



## IS APPLE CHINA REMOVING AD-ONLY GAMES?

### [CHINA REGULATION WATCH](#)<sup>1</sup>

April 27, 2022

By: Greg Pilarowski | Charles Yu | Alexandra Ashbrook

#### 1. Introduction

Apple Inc. (“Apple”) recently began removing from its China App Store mobile games that monetize only through in-game advertisements (“Ad-Only Games”) if the game does not have the required game approval number issued by the National Administration of Press and Publication (国家新闻出版署) (“NPPA”). Previously, unapproved Ad-Only Games were one of the few types of games that Apple did not remove from the China App Store when Apple began enforcing the game approval requirements in the summer of 2020.

In 2020, Apple changed its policies and began enforcing China’s game approval rules, requiring developers of “premium” (i.e., pay to download) games and games that include in-app purchases to obtain a game approval number issued by the NPPA before publication of the game on the China App Store or to remain in the China App Store if already published.<sup>2</sup> Although China requires content censorship approvals for all types of games prior to publication,<sup>3</sup> our informal market checks in early 2021 found that Ad-Only Games without game approvals were still being published in the China Apple Store and if previously published were not being removed. Recently, however, the situation has changed again. Although Apple continues to allow Ad-Only Games to launch on the China App Store, Apple is now also removing many of these Ad-Only Games if they lack game approvals.

#### 2. Apple China App Store Market Check

To confirm whether or not Apple continues to allow game developers to launch Ad-Only Games without NPPA game approvals, we reviewed the games launched on the China App Store

---

<sup>1</sup> This China Regulation Watch is provided by Pillar Legal, P.C. (the “Firm”) as a service to clients and other readers. The information contained in this publication should not be construed as legal advice, and use of this memorandum does not create an attorney - client relationship between the reader and the Firm. In addition, the information has not been updated since the date first set forth above and may be required to be updated or customized for particular facts and circumstances. This China Regulation Watch may be considered “Attorney Advertising” under applicable law. Questions regarding the matters discussed in this publication may be directed to the Firm at the following contact details: +1-925-930-3932 (San Francisco Bay Area office), +86-21-5876-0206 (Shanghai office), email: [info@pillarlegalpc.com](mailto:info@pillarlegalpc.com). Firm website: [www.pillarlegalpc.com](http://www.pillarlegalpc.com). © 2022 Pillar Legal, P.C.

<sup>2</sup> For more information about Apple’s 2020 policy change to enforce China’s game approval requirements, see the Pillar Legal China Regulation Watch legal update [here](#): “Apple to Enforce Game Approval Rules in China”, posted on February 28, 2020.

<sup>3</sup> For more information about the regulation of China’s digital game industry, see the Pillar Legal China Regulation Watch [here](#): “Legal Primer: Regulation of China’s Digital Game Industry,” posted on January 6, 2021.

between April 13<sup>th</sup> and April 19<sup>th</sup> of 2022.<sup>4</sup> We found that of the 1,022 mobile games launched during that period, most were Ad-Only Games without NPPA game approvals.

We also reviewed games that Apple removed from the China App Store during the same period (April 13<sup>th</sup> to April 19<sup>th</sup> of 2022).<sup>5</sup> We found that approximately ninety-six percent (96%) of the games Apple removed from the China App Store were Ad-Only Games that did not have game approvals. Although it remains unclear why Apple removed these particular games, it is clear that Apple is now removing Ad-Only Games in accordance with China’s game approval requirements.

Date	Removed Games <sup>6</sup>	In-App Purchases <sup>7</sup>	Game Approvals <sup>8</sup>	Ad-Only Games <sup>9</sup>	Percentage
April 19	106	4	6	96	90.6%
April 18	108	3	0	105	97.2%
April 17	205	2	0	203	99.0%
April 16	205	3	6	196	95.6%
April 15	171	4	7	160	93.6%
April 14	169	4	2	163	96.4%
April 13	93	2	2	89	95.7%
<b>TOTAL</b>	<b>1,057</b>	<b>22</b>	<b>23</b>	<b>1,012</b>	<b>95.7%</b>

It is also unclear why Apple would allow Ad-Only Games without game approvals to launch in the China App Store in the first place, while at the same time removing Ad-Only Games without game approvals. One theory is that Apple’s enforcement activities are focused on high performing games (e.g., games on Apple China’s “Best Games” list) or on games that attract non-compliance complaints. Thus, Apple might not be removing less popular games or games that have not yet been the subject of complaints to regulators regarding lack of a game approval or other compliance problems.

### 3. Challenges for Foreign Games In China

Ultimately, Ad-Only Games are no longer categorically exempt from Apple’s enforcement of China’s game approval rules, although many Ad-Only Games continue to launch in the China

<sup>4</sup> We reviewed games based on the new game launch list at the [website](#) of Qimai Data (七麦数据), a mobile app data analysis tool in China.

<sup>5</sup> We reviewed games based on the list of removed games at the [website](#) of Qimai Data (七麦数据).

<sup>6</sup> “Removed Games” indicates, for the given date, the number of the games Apple removed from the China App Store, all of which are free-to-play games (i.e. none are premium pay for download games).

<sup>7</sup> “In-App Purchase” indicates, for the given date, the number of removed games that have in-app purchases but do not have a game approval.

<sup>8</sup> “Game Approval” indicates, for the given date, the number of removed games that have game approvals.

<sup>9</sup> “Ad-Only Games” indicates, for the given date, the number of removed games that have neither in-app purchases nor game approvals.



App Store and some escape post-launch removal. Separately, the eight month pause on NPPA game approvals ended on April 11, 2022, when NPPA granted a batch of new game approvals for 45 domestic games.<sup>10</sup> No foreign game, however, has received an NPPA approval since June 28, 2021. As a result, it is challenging to launch a foreign mobile game in China, irrespective of whether the mobile game is an Ad-Only Game, premium game or game with in-app purchases.

---

<sup>10</sup> See NPPA [website](#).