



28 April 2026

Manager, Content and Media Reform
Australian Communications and Media Authority
PO Box 78, Belconnen ACT 2616

Lodged online: <https://www.acma.gov.au/consultations/2026-03/review-alcohol-advertising-rules-free-tv-code>

Dear ACMA,

Submission to ACMA Review of Alcohol Advertising in the Free TV Code

The Australian Hotels Association (AHA) welcomes the opportunity to contribute to the Australian Communication and Media Authority's (ACMA) review of alcohol advertising rules within the Free TV Code.

Overview

The AHA supports the submissions made by its partners (Asahi Beverages, LION, Diageo and Treasury Wine Estates), and this document should be read in conjunction with theirs. It's important to note that the AHA, and our partners, did not support the proposals by Free TV Australia to extend alcohol advertising hours on commercial television.

Background

The Australian Hotels Association (AHA) is an organisation of employers in the hotel and hospitality industry registered under the *Fair Work (Registered Organisations) Act 2009*. Its diverse membership includes pub-style hotels, bars, taverns, restaurants plus three, four and five-star international accommodation hotels located in each state and territory. The size and scope of the AHA hotel membership includes:

- More than 6,000 businesses
- Generating over \$12,000,000,000 economic benefit
- Providing over 300,000 jobs
- Providing more than 150,000 accommodation rooms across the country
- Supporting over 50,000 community groups

Australia's Drinking Culture Is Improving

Australian Government data shows that there has been a consistent and positive improvement in Australia's drinking culture since the turn of the century. Among Australians aged 14–17:

- The percentage of young people who consumed alcohol in the previous 12 months has fallen from **69% (2001) to 31% (2022-23)**
- Risky drinking has declined from **30.7% to 5.5%**

Across the broader population:

- Daily drinking has dropped from **8.5% to 5.2%**
- The average age of first drink has increased from **14.7 to 16.1 years**
- Risky or harmful consumption has fallen from **38.1% to 30.7%**.

These are significant, long-term improvements. In hotels and pubs, this is reflected in more moderate consumption and growing demand for low and no-alcohol options. These outcomes have been achieved under the current regulatory framework.

Advertising Exposure is Controlled and Declining

Alcohol advertising on free-to-air television is already tightly regulated. Under the Free TV Code and the Alcohol Beverages Advertising Code (ABAC):

- Advertising is time-restricted
- Placement is limited to programming with predominantly adult audiences (>80%)
- Content must not appeal to minors

Exposure to children is therefore constrained by design. At the same time, alcohol advertising on television has declined significantly, seeing substantial reductions in expenditure. Alcohol advertising on free-to-air television has declined sharply since 2019:

- In metropolitan markets, it has fallen from **1.24% of total advertising expenditure to 0.44% in 2025**
- In regional markets it has halved from **0.64% to 0.32%** over the same period

The Framework Is Fit-for-Purpose

Australia's co-regulatory system, which combines the Free TV Code, the AANA and, importantly, ABAC, is comprehensive and effective. The governance of ABAC reinforces its independence and credibility. Its management committee includes representation from the Australian Government Department of Health and Aged Care. The Scheme is chaired by former Speaker of the House of Representatives, the Hon Tony Smith, and its Chief Adjudicator is former Australian Attorney-General, Professor the Hon Michael Lavarch AO.

Since its establishment in 1998, ABAC has provided an effective and efficient mechanism for addressing community concerns and adjudicating complaints regarding alcohol marketing. It aligns with the realities of a highly regulated sector where venues already operate under strict responsible service obligations and Federal and State and Territory Acts and regulations. There is no evidence additional regulation of alcohol advertising would improve outcomes.

AHA Community Role

Hotels and pubs are regulated, community-based environments that support employment, local economies and safe social settings. Responsible service and promotion of alcohol are central to maintaining that role. Every staff member is trained in the responsible service of alcohol.

Sporting Partnerships

Consistent with the submissions of our partners, alcohol sponsorship in sport remains an important funding source for codes, clubs and grassroots participation. These activities occur in predominantly

adult environments and remain subject to strict ABAC rules. Hotels are often significant sponsors of grass roots sport.

Conclusion

The evidence is clear:

- Drinking patterns and moderation continue to improve
- Young people are drinking less and later
- Alcohol advertising exposure is controlled and declining
- The existing alcohol advertising framework is working

No case has been made for further restrictions on alcohol advertising in the Free TV Code. The AHA supports maintaining the current, effective co-regulatory model.

Yours faithfully,



STEPHEN FERGUSON
NATIONAL CEO