



ADVERTISING  
STANDARDS  
BUREAU

Level 2, 97 Northbourne Avenue, Turner ACT 2612  
Ph (02) 6173 1500 | Fax (02) 6262 9833  
[www.adstandards.com.au](http://www.adstandards.com.au)  
ACN 084 452 666

## Case Report

1	Case Number	0108/14
2	Advertiser	Target Australia Pty Ltd
3	Product	Lingerie
4	Type of Advertisement / media	TV
5	Date of Determination	09/04/2014
6	DETERMINATION	Dismissed

### ISSUES RAISED

- 2.1 - Discrimination or Vilification Gender
- 2.4 - Sex/sexuality/nudity S/S/N - general
- 2.5 - Language Inappropriate language

### DESCRIPTION OF THE ADVERTISEMENT

A television commercial featuring Gok Wan advertising Target's range of women's underwear. There are close up shots of woman wearing bras whilst Gok explains that he has never met a woman who doesn't need a little extra support.

### THE COMPLAINT

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

*We were watching Ninja Warrior (an obstacle course show) and I think My Kitchen Rules as a family and continued to be bombarded with the imagery.*

*Whilst you cannot comment on other advertising, these garments were advertised in amongst simulated sex and drugs for a news program on SBS and on channel seven 'Sunday' continued to simulate a murder scene and use provocative language to advertise the upcoming content and its was relentless.*

*I am not a prude but its the saturation that is getting too much. Let children be children. Save this advertising for after 8.30pm.*

*I do change the channel when I note the advertising is too inappropriate only to find another channel has something else provocative.*

*It is offensive to have anyone discuss women's breasts (or any other body part) as an asset. Having an obviously homosexual man doing it does not make it more offensive.*

*I was watching a program with my 14 and 12 year old daughters who had never, and should not have ever, heard breasts described as assets.  
A disgraceful advertisement.*

## **THE ADVERTISER'S RESPONSE**

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

*The TVC is part of a campaign featuring Target's brand ambassador Gok Wan (the Gok Campaign). The TVC forms part of the suite of advertisements promoting Target's underwear range. The underwear advertisements were not the first advertisement in the Gok Campaign. Other advertisements in the Gok Campaign have featured homewares, women's outerwear, women's swimwear and contain similar messages about feeling good about yourself and the way you present yourself using products ranged at Target.*

*The TVC features Gok encouraging women to dress in correctly sized and shaped underwear to feel good about themselves. The women used to model the underwear in the TVC have a range of normal body shapes. None of them have an idealised body shape. During the TVC Gok says "Girls, investing in your assets, doesn't need to break the bank".*

*Target does not consider the advertisement to breach any part of Section 2 of the AANA Advertiser Code of Ethics (the Code) or the AANA Code for Advertising and Marketing Communications to Children (the Children's Code).*

*Target submits that the advertisement does not fall within the definition of an "Advertising or Marketing Communication to Children" as set out in section 1 of the Children's Code. The advertisement is not primarily directed to children aged 14 years or younger and is not an advertisement for a product which is targeted toward or has principal appeal for children. The relevant sections of the Code provide as follows:*

*2.1 Advertising or marketing communications shall not portray people or depict material in a way which discriminates against or vilifies a person or section of the community on account of race, ethnicity, nationality, gender, age, sexual preference, religion, disability, mental illness or political belief.*

*2.4 Advertising or Marketing Communications shall treat sex, sexuality and nudity with sensitivity to the relevant audience.*

*2.5 Advertising or Marketing Communications shall only use language which is appropriate in the circumstances (including appropriate for the relevant audience and medium). Strong or obscene language shall be avoided.*

*The complainants are offended by Gok referring to breasts as assets. One complainant is offended by the close up images of women in bras. A number of the complainants are also offended that a gay man should refer to women's breasts as assets. One of the complaints appears offended that Target should be using a gay man in advertising.*

*We respectfully disagree with the complainants. The target market for the advertising is women and the main message is that the Target range of underwear is accessible to the Target customer. We consider the advertisement to be appropriate and in line with Target's brand values.*

*Gok Wan was chosen as a brand ambassador for Target because of his personality and reputation, not his sexuality. He feels good about who he is as he is. He is playfully irreverent, colourful and fun. He has a great capacity for making other people feel good about themselves too. Target strongly believes that a person's sexuality is irrelevant to their worth as a person. Target makes no apology for using a gay man in its advertising and we do not*

*believe that this should be grounds for upholding a complaint.*

*More importantly, Gok is a British style icon. The brands he has chosen to provide with his imprimatur are Department Stores such as Sainsbury's in the UK and Target in Australia - not high end fashion houses. He is about making fashion accessible to everyone and making people feel good about themselves. This is completely in line with Target's brand values.*

*The Gok Campaign is about building confidence, looking and feeling fantastic and having fun. The majority of feedback that Target has received regarding the Gok Campaign, including the underwear advertisements, is that our customers are telling us they love the honesty and quirkiness of our language and imagery.*

*The TVC is intended to capture Gok's playful approach. It contains words used in common parlance such as "assets" to encourage women to think about themselves in positive terms. The use of "assets" is not derogatory but in Target's view strongly supportive of women feeling good about themselves. Target does not view breasts as the only measure by which women should be valued. The advertisement does recognise that how women feel about their body image does play an integral part in many women's feelings about themselves and how they feel they are perceived. Feeling like you are wearing the right clothing in the right size for you makes a big difference.*

*A lot of women feel ambivalent about their body shape, including the shape and size of their breasts. The images in the TVC are positive: showing the models feeling good about who they are and what they are wearing. The images are not sexualised and Gok's interaction with the women is not sexually charged or predatory. It is in this context that Gok uses the phrase "Girls, investing in your assets, doesn't need to break the bank". The comment is delivered in a manner that is positive and supportive and not crass or dismissive. It reinforces that the Target range of underwear is accessible to the Target customer.*

*The use of "assets" recognises the ambivalence many women have for their bodies but still encourages women to feel good about themselves in a fun way. It should be interpreted in the context of the TVC and the Gok Campaign as a whole.*

*We note that the TVC was provided with a CAD rating of W, with a CAD reference TAR044115AI. It has only been displayed to the public in accordance with that rating in an appropriate timeslot from Sunday 16 March.*

*We consider that the advertisement is appropriate for and reflective of our target market and would not offend the sensibilities of the general public within the context of an advertisement for women's underwear.*

*We note that section 2.1 of the Code prohibits advertising or marketing communications that "portray people or depict material in a way which discriminates against or vilifies a person or section of the community on account of race, ethnicity, nationality, gender, age, sexual preference, religion, disability, mental illness or political belief". We consider Target's choice of Gok Wan does not discriminate against or vilify gay members of our community.*

*We submit that the TVC does not vilify women or objectify them. We consider that the advertisement does not breach section 2.1 of the Code.*

*The complaint relates to section 2.4 of the Code requiring "sex, sexuality and nudity with sensitivity to the relevant audience". We submit the images would not be considered sexual or exploitative by the general community. We consider that the advertisement does not breach section 2.4 of the Code.*

*Section 2.5 of the Code requires only language which is appropriate in the circumstances (including appropriate for the relevant audience and medium). Strong or obscene language shall be avoided. Target submits that the language used in the advertisement is appropriate and not strong or obscene. We consider the advertisement does not breach section 2.5 of the Code.*

*Target is committed to upholding the standards of the Code in its advertising and appreciates*

*your review of our response to these complaints.*

## **THE DETERMINATION**

The Advertising Standards Board (“Board”) considered whether this advertisement breaches Section 2 of the Advertiser Code of Ethics (the “Code”).

The Board noted the complainants’ concerns that the advertisement is sexist in its description of women’s breasts as assets, is objectifying in its depiction of women in bras and overall is inappropriate for viewing by children.

The Board first considered whether the advertisement complied with Section 2.1 of the Code which requires that 'advertisements shall not portray or depict material in a way which discriminates against or vilifies a person or section of the community on account of race, ethnicity, nationality, gender, age, sexual preference, religion, disability, mental illness or political belief.'

The Board noted that the advertisement features Gok Wan a well-known fashion stylist talking to the camera about women’s bras and choosing the right bra size.

The Board considered that the overall tone of the advertisement is positive and light-hearted and is intended to draw the attention of women to the various bras available in store and also to the fact that it is important to purchase the correct bra size.

The Board noted that the advertisement includes women of varying sizes and shapes and that the woman appear very happy and comfortable being presented in their underwear.

The Board noted that it is reasonable for an advertiser to show their product in an advertisement and considered that in the context of an advertisement promoting bras it is not discriminatory to depict women wearing bras.

The Board noted the complainants’ concerns about the use of the descriptor, ‘assets’, to describe a woman’s breasts and considered that the term ‘assets’ is used in a positive manner and does not amount to a description of a part of a woman’s body which would be considered discriminatory or vilifying.

The Board determined that the advertisement did not breach section 2.1 of the Code.

The Board then considered whether the advertisement was in breach of Section 2.4 of the Code. Section 2.4 of the Code states: “Advertising or Marketing Communications shall treat sex, sexuality and nudity with sensitivity to the relevant audience.”

The Board noted that the women in the advertisement are seen in their underwear and are standing in a group as in a photo shoot and also walking along a fashion catwalk. The Board noted that the women are completely covered by their bra and underpants.

The Board noted the “W” rating given by CAD which means the advertisement may be

shown within the same restrictions as a “G” rating with additional care in placement during P and C rated programs or programming likely to attract a substantial child audience. The Board noted that the advertisement had been aired in the appropriate time slot for the rating.

The Board noted it had previously dismissed a similar advertisement for the same advertiser which also featured Gok discussing women’s bras (0274/13) where:

“The Board considered that the theme of the advertisement was not of a sexual content and that the presentation and discussion about bras was factual and helpful for the target market of women who wear bras.”

In this instance the Board noted that whilst there are close up shots of the women’s chests in the Board’s view these images are designed to promote the advertised product, bras, and that there is no inappropriate nudity and no exposed breasts or private areas. The Board considered that the women are not portrayed in a sexualised manner and that the level of nudity is consistent with a “W” rated advertisement for underwear.

The Board considered that the advertisement did treat sex, sexuality and nudity with sensitivity to the relevant audience and did not breach section 2.4 of the Code.

The Board then considered whether the advertisement was in breach of Section 2.5 of the Code. Section 2.5 of the Code states: “Advertising or Marketing Communications shall only use language which is appropriate in the circumstances and strong or obscene language shall be avoided.”

The Board noted the advertisement uses the term ‘assets’ and recognised that some members of the community may be offended by the reference to women’s breasts as assets.

The Board considered that the word ‘assets’ in relation to a woman’s breasts is not language which most members of the community would find to be strong, obscene or inappropriate.

The Board determined that the advertisement did not use strong or obscene language and that it did not breach Section 2.5 of the Code.

Finding that the advertisement did not breach the Code on other grounds, the Board dismissed the complaints.