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Review of alcohol advertising rules in the Free TV Code

Thank you for the opportunity to contribute to the AMCA's review of alcohol advertising rules in the Free TV Code.

This submission is informed by, and consistent with, submissions made in consultation processes concerning intimate partner violence, abuse and mistreatment of older people, child maltreatment and sexual violence, and factors which contribute to those phenomena. Most recently, we provided a submission to the 2025 inquiry of the House of Representatives Standing Committee on Health, Aged Care and Disability into health impacts of alcohol and other drugs. Our submissions can be found at

<https://www.relationships.org.au/research/#advocacy> . Relationships Australia's interest in this inquiry relates to:

- the prevalence of harmful use of alcohol among our clients (including, but not only, clients who present with concerns about domestic and family violence)
- the prevalence of domestic, family and sexual violence among our clients
- our understanding of the impact, among our clients, of:
 - social determinants of health, and
 - intersectional disadvantage, marginalisation, and circumstances of vulnerability
- our commitment to preventing harm, and enhancing public health, and
- our increasing involvement in delivering community-based mental health and social connection services and programs to meet needs that are unmet by specialist mental health services.

The work of Relationships Australia

Relationships Australia is a federation of community-based, not-for-profit organisations with no religious affiliations. Our services are for all members of the community, regardless of religious belief, age, gender, sexual orientation, lifestyle choice, cultural background or economic circumstances. We aim to support all people in Australia to live with positive and respectful relationships, and believe that people have the capacity to change how they relate to others.

Relationships Australia believes that violence, coercion, control and inequality are unacceptable. We respect the rights of all people, in all their diversity, to live life fully within their families and communities with dignity and safety, and to enjoy healthy relationships. Our services include:

- individual, couples, and family counselling
- family law counselling, mediation and dispute resolution
- Specialised Family Violence Services
- Children's Contact Services (services which provide supervised contact and changeovers for high risk families)
- post-separation services for parents and children
- services designed for men, including programs to support parenting capacities and resources, Men's Behaviour Change Programs, and tailored programs such as the Respectful Relationships Program for Indigenous clients
- parenting capacity programs
- services to support those adversely affected by harmful use of alcohol and other drugs
- gambling help services
- mental health services and program, including suicide prevention, Headspace services, and Family Mental Health Support Services
- therapeutic and case management services to applicants for Redress Support Services, Forgotten Australians, Forced Adoption Support Services, Intercountry Adoptee Family Support Service, and Post Adoption Support Services
- a range of tailored services for older Australians, including senior relationship services, elder mediation, elder abuse case management and mediation, social connection services and mental health services in residential aged care on behalf of Primary Health Networks in South Australia, and
- employee assistance programs.

For more than 75 years, we have worked with people to enhance not only family relationships, but also relationships with friends, colleagues, and across communities. This submission draws upon:

- our lengthy experience in delivering diverse programs to people affected by crime, domestic, family and sexual violence, and institutional abuse, as well as people affected by harmful use of alcohol
- evidence-based programs and research, and
- our leadership and policy development experience.

Summary of recommendations

Recommendation 1

A new Commercial Television Industry Code of Practice should not extend the hours when alcohol advertising is permitted to be broadcast.

Recommendation 2

Increase restrictions on advertising alcohol on commercial television.

Recommendation 3

Alcohol advertising should be completely prohibited, with no exceptions, during children's viewing times.

Recommendation 4

Prohibit sports programs and live sporting event broadcasts from including commercials for alcoholic drinks. Accordingly, existing paragraphs 6.2(b) and (c) must not be included in a new Code.

Recommendation 5

Australian governments should collaborate to align and simplify restrictions on advertising harmful and addictive products and services (including tobacco, gambling and alcohol).

Recommendation 6

Australian governments should implement Recommendation 17 of the *Rapid Review of Prevention Approaches to End Gender-Based Violence*.

Framing principles of this submission

Principle 1 - Commitment to human rights

Relationships Australia contextualises its services, research and advocacy within imperatives to strengthen connections between people, scaffolded by a robust commitment to human rights. Relationships Australia recognises the indivisibility and universality of human rights and the inherent and equal freedom and dignity of all.

Principle 2 – Commitment to inclusive and universally accessible services

Relationships Australia is committed to universal accessibility of services, as well as inclusive and culturally safe services. Our clients (and staff) experience stigma, marginalisation and exclusion arising from diverse circumstances and positionalities. None of these exists at the level of an individual or family. They become barriers to full enjoyment of human rights and full participation in economic, cultural, and social life through the operation of broader systemic and structural factors including:

- legal, political and bureaucratic frameworks
- beliefs and expectations that are reflected in decision-making structures (such as legislatures, courts and tribunals)
- policy settings that inform programme administration, and
- biases or prejudices that persist across society and that are reflected in arts, culture, media and entertainment.

Principle 3 – An expanded understanding of diverse ways of being and knowing

Relationships Australia is committed to working with Aboriginal and Torres Strait Islander people, families and communities. Relationships Australia is also committed to enhancing the cultural responsiveness of our services to other culturally and linguistically marginalised individuals, families and communities. Our commitment to human rights necessarily includes a commitment to respecting epistemologies beyond conventional Western ways of being, thinking and doing. Of acute importance is a commitment to respecting epistemologies and experiences of Aboriginal and Torres Strait Islander people as foundational to policy and programme development, as well as service delivery.

Principle 4 - Prevention is key to disrupting harmful behaviours

Intergenerational patterns, as well as early indicators of risk, of engaging in harmful behaviours must be disrupted to achieve major strategic goals including ending gender-based violence within a generation, preventing child sexual abuse, and ending abuse and mistreatment of older adults.¹

Harm prevention anchors the achievement of multiple Government health and social policy commitments and priorities. It is a necessary prerequisite of Australia's long-term economic success, boosting labour market and education participation while also lowering avoidable expenditure on health and social services. The importance of preventing alcohol-related harms is far more urgent, and will confer far greater and more durable economic and social benefits, than the narrow economic contribution of alcohol advertising on commercial television. Responsible intergenerational stewardship demands that that harm prevention across the broader population be privileged over profits accrued by narrow economic sectors.

Principle 5 - Commitment to promoting social connection and addressing loneliness as a serious public health risk

Research literature indicates associations between loneliness and harmful use of alcohol and other drugs² (although more research is needed to clarify causal pathways).³ Policy, regulatory and service interventions that strengthen connections and reduce loneliness and isolation are the most promising and feasible avenues for reducing the risk of abuse and exploitation of people who face structural and systemic barriers to their full participation in society.

For example, social support has emerged as one of the strongest protective factors identified in studies of abuse of older adults:

....Social support in response to social isolation and poor quality relationships has also been identified as a promising focus of intervention because, unlike some other risk

¹ See, eg, the National Plan to End Violence Against Women and Children 2022-2032, the National Framework for Protecting Australia's Children 2021-2031 (Safe and Supported), the National Strategy to Prevent and Respond to Child Sexual Abuse 2021-2030 and the National Plan to End Abuse and Mistreatment of Older People 2026-2036.

² Herchenroeder et al, 2022; Johar et al, 2025; Wakabayashi et al, 2022.

³ Wootton et al, 2021.

factors (eg disability, cognitive impairment), there is greater potential to improve the negative effects of social isolation.⁴

Loneliness is a complex social problem and a public health concern. It stems from dissatisfaction with our relationships, a lack of positive and respectful relationships, or both of these, and is often caused by experiences of exclusion due to structural and systemic social realities that form obstacles to participation in social, economic, cultural and political life. As a public health concern (Heinrich & Gullone, 2006; Holt-Lunstad et al, 2015; Mance, 2018), loneliness has been linked to physical health risks such as being equivalent to smoking 15 cigarettes a day and an increased risk of heart disease (Valtorta, 2016). Loneliness is a precursor to poorer mental health outcomes, including increased suicidality (Calati et al, 2019; McClelland et al, 2020; Mushtaq, 2014).⁵ Relationships Australia is a foundation member of the Ending Loneliness Together network and has, since 2013, been the custodian of Neighbours Every Day,⁶ the primary purpose of which is to equip and empower individuals to build sustainable, respectful relationships with those around them. It is an evidence-based campaign aimed at reducing loneliness by raising awareness and, importantly, providing tools to combat social isolation.

Principle 6 – Advertising influences people’s purchasing and consumption of alcohol

Advertising influences people’s decisions about whether to purchase and consume alcohol, what alcohol they purchase and consume, in what quantities, and in what circumstances.⁷ This influence extends to adults as well as children and young people.⁸ If advertising alcohol on commercial television did not deliver such outcomes to the alcohol industry, then the industry would not advocate for regulatory arrangements allowing them to do so. Nor would industry be spending money on advertising.⁹

⁴ Dean, 2019; Hamby, 2016.

⁵ The campaign Ending Loneliness Together has released a guide that explains how community organisations can use validated scales to measure loneliness:

https://endingloneliness.com.au/wpcontent/uploads/2021/08/AGuidetoMeasuring-Loneliness-for-Community-Organisations_Ending-LonelinessTogether.pdf

⁶ Neighbours Every Day is an evidence-based campaign, evaluated by the Australian National University, aimed at reducing loneliness by raising awareness and, importantly, providing tools to combat social isolation. With adequate resourcing, we are confident that Neighbours Every Day could be scaled to reach a greater number of Australians, in all communities and at all stages of the life course. For recent international endorsement of Neighbours Every Day as an evidence-based intervention for loneliness, see: WHO, 2025.

⁷ See, eg, Giesbrecht et al, 2024; Stautz et al, 2017; Jones, et al, 2010; Martino et al, 2022; Petticrew et al, 2017.

⁸ For the impact of alcohol advertising on children and young people, including inducing earlier first consumption of alcohol, see, eg, Jernigan et al, 2017; Jones et al, 2010; Valkenburg & Cantor, 2001; Pettigrew et al, 2013.

⁹ A 2011 estimate of total advertising spend by the Australian alcohol industry was in excess of \$220 million: White et al, 2015.

Response to Terms of Reference, Part 1 – harms related to alcohol consumption

Globally, Australians are leading consumers of alcohol (WHO, 2018). Alcohol consumption is a leading cause of preventable premature death, illness and injury, through a range of circumstances, including domestic and family violence, suicide, violence between strangers, motor vehicle accidents, acquired brain injury and dementia, liver disease, and various cancers. (AIHW, 2025)

What our clients tell us

Across Relationships Australia's diverse suite of services, our practitioners support individuals and families affected by harmful use of alcohol. While Relationships Australia does not oppose alcohol consumption in itself, the prevalence and magnitude of harms attributable to alcohol consumption imposes on governments a responsibility to ensure that advertising of innately attractive and addictive products occurs within clear guardrails informed by robust evidence and underpinned by harm prevention principles and public health considerations.

Snapshot – Relationships Australia South Australia

People experiencing family breakdown often have a constellation of problems including family violence, harmful gambling, and risky alcohol or other drug use that have negative and often long-term harmful impacts. All Relationships Australia South Australia (RASA) services use the Detection Of Overall Risk Screen (DOORS),¹⁰ a simple, practical, and flexible three-part framework supporting professionals to comprehensively identify, map, and respond to safety and well-being risks. This approach ensures there is a consistent and holistic approach across all RASA services that has helped us build effective cross program collaboration as well as service wide procedures for responding to safety risks.

In 2023/24, RASA's clinical services were accessed by 20,863 clients. DOORS screening highlighted the challenges clients face upon intake to service. Almost 1 in 5 (17%) clients across RASA felt that they wanted or needed to cut down on their use of alcohol and/or other drugs. Other analyses indicated almost 1 in 4 (24.3%) young people in RASA's *Tailored Learning Service*, supporting young people at risk of disengaging from school, disclosed having used alcohol or drugs more than they meant to in the past 12 months (N=313). And, of men entering RASA's *Reset2Respect*, the South Australian Magistrates Court Abuse Prevention Program, almost 1 in 2 (47%) indicated they recently engaged in risky AOD use and needed 'mental health/AOD/gambling' support in the last 2 years (46%) (N=201).

¹⁰ Family Law DOORS was originally commissioned by the Attorney-General's Department in 2010. It has been periodically validated: see McIntosh & Ralfs, 2012; McIntosh et al, 2016; Wells et al, 2018; McIntosh et al, 2021. The Federal Circuit and Family Court of Australia has, since 2023, used a bespoke version of DOORS as part of its response to DFV among families coming before the Court: see <https://www.fcfcoa.gov.au/news-and-media-centre/updates-profession/lh-281124>

Snapshot - Relationships Australia Tasmania

Relationships Australia Tasmania works with families across the state, where harmful alcohol and other drug use is a common intersecting issue alongside family and domestic violence, abuse and mistreatment of older adults, mental health challenges, and child wellbeing concerns.

Risk screening data from 2017/2018 to the present is consistent with that of other members of the Relationships Australia Federation, and with the broader literature base.

Relationships Australia Tasmania has aggregated data from the DOORS tool completed by clients engaged in both early intervention programs (My DOORS) and post-separation programs (Family Law DOORS). Data from 2017/2018 to the present highlights how these risks present within our services and offers a longitudinal perspective on how harmful alcohol and other drug use presents across different client groups.

Harmful use of alcohol is consistently reported at higher rates than other drug use across both My DOORS and Family Law DOORS programs. Clients are more likely to identify concerns about the alcohol and drug use of a partner or family member than their own use, highlighting the ripple effects of harmful alcohol and other drug use on families. The prevalence of alcohol and other drugs concerns is notably higher among clients engaged in Family Law DOORS, reflecting the elevated risks present in families experiencing separation, conflict, and parenting disputes. Alcohol is the most frequently reported issue, with drug misuse a significant but less common concern. These patterns underscore the ongoing impact of harmful alcohol use across diverse client groups and reinforce the need for integrated responses.

Harmful use of alcohol and other drugs among separating families

Services to assist with reducing harmful use of alcohol are an important piece of the service delivery patchwork for people caught up in the family law system. The 2018 AIFS report about the experience of children and young people in the family law system observed that:

It is worth noting that 50% of parents reported that they held safety concerns for themselves and/or their children as a result of ongoing contact with the other parent. The main issues of concern were: emotional abuse (64%), mental health issues (61%), violent or dangerous behaviour (32%) and alcohol or substance abuse (21%).¹¹

Domestic and family violence is a serious and highly prevalent problem among Relationships Australia's clients. A national study of family dispute resolution ('FDR') outcomes conducted by Relationships Australia involved approximately 1700 participants, of whom nearly a quarter (23%) presented with high levels of psychological distress, and 68% reported experiencing at least one form of abuse, with verbal abuse being the most common (64%).¹² A large proportion (72%) of parenting participants in the Study also reported significant child exposure to verbal

¹¹ Carson et al, 2018, p 21.

¹² See Heard & Bickerdike, 2021a; Heard & Bickerdike, 2021b; Heard, Bickerdike & Lee, 2021.

conflict between parents, including yelling, insulting and swearing.¹³ These findings accord with broader research findings demonstrating that DFV is endemic to families who seek professional assistance when they are separating or separated.¹⁴ Further, practice observation and research consistently demonstrate that DFV is not a discrete phenomenon, but is generally accompanied by a constellation of interacting challenges including harmful use of alcohol, harmful use of other drugs, mental health challenges and personality disorders.¹⁵

This means not only that DFV is core business for Relationships Australia, but that it is an ethical imperative to identify and respond to DFV and co-occurring circumstances, supporting victim survivors and perpetrators. Relationships Australia member organisations are funded to provide specialist services for families experiencing DFV, such as Children's Contact Services and Parenting Orders Programs (funded by the Commonwealth Attorney-General's Department) and the Specialised Family Violence Service (funded by the Department of Social Services).

Like general practitioners, service providers like Relationships Australia are often first points of contact by people seeking help when they are worried about, or feel unsafe in, their relationships. DFV may not be identified by our clients as their primary concern; clients may instead approach us through our services for people experiencing harm related to the consumption of alcohol and of other drugs, our gambling help services or our mental health services. Through use of screening tools such as DOORS, and as relationships of trust are built, DFV is often disclosed.

Similarly, abuse, neglect and mistreatment of older adults is accompanied by multiple other health, relationship and wellbeing challenges. The report by the Australian Institute of Family Studies into the nature and prevalence of abuse and neglect of older people indicated the following risk factors for experiencing and perpetrating abuse and neglect of older people:

- family separation
- conflictual family dynamics
- misuse of alcohol (particular association to perpetrating sexual abuse of an older person)
- financial hardship (particular association to perpetrating financial abuse of an older person)
- physical ill-health (particular association to perpetrating neglect of an older person), and
- mental ill-health.¹⁶

¹³ The *Family Law Act 1975* recognises that such exposure is a form of family violence in its own right, of which children are direct victims, reflecting increased understanding of the impact of DFV on children, as well as reflecting increased acknowledgement of children as rights bearers: see *Family Law Act 1975* (Cth), subsections 4AB(3) and 4AB(4); see also the Australian Child Maltreatment Study, especially Higgins, Mathews et al, 2023; Hameed, 2019.

¹⁴ Kaspiew et al, 2015.

¹⁵ See Family Law Council, 2015, 2016.

¹⁶ Qu et al, 2021.

Preventing DFSV through restricting alcohol advertising

The Rapid Review of Prevention Approaches to End Gender-Based Violence (2024) (Rapid Review) observed that harmful use of alcohol and other drugs has associations with domestic, family and sexual violence (DFSV), including in exacerbating the intensity of violence (Rapid Review, p 106). The authors of the Rapid Review found that

Crime statistics show that perpetrators of DFSV who abuse substances, especially alcohol, are more likely to inflict serious injury.¹⁷

The Rapid Review also reported that

Alcohol has long been known to increase both the incidence and severity of physical and sexual violence within intimate relationships and families.Over 1 in 3 incidents of physical intimate partner violence involve alcohol, and alcohol-related incidents are twice as likely to involve severe physical violence and life-threatening injuries. (p 104)

Commercial interests have long profited from relaxed regulatory frameworks privileging profit over harm prevention under the guise of defending autonomy. (see, eg, Rapid Review, pp 10, 12, 24, 43, 80, 105ff). Relationships Australia **recommends** that the Commercial Television Industry Code of Practice should not extend the hours when alcohol advertising is permitted to be broadcast. (**Recommendation 1**) We further **recommend** that restrictions on advertising alcohol on free TV should be increased, rather than reduced, reflecting increased understanding, since 2015, of:

- the nature and prevalence of domestic and family violence (DFV), including abuse and neglect of older adults and child maltreatment
 - the role of alcohol consumption in increasing the risk and severity of DFV
 - the avoidable economic and social costs of harmful use of alcohol, which give rise to particular concern during the current cost of living crisis and economic uncertainty.
- (**Recommendation 2**)

In 2022, Martino et al found

...strong evidence that there is a substantial number of alcohol ads broadcast during sport programs at times classified as children's viewing times. These high levels of alcohol advertising are enabled by the exemption to the regulations that allows alcohol advertising during the broadcast of sports programs on weekends and public holidays.... Indeed, there is evidence that Australian children are exposed to alcohol advertising during sports broadcasts on television at similar rates to young adults.¹⁸

In view of that finding, and of the compelling research demonstrating the adverse impacts of alcohol advertising on children and young people, Relationships Australia **recommends** that

¹⁷ Rapid Review, 2024, at p 76, citing Network of Alcohol and other Drugs Agencies (NADA), Engaging men who perpetrate domestic and family violence in the AOD treatment context, NADA Practice Resource, NADA, 2021. See also Pescud, 2018.

¹⁸ Martino et al, 2022, citing Carr et al, 2016.

alcohol advertising be completely prohibited, with no exceptions, during children's viewing times. (**Recommendation 3**)

The Rapid Review recommended that 'alcohol advertising be restricted during sporting events' (see, eg, p 105). This recommendation was informed by 'the statistical increase in DFSV incidents during football grand finals, as well as the high number of children who watch sport on television and mobile apps' (see p 106).¹⁹ The report of the Rapid Review acknowledged

... that certain industries, such as alcohol, gambling, media and technology, are particularly well positioned to prevent and reduce DFSV. This is in part because these same industries too often function as the foundation for, or means of, the escalation of abuse. As such, the Review recommends that governments review and amend alcohol and gambling regulatory environments to prioritise the prevention of DFSV. This includes through restrictions on alcohol sale, advertising and delivery timeframes; restrictions leading to a total ban on advertising in gambling; and an examination of the density of electronic gaming machines and use of online gambling in relation to DFSV prevalence.²⁰

The nexus between sport and alcohol consumption must be severed, as it has been for tobacco products and will be for gambling. Accordingly, Relationships Australia **recommends** that sports programs and live sporting event broadcasts should not include commercials for alcoholic drinks. Accordingly, existing paragraphs 6.2(b) and (c) must not be included in a new Code. (**Recommendation 4**) We further recommend that Australian governments should collaborate to align and simplify restrictions on advertising harmful and addictive products and services (including tobacco, gambling and alcohol). (**Recommendation 5**)

Relationships Australia notes, too, Recommendation 17 of the Rapid Review:

17. The Commonwealth and state and territory governments to work with industries that are well positioned to prevent and reduce DFSV, including homicide, with a focus on alcohol and gambling industries, in addition to media and pornography. This includes reviewing and strengthening alcohol and gambling regulatory environments to prioritise the prevention of gender-based violence. This should include:

a. adopting clear primary objectives in state and territory liquor regulatory regimes to prevent gender-based violence, alongside existing objectives around alcohol harm reduction (states and territories);

b. restrictions on alcohol sales, delivery timeframes (states and territories) and advertising (Commonwealth and states and territories)....

Further, the Review recommends that the Commonwealth Government work with the Foundation for Alcohol Research and Education (FARE) and other organisations on a

¹⁹ Martino et al, 2022, found that 'Of the 10,600 alcohol ads in sports broadcasts, 4,767 (44.7%) were during children's viewing times' and that 'TV network revenue from alcohol advertising in sports broadcasts during children's viewing times was estimated at A\$6.2 million'.

²⁰ Rapid Review, 2024, at p 12.

framework to ensure the development of an integrated and focused effort to address the role of alcohol in DFSV.

Relationships Australia **recommends** that Australian governments collaborate to implement Recommendation 17 of the Rapid Review (**Recommendation 6**).

Response to Terms of Reference, Part 2 – Relationships Australia’s views on the ‘economic contribution of alcohol advertising on commercial tv’

Relationships Australia understands that the alcoholic beverage industry, commercial television and professional sports entities may consider that alcohol advertising on commercial television confers an economic benefit. To the extent that it does confer any economic benefit, this benefit is enjoyed by far fewer than those who are harmed, physically, socially and financially.

The evidence base demonstrates that while revenue from alcohol advertising is a valued source of revenue for commercial television, it is but a small proportion of that revenue.²¹

Martino et al (2022) report that

The total revenue of alcohol ads to broadcasters over the period was estimated at A\$42.3 million, of which approximately A\$14.4 million (33.9%) was during sports broadcasts.

On the other hand, as canvassed above, alcohol advertising induces increased alcohol consumption which, in turn, drives DFSV, violence against older adults (especially sexual violence), and child maltreatment, as well as causing chronic and acute disease and injury to the point of imposing on taxpayers a substantial impost through health and social services expenditure.

If industry relies on a dollar argument, then it loses, because alcohol-related, preventable violence, disease and injury cost Australia and its hard-pressed taxpayers far more in dollar terms than commercial television and professional sports benefit from promoting alcohol purchase and consumption. Moreover, free to air television would easily survive implementation of the recommendations made in this submission, noting the findings of Martino et al (2022) that

... removal of alcohol advertising in sports broadcasts is likely to reduce each network’s advertising revenue by a maximum of 1% (\$A10 million) in total, or a maximum of 0.5% (A\$5 million) if during children’s viewing times only. The actual impact of removal of alcohol advertising in sports broadcasts on network revenue is likely to be substantially lower, given that replacement advertisers are highly likely to be found, particularly given the popularity of sports broadcasts in Australia. Accordingly, the removal of alcohol advertising during sports broadcasts would likely result in minimal (if any) negative

²¹ Martino et al, 2022.

financial impact for television networks, whilst substantially reducing the exposure to alcohol advertising on television for children and adults.

Avoidable costs – the disease and injury burden of harmful alcohol consumption

According to the AIHW,

Alcohol use contributed to 4.1% of the total burden of disease, including alcohol dependence, cancers, cardiovascular diseases, chronic liver disease, and injuries. (AIHW, 2025, Table ABDS1)

The AIHW further reports that

The [Australian Burden of Disease Study 2024](#) found that alcohol use was the sixth highest risk factor contributing to the burden of disease in Australia and was responsible for 4.1% of the total burden of disease and injury ([Table ABDS1](#)). The age-standardised rate of total attributable burden due to alcohol use was 8.3 Disability-Adjusted Life Years (DALY) per 1,000 population in 2024, a 13.5% decline from 9.6 DALY per 1,000 population in 2003.

and that

Alcohol use contributed to a number of diseases and injuries including:

- *100% of the burden due to alcohol use disorders*
- *39% of the burden due to liver cancer*
- *26% of the burden due to road traffic injuries involving motor vehicle occupants*
- *20% of the burden due to chronic liver disease*
- *13% of the burden due to suicide and self-inflicted injuries*
- *11% of the burden due to breast cancer (AIHW 2024a, Table S6).*

Preliminary estimates from [Causes of Death](#) indicate there were 1,765 alcohol-induced deaths in 2024, higher than for any other drug. This represents an age-standardised rate of 5.9 deaths per 100,000 people (ABS 2025, Table 13.11). The number and rate of alcohol-induced deaths has risen over the past decade, from 1,362 deaths in 2015 (5.2 per 100,000 people) (ABS 2025, Table 13.11). [emphasis added]

In addition, a 2025 report into Foetal Alcohol Spectrum Disorder (FASD) identified that prevalence across the general population is 3.64% (ie affecting nearly 4 in 100 live births and one child in every classroom). This is similar to that in comparable countries, but likely to be

...significantly higher in certain vulnerable Australian groups than our estimate in the general population, as indicated by studies in juvenile justice detention (36%) and remote Aboriginal communities (19%), but will vary across sub-groups and regions (Tsang et al, 2025)

Tsang et al expressed concern that

... the rate of risky drinking among females of childbearing age (18–24 years) increased by 5% within the same period [from 2019 to 2022-2023], a trend which may impact future FASD prevalence.

Avoidable costs - DFV

According to the AIHW, 2026, the cost of DFV is

....borne by victim-survivors, perpetrators and the community. The direct cost of the health system, counselling and other related services, the justice system, and child and welfare support, as well as indirect costs, such as lost wages, productivity and potential earnings, are just a part of what societies pay for violence against women (Puri 2016). Globally, the cost of violence against women could amount to about 2% of gross domestic product – about the size of Canada’s economy (Puri 2016).

The economic and financial impacts of DFV include:

- loss of assets by women fleeing DFV
- impairment of earning power (including superannuation accumulation) by women who experience DFV
- reduced capacity to participate in employment and education by women and children who experience DFV, compounded across the lifecourse
- homelessness and housing precarity across the lifecourse
- costs of moving house, often several times, to escape a person who has used DFV
- out of pocket health care expenses to deal with injury and disease arising from experience of DFV, and
- costs to the taxpayer to support the health, justice and social security systems.²²

We also know that, post separation (including separation caused by escaping DFV), women experience adverse financial impacts for longer.²³

A decade ago, KPMG was commissioned by the Department of Social Services to calculate the economic cost of violence against women in Australia. The figure reached was \$22 billion across 2015-2016. Police reports, hospitalisations, AVO breaches and homelessness linked to escaping DFV indicate that incidents of DFV have increased since that time (see, eg, ABS, 2026; ABS, 2024-2025). The AIHW also noted research commissioned by the Commonwealth Bank of Australia which found that financial abuse on its own cost almost \$11 billion in 2020 (AIHW, 2026).

²² See, eg, AIHW, 2026: <https://www.aihw.gov.au/family-domestic-and-sexual-violence/responses-and-outcomes/economic-financial-impacts>.

²³ See, eg, Cortis & Bullen (2015); Cortis & Bullen (2016); Broadway et al, 2022; de Vaus et al, 2007; de Vaus et al, 2015; Easteal et al, 2018; Fehlberg & Millward, 2014; Gray et al, 2010; Smyth & Weston, 2000; Warren, 2017.

In short, the monetary gain to stakeholders in commercial television and professional sports must be weighed against the costs borne by the rest of the population – in dollars, injury and disease burden, and impairment of social cohesion.

But even if the dollar figures did not powerfully favour harm prevention over shareholder profits and specious appeals to autonomy, should it matter? If alcohol purchasing and consumption, driven by advertising, in fact made commercial television and professional sports stakeholders wealthy beyond mortal imaginings, should it be accepted that entrenched violence and chronic disease is a fair price (for others) to pay?

Further, in the midst of a cost of living crisis and the economic uncertainties of armed conflict, it is surely incumbent on fiscally prudent governments to minimise avoidable costs to taxpayers. Were Government even to achieve the relatively modest goal of ending the proportion of DFV, and other disease and injury burdens which are fuelled by attractively marketed alcohol, the cost savings would bring appreciable and welcome relief to taxpayers.

Avoidable costs – productivity losses attributable to alcohol consumption

A systematic review of the economic costs of preventable deaths in Australia estimated that annual productivity losses attributable to excess alcohol consumption amounted to \$6.8 billion.²⁴ As noted above, Martino et al (2022) report that, over a 12 month period, broadcasters received \$42.3 million in revenue from alcohol advertising. Again, on a dollar argument, alcohol advertising confers a limited, narrowly-enjoyed benefit while imposing crushing burdens on our economy, our society, our families and our children.

In 2025, the Treasurer noted that

*...Flatlining productivity is one of the biggest challenges facing our nation, and that's why we need a big national effort to turn it around.*²⁵

The Treasurer described the Government's productivity agenda as 'ambitious', and identified a range of productivity reforms to be progressed in the second term of the Albanese Government.

A few months later, the Prime Minister recounted that

*... in one of the first cabinet meetings after the [2025] election ... we decided to put productivity at the very core of our second term agenda.*²⁶

Combatting the \$6.8 billion per annum productivity drag of alcohol consumption by restricting advertising would meaningfully progress that agenda, while also conferring the substantial

²⁴ Crosland et al, 2019.

²⁵ Media release from the Treasurer, the Hon Dr Jim Chalmers MP, *Public consultation on productivity reform priorities*, 19 May 2025. Accessible at <https://ministers.treasury.gov.au/ministers/jim-chalmers-2022/media-releases/public-consultation-productivity-reform-priorities>

²⁶ The Prime Minister's Opening Remarks at the Economic Reform Roundtable, 19 August 2025. Accessible at <https://www.pm.gov.au/media/opening-remarks-canberra>

health and safety benefits canvassed above. Australia currently faces rising interest rates, sticky inflation, ballooning energy prices and consequent impacts on agriculture and other industries, as well as cost of living that was painfully elevated even before the Iran conflict. The Government cannot afford to squander this opportunity to boost productivity.

Conclusion

Thank you again for the opportunity to participate in the review of alcohol advertising rules in the Commercial Television Industry Code of Practice. Since that Code was established in 2015, much has changed. We are far better informed about the nature and prevalence of gender-based violence, child maltreatment and the abuse of older adults. We are also far better informed about the causal links and other associations between these kinds of behaviours and the consumption of alcohol. The accumulation of profit by broadcasters and sports organisations should not be purchased by DFV victim survivors and those suffering the disease and injury effects of harmful alcohol use. The price of accumulating these profits is being forcibly extracted from DFV victim-survivors and those suffering the disease and injury effects of harmful alcohol use. It is a particularly iniquitous form of taxation.

If you wish to discuss any aspect of this submission, please do not hesitate to contact me at ntebbey@relationships.org.au or our National Policy Manager, Dr Susan Cochrane, at scochrane@relationships.org.au.

Kind regards



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