

30 April 2026

Submission of the Coalition of Major Professional and Participation Sports to the Australian Communications and Media Authority in response to the Review of Alcohol Advertising Rules in the Free TV Code.

This submission is made on behalf of the Coalition of Major Professional and Participation Sports (COMPPS).

Background

COMPPS consists of the following organisations:

- Australian Football League (**AFL**);
- Cricket Australia (**CA**);
- Football Australia (**FA**);
- National Rugby League (**NRL**);
- Netball Australia (**NA**);
- Rugby Australia (**RA**); and
- Tennis Australia (**TA**);

As a coalition, we represent more than nine million participants and 16,000 sporting clubs across Australia. Each member plays a vital role in developing, promoting and facilitating sport in Australia from the grass roots through to the international level. Our members are not-for-profit bodies responsible for the long-term development and sustainability of Australia's most prominent sports.

One of COMPPS' roles is to provide a collective response on behalf of its member sports where their interests are aligned. Sport, and in particular live sport broadcast on commercial free-to-air television, is directly engaged by the matters under consideration in this review.

Summary of COMPPS Position

COMPPS supports the maintenance of the current regulatory position regarding alcohol advertising on commercial free-to-air television. The existing framework, established under Part 6.2 of the Free TV Code of Practice and underpinned by the co-regulatory Alcohol Beverages Advertising Code (ABAC), has operated effectively and proportionately. COMPPS submits that a more restrictive regulatory intervention would have unintended consequences and makes two principal submissions in support of that position.

1. Commercial partnerships are an essential and irreplaceable source of funding for Australian sport

COMPPS wishes to emphasise that commercial partnerships constitute a critical and non-discretionary component of the financial architecture of Australian sport at every level, from elite national competitions to community and grassroots participation.

Alcohol beverage brands represent some of the most significant commercial partners of COMPPS member sports. These partnerships span naming rights, major sponsorships, licensed venue arrangements and integrated broadcast and in-stadium agreements. The financial contribution of these relationships runs to hundreds of millions of dollars across the sector.

This revenue does not simply fund elite competition. Through the funding and distribution models operated by each COMPPS member, commercial partnership revenue flows directly into:

- grassroots and community sport participation programs;
- junior pathways and development academies;
- women's sport competitions and pathways;
- referee, umpire and coach development programs; and
- regional and rural sporting infrastructure and club support.

The interconnection between elite and community sport means that disruption to commercial partnership income cascades rapidly into reduced investment in participation sport. For the many Australians who cannot afford pay television or subscription streaming services, commercial free-to-air television is one of the only means of accessing live sport. That access is itself underwritten by advertising revenue, including alcohol advertising revenue, that makes it commercially viable for broadcasters to acquire broadcast rights.

COMPPS submits that any regulatory change which materially reduces the scope or value of advertising during sports broadcasts would have direct and adverse financial consequences for the sports themselves and, by extension, for the millions of Australians who participate in community sport. This is not a hypothetical risk; it is a structural financial reality that ACMA must weigh as part of any assessment of regulatory options. ACMA's own Terms of Reference identify the economic contribution of alcohol advertising to commercial free-to-air television as a matter within scope: COMPPS submits that the contribution to sport itself is equally material and must receive equivalent weight.

2. The consultation's scope in relation to in-stadia and integrated advertising exceeds ACMA's statutory remit

The Terms of Reference indicate that, while the review is focused on Part 6.2 of the Free TV Code, ACMA "may also draw from our consultation process to provide insights on" in-stadia advertising (such as alcohol branding in sporting stadiums and on jerseys) and sponsored collaborations within programming. ACMA itself has acknowledged that "this review will only be examining existing alcohol restrictions within our direct regulatory remit."

COMPPS respectfully submits that soliciting 'insights' on in-stadia advertising, apparel, signage and commercial sponsorship arrangements between sporting organisations and alcohol companies arguably falls outside ACMA's statutory powers. Our understanding is that ACMA's authority derives principally from the Broadcasting Services Act 1992 (Cth) (BSA), which regulates broadcasting licensees - that is, commercial television broadcasters. While this will be a matter for ACMA itself to consider in due course, our reading of the BSA is that it does not confer any power on ACMA to regulate the commercial relationships of sporting organisations, the content of stadium signage, or the terms of sponsorship agreements between sports and their commercial partners. If those arrangements are not considered broadcasting services, COMPPS queries whether they could be subject to ACMA oversight.

Any observations ACMA were to make on such matters, even styled as 'insights' rather than regulatory determinations, would risk exceeding the agency's mandate and could create uncertainty for lawful and long-standing commercial relationships. COMPPS respectfully requests ACMA to confine the outcomes of this review, and any observations it chooses to publish, strictly to matters within its statutory jurisdiction to avoid any confusions on jurisdictional issues.

Coalition of Major Professional and Participation Sports

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