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Australian Communications and Media Authority  
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April 2026

**Submission by Alcohol Beverages Australia to the  
Australian Communications and Media Authority's review into alcohol advertising**

Alcohol Beverages Australia (ABA) welcomes the opportunity to contribute to the Australian Communications and Media Authority's (ACMA) Review into alcohol advertising restrictions in the Free TV Code.

At the outset, we wish to make clear that Alcohol Beverages Australia opposed the proposed extension of the hours in which alcohol advertising was to be permitted on commercial TV. This submission sets out why the current co-regulatory framework provides significant and effective safeguards, and why additional restrictions in the form of a standard will not deliver the intended benefits, instead hampering the comprehensive processes already being used.

ABA is made up of members from all parts of the Australian alcohol beverages industry. We use a balanced, evidence-based approach to actively engage in public debate on alcohol policy issues and lead the development of innovative and effective alcohol policies.

With advertising specifically, ABA works closely with our members to understand their processes and procedures to ensure that they meet the requirements of the co-regulatory framework (including but not limited to sophisticated content rules, placement restrictions and audience safeguards). Across members, there is a culture of high compliance and rigorous internal vetting, which has created a baseline for advertising.

More broadly, Australia is experiencing a long-term reduction in harmful drinking statistics and positive social changes around risky drinking behaviours, which have matured under the current co-regulatory framework. This suggests that the existing policy settings are successfully managing exposure without driving consumption.

Furthermore, there remains a lack of credible evidence to support a direct causal link between advertising and overall harm; rather, consumption is driven by complex socio-economic factors. Therefore, any policy evolution must be guided by demonstrable effectiveness and the high standards already being met by the industry, rather than assumptions about the impact of exposure alone.

## EXECUTIVE SUMMARY

ABA represents a national industry that makes a significant economic and social contribution, and which is committed to responsible marketing and the promotion of moderation.

The industry operates within a well-established co-regulatory system, working closely with Commonwealth, state and local governments to ensure compliance with high standards and continuous improvement.

### Overall conclusion

Australia has a world-leading, comprehensive and robust regulatory and non-regulatory framework for alcohol advertising. The Free TV Code imposes restrictions on alcohol advertising, embeds the role of the single national Responsible Alcohol Marketing Code (ABAC) as the overarching framework governing advertising content and placement<sup>1</sup>, and ensures that adults comprise the vast majority of the viewing audience.

This framework provides robust and reasonable safeguards in support of responsible drinking and ensures that viewing by minors is limited. This risk management approach is consistent with the operation of other broadcasting codes, which take a risk-based approach to all content, including movies, television programs and advertising.

For the reasons set out in this submission, ACMA should not determine a program standard under Section 125 of the *Broadcasting Services Act 1992*.

### Strong and effective regulatory framework

The current framework, comprising the Free TV Code, ABAC, and related industry codes, operates as an effective co-regulatory system with multiple, overlapping safeguards. It ensures that both the placement and content of advertising are subject to clear, enforceable standards, supported by independent oversight, pre-vetting and transparent adjudication.

As the existing codes are operating effectively and providing appropriate safeguards, the threshold for a program standard has not been met.

### Advertising and limited exposure

The placement of alcohol advertising on free-to-air television is regulated by time of day and audience composition.

Operating in a comprehensive co-regulatory environment, the Free TV Code sets time-based restrictions, while also incorporating the ABAC rules, which require that advertisements are placed only where adults comprise at least 80% of the audience. This applies to all broadcasts, including sport (which typically comprise in excess of 85% adults).

Building on the Free TV Code, ABAC ensures that the content of alcohol advertising does not have strong or evident appeal to minors, meaning that mere exposure does not equate to attraction or influence. Compliance and planning for this occurs both pre and post broadcast.

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<sup>1</sup> Australian Government, National Alcohol Strategy (2019-2028), p. 22.

Taken together, the overlapping regulatory safeguards demonstrate that exposure is carefully limited, and tightly controlled, and therefore significantly limit the potential exposure of children and young people to alcohol advertising.

Alcohol advertising on free-to-air television has declined dramatically since 2019. From 1.24% of expenditure of free-to-air TV commercials in 2019 to 0.44% in 2025 in metropolitan markets, and from 0.64% to 0.32% in regional markets.

Alcohol advertising rated as Australians' 13<sup>th</sup> issue of most concern in advertising, with only 1% rating it as their number one issue of advertising concern (Source: Ad Standards Community Sentiment Tracker Report produced by Ad Standards and Roy Morgan (Wave 1 - Q2 FY26)).

### **Risky drinking is declining**

Trends in alcohol consumption and harm provide important context for assessing the operation and effectiveness of current advertising settings. Importantly, long-term trends demonstrate sustained progress in reducing harmful consumption, as reported by AIHW:<sup>2</sup>

- Per capita alcohol consumption has fallen by 25% since 1975;
- Risky drinking has declined significantly across the Australian population from 38.1% in 2001 to 30.7% in 2022-23; the proportion of young people engaging in underage drinking has more than halved over the past two decades; and
- According to the most recent AIHW data, young people drinking at risky levels is now at 5.5%, down from 30.7% in 2001.

These outcomes have been achieved within the current regulatory settings, including those governing alcohol advertising. This evidence indicates that existing policy settings, together with Australian alcohol industry initiatives, are supporting a culture of drinking in moderation.

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<sup>2</sup> Australian Institute of Health and Welfare, *Alcohol, Tobacco & Other Drugs in Australia*, Figures ALCOHOL 1 and ALCOHOL 3, <https://www.aihw.gov.au/reports/alcohol/alcohol-tobacco-other-drugs-australia/contents/drug-types/alcohol>

## INTRODUCTION

This submission provides an overview of the evidence relevant to the review of alcohol advertising on free-to-air television. It considers trends in alcohol consumption, the volume and placement of advertising and audience exposure, the effectiveness of the existing co-regulatory framework and research relating to harm. It also outlines the broader role of advertising in supporting Australia's media, cultural and sporting landscape.

## EVIDENCE: DECLINE IN RISKY DRINKING IN AUSTRALIA

Australia is experiencing a sustained and significant decline in risky alcohol consumption across the population, including among younger age groups.<sup>3</sup> The Australian Government data below shows long-term reductions in per capita consumption, frequency of drinking, and indicators of harmful use. These trends indicate that current policy settings, in conjunction with industry efforts, are supporting a culture of drinking in moderation among the 77% of Australians who consume alcohol.

The key AIHW statistics are:<sup>4</sup>

- Per capita consumption has fallen to the lowest level since 1963;
- Since 2001, daily drinking has declined significantly, from 8.5% to 5.2%; and
- Risky or harmful consumption across all age groups has also declined, from 38.1% in 2001 to 30.7% in 2022–23.

### Young people are drinking considerably less

One of the most significant changes over the last 20 years has been the extraordinary decline in underage drinking. Across Australia, the portion of young people abstaining from alcohol has more than doubled.

14 to 17 year olds	2001	2022-23
Young people abstaining from alcohol	31.8%	69.9%

Source: AIHW<sup>5</sup>

Furthermore, of those who are drinking alcohol, the level of risky drinking, as defined by AIHW, has fallen.

14 to 17 year olds	2001	2022-23
Young people drinking alcohol at 'risky levels' (as defined by AIHW)	30.7%	5.5%

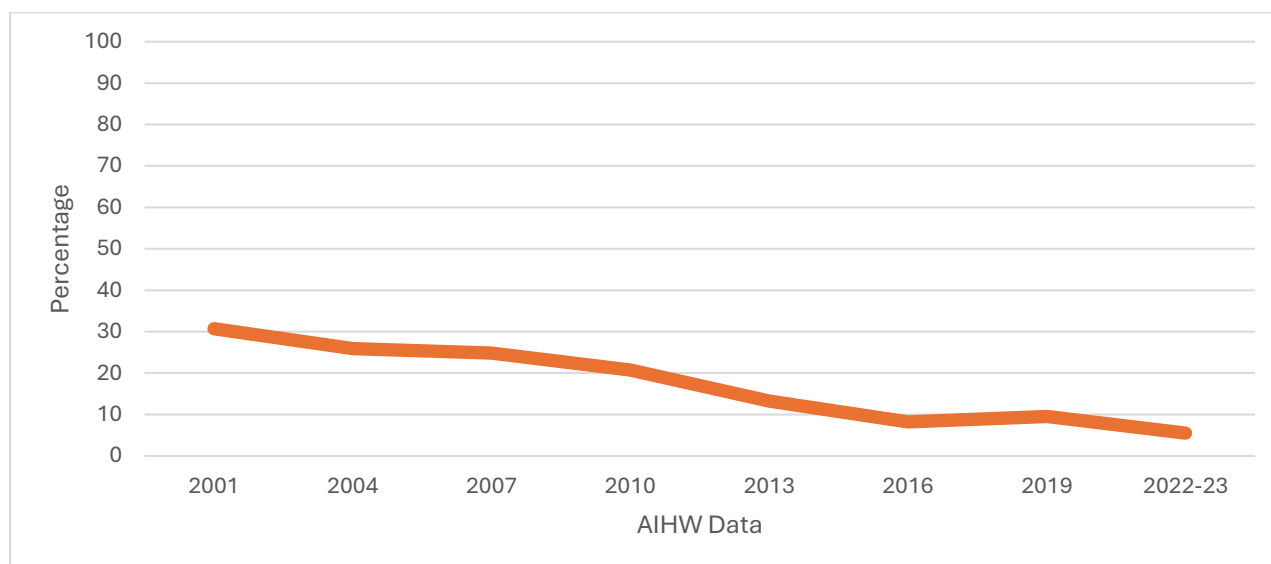
<sup>3</sup> Australian Institute of Health and Welfare, *Alcohol, Tobacco & Other Drugs in Australia*, Figure ALCOHOL 1, <https://www.aihw.gov.au/reports/alcohol/alcohol-tobacco-other-drugs-australia/contents/drug-types/alcohol>

<sup>4</sup> Australian Institute of Health and Welfare, *Alcohol, Tobacco & Other Drugs in Australia*, <https://www.aihw.gov.au/reports/alcohol/alcohol-tobacco-other-drugs-australia/contents/drug-types/alcohol>

<sup>5</sup> Australian Institute of Health and Welfare, *Alcohol, Tobacco & Other Drugs in Australia*, Figure ALCOHOL 3, <https://www.aihw.gov.au/reports/alcohol/alcohol-tobacco-other-drugs-australia/contents/drug-types/alcohol>

Source: AIHW<sup>6</sup>

### Risky drinking by 14- to 17-year-olds



Source: AIHW<sup>7</sup>

## EVIDENCE: ADVERTISING & TELEVISION VIEWERS

It is important that this review into alcohol advertising is guided by a clear and objective assessment of the evidence. The data shows a reduction in alcohol advertising on television, and that audiences for live sport are overwhelmingly adult.

### Number of alcohol advertisements is declining

Alcohol advertising on free-to-air television has declined across both metropolitan and regional markets, in both nominal and real terms. The data below details the trends across expenditure, live sport advertising and audience composition.

<sup>6</sup> Australian Institute of Health and Welfare, *Alcohol, Tobacco & Other Drugs in Australia*, Figure ALCOHOL 3, <https://www.aihw.gov.au/reports/alcohol/alcohol-tobacco-other-drugs-australia/contents/drug-types/alcohol>

<sup>7</sup> Australian Institute of Health and Welfare, *Alcohol, Tobacco & Other Drugs in Australia*, Figure ALCOHOL 3, <https://www.aihw.gov.au/reports/alcohol/alcohol-tobacco-other-drugs-australia/contents/drug-types/alcohol>

<b>Expenditure: Alcohol TV Commercials</b>	<b>2019</b>	<b>2025</b>	<b>Change</b>
Proportion of alcohol advertising on metropolitan television (based on media spend)	1.24%	0.44%	↓ 64%
Proportion of alcohol advertising on regional television (based on media spend)	0.64%	0.32%	↓ 50%

It is important to note that some statistics report the aggregate volume of alcohol advertisement impressions across all TV markets. Of course, this is not a reasonable reflection of the actual exposure a person would have to advertisements, as viewers experience television within a single market at any given time. As such, the data below shows the number of impressions/advertisements shown to television audiences in Sydney.

<b>Live Sport: Total annual count of alcohol commercials on all television channels in Sydney</b>	<b>2019</b>	<b>2025</b>	<b>Change</b>
Commercial television stations (excluding Racing Channel in 2025)	2297	1246	↓ 45%
Racing Channel	-	664	
Total	2297	1910	↓ 16%

Source: Nielsen

### Live sport audience

In addition to ensuring that alcohol advertisements do not have inherent appeal to minors, Australia's regulatory framework ensures alcohol advertising is directed to predominantly adult audiences. ABAC ensures an 80% adult audience threshold, which objectively goes beyond the time-of-day rules used by Free TV, as well as the rules for adult content on SBS and ABC. Consistent with this framework, live sport audiences are overwhelmingly adult, as shown in the data below.

<b>Live Sport: Average TV Audience Age</b>	<b>Over 18 years old</b>	<b>Under 18 years old</b>
NRL, June 2025	92%	8%
Rugby League State of Origin, July 2025	87%	13%
NRL Grand Final, July 2025	87%	13%

AFL, June 2025	93%	7%
AFL Grand Final, September 2025	86%	14%
Cricket (Ashes), December 2025	93%	7%

Source: OzTAM

## REGULATION OF ALCOHOL MARKETING

Australia's alcohol sector operates within a comprehensive and multi-layered regulatory framework that applies across production, marketing and sale. This framework combines industry-led standards with government oversight to ensure responsible practices and appropriate community safeguards.

### ABAC

The industry adheres to the Responsible Alcohol Marketing Code (the Code) administered by the Alcohol Beverages Advertising Code Scheme. The Code sets key standards for the responsible content of alcohol marketing in Australia. It applies to all advertising, including television, radio, print, digital, social media and outdoor advertisements. ABAC works in close collaboration with state liquor authorities.

The Management Committee of ABAC includes representation by the Australian Government Department of Health and Aged Care. ABAC's Chair is the former Speaker of the House of Representatives, the Hon Tony Smith and the Chief Adjudicator of the Panel is the former Australian Attorney-General, Prof the Hon Michael Lavarch AO.

ABAC has effectively and efficiently managed community concerns and complaints since its establishment in 1998.

Features of the Code include:

- Development and enforcement of a rigorous code for alcohol advertising in Australia;
- Standards applicable to all advertising platforms, including television, digital, on demand, online, print, outdoor, radio and other forums; and,
- That independent adjudicators' decisions are published and open to scrutiny.

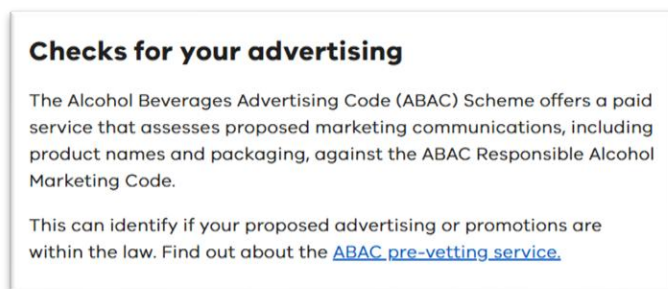
ABAC has proactively updated the Code in recent years by raising the required adult audience for television advertisements from 75% to 80%, and by including restrictions on the marketing of zero-alcohol products.

The ABAC Scheme actively keeps pace with societal expectations, marketing practices and industry developments by regularly reviewing and updating its Code, informed by community sentiment research.

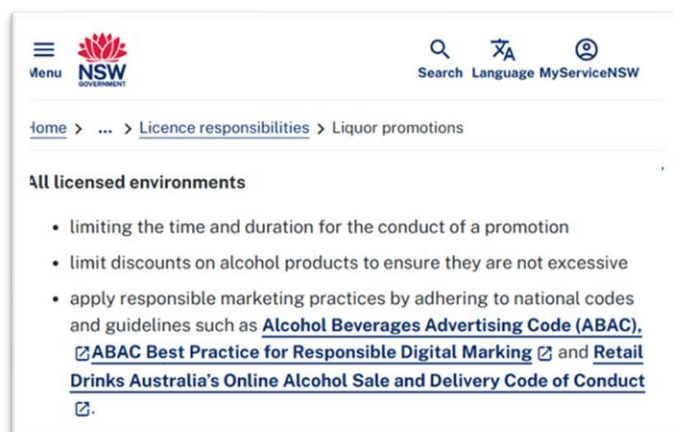
## Close cooperation with state and territory Governments

The ABAC regulatory system is reinforced by state and territory government liquor authorities. Whilst more than 99% of ABAC decisions are voluntarily complied with by alcohol advertisers, ABAC works in conjunction with local regulatory agencies, including in the rare instances where advertisers do not voluntarily comply with ABAC decisions.

Victorian Government advice:



New South Wales Government advice:



## Television advertisement safeguards

The placement of alcohol commercials on television channels requires numerous checks to ensure compliance with the relevant codes. The industry must comply with the highest standards of each applicable code, including ABAC, the Free TV Code and the AANA Code of Ethics.

The *Commercial Television Industry Code of Practice (2015)*, as registered by ACMA, recognises the role of ABAC in relation to alcohol advertisements. Given that ABAC's standards apply to advertising content across all forms of marketing, including television and streaming, the ABAC Code is of the most rigorous and detailed standard. It is also periodically strengthened, and ABAC's published decisions serve as practical precedents for the public and advertisers. Therefore, Free TV's recognition of ABAC ensures that the highest applicable standards are in force.



ClearAds also plays an important role in Australia's alcohol advertising system by acting as a gatekeeper for broadcast advertising. Their process seeks confirmation that advertisements have undergone ABAC pre-vetting before they can be aired. This proactive requirement ensures that the safeguards provided by the ABAC Code are met before advertisements are placed, rather than relying on complaints after they have been aired.

The regulatory framework for advertising in Australia is further strengthened by the Australian Association of National Advertisers (AANA) Code of Ethics, which applies to all advertising, including alcohol and alcohol alternative products. Under section 5.7 of the Free TV Code, compliance with both the ABAC Responsible Alcohol Marketing Code and the AANA Code of Ethics is required, effectively incorporating these standards into the Free TV regulatory framework.

### **AANA Code of Ethics**

The AANA Code is platform-neutral and applies across all media and at all times, including broadcast television, online streaming services and digital platforms. Importantly, the interaction between the Free TV Code, ABAC and the AANA Code create a comprehensive system of overlapping safeguards. Alcohol advertising is therefore subject not only to specific content and placement restrictions, but also to general advertising standards that apply to all products and services across all platforms.

### **Television audience**

Australia's broadcasting framework is based on the principle that reasonable safeguards are in place regarding content seen on television. The *Broadcasting Services Act 1992* establishes a system of co-regulation in which industry codes, registered by the Australian Communications and Media Authority, are required to provide appropriate community safeguards while recognising the diversity of content and audience expectations.

Consistent with this approach, content suitable for adults is not prohibited, but is subject to restrictions based on a risk-based framework. The fundamental objective of this framework is to take reasonable precautions to reduce the likelihood that minors will view inappropriate content. This approach means that content unsuitable for minors may still be broadcast, provided broadcasters take reasonable precautions. This is reflected in practice, including by the ABC, which schedules M and MA15+ rated programs on its free-to-air channels. While no system can guarantee that minors will not be watching adult content, ACMA's framework allows for reasonable measures to minimise the likelihood of minors viewing such content.

As previously discussed, the Australian alcohol industry adheres to all applicable standards. The Free TV Code sets criteria for when alcohol advertising may be broadcast, complemented by the ABAC Responsible Alcohol Marketing Code. ABAC applies stricter and more objective requirements on content (clause 3), and also requires that, where age-restriction controls are not available, the audience is reasonably expected to comprise at least 80% adults (clause 4). This requirement is more stringent and more accurate than a time-of-day proxy for viewing by minors.

Under the Free TV Code registered by ACMA, alcohol advertisements may be broadcast at certain times of day and during some sports programming. This reflects the broader principle of having reasonable safeguards in the broadcasting framework. The additional ABAC requirements mean that compliance is not based solely on scheduling, but also on the nature of advertising content and audience composition. In practice, audiences for live sport are overwhelmingly adult, typically exceeding 85%.

Accordingly, the regulatory framework for alcohol advertising goes beyond the general broadcasting codes, including those applicable to MA15+ content, by imposing both scheduling restrictions and audience-based thresholds, rather than simple time-of-day controls.

## **Legislation**

The Australian alcohol industry is heavily regulated at every stage from production or importation through to marketing and sale. The most relevant Commonwealth laws for the industry include:

- Excise Act 1901
- Customs Act 1901
- Australian Consumer Law
- Food Standards Australia New Zealand Act 1991
- Trade Practices (Industry Codes—Alcohol Beverages Advertising) Regulations 2010
- Criminal Code Act 1995

Companies also operate according to state legislation and regulations, including:

- Liquor Act 2007 (NSW)
- Liquor Control Reform Act 1998 (Vic)
- Liquor Act 1992 (Qld)
- Liquor Licensing Act 1997 (SA)
- Liquor Control Act 1988 (WA)
- Liquor Licensing Act 1990 (Tas)
- Liquor Act 2010 (ACT)
- Liquor Act 2019 (NT)

## **Announcement on gambling**

The Prime Minister's 2 April 2026 announcement regarding gambling reform highlights that different industries are subject to distinctly different regulatory approaches, reflecting their unique characteristics and risk profiles.<sup>8</sup>

The alcohol sector has operated within a regulatory system for responsible advertising and promotion for more than 25 years. This framework includes established safeguards such as

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<sup>8</sup> Australian Government, *Strong action to tackle gambling harms* (Media Release, 2 April 2026) <https://www.pm.gov.au/media/strong-action-tackle-gambling-harms>

strict content standards and placement rules that are in addition to, and extend beyond, the rules and codes for specific media types.

Of course, alcohol does not present the same regulatory challenges as those associated with online gambling services, including issues relating to unregulated foreign online gambling platforms.

The Ad Standards Community Sentiment Tracker Report produced by Ad Standards and Roy Morgan (Wave 1 - Q2 FY26) provides instructive insights.

Australians rated gambling advertising as their number one issue of concern (24%). By contrast, alcohol advertising rated as Australians' 13<sup>th</sup> issue of most concern in advertising, with only 1% rating it as their number one issue of advertising concern.

## **ROLE OF ADVERTISING**

Advertising plays a critical role in supporting Australia's media, cultural and sporting landscape. Revenue from advertising underpins the viability of commercial television, enabling broadcasters to invest in high-quality Australian content, including news, entertainment and live sport. Without this revenue, the capacity of free-to-air services to deliver accessible, locally relevant programming would be clearly diminished.

The National Alcohol Strategy (2019-2028) also acknowledges the roles that alcohol plays in the economy, including through advertising:

The alcohol manufacturing industry, wider retail and hospitality industries, advertising, broadcasting and sporting industries play a significant role in Australia's economy and social fabric. Governments collect a significant amount of revenue via measures such as alcohol excise and liquor licence fees.<sup>9</sup>

### **Economic contribution to broadcast and sports**

As with other categories, advertising contributes to the commercial sustainability of broadcasters operating in an increasingly competitive and fragmented media environment. This is particularly important in the context of live sport, where advertising and sponsorship revenue directly support media rights agreements.

These agreements are a foundational source of upstream funding for the media organisations that secure the rights (through the sale of advertising) and downstream funding for sporting organisations (through rights fees from media companies). It follows that revenue generated through media deals flows through to all levels of sport, supporting not only elite competitions but also pathways and grassroots participation. This includes investment in junior and

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<sup>9</sup> Department of Health, *National Alcohol Strategy 2019-2028* (Canberra: Australian Government, November 2020), 4, <https://www.health.gov.au/sites/default/files/documents/2020/11/national-alcohol-strategy-2019-2028.pdf>

community sport, regional competitions, club development, coaching and officiating pathways, and infrastructure.

Importantly, this funding also supports the continued growth of women's sport and the development of inclusive participation opportunities. Many national sporting organisations rely on broadcast and commercial revenue to expand women's competitions, increase visibility, and build sustainable pathways from junior participation to elite performance.

The relationship between advertising, broadcasting and sport is therefore not incidental, but structural and necessary for professional and community sport to operate in our country. It supports a broad range of social and community outcomes, including physical activity, social connection and community engagement.

Policy settings should take into account these wider benefits. Changes that reduce or place limitations on the media rights ecosystem for sports broadcasting risk unintended consequences, including reduced revenue and resultant reduced investment in Australian content and diminished support for community and grassroots sport.

### **In-stadia and jersey sponsorship**

Notwithstanding that this is beyond ACMA's jurisdiction, we make the following points below.

In-stadia signage and jersey sponsorship are longstanding and integral features of Australian sport. These forms of advertising are distinct from traditional broadcast advertising, as they arise from commercial partnerships between sporting organisations and sponsors, rather than from decisions about advertising placement in programming.

These partnerships provide another critical source of revenue for sporting codes, clubs and venues. As with media rights revenue, this revenue funding supports the delivery of competitions, investment in grassroots and community sport, and the growth of emerging sports. The visibility of sponsors through signage and team apparel reflects these commercial arrangements and is embedded within the structure of sporting events.

Importantly, these forms of promotion occur in environments that are predominantly attended and viewed by adults. As outlined above, audiences for major sporting events are overwhelmingly adult, and existing safeguards within the regulatory framework continue to apply. This includes the operation of the ABAC Responsible Alcohol Marketing Code, which imposes strict content requirements and restrictions to ensure that advertising and marketing material does not appeal to minors. As outlined elsewhere in this submission, an important restriction includes a requirement that the TV audience be at least 80% adult.

### **We are contributing to a positive drinking culture**

The alcohol industry supports the work of DrinkWise Australia, which is an independent, not-for-profit organisation established to help create a healthier and safer drinking culture in Australia. DrinkWise's board of directors is made up both of community and industry members, with the Chair and majority of the Board being non-industry representatives.

DrinkWise develops and delivers campaigns that focus on educating consumers and reducing alcohol-related harm. The evidence-based campaigns and DrinkWise's whole-of-community approach to delivering responsible consumption messages have proved effective in changing attitudes and behaviours around alcohol.

DrinkWise advertising and the DrinkWise banner are shown prominently in-stadia across many national sporting fixtures and events, including the AFL, NRL, golf – it is almost unmissable for those attending the events or watching on TV.

The 'You won't miss a moment if you DrinkWise' is a collaboration with event sponsors, media, and sporting codes which spreads the moderation message at major Australian events, including the AFL, NRL, and music festivals. The campaign encourages Australians who choose to drink to do so responsibly, ensuring that they do not miss out on memorable moments at sporting, cultural, and community events.

These partnerships highlight that live sport is not only a setting for advertising, but also a platform for delivering responsible drinking messages to predominantly adult audiences. The current framework therefore enables both commercial support for sport and the promotion of safer alcohol consumption behaviours.

### **COMMITMENT TO REDUCING HARM**

As a responsible industry, we are committed to continuing our work with governments and communities to support evidence-based initiatives that address the root causes of harm and promote safer communities for all.

In December 2025, the United Nations General Assembly passed its Political Declaration on non-communicable diseases, which reaffirmed the importance of a whole-of-society approach to alcohol policy, with a focus on reducing 'harmful alcohol' consumption rather than alcohol more broadly. Resolution A/80/L.34 recognises the alcohol industry as an important stakeholder in the development of policy solutions. The resolution was adopted by an overwhelming majority of Member States, including Australia.

### **Domestic violence**

The alcohol industry works collaboratively with governments, community leaders and other stakeholders to embed evidence-based initiatives that support prevention, education, and early intervention. We support a whole of society approach that prioritises the safety and wellbeing of those affected, particularly women and children.

The alcohol industry promotes drinking in moderation and recognises the role that irresponsible alcohol consumption can play as a risk factor. It is important to note that alcohol use is not a cause or excuse for violence. While alcohol, like many factors, can be a risk factor, the causes of violence are complex and driven by broader societal factors. Recognising this, the alcohol industry continues to invest in campaigns to reduce the harmful consumption of alcohol and to improve Australia's drinking culture, while adhering to the strict regulatory and non-regulatory rules that govern the advertising and sale of alcohol.

## Major event safety

Claims that position alcohol as a driver of violence on occasions of significant sporting events risk oversimplifying a complex and multi-factorial issue. The vast majority of people who consume alcohol do not engage in violence.<sup>10 11 12</sup> In guidelines designed for media organisations, Our Watch advises:

Don't: Describe violence as being driven or 'fuelled' by alcohol or drugs, or connected to mental health, stress, finances, culture, the 'burden' of caring for someone with disability, or a perpetrator 'just snapping.' This does not align with the evidence. While these issues may exacerbate violence, they do not drive it.<sup>13</sup>

This view is also discussed in the National Plan to End Violence against Women and Children 2022–2032:

The media has an important role to play in the way they report gender-based violence, in promoting perpetrator accountability, moving away from victim-blaming narratives, and raising awareness of support services.<sup>14</sup>

When emphasis is placed on alcohol as the only risk factor, or even as the cause, the fundamental drivers of violence and perpetrator accountability are ignored. On occasions where there are large congregations of people at events, venues or residences, numerous risk factors are heightened. Policy responses should therefore focus on underlying behavioural and social drivers, and on holding perpetrators accountable for their actions. The work of DrinkWise in collaboration with major sporting codes and governments, has been an important part of the approach that has demonstrably improved Australia's drinking culture, including around major events. In addition, the strict rules that govern alcohol advertising are an important element in the responsible consumption of alcohol.

## Advertising & consumption

Alcohol advertising is about companies seeking to increase market share for their products, rather than increasing the number of people who consume alcohol. As in all markets, there are increasing channels for advertising products, including platforms that did not exist in decades gone by, such as social media and streaming services. Despite these additional channels, alcohol consumption and harmful alcohol consumption has decreased. The evidence suggests that marketing is more closely associated with influencing brand choice and product preference, rather than increasing total consumption.

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<sup>10</sup> Ostrowsky, MK (2014) The social psychology of alcohol use and violent behaviour among sports spectators. *Aggression and violent behaviour*, 17(4): 303-310.

<sup>11</sup> Taylor, J, Strang, L, Disley, E (2018) Alcohol and international football tournaments. Case study. Rand Corporation, Santa Monica, California, and Cambridge, UK; [www.rand.org/t/RR2738](http://www.rand.org/t/RR2738)

<sup>12</sup> Ostrowsky, MK. (2018) Sports fans, alcohol use, and violent behavior: A sociological review. *Trauma Violence Abuse*, 19(4):406-419. doi: 10.1177/1524838016663937

<sup>13</sup> Our Watch, *How to report on violence against women and their children: 2019 National Edition* (2019)

<sup>14</sup> Department of Social Services (Cth), First Action Plan 2023–2027 (Accessible PDF, 2023) <https://www.dss.gov.au/system/files/resources/d23-1021308-first-action-plan-accessible-pdf.pdf>

In 2024, an international systematic review by Manthey et al., published in *Addiction*, examined the real-world impact of alcohol marketing restrictions on consumption across a range of countries and study designs.<sup>15</sup> The research, supported by the German Ministry of Health, concludes that there is insufficient evidence to support the claim that alcohol marketing restrictions reduce overall consumption. This finding is based on an analysis of the available empirical studies assessing whether commonly proposed regulatory approaches translate into measurable outcomes in practice.

Australian Government data shows that underage drinking has more than halved this century, alongside a significant increase in the age of first drink.<sup>16</sup>

### Community concern

Available evidence, both peer-reviewed and grey literature, does not support the proposition that alcohol advertising is of significant community concern. A nationally representative online survey of 1,500 Australian adults conducted by JWS Research in 2025 found that alcohol marketing ranked lowest out of 14 societal issues tested, with only 12% of respondents identifying it as a significant concern, down from 16% in 2021.<sup>17</sup>

Consistent with this, user behaviour on digital platforms indicates limited demand to avoid alcohol advertising. SBS has implemented a user-controlled advertising opt-out function on SBS On Demand, allowing registered users to exclude advertising in categories including alcohol, wagering and quick service restaurants. The uptake has been minimal. Evidence from Senate Estimates shows that as of 3 November 2025 only 4,740 users had opted out of wagering, alcohol or QSR advertising, despite SBS On Demand having millions of registered users. This demonstrates that even when given a clear and accessible choice, very few users elect to exclude these categories of advertising.<sup>18</sup>

## CONCLUSION

The co-regulatory framework under the *Broadcasting Services Act 1992* is operating effectively, with industry codes developed, enforced and modernised over time. In conjunction with ABAC, the regulatory system provides overlapping safeguards across content, placement and audience composition, including scheduling restrictions and audience thresholds designed to

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<sup>15</sup> Manthey J, Jacobsen B, Klinger S, Schulte B, Rehm J. Restricting alcohol marketing to reduce alcohol consumption: A systematic review of the empirical evidence for one of the ‘best buys’. *Addiction*. 2024;119(5):799–811. <https://doi.org/10.1111/add.16411>

<sup>16</sup> Australian Institute of Health and Welfare, *Alcohol, tobacco and other drugs in Australia: Children and young people* (web report, 11 December 2025) <https://www.aihw.gov.au/reports/alcohol/alcohol-drugs-young-people>

<sup>17</sup> ABAC Scheme Limited, *Summary of Community Standards Research* (Report, 5 March 2026).

<sup>18</sup> Special Broadcasting Service, *Answer to Question on Notice* (Senate Environment and Communications Legislation Committee, Additional Estimates 2024–25, 3 November 2025) <https://www.aph.gov.au/api/qon/downloadattachment?attachmentId=c6f8a9c2-582a-4294-a89b-fc4a3d02aafa>

limit exposure to minors. As such, ACMA should not determine a program standard under Section 125 of the Act.

Alcohol Beverages Australia appreciates the opportunity to engage with ACMA as part of this review.

A handwritten signature in black ink, reading "Alistair Coe". The signature is written in a cursive, flowing style.

Alistair Coe  
Executive Director  
Alcohol Beverages Australia