

15 April 2026

Ms Nerida O'Loughlin
Chair and Agency Head
Australian Communications and Media Authority
Via email: camr@acma.gov.au

CC:
Manager, Content and Media Reform
Australian Communications and Media Authority
Via email: camr@acma.gov.au

Dear Ms O'Loughlin

Thank you for inviting submissions to the Australian Communications and Media Authority (ACMA) review of alcohol advertising rules in the Commercial Television Industry Code of Practice 2015 (Free TV Code). I note the terms of reference provide that while the review is focused on assessment of part 6.2 of the Free TV Code, ACMA may also draw from its consultation process to provide insights on 'in-stadia and integrated content advertising, such as alcohol advertising in sporting stadiums, signage on jerseys and sponsored collaborations'. The purpose of this submission is to provide information on in-stadia advertising at venues owned by Stadiums Queensland (SQ).

SQ is a Queensland independent statutory body that owns nine major sports facilities declared under the *Major Sports Facilities Act 2001* (Qld). Of its nine venues, SQ operates six, being The Gabba, Cbus Super Stadium, People First Stadium, Queensland County Bank Stadium, the Queensland Sport and Athletics Centre and the Sleeman Sports Complex. The operation of the three remaining SQ owned venues are either fully or partially outsourced, including the Queensland Tennis Centre through an operating lease, Suncorp Stadium through an agency agreement, and the Brisbane Entertainment Centre through an operating agreement.

Income from commercial signage is an important revenue source for SQ's venue hirers. SQ generally limits its rights to commercial venue naming rights and provides all in-venue signage rights to hirers. SQ hirers include Queensland major sport league teams (e.g. the Brisbane Broncos, the North Queensland Cowboys, the Gold Coast SUNS), state and national sports organisations (e.g. Queensland Cricket, Cricket Australia, National Rugby League, Australian Football League, Football Federation Australia, AusCycling, Swimming Australia, Australian Athletics, Netball Queensland, Basketball Queensland) and international major event organisers (e.g. FIFA, AFC). SQ venue hirers also include schools and community sport organisations, particularly at the Sleeman Sports Complex and the Queensland Sport and Athletics Centre.

Game day and sponsorship revenue are the largest sources of income for many SQ venue anchor hirers (major sport league teams). Any restrictions on in-stadia advertising that reduces the value of a sponsorship segment is likely to have a significant impact on Queensland's major professional sports teams. Restrictions on certain forms of 'in stadia' advertising may also introduce contractual issues for SQ as the venue owner and operator, and for hirers associated with their sponsorship contracts.

SQ requests that any recommendations that have the potential of reducing the value of a sponsorship segment include a strategic partnership approach between government and sport sector stakeholders. The aim of the strategic partnership should be to ensure the commercial viability of the sports sector and support the identification of alternative sources of commercial revenue to ensure the viability of the sector.

Should you require any further information please do not hesitate to contact Ms. Victoria Turns, Head of Strategic Policy, SQ on 0429 830 849 or via email on Victoria.Turns@stadiums.qld.gov.au .

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Todd Harris', with a stylized, cursive script.

Todd Harris
Chief Executive