## SUMMARY OF REASONS FOR DECISION

Under the Films, Videos, and Publications Classification Act 1993 (FVPC Act)

#### **HEADNOTE**

Title of publication:

Far Cry Primal

Other known title(s): Not stated

OFLC ref:

1500872.000

Medium:

Computer Game

Classification:

Objectionable except if the availability of the publication is restricted

to persons who have attained the age of 16 years.

Descriptive note:

Contains graphic violence.

Display conditions:

None

The publication is an action adventure console game examined on the Xbox One console, which will also be available on PC and PlayStation4. The game is the fifth in a line of standalone, selfcontained Far Cry games. Despite being set in 10,000BCE (the previous games are set in contemporary time periods), the basic gameplay mechanics and first-person perspective remain similar.

Far Cry Primal is an expansive open world game. The player character, Takkar, is a young warrior seeking to unite the Wenja people who are currently scattered across the large central European territory known as Oros. Takkar begins the game unarmed but in a short space of time begins fashioning weapons - spears, clubs, and short-ranged bows - using scavenged materials. Takkar learns how to hunt for food while facing the constant threat of natural predators, including snakes, wolves, wild boar, and sabre tooth tigers. Takkar becomes the leader of an expanding tribe of people and must manage and protect his fellow tribe members from opposing tribes, such as the cannibalistic Udam.

The game features a day-night cycle which affects gameplay; at night some enemies become more numerous or aggressive, and environments are harder to navigate. Takkar acquires the ability to tame various kinds of wildlife, such as bears and sabre-toothed tigers, and uses these animals to assist him in combat. Takkar also has a pet owl which can be directly controlled, and is useful for scouting enemy outposts and enjoying an aerial view of the landscape.

According to online information from the Australian classification of Far Cry Primal there is some sexual content in the game - "sex scenes and nudity" - however this content was not sighted during the portion of the game examined by the Classification Office. It is unlikely that it would be of a level higher than the violence and cruelty which is discussed below.

The publication deals with matters of cruelty and violence under s3(1) of the FVPC Act. The extent and degree to which, and the manner in which, the publication depicts the infliction of serious physical harm and acts of significant cruelty are discussed in relation to s3(3)(a)(i).

The publication does not promote or support, or tend to promote or support, any s3(2) matters.

The game depicts the infliction of serious physical harm and acts of significant cruelty to a high extent and moderate degree. While the gameplay is relatively complex and involves a number of different elements such as asset building, establishing and maintaining relationships with various characters, and exploring the vast landscape, a lot of the playing time is nevertheless spent killing human (and animal) adversaries. The deaths are very bloody, with large blood spatters appearing onscreen when opponents are clubbed or stuck with spears. Spears can also be used to impale enemies so that their bodies become stuck to walls or trees. The effect is fairly brutal, although post-mortem damage is unable to be inflicted beyond a generic "rag-dolling" of the body. Takkar can sneak up behind enemies and commit quick kills, for instance by skewering them on the end of a spear. There are also moments in the game where Takkar becomes involved in massacres. During these times he is required to kill numerous adversaries in quick succession in order to protect a village (or invade a hostile one). An effective weapon in these circumstances is the club, which is used to repeatedly bash people in the face and body. Wolves, sabre toothed tigers and other wild animals once tamed can also be commanded to savagely attack other people and creatures. Gruesomely bloodied and dismembered bodies are also encountered on the player's travels.

The publication's dominant effect is a sophisticated and violent action adventure game set in the Stone Age. The open world nature of the game and its attention to detail – the changing weather and time of day, the behaviour of the fauna, and variety of landscapes to explore – all contribute to making the game an enjoyable and immersive experience.

The unrestricted availability of the publication would be injurious to the public good. The game's depictions of violence and cruelty would be disturbing to children or younger teens, and for some would trivialise violence by presenting it as entertaining and exciting. Constant exposure to the game's killings of human beings, in which the player is an active participant, has the potential to desensitise some towards violent behaviour in real life, particularly given the close-up and personal nature of much of the violence. Likelihood of injury to the public good is balanced by restricting this publication to persons who have attained the age of 16 years. This classification interferes with the freedom of expression contained in the New Zealand Bill of Rights Act 1990 but is consistent with s3 of the FVPC Act to limit the availability of publications likely to be injurious to the public good.

#### Note:

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# **CONSIDERATION SHEET**

OFLC ref:

1500872.000

Submission channel:

s12(1)

Title of publication:

Far Cry Primal

Other known title:

Not stated

Medium:

Computer Game

Distributor:

Fiveight Distribution Ltd

Country of origin:

France

Language:

English

Applicant:

Film & Video Labelling Body

Examination transcript No:

672, p300

Examination date:

08 December 2015

Classification Officer(s):

Other identifying information:

# **COMPONENTS OF FILM**

# Components of film originally examined:

	Components	Running time
Game:	Far Cry Primal	
Total running time:		

Components of film excised:

### **EXAMINATION**

#### Section 23 Examination and classification:

...the Classification Office shall examine the publication to determine the classification of the publication.

#### Section 24 Soundtrack to be considered:

Where a film is intended to be viewed with an accompanying soundtrack (whether or not the soundtrack is an integral part of the film), an examination of the film under s23 of the Act shall also take into account the content of the soundtrack and its relationship to the film.

## Description of Publication:

The publication is an action adventure console game examined on the Xbox One console, and also to be available on PC and PlayStation4. The game is the fifth in a line of Far Cry games, each one standalone. Despite being set in 10,000BCE (the previous games are set in contemporary time periods), the basic gameplay mechanics and first-person perspective remain similar.

Far Cry Primal is an expansive open world game. The player character, Takkar, is a young warrior seeking to unite the Wenja people who are currently scattered across the large central European territory known as Oros. Takkar is unarmed initially in the game but in a short space of time begins fashioning weapons — spears, clubs, and short-ranged bows — using scavenged materials. Takkar learns how to hunt for food while facing the constant threat of natural predators, including snakes, wolves, wild boar, and sabre tooth tigers. Takkar becomes the leader of an expanding tribe of people and must manage and protect his fellow tribe members from opposing tribes, such as the cannibalistic Udam.

The game features a day-night cycle which affects gameplay; at night some enemies become more numerous or aggressive, and environments are harder to navigate. Takkar acquires the ability to tame various kinds of wildlife, including badgers, bears and sabre-toothed tigers, and use these animals to assist him in combat. Takkar also has a pet owl which can be directly controlled, and is useful for scouting enemy outposts and enjoy an aerial view of the landscape.

## Statutory Submissions

# Section 20 – Synopsis of Written Submissions

Not Applicable	XX

# Section 21 Other Assistance

None Requested	
See Record of Assistance	

## Other Relevant Information

None	Considered	
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In reaching a classification decision the Classification Office may consider a variety of information including **previous decisions** of the Classification Office or other **censorship bodies**, **research**, **books**, **articles**, **reviews**, and information obtained from the **Internet**. If you have used any of this information please record this below.

Previous decisions	, h.,						
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,	Chief Censor of Film	IP7	Γ				
Title:							
Publication/Certificate/I	Decision No.						
Other Sources (please sp	Other Sources (please specify and reference):						
https://en.wikipedia.org/wiki/Far Cry Primal							

## **CLASSIFICATION**

### New Zealand Bill of Rights Act 1990:

Section 14 of the New Zealand Bill of Rights Act 1990 (NZBORA) states that everyone has "the right to freedom of expression, including the freedom to seek, receive, and impart information and opinions of any kind in any form". Under s5 of the NZBORA, this freedom is subject "only to such reasonable limits prescribed by law as can be demonstrably justified in a free and democratic society". Section 6 of the NZBORA states that "Wherever an enactment can be given a meaning that is consistent with the rights and freedoms contained in this Bill of Rights, that meaning shall be preferred to any other meaning".

### Section 3 Meaning of "objectionable":

s3(1) ... a publication is objectionable if it describes, depicts, expresses, or otherwise deals with matters such as sex, horror, crime, cruelty, or violence in such a manner that the availability of the publication is likely to be injurious to the public good.

#### Subject Matter Gateway:

The Court of Appeal's interpretation of the words "matters such as sex, horror, crime, cruelty or violence" in s3(1), as set out in *Living Word Distributors v Human Rights Action Group (Wellington)* [2000] 3 NZLR 570; (2000) 6 HRNZ 28, must also be taken in to account in the classification of any publication:

[27] The words "matters such as" in context are both expanding and limiting. They expand the qualifying content beyond a bare focus on one of the five categories specified. But the expression "such as" is narrower than "includes", which was the term used in defining "indecent" in the repealed Indecent Publications Act 1963. Given the similarity of the content description in the successive statutes, "such as" was a deliberate departure from the unrestricting "includes".

[28] The words used in s3 limit the qualifying publications to those that can fairly be described as dealing with matters of the kinds listed. In that regard, too, the collocation of words "sex, horror, crime, cruelty or violence", as the matters dealt with, tends to point to activity rather than to the expression of opinion or attitude.

[29] That, in our view, is the scope of the subject matter gateway.

The content of the publication must bring it within the "subject matter gateway". In classifying the publication therefore, the question is whether or not it deals with the following:

Matters such as sex

Included as a "matter such as sex" is any publication that in terms of s3(1A) -

(a) ... is or contains 1 or more visual images of 1 or more children or young persons who are nude or partially nude; and

(b) those 1 or more visual images are, alone, or together with any other contents of the publication, reasonably capable of being regarded as sexual in nature.

According to online information from the Australian classification of Far Cry Primal there is some sexual content in the game — "sex scenes and nudity" — however this content was not able to be sighted during examination. It is also unlikely that it would be of a level higher than the violence and cruelty which is discussed below.

Matters such as horror N/A
Matters such as crime N/A
Matters such as cruelty
See violence

Matters such as violence

The publication deals with matters of cruelty and violence under s3(1) of the FVPC Act. The extent and degree to which, and the manner in which, the publication depicts the infliction of serious physical harm and acts of significant cruelty are discussed in relation to s3(3)(a)(i).

Or - The content of the publication does not bring it within any "subject matter gateway".	
For publications that fall outside the "subject matter gateway" go to s3A and s3B	

#### Section 3(2) Certain publications are deemed to be objectionable:

Under s3(2) of the FVPC Act, a publication is deemed to be objectionable if it promotes or supports, or tends to promote or support, certain activities listed in that subsection.

In Moonen v Film and Literature Board of Review (Moonen I), the Court of Appeal stated that the words "promotes or supports" must be given "such available meaning as impinges as little as possible on the freedom of expression" in order to be consistent with the NZBORA. The Court then set out how a publication may come within a definition of "promotes or supports" in s3(2) that impinges as little as possible on the freedom of expression:

Description and depiction ... of a prohibited activity do not of themselves necessarily amount to promotion of or support for that activity. There must be something about the way the prohibited activity is described, depicted or otherwise dealt with, which can fairly be said to have the effect of promoting or supporting that activity.<sup>2</sup>

Mere depiction or description of any of the s3(2) matters will generally not be enough to deem a publication to be objectionable under s3(2). When used in conjunction with an activity, the Classification Office defines "promote" to mean the advancement or encouragement of that activity.

<sup>&</sup>lt;sup>1</sup> Moonen v Film and Literature Board of Review [2000] 2 NZLR 9 at para 27.

<sup>&</sup>lt;sup>2</sup> Above n2 at para 29.

The Classification Office interprets the word "support" to mean the upholding and strengthening of something so that it is more likely to endure. A publication must therefore advance, encourage, uphold or strengthen, rather than merely depict, describe or deal with, one of the matters listed in s3(2) for it to be deemed to be objectionable under that provision.

s3(2)(a) The exploitation of children, or young persons, or both, for sexual purposes.

In Moonen v Film and Literature Board of Review (Moonen II) [2002] 2 NZLR 754, the Court of Appeal stated that the absence of definitions of "young persons" and "children" in s3(2)(a) was deliberate. The provision does not require proof of the models' ages; it requires an assessment of whether or not the publication in which the models appear promotes or supports the exploitation of children or young persons for sexual purposes:

The legislation is concerned with the vulnerability of young people and with the corrosive injury to the public good of depicting persons perceived to be children or young people as subjects for exploitation. The Board properly assessed whether the publication of the photographs would tend to promote or support the exploitation of children or young persons, not limited to the impact on the particular persons photographed. The inquiry under s3 does not require the ascertainment of the precise age of the person photographed.<sup>3</sup>

It was Parliament's intention therefore that s3(2)(a) should apply to any publication as defined in the Act, that promotes, supports, or tends to promote or support, the exploitation of children or young persons for sexual purposes. As long as a publication at least tends to promote or support such exploitation, whether or not it depicts underage models, no underage models or no models at all is irrelevant to the proper application of s3(2)(a). The issue is whether, on the evidence presented by the publication itself, the publication at least tends to promote or support the exploitation of children or young persons for sexual purposes.

N/A	
s3(2)(b)	The use of violence or coercion to compel any person to participate in, or submit to, sexual conduct.
N/A	
s3(2)(c)	Sexual conduct with or upon the body of a dead person.
N/A	
s3(2)(d)	The use of urine or excrement in association with degrading or dehumanising conduct or sexual conduct.
N/A	
s3(2)(e)	Bestiality.
N/A	· ·
s3(2)(f)	Acts of torture or the infliction of extreme violence or extreme cruelty.
N/A	

If the publication promotes and supports, or tends to promote and support, any of the 3(2) provisions above and is deemed objectionable go to <u>Conclusion</u>.

However, section 32 of the FVPC Act directs the Classification Office to consider whether it would classify the publication differently if the material falling under s3(2) were excised or altered. If an excision were made, the publication would no longer fall under 3(2) of the FVPC Act. If the

<sup>&</sup>lt;sup>3</sup> Moonen v Film and Literature Board of Review [2002] 2 NZLR 754 at para 40.

publication contains material that falls under 3(2) which can be excised or altered, go the Excisions section and then return to s3(3) and 3(4) below.

Otherwise, if the publication does not fall under s3(2) consider the following matters:

## Section 3(3) Matters to be given particular weight:

In determining, for the purposes of the Act, whether or not any publication (other than a publication to which subsection 3(2) of this section applies) is objectionable or should in accordance with section 23(2) be given a classification other than objectionable, the following matters shall also be considered:

...particular weight shall be given to the **extent** and **degree** to which, and the **manner** in which, the publication describes, depicts, or otherwise deals with...

s3(3)(a)(i) Acts of torture, the infliction of serious physical harm, or acts of significant cruelty.

The game depicts the infliction of serious physical harm and acts of significant cruelty to a high extent and moderate degree. While the gameplay is relatively complex and involves a number of different elements such as asset building, establishing and maintaining relationships with various characters, and exploring the vast landscape, a lot of the playing time is nevertheless spent killing human (and animal) adversaries. The deaths are very bloody, with large blood spatters appearing onscreen when opponents are clubbed or stuck with spears. Spears can also be used to impale enemies so that their bodies become stuck to walls or trees. The effect is fairly brutal, although post-mortem damage is unable to be inflicted beyond a generic "rag-dolling" of the body. Takkar can sneak up behind enemies and commit quick kills, say by skewering them on a spear. There are also moments in the game where Takkar becomes involved in massacres. During these times he is required to kill numerous adversaries in quick succession in order to protect a village (or invade a hostile one). An effective weapon in these circumstances is the club, which is used to repeatedly bash people in the face and body. Wolves, sabre toothed tigers and other wild animals can also be used to savagely attack other people and creatures.

s3(3)(a)(ii)	Sexual violence or sexual coercion, or violence or coercion in association with sexual conduct.
N/A	
s3(3)(a)(iii)	Other sexual or physical conduct of a degrading or dehumanising or demeaning nature.
N/A	
s3(3)(a)(iv)	Sexual conduct with or by children, or young persons, or both.
N/A	
s3(3)(a)(v)	Physical conduct in which sexual satisfaction is derived from inflicting or suffering cruelty or
	pain.
N/A	

...particular weight shall be given to the extent and degree to which, and the manner in which, the publication

s3(3)(b) Exploits the nudity of children or young persons, or both. N/A

s3(3)(c) N/A	Degrades, dehumanises or demeans any person.
s3(3)(d) N/A	Promotes or encourages criminal acts or acts of terrorism.
s3(3)(e)	Represents (whether directly or by implication) that members of any particular class of the public are inherently inferior to other members of the public by reason of any characteristic of members of that class, being a characteristic that is a prohibited ground of discrimination specified in section 21(1) of the Human Rights Act 1993. <sup>4</sup>
N/A	

#### 3A Publication may be age-restricted if it contains highly offensive language likely to cause serious harm:

3A(1) A publication to which subsection 3A(2) applies may be classified as a restricted publication under section 23(2)(c)(i).

This subsection applies to a publication that contains highly offensive language to such an extent 3A(2)or degree that the availability of the publication would be likely, if not restricted to persons who have attained a specified age, to cause serious harm to persons under that age.

3A(3)In this section, highly offensive language means language that is highly offensive to the public in general. N/A

### 3B Publication may be age-restricted if likely to be injurious to public good for specified reasons:

3B(2) This subsection applies to a publication that contains material specified in subsection (3) to such an extent or degree that the availability of the publication would, if not restricted to persons who have attained a specified age, be likely to be injurious to the public good for any or all of the reasons specified in subsection (4).

3B(3)The material referred to in subsection (2) is material that 3B(3)(a)describes, depicts, expresses, or otherwise deals with-

3B(3)(a)(i)Harm to a person's body whether it involves infliction of pain or not (for example, selfmutilation or similarly harmful body modification) or self-inflicted death.

Discussed elsewhere

3B(3)(a)(ii) Conduct that, if imitated, would pose a real risk of serious harm to self or others or both. N/A

3B(3)(a)(iii) Physical conduct of a degrading or dehumanising or demeaning nature. N/A

<sup>4</sup> The grounds of discrimination prohibited by s21(1) of the Human Rights Act 1993 are sex, marital status, religious belief, ethical belief, colour, race, ethnic or national origins, disability, age, political opinion, employment status, family status and sexual orientation.

3B(3)(b) is or includes 1 or more visual images—

3B(3)(b)(i) of a person's body; and

3B(3)(b)(ii) that, alone, or together with any other contents of the publication, are of a degrading or

dehumanising or demeaning nature.

N/A

3B(4) The reasons referred to in subsection (2) are that the general levels of emotional and intellectual development and maturity of persons under the specified age mean that the availability of the publication to those persons would be likely to—

3B(4)(a)

Cause them to be greatly disturbed or shocked; or

3B(4)(b)

Increase significantly the risk of them killing, or causing serious harm to, themselves, others, or both; or

3B(4)(c)

Encourage them to treat or regard themselves, others, or both, as degraded or dehumanised or demeaned.

See conclusion

#### 3C Procedure for classification under sections 3A and 3B:

In determining whether to classify a publication as a restricted publication in accordance with section 3A or section 3B, the Classification Office must consider the matters specified in paragraphs (a) to (f) of section 3(4).

#### Section 3(4) Additional matters to be considered:

In determining, for the purposes of the Act, whether or not any publication (other than a publication to which subsection 3(2) of this section applies) is objectionable or should in accordance with section 23(2) be given a classification other than objectionable, the following matters shall also be considered:

s3(4)(a) The dominant effect of the publication as a whole.

The publication's dominant effect is a sophisticated and violent action adventure game set in the Stone Age. The open world nature of the game and its attention to detail – the changing weather and time of day, the behaviour of the fauna, and variety of landscapes to explore – all contribute to making the game an enjoyable and immersive experience.

s3(4)(b) The impact of the medium in which the publication is presented.

An Xbox One console game which has high definition graphics and audio in a portable gaming format.

The character of the publication, including any merit, value or importance it has in relation to literary, artistic, social, cultural, educational, scientific or other matters.

Artistic merit in terms of graphics and the general sophisticated and complex nature of the gaming world.

s3(4)(d)

The persons, classes of persons, or age groups of the persons to whom the publication is intended

or is likely to be made available.

Mature players, fans of violent first-person adventure games

s3(4)(e)

The purpose for which the publication is intended to be used.

Entertainment

s3(4)(f)

Any other relevant circumstances relating to the intended or likely use of the publication.

None

## **CONCLUSION (INCLUDING NZBORA CONSIDERATIONS)**

If s3(1) applies to the publication the question is whether or not it deals with the matters discussed in a manner that the availability of the publication is likely to be injurious to the public good. In discussing injury consider the nature and severity of that injury, the likelihood of it occurring and who would be injured by the publication's availability. The classification recommended must remedy the injury identified.

If s3B applies to the publication, the injury to the public good must be explained in terms of s3B(4) of the FVPC Act.

If s3A applies to the publication, explain the age restriction in terms of how the language is likely to cause serious harm to persons under the age of the restriction.

Any classification that limits the right to freedom of expression affirmed by s14 of the NZBORA must be reasonable and demonstrably justifiable.

Classification:	R16

The unrestricted availability of the publication would be injurious to the public good. The game's depictions of violence and cruelty would be disturbing to children or younger teens, and for some would trivialise violence by presenting it as entertaining and exciting. Constant exposure to the game's killings of human beings, in which the player is an active participant, has the potential to desensitise some towards violent behaviour in real life. Likelihood of injury to the public good is balanced by restricting this publication to audiences that have attained the age of 16 years. This classification interferes with the freedom of expression contained in the New Zealand Bill of Rights Act 1990 but is consistent with s3 of the FVPC Act to limit the availability of publications likely to be injurious to the public good.

## **EXCISIONS/ ALTERATIONS**

#### Section 32 - Excisions from and alterations to film -

In the case of a film submitted for classification under any part of the Act other than s29(1) and 41(3) (court referrals), if the Classification is of the opinion that it would classify the film differently according to whether any specified part or parts of the film are excised from or left in the film, it shall, before making a final determination in respect of the classification of the film, follow the procedure prescribed by section 33.

Section 33(1) directs the Classification Office to notify the authorised distributor of the film of the classification that would be given if part or parts of the film were excised or altered, and, the classification that would be given if the specified part or parts were not excised or altered.

Section 33(5) provides that, in deciding whether or not to propose excisions or alterations, the Classification Office may consider the effect that any such excision or alteration may have on the continuity of the film or on its overall effect.

I	EXCISIONS SUMMARY		
	None (for non-moving image and s29(1) / 41(3) publications)		
	No excisions recommended (for all other moving image publications)	X	
	Excisions/alterations recommended		
ľ	Number of Excisions/Alterations:		
E	Brief Description:		

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## PUBLIC DISPLAY CONDITIONS

Not Applicable	
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## Section 27 Conditions relating to the display of restricted publications -

Where the Classification Office classifies any publication as restricted, the Office shall in every case consider whether or not to impose conditions on the public display of that publication, and may impose such conditions at the time of classifying the publication.

In determining whether or not conditions in respect of public display should be imposed, the Classification Office must have regard to:

s27(2)(a) The reasons for classifying the publication as a restricted publication.

Primarily due to the publication's treatment of cruelty and violence

s27(2)(b) The terms of the classification given to the publication.

R16

s27(2)(c) The likelihood that the public display of the publication, if not subject to conditions or, as the case may be, any particular condition, would cause offence to reasonable members of the public.

#### No likelihood

Section 27(3) directs that where the Classification Office considers that the public display of the publication, if not subject to conditions under this section, would be likely to cause offence to reasonable members of the public, the Classification Office shall, at the time of classifying the publication, impose such conditions under this section in respect of the public display of that publication as it considers necessary to avoid the causing of such offence.

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