

30 April 2026

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

Subject: Review of alcohol advertising rules in the Free TV Code

Australian Grape & Wine (AGW) welcomes the opportunity to provide a submission to the Australian Communications and Media Authority (ACMA) Review of alcohol advertising rules in the Free TV Code.

AGW is the national peak body representing Australia's grape growers and winemakers, supporting a sector that contributes \$51.3 billion to the Australian economy and employs more than 200,000 Australians, predominantly in regional communities.

This submission is intended to complement and support the detailed submission provided by Alcohol Beverages Australia (ABA). AGW endorses ABA's conclusions that:

- The current co-regulatory framework is robust and effective;
- There is no clear evidence linking alcohol advertising to increased consumption or harm; and
- Additional restrictions are highly unlikely to deliver meaningful public health benefits.

AGW's submission focuses on the wine sector's specific contributions, initiatives, and partnerships that support responsible consumption and positive community outcomes.

Commitment to Responsible Consumption

The Australian wine sector is committed to promoting a culture of moderation and responsible consumption. Wine is typically consumed with meals and in social and cultural settings and is subject to strict regulatory requirements that ensure it is marketed only to adult audiences. This context is important in understanding both consumption patterns and the role of advertising. AGW and its members support evidence-based approaches that target harmful consumption, promote education and moderation, and avoid unintended consequences for responsible consumers and regional industries.

**FOR INDUSTRY,
BY INDUSTRY**

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Support for the Existing Regulatory Framework

AGW supports the current co-regulatory system, including the Commercial Television Industry Code of Practice (Free TV Code), the Alcohol Beverages Advertising Code (ABAC) Responsible Alcohol Marketing Code, and the Australian Association of National Advertisers (AANA) Code of Ethics. Together, this framework provides strong content controls through ABAC, robust placement and audience safeguards - including the requirement that advertisements are directed to audiences that are overwhelmingly adult - and independent oversight and complaints handling mechanisms. As outlined in the ABA submission, this system has evolved over time and continues to be strengthened, including through recent tightening of audience thresholds and restrictions on marketing content.

Industry Initiatives and Programs

AGW and its members support the work of DrinkWise Australia, an independent, not-for-profit organisation focused on fostering a safer drinking culture in Australia.

DrinkWise delivers nationally recognised, evidence-based campaigns designed to influence attitudes and behaviours around alcohol consumption. These include moderation campaigns such as *"You won't miss a moment if you DrinkWise"*, as well as partnerships with major sporting codes, media organisations and events that extend the reach of responsible drinking messages to broad adult audiences.

In addition, DrinkWise develops targeted education initiatives aimed at reducing harmful consumption and supporting informed decision-making.

Importantly, these campaigns demonstrate that the current co-regulatory framework enables responsible messaging to be delivered at scale, including in settings such as live sport, while maintaining appropriate safeguards. This approach supports a practical balance between commercial activity and public health objectives, and highlights the value of collaboration between industry, community organisations and government in promoting safer drinking behaviours.

Responsible Marketing Practices

Wine businesses operate within strict marketing standards, including compliance with the ABAC Scheme, which prohibit content with appeal to minors, avoid any association with risky or excessive consumption, and promote responsible and moderate drinking. These requirements are supported by a system of independent oversight, pre-vetting of advertisements, and transparent complaints handling, ensuring that standards are applied consistently and enforced in practice. The standards apply across all channels, including broadcast television, digital and social media, as well as sponsorship and event partnerships, providing a comprehensive and platform-neutral framework for responsible alcohol marketing.

Partnerships and Community Contributions

Support for Sport and Regional Communities

The wine sector plays an important role in supporting regional and community sport, cultural and tourism events, and local economies. Through sponsorships and partnerships, the sector provides essential funding for both grassroots and professional sport, supports regional events and tourism, and contributes to community cohesion and wellbeing. In many regional areas, these partnerships help sustain local clubs, events and organisations that might otherwise struggle to attract stable funding, and play a role in maintaining participation, infrastructure and community connection.

These contributions are part of a broader ecosystem in which commercial partnerships underpin the viability of sporting codes, events and regional attractions, supporting jobs, tourism and local economic activity. Importantly, these activities are undertaken within the existing regulatory framework, ensuring responsible messaging and placement consistent with strict audience composition requirements designed to limit exposure to minors.

Wine Tourism and Regional Engagement

Wine is uniquely linked to regional tourism and hospitality, with cellar doors and wine regions providing:

- Safe, moderated environments for consumption;
- Opportunities for education about wine and responsible drinking; and
- Significant economic benefits to regional Australia.

The sector works closely with Commonwealth, state and territory governments to support regional tourism outcomes. Australian Grape & Wine acknowledges the support provided through initiatives such as the Wine Tourism Cellar Door Grant Program, which has delivered more than \$70 million to cellar doors across Australia since its commencement in July 2019.

This investment has been complemented by a range of state-based initiatives that support wine tourism and regional visitation, as well as regional infrastructure, marketing and event funding across key wine regions.

These partnerships play an important role in driving visitation to regional communities, supporting small and medium wine businesses, and promoting responsible, experience-based wine consumption in controlled settings. In doing so, they contribute to regional economic resilience and align with broader government priorities to strengthen tourism, support local economies, and sustain vibrant regional communities.

Sustainability and Corporate Responsibility

Sustainability is fundamental to the long-term future of the wine sector, which is intrinsically linked to the health of the natural environment and climate on which it depends.

Many Australian wine businesses publish sustainability and ESG reports covering environmental stewardship, including water use, emissions reduction, land management and biodiversity, as well as social responsibility through community engagement, workforce wellbeing and initiatives that promote responsible consumption. These commitments are increasingly embedded in business operations and reflect a proactive approach to managing environmental and social impacts across the value chain.

The sector is also actively contributing to broader national priorities, including emissions reduction, sustainable agriculture, circular economy practices and regional resilience. Industry-led initiatives and individual business commitments are supporting improved resource efficiency, climate adaptation, and long-term viability in the face of changing environmental conditions.

Together, these efforts demonstrate a broader industry focus on long-term sustainability and responsible participation in Australian society, underpinned by transparency, accountability and continuous improvement.

Key Considerations for ACMA

AGW encourages ACMA to consider the following:

Evidence-based policy

According to Australian Government statistics, risky drinking across the population is declining, and under-age drinking has fallen considerably.

Effectiveness of current regulations

Australia has a world-leading advertising regulatory system that provides safeguards for both content and placement and features highly effective independent complaints mechanisms.

Unintended consequences

Additional restrictions may:

- Undermine regional industries, including Government programs that promote and support the development of the wine sector;
- Reduce funding for Australian television content, sport and media; and
- Disrupt effective moderation messaging.

Conclusion

The Australian wine sector is committed to responsible marketing, moderation, and positive community outcomes. The existing co-regulatory framework is comprehensive and effective, continues to evolve, and is delivering positive results in terms of consumption trends and

exposure. Australian Grape & Wine therefore supports the position outlined in the Alcohol Beverages Australia submission and does not support the introduction of additional advertising restrictions through a program standard. We welcome continued engagement with ACMA on this important issue.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lee McLean', with a stylized flourish at the end.

Lee McLean
Chief Executive