Panel
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AdStandards.com.au

Ad Standards Limited
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Case Report

1. Case Number :	0278-20
2. Advertiser :	Wildlife Studios
3. Product :	Entertainment
4. Type of Advertisement/Media :	Internet
5. Date of Determination	7-Oct-2020
6. DETERMINATION :	Dismissed

ISSUES RAISED

AANA Code of Ethics\2.3 Violence

DESCRIPTION OF ADVERTISEMENT

This advertisement is for a sniper game. The advertisement is from the point-of-view of the sniper. The advertisement first shows a zoomed-out scene with a “criminal” holding a “civilian” hostage at gun point, with a non-descript cityscape background and police officers at the scene. Over the top of the image, there are instructions that you would see in the game itself, including “Drag to aim”, “Drag up to Zoom”, “Zoom” and “Shoot”, as well as a gun scope to allow the viewer to target their aim. The advertisement is interactive, with the viewer able to aim, zoom and shoot in the advertisement.

If, for example, the viewer zooms in on the hostage scene, the viewer would then see the hostage scene through a gun scope, demonstrating how the player would be able to zoom in and aim at the criminal in the video game.

The viewer can then “shoot”, and the sniper releases a bullet from the sniper’s weapon. The bullet travels in slow motion towards the hostage scene. While the advertisement is interactive, it is programmed so that the bullet never hits anyone in the scene – that is, regardless of the aim and release of the bullet, it will always miss the individuals in the scene.

The final shot of the advertisement shows a slide which states “Mission Failed. Hostage Taken. Mission Rewards 0”, in a format that reflects the format in the video game.



THE COMPLAINT

A sample of comments which the complainant/s made regarding this advertisement included the following:

Very violent and upsetting especially when such imaging is unexpected. Seeing people being held in a violent manner and having guns held to their head without planning or wanting to see that is very distressing. This ad is unable to be closed for several seconds.

THE ADVERTISER'S RESPONSE

Comments which the advertiser made in response to the complainant/s regarding this advertisement include the following:

We are sorry to hear that a recent Wildlife Studios advertisement has caused concern for a member of the community. It is never our intention to cause any discomfort or offence with any of our advertisements – rather, our intention is to demonstrate the concept of the relevant video game through interactive, engaging advertising.

Please find below our response to the complaint received under Complaint Reference Number 0278-20.

The advertisement subject to the complaint is for the video game titled Sniper 3D, where players play as a sniper character fighting criminals and rescuing hostages in various situations (e.g. where a criminal is holding a hostage at gun point). All missions in the video game make clear that the sniper is fighting criminal activities.

Description of the advertisement

The advertisement is from the point-of-view of the sniper. The advertisement first shows a zoomed-out scene with a criminal holding a civilian hostage at gun point, with a non-descript cityscape background and police officers at the scene. Over the top of the image, there are instructions that you would see in the game itself, including “Drag to aim”, “Drag up to Zoom”, “Zoom” and “Shoot”, as well as a gun scope to allow the viewer to target their aim. The advertisement is interactive, with the viewer able to aim, zoom and shoot in the advertisement.

If, for example, the viewer zooms in on the hostage scene, the viewer would then see the hostage scene through a gun scope, demonstrating how the player would be able to zoom in and aim at the criminal in the video game.

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the scene – that is, regardless of the aim and release of the bullet, it will always miss the individuals in the scene.

The final shot of the advertisement shows a slide which states “Mission Failed. Hostage Taken. Mission Rewards 0”, in a format that reflects the format in the video game.

Objective of the campaign

The intention of this interactive advertisement is to simulate an in-game mission, to convey the key features of the video game in a way that the viewer is able to understand.

This approach is intended to ensure that the viewer understands the context and aim of the game (playing the role of a sniper character fighting criminals and rescuing hostages in various situations), as well as the mechanics of how the player plays the game (e.g. from the point-of-view of the sniper, with the ability to zoom, aim, and shoot at the criminal).

Advertising Campaign

This advertisement was part of a wider advertising campaign for the Sniper 3D video game, placed across a variety of advertising inventory throughout the world.

Wildlife Studios generally places inventory with third parties such as TikTok, Google, Facebook Twitter, and Snapchat. Each of these third party publishers have strict codes of conduct that apply to any advertisement published on their sites (for example, Apple and Google’s app-store guidelines). Wildlife’s legal and user experience teams work closely to ensure compliance with these codes. Wildlife Studios has never received any complaints from these third party publishers for breach of the applicable codes.

Comments in relation to the specific advertisement

Wildlife Studios submits that the advertisement the subject of the complaint does not breach section 2 of the AANA Code of Ethics for the following reasons:

- 1. While the advertisement does include weapons (the viewer can see the sniper’s weapon, as well as the criminal’s gun), the weapon is at no time directed at the viewer.*
- 2. Further, the advertisement does not show a weapon making contact with any characters in the advertisement, with the bullet missing the criminal. As noted above, while the advertisement is interactive, it is programmed so that the bullet never hits anyone in the scene. The advertisement also does not show any blood or other violent activities.*



3. *The use of the weapons in the advertisement is directly related to the content of the video game being promoted, which as mentioned above, is called "Sniper 3d" and involves the player playing a sniper character fighting criminals and rescuing hostages in various situations. The scene in the advertisement is in fact a simulation of what a player would play in the game.*

4. *The use of the weapon by the criminal to hold the civilian hostage aims to show the criminal activities that the player playing the sniper is fighting in the video game. The weapon held by the criminal is not fired at the civilian or the viewer of the advertisement.*

5. *For these reasons, we respectfully submit that in accordance with Section 2.3 of the AANA Code, the violence portrayed was justifiable in the context of a video game of this nature, and did not depict any realistic acts of violence that resulted in harm against people in the advertisement.*

We note that the advertisement otherwise does not feature any content that may be considered to be in breach of the AANA Code in relation to:

- *discrimination or vilification;*
- *exploitative or degrading;*
- *sex, sexuality and nudity;*
- *adult language; or*
- *Health and Safety.*

We appreciate your consideration of our response to the complaint. We would be happy to answer any further questions you may have.

THE DETERMINATION

The Ad Standards Community Panel (the Panel) considered whether this advertisement breaches Section 2 of the AANA Code of Ethics (the Code).

The Panel noted the complainant's concern that the advertisement is violent and distressing by showing imagery of a person held with a gun at their head.

The Panel viewed the advertisement and noted the advertiser's response.

The Panel considered whether the advertisement was in breach of Section 2.3 of the Code. Section 2.3 states: "Advertising or Marketing Communications shall not present or portray violence unless it is justifiable in the context of the product or service advertised".

The Panel noted that the Practice Note for the Code provides: "Realistic depictions of the consequences of violence are not acceptable. More leeway is permitted where the depiction is stylised rather than realistic."



The Panel considered that the depiction of the woman being held with a firearm to her head, and the depiction of the man holding her appearing to be shot is a depiction of violence. The Panel considered that the advertisement is highly stylised and animated and does not show any blood or graphic imagery and the Panel noted that the advertisement does not show the man being shot. The Panel considered that the violence in the advertisement would be considered by most members of the community to be mild.

The Panel noted that the advertised product is a game in which players aim and shoot various firearms in a manner similar to a sniper, and considered that the scenario shown in the advertisement is consistent with game play. The Panel considered that the mild degree of violence in the advertisement was justifiable in the context of the storyline of the advertisement and did not breach Section 2.3 of the Code.

Finding that the advertisement did not breach any other section of the Code the Panel dismissed the complaint.