



ASAHI BEVERAGES

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30 April 2026

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

Submission by Asahi Beverages Pty Ltd to the Australian Communications and Media Authority's (ACMA) review into alcohol advertising

Asahi Beverages welcomes the opportunity to provide this submission to support ACMA's review of alcohol advertising rules in the Free TV Code.

This submission supports in full the industry submission made by Alcohol Beverages Australia (ABA) (**Attached by email**).

At the outset, we wish to make clear the alcohol industry, including Asahi Beverages, publicly opposed a proposed extension of the hours in which alcohol advertising may have been permitted on commercial TV.

Overview

Asahi Beverages is Australia's leading beverages company. We support the ABA submission but wish to draw ACMA's specific attention to the points made below.

The existing regulatory and non-regulatory framework for alcohol advertising in Australia is robust and comprehensive. The Free TV Code imposes restrictions on alcohol advertising and ensures that adults comprise the great majority of the viewing audience. It also embeds the Responsible Alcohol Marketing Code, administered by the Alcohol Beverages Advertising Code Scheme (ABAC), as the framework governing alcohol advertising content.

The Free TV Code, ABAC, and related industry codes, operate effectively to ensure the placement and content of alcohol advertising is subject to clear, enforceable standards. Critically, these standards are supported by independent oversight and robust pre-vetting and adjudication processes.

Available evidence shows that, under these existing regulatory settings, there have been sustained declines in risky drinking alongside a reduction in alcohol advertising exposure on free-to-air television.

Asahi Beverages proudly contributes to these outcomes through our commitment to compliance and engagement with ABAC and other industry codes, including the Free TV Code, to ensure we take a considered approach to marketing our alcohol beverages products.

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We are also pleased with the industry's record on the promotion of responsible drinking and moderation, not only through compliance with this framework, but also through proactive support for reputable and authoritative sources like DrinkWise Australia (DrinkWise), which provides an evidence-based, whole of community approach to building a positive, more responsible drinking culture in Australia.

On the basis that the existing regulatory and non-regulatory framework for alcohol advertising in Australia is robust and comprehensive, and there continues to be a demonstrable long-term improvement in Australia's approach to alcohol, we submit additional restrictions in the form of a standard are not necessary.

Asahi Beverages

Asahi Beverages is proud to be Australia's largest beverages company. We have 17 breweries and manufacturing plants across Australia, where we produce some of Australia's most loved alcohol and non-alcohol brands.

Asahi Beverages employs around 4,000 Australians and makes a substantial contribution to jobs and the economy, from manufacturing to our contribution to hotels, hospitality and retail in almost every town and city in the country. In partnership with our hospitality partners, we contribute strongly to Australia's world class tourism offering.

We're proud that around 97 per cent of the beverages we sell in Australia, we make in Australia.

Our brands

Our alcohol brands include Great Northern (the biggest beer brand in the country), Victoria Bitter, Carlton Draught, Asahi Super Dry, Pure Blonde, Peroni, Reschs, Somersby cider, Hard Rated, Vodka Cruiser and craft brands, including Balter, 4Pines, Pirate Life and Mountain Goat.

Our non-alcohol brands include Schweppes, Solo, Cottee's, Spring Valley juices, StrangeLove and Cool Ridge water. We also produce and distribute under license a number of leading beverages, including Pepsi and Gatorade.

The existing regulatory framework

Asahi Beverages is committed to the responsible marketing and promotion of our alcohol beverages, and we are pleased to operate within a world leading, comprehensive and robust regulatory and non-regulatory framework for alcohol advertising.

ABAC sets key standards for the responsible content of alcohol marketing, and applies to all advertising, including television, radio, print, digital, social media and outdoor advertisements.

The Management Committee of ABAC includes representation by the Australian Government Department of Health and Aged Care. While 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.



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ABAC has effectively and efficiently managed community concerns regarding the content of alcohol advertising since its establishment in 1998 and is recognised as working in concert with other industry codes (the Free TV Code, AANA Code of Ethics and Commercial Television Industry Code of Practice).

Importantly ABAC is proactive with respect to its management of emerging issues in alcohol advertising and has demonstrated agility when it comes to ensuring that the ABAC Code is operating in line with (or to exceed) community standards.

Membership and compliance with ABAC is voluntary. However, the largest alcohol industry associations (Brewers Association of Australia, Spirits & Cocktails Australia, Australian Grape & Wine) have agreed that their members will be bound by the Scheme. Several major alcohol companies have joined the ABAC scheme as direct signatories – Asahi Beverages is a direct signatory, having joined in 2017.

ABAC reports that around 665 companies involved in the production and distribution of alcohol are signatories – comprising around 88% of alcohol producer media spend.¹ Importantly, membership of the Scheme continues to grow, demonstrating both ABAC's standing within industry as well as the alcohol industry's determination to support responsible marketing.

Contributing to a culture of responsible drinking

As a business, Asahi Beverages is committed to promoting moderation in the consumption of alcohol, as well as the reduction of harmful drinking practices in Australia.

Asahi Beverages is proud to support the work of DrinkWise, an independent, not-for-profit organisation which was established in 2005 with funding from government and the alcohol industry. The DrinkWise board of directors comprises both community and industry members, with the Chair and majority of the Board being non-industry representatives. To underscore the importance that we place on the work of DrinkWise, our Group CEO sits on the DrinkWise Board.

DrinkWise develops and delivers campaigns that focus on educating consumers and the community to reduce alcohol-related harm. These campaigns take an evidence-based, whole-of-community approach which has proven effective in changing attitudes and behaviours around alcohol and moderation.

DrinkWise advertising and the DrinkWise banner is shown prominently in-stadia across many national sporting fixtures and events, including the AFL and NRL, with several major collaborative campaigns directly targeting sporting occasions.

For example, DrinkWise's "*Always Respect, Always DrinkWise*" campaign promotes moderation and respect for others at major sporting events – showcasing DrinkWise's whole-of-community

¹ ABAC Annual Report 2025, p7



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approach by bringing together Government, State Police and support services together with sporting codes to promote the responsible drinking message.

Asahi Beverages, alongside others in the alcohol industry, also plays an important role in moderating alcohol consumption through our growing range of no and low alcohol products. Notably, more than 30% of Asahi Beverages' beers sold in Australia are now zero, low- and mid-strength beer.

Trends in alcohol consumption

Asahi Beverages takes pride in the fact that today's consumers are more discerning, better informed, and more socially aware when it comes to responsible alcohol consumption. Pleasingly, the message of moderation has firmly taken hold.

Over the past 15 years, our business has made substantial investments in no, low and mid-strength products, which now account for more than 30 per cent of our sales in Australia. This shift underscores that, within the current regulatory framework for alcohol advertising, consumers are actively choosing more responsible consumption options.

As noted in the ABA submission, Australia has experienced a sustained and meaningful decline in risky alcohol consumption across the population, including among younger age groups.

The Australian Government key statistics² show;

1. Consumption of alcohol in the previous 12 months for people aged 14–17 has fallen from 69% in 2001 to 31% in 2022-203
2. Fewer young people aged 14–17 drank alcohol at risky levels falling from 30.7% in 2001 to 5.5% in 2022-23
3. Since 2001, there has been a significant decline in people who drink daily from 8.5% to 5.2% in 2022-23
4. The age of first alcohol consumption has increased from 14.7 years of age in 2001 to 16.1 years of age in 2022-23
5. Risky or harmful consumption across all age groups has reduced from 38.1% in 2001 to 30.7% in 2022-23. (NHMRC guidelines – defined as having had more than 10 standard drinks per week or more than 4 standard drinks on a single day at least once a month on average).

These trends reflect significant progress in Australia's drinking culture. They point to reductions in underage drinking, a later age of initiation, and a sustained decline in harmful consumption patterns among both young people and the broader population.

Arguments sometimes made by opponents of alcohol advertising, that exposure to alcohol consumption by minors leads to an earlier uptake of alcohol consumption, cannot be

² Australian Institute of Health and Welfare, *National Drug Strategy Household Survey 2022-2023 Alcohol Consumption*, Supplementary Data Tables, February 2024.

substantiated and are arguably misleading based on the clear Government data that shows young people are first consuming alcohol later in life and with greater moderation.

The above figures indicate that the current policy settings, alongside industry efforts, are supporting the moderation message and a more positive drinking culture amongst those Australians who do choose to consume alcohol.

Alcohol Advertising on free-to-air television

As one of the largest advertisers of alcohol in the country, we note the important points within ABA submission regarding the role advertising plays in supporting Australia's media cultural and sporting landscape.

We also note the trends outlined in the ABA submission, which demonstrate a very significant decline in alcohol advertising on free-to-air television across both metropolitan and regional markets, in both nominal and real terms.

Data included in the attached ABA submission shows a substantial reduction in alcohol advertising expenditure on free-to-air television, with spending in metropolitan markets down 64 per cent since 2019. This marked decline in commercial television advertising, together with an already robust regulatory framework governing the placement, timing and content of alcohol advertising, indicates that Australians are not being exposed to irresponsible or inappropriate alcohol advertising on commercial television.

Our business remains committed to full compliance with all relevant regulatory requirements for alcohol advertising on free-to-air television, including the Free TV Code, ABAC and other applicable standards.

It is also worth understanding that – by and large – the Australian community does not consider alcohol advertising to be a particular area of concern. 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' 13th issue of most concern in advertising, with only 1% rating it as their number one issue of advertising concern.

In-stadia and jersey sponsorship

Given in-stadia and jersey assets are beyond the scope of ACMA, we were surprised to learn ACMA is inviting submissions on matters outside of its jurisdiction. However, having been invited to do so, and as this is a matter of importance for our industry and sporting codes, we wish to reinforce the points made in the ABA submission.

- In stadia signage and jersey sponsorship are longstanding and integral features of Australian sport.



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- These partnerships provide another critical source of revenue for sporting codes, clubs and venues.
- Like media rights revenue, this revenue funding supports the delivery of competitions, investment in grassroots and community sport, and the continued growth of women's and emerging sports.

Importantly, these forms of promotion occur in environments that are predominantly attended and viewed by adults (>80%). 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.

We urge ACMA to consider only those matters for which it has direct responsibility.

Conclusion

As noted above, Asahi Beverages is committed to compliance with all regulatory requirements when it comes to our alcohol advertising on free-to-air television, including the Free TV Code, ABAC and others. We believe the existing framework is robust, enforceable and adaptable. Importantly, it exceeds the community's expectations.

As Australia's largest alcohol producer, we are pleased to see and contribute to the positive trends with respect to alcohol moderation, including the very significant decline in alcohol consumption by minors.

In addition to the positive consumption trends, data indicates the significant reduction in alcohol advertising on commercial TV over time.

Taken as a whole, we submit ACMA should not determine a program standard under Section 125 of the *Broadcasting Services Act 1992*.

Once again, we appreciate the opportunity to provide this submission to support ACMA's review of alcohol advertising rules in the Free TV Code and commend the ABA submission to ACMA for its consideration.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Julian Sheezel".

Julian Sheezel

General Manager, Corporate Affairs and Sustainability