

30 April 2026

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

By email: camr@acma.gov.au

Submission by the Brewers Association of Australia to the Australian Communications and Media Authority's (ACMA) review into alcohol advertising

The Brewers Association of Australia welcomes the opportunity to contribute to ACMA's review of the alcohol advertising rules in the Free TV Code.

This submission supports in full the submission made by Alcohol Beverages Australia (ABA) (see *Appendix 1*).

Overview

The Brewers Association of Australia represents Australia's leading beer makers and, more broadly, beer drinkers across Australia. We support the ABA submission but wish to draw the ACMA's specific attention to the declining alcohol consumption trends we are observing, and the recent success of no, low and mid-strength beer options for the industry.

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

This submission sets out why the current co-regulatory framework provides comprehensive and effective safeguards, and why additional restrictions in the form of a standard are not necessary.

About the Brewers Association

The Brewers Association of Australia is the peak body representing Australia's leading beer makers and, more broadly, beer drinkers across Australia.

It is a leading voice for sensible, responsible, and workable policy solutions for our sector and the community. Our membership comprises the nation's premier beer producers: Asahi Beverages (owner of Carlton & United Breweries), LION and Coopers.

Together the iconic brands and premium beers made by these companies account for around 80 per cent of all beer sales in Australia. Australian brewing is a critical part of our economy, generating jobs and income for local communities and delivering a world-renowned product that is overwhelmingly consumed moderately and responsibly.

The Australian brewing industry is a \$17 billion economic engine that powers prosperity across the nation and supports around 100,000 FTE jobs.

We're proud that more than 95% of the beer consumed in Australia is brewed in Australia.

The Brewers Association of Australia acknowledges and is pleased to support the work of both the Alcohol Beverages Advertising Code Scheme (ABAC) and DrinkWise. Both of these bodies play an incredibly important role in ensuring Australia's marketing and advertising regime and responsible drinking culture are world class exemplars.

Declining consumption

It's an indisputable fact that today's drinkers are more discerning, better informed and better equipped socially regarding responsible alcohol consumption than ever before.

The message of moderation has overwhelming sunk in. And beer is the drink of moderation – typically even full-strength beer at between 4.2 per cent to 5 per cent alcohol is many times lower in concentration than other alcohol products.

Over the last 15 years our members have invested significantly in no, low and mid-strength options – today these products account for more than 30 per cent of all beer sales in Australia.

This trend highlights the fact that under the current alcohol advertising regulations, people are actively seeking to consume more responsibly.

As mentioned in the ABA submission, Australia is experiencing a sustained and significant decline in risky alcohol consumption across the population, including among younger age groups.

The Australian Government key statistics¹ show;

1. Consumption of alcohol in the previous 12 months for people aged 14–17 has fallen from 69% in 2001 to 31% in 2022-2023
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).

We are pleased to note that significant gains have been made in improving Australia's drinking culture, including reductions in underage drinking, an increase in the age of initiation and reductions in harmful drinking patterns among young adults and the broader population.

These figures indicate that the current policy settings, together with industry and community efforts, are supporting the message of moderation and a positive drinking culture.

Advertising and limited exposure

Alcohol advertising on free-to-air television operates within a tightly defined regulatory environment that combines restrictions on both scheduling and audience profile. Under the FreeTV Code, advertising is limited by time of day, with the ABAC Placement Rules further requiring that alcohol advertisements only appear in programming where at least 80 per cent of the audience is adult. These requirements apply uniformly across all content, including sporting broadcasts, which, as data shows, often attracts adult audiences in excess of 90 per cent.

As a result of these layered controls, the number of alcohol ads that children may be exposed to on commercial tv is significantly constrained. This is reinforced by a demonstrated long-term decline in the overall volume of alcohol advertising on television.

Importantly, the ABAC Scheme also governs advertising content, ensuring it does not have strong or evident appeal to minors. Accordingly, even where exposure occurs, the ads are designed not to generate attraction or

¹ Australian Institute of Health and Welfare, *National Drug Strategy Household Survey 2022-2023 Alcohol Consumption*, Supplementary Data Tables, February 2024.

influence with minors. Viewed collectively, the placement and content rules operate to ensure that alcohol advertising exposure is both declining and carefully regulated under the existing framework.

Alcohol advertising on commercial television

Alcohol advertising on free-to-air television has declined across both metropolitan and regional markets, in both nominal and real terms.

The data in the attached ABA submission demonstrates the declining expenditure in alcohol advertising on free-to-air television, down 64 per cent in metro locations since 2019. This trend of significantly reduced alcohol advertising on commercial tv, combined with a framework that already tightly manages alcohol advertising placement, timing and content, reinforces that Australians are not being exposed to irresponsible or improper alcohol advertising on commercial tv.

Our members are 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.

Support for regulatory frameworks and bodies

Australia has established a comprehensive and internationally regarded co-regulatory framework for alcohol advertising that brings together broadcasting codes and industry-led standards. Industry has played a central role in developing and maintaining this framework, ensuring that alcohol advertising promotes responsible drinking, and limits the likelihood of exposure to children and young people. Under this co-regulatory system, marketing guidelines are negotiated with government and complaints are handled through an independent adjudication process.

The FreeTV Code operates as a component of this framework, imposing restrictions on the placement of alcohol advertising and the nature of content through the ABAC scheme. ABAC provides strict and robust rules across alcohol advertising, marketing and social media, and complements the Australian Association of National Advertisers' system by applying specific and significant content restrictions unique to alcohol. Importantly, the Scheme operates independently and includes government representation, reinforcing its independence. It is Chaired by former House of Representatives Speaker, the Hon Tony Smith, and its Chief Adjudicator is former Australian Attorney-General, Prof the Hon Michael Lavarch AO.

In combination, these arrangements ensure that alcohol advertising is directed to adult audiences and supported by strong content controls. This layered, risk-based approach provides effective safeguards that support responsible drinking, while minimising the exposure of minors. It is consistent with the broader operation of Australian broadcasting codes, which manage potential audience impacts across all content types, including television programs, movies and advertising.

Similarly, the Brewers Association of Australia is proud to support the work of DrinkWise, a not-for-profit organisation established to promote a healthier and safer drinking culture. DrinkWise operates with clear independence, reflected in a Board structure where the Chair and majority of directors are non-industry representatives.

Through evidence-based public education campaigns and a whole-of-community approach, DrinkWise has played an effective role in improving understanding of alcohol-related risks and successfully encouraging more responsible attitudes and behaviours around alcohol consumption.

In-stadia and jersey sponsorship

Notwithstanding this is beyond ACMA's jurisdiction, this is a significant area of investment for Brewers' members, and 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.
- 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. As outlined above and in the ABA submission, 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 and not to stray into areas of offering the Federal Government policy advice on issues beyond its remit.

Conclusion

The evidence demonstrates that the existing co-regulatory framework is operating effectively, with industry codes developed, enforced and updated over time. With strong and restrictive rules in place for alcohol advertising, with a significant decline in alcohol consumption over a long period of time, and with a significant decline in alcohol advertising on commercial tv, the case has not been made for additional restrictions to be imposed on alcohol advertising on commercial tv.

Once again, we appreciate the opportunity to submit this submission to ACMA's review of alcohol advertising rules in the Free TV Code and support the industry submission by Alcohol Beverages Australia provided at *Appendix 1*.

Yours sincerely

A handwritten signature in black ink that reads "James Brindley". The signature is written in a cursive, flowing style.

James Brindley

Chair, Brewers Association of Australia