



Reducing Health Harms in the Australian Community: Submission to the Review of Alcohol Advertising Provisions in the Commercial Television Industry Code of Practice

The Department of Health, Disability and Ageing (the department) welcomes the opportunity to provide a submission to the Australian Communications and Media Authority's (ACMA) review of the existing alcohol advertising provisions within part 6.2 of the Commercial Television Industry Code of Practice (Free TV Code). This submission provides evidence on the significant health harms caused by alcohol consumption, including the disproportionate impacts on children and other population groups. It also highlights the importance of ensuring the Free TV Code aligns with national and international health policy objectives. The department reiterates its commitment to the health and wellbeing of all Australians including minimising the harms caused by alcohol consumption.

The link between alcohol advertising, consumption and harms

Both the content and context of alcohol promotion and the frequency of media exposure can have an impact on alcohol consumption attitudes and behaviours. Alcohol advertising is directly linked to higher levels of drinking and increased levels of risky drinking. Increased exposure amplifies the existing harms associated with alcohol consumption, including normalising and contributing to consumption in children and young people (Jernigan et al., 2017). This is especially apparent for people with lived experience of alcohol harm and people with alcohol dependence (ADF, 2024).

Evidence for alcohol-related harms is clear, with alcohol use a leading contributor to preventable disease, injury and death. Globally, alcohol is responsible for 5.1% of the total burden of disease and contributes to adverse health, social and economic outcomes worldwide. It is estimated 3 million people die each year due to harmful alcohol use (one every 10 seconds). A disproportionate number of these alcohol-related deaths occur among young people, with 13.5% of all deaths among those who are 20-39 years of age being alcohol-related. Alcohol use contributes to the burden of approximately 30 diseases and injuries including alcohol use disorders, 8 types of cancer, chronic liver disease and 12 types of injury — predominantly road traffic injuries and suicide and self-inflicted injuries (WHO, 2024b).

The consumption of alcohol is widespread within Australia. The 2022-2023 National Drug Strategy Household Survey (NDSHS) found over two-thirds (69%) of the population aged 14 and over had consumed alcohol in the previous 12 months. Around 1 in 3 people (31%) in Australia drink alcohol in ways that put their health at risk (AIHW, 2025c). Alcohol use is the sixth highest risk factor contributing to the burden of disease in Australia and is responsible for 4.1% of the total burden of disease and injury (AIHW, 2024b).

Alcohol significantly burdens the Australian health system. Alcohol has consistently accounted for a higher number of ambulance attendances, hospitalisations and deaths than any other drug over time in Australia. In 2023 there were 5,004 alcohol-related deaths and 1,667 alcohol-induced deaths in Australia (AIHW, 2025b). Alcohol continues to account for a higher number of deaths than any other drug type and deaths involving alcohol have risen over the last decade.

Any change to the Free TV Code that expanded alcohol advertising timeframes would arguably increase viewing exposure, thereby increasing alcohol consumption and alcohol-related harms. Accordingly, the department considers further restrictions and safeguards are warranted to reduce exposure, mitigate associated harms and protect the Australian community.

Alcohol advertising and harms amongst priority populations

Children and adolescents

Alcohol consumption among young people in Australia is widespread. In 2022-2023, 31% of young people aged 14-17 had consumed alcohol in the previous 12 months, and 42% of young people aged 18-22 consumed alcohol at risky levels (AIHW, 2025c). Early initiation to alcohol is associated with an elevated risk of alcohol-related harm in adulthood, including alcohol dependence and heavy episodic drinking (Clare et al., 2026).

Extensive evidence demonstrates a strong association between exposure to alcohol advertising and young people's drinking attitudes and behaviours, including the likelihood of hazardous or binge drinking (Giesbrecht et al., 2024). Adolescents are particularly vulnerable to alcohol marketing, as many do not fully recognise the intentions of advertisers until around age 16 (ADF, 2024). A systematic review of 12 studies involving over 35,000 participants examined the relationship between alcohol marketing and young people's consumption of alcohol. All studies showed a positive relationship between alcohol marketing and alcohol consumption amongst young people, including earlier initiation of drinking, increased frequency and volume of consumption, and higher likelihood of binge or hazardous drinking (Jernigan et al., 2017).

Children who watch televised sport are frequently exposed to alcohol advertising. Children are highly aware of alcohol advertising, including sports celebrity endorsement of alcohol brands. Repeated exposure can contribute to children learning to associate alcohol with sport, success, and positive traits. This is particularly problematic for children aged 8-12 years, who are highly influenced by sporting heroes (Jones et al., 2010).

The majority of alcohol advertising seen by children during daytime TV viewing is broadcast during free-to-air sports programs. Current regulations are not protecting children from exposure to alcohol advertising by permitting day-time advertising in sport programs and in any programs from 8.30pm, when many children are still watching TV. (O'Brien et al., 2015).

Women's safety and domestic, family, and sexual violence

Alcohol is a key risk factor linked to the increasing frequency and severity of domestic, family and sexual violence (DFSV). Over one-third of intimate partner violence incidents (34%) and almost three in ten family violence incidents (29%) involve alcohol use (AIHW, 2026a). It is estimated up to 65% of incidents of DFSV reported to police in Australia can be associated with alcohol use (ANROWS, 2019).

Extensive exposure to alcohol marketing increases alcohol consumption at a population level, which in turn elevates the risk of alcohol-related harms, including DFSV. Televised sporting events with high rates of alcohol advertising are closely associated with significant increases in violence. Research has found an increase of 40.7% in domestic assaults, 71.8% in non-domestic assaults and 55.2% in total assaults for State of Origin nights compared with non-State of Origin nights in New South Wales (Livingston, 2018). These findings highlight that alcohol advertising and promotion function as an upstream driver of DFSV by shaping drinking norms, increasing consumption, and amplifying the likelihood and severity of alcohol-related violence.

First Nations communities

First Nations people disproportionately suffer harms from alcohol use compared to other Australians. Approximately 1 in 3 (33%) First Nations people consumed alcohol in ways that put their health at risk in 2022-2023. Additionally, First Nations people were more likely to engage in very risky drinking (consumption of 11 or more standard drinks in a single day) than non-Indigenous people. Alcohol contributes to approximately 10% of the total disease burden among First Nations people (AIHW, 2024a). In 2023-24, First Nations people accounted for 1 in 6 people receiving treatment or support for their own or someone else's alcohol or other drug use (AIHW, 2025a).

Aggressive marketing of harmful products including alcohol have been identified by Aboriginal leaders as a contributing factor to the disproportionate levels of harm experienced by First Nations communities (Crocetti et al., 2024). Achieving improved First Nations health outcomes and progress on Closing the Gap potentially requires stronger policy and regulatory action to mitigate harmful industry practices.

Economic impacts of alcohol advertising

Alcohol advertising during sports events contributes a relatively small proportion of revenue for television networks. Analysis of Nielsen advertising data over 12 months for the 10 highest-spending alcohol brands across major television networks in Australia found alcohol advertising during sports events accounted for approximately 0.5% of revenue for the most exposed network. Broadcasters are not financially dependent on this income stream. A ban on alcohol advertising during sport events is unlikely to have major financial impacts on broadcasters, whilst the health and social benefits could be substantial (Martino et al., 2022).

In contrast, the estimated social cost of alcohol use in Australia was \$72.9 billion in 2020-21, projected to rise to \$75.0 billion in 2022. The most significant projected costs in 2022-23 were related to premature mortality (\$29.1 billion) and morbidity (\$23.3 billion), and workplace-related costs (\$4.5 billion) (The George Institute for Global Health, 2024).

While alcohol advertising generates economic activity through media revenue, sponsorship, and employment, these benefits are substantially outweighed by the health, social, and productivity burdens attributable to alcohol consumption in Australia.

Australia's alcohol advertising regulatory system

Responsibility for the regulation of alcohol marketing in Australia is complex and shared across industry, federal, and state and territory governments. A core component of the regulatory system is the Alcohol Beverages Advertising Code (ABAC) Scheme, an industry-developed code that sets standards for the content and placement of alcohol marketing across traditional and digital media. Compliance with the Scheme is enforced by the ABAC Management Committee, on which the department is represented. Given the intersections of responsibility between ABAC and ACMA, consideration on how regulatory actions are applied to improve consistency would be beneficial.

Community expectations of alcohol advertising

A 2023 poll conducted by Alcohol Change Australia found:

- 77% of Australians support restricting alcohol advertising on television during times when children are likely to be watching, including during live sports broadcasts.
- 63% of Australians are concerned about the amount of alcohol advertising they see in the community.
- 80% of Australians are either very concerned or moderately concerned about alcohol-related harm in Australian communities.
- 71% of Australians agree that more needs to be done by governments to reduce the harms caused by alcohol in Australia (Alcohol Change Australia, 2023).

These sentiments are consistently reflected in correspondence received by the Minister for Health and Ageing, and Minister for Disability and the National Disability Insurance Scheme, and the department from members of the public expressing concern regarding alcohol advertising and its association with health outcomes. The Australian community recognises the negative impacts of alcohol advertising and is supportive of reforms to prevent alcohol-related harms and minimise children's exposure.

Alignment with National Strategies

National Alcohol Strategy

The National Alcohol Strategy 2019-2028 (NAS) is the national framework to prevent and minimise alcohol related harms among individuals, families and communities. Key priorities outlined in the NAS include "Priority 1: Improving community safety and amenity" and "Priority 3: managing alcohol availability, price and promotion". The NAS also highlights the following policy objectives regarding alcohol advertising:

- Implement measures to reduce alcohol advertising exposure to young people (including online and sporting events).
- Extend the single national advertising code to cover placement and content across all media which provides consistent protection of exposure to minors regardless of programming.
- Promotion of measures that support changing individual and community attitudes towards risky alcohol consumption (DHDA, 2019a).

Any revisions to the Free TV Code that would allow increased alcohol advertising during children's viewing hours directly contradicts the objectives of the NAS and would undermine efforts to reduce alcohol-related harm.

National Drug Strategy

The National Drug Strategy 2017-2026 (NDS) is the national framework for reducing and preventing harm caused by alcohol and other drugs. The NDS is guided by the three pillars of demand reduction, supply reduction and harm reduction. The demand reduction pillar seeks to prevent and delay the uptake of alcohol use and reduce risky consumption through population-level measures. The NDS identifies 'Enforced advertising standards and restrictions' as a key strategy to support alcohol demand reduction efforts.

The NDS highlights good practice regarding restrictions on marketing, advertising and promotion, and identifies priority populations who are at heightened risk of harm due to alcohol use, including Aboriginal and Torres Strait Islander people, young people, and people experiencing social and health disadvantage (DHDA, 2017). Exposure to alcohol advertising disproportionately impacts these groups and exacerbates existing health inequities.

Alignment with National Inquiries and Reviews

House of Representatives Inquiry into the health impacts of alcohol and other drug use in Australia

In August 2024, on referral from the Minister for Health and Aged Care, the Hon Mark Butler MP, the House Standing Committee on Health, Aged Care and Sport commenced an inquiry into the health impacts of alcohol and other drugs in Australia. The Minister for Health and Ageing re-referred this inquiry following the federal election in 2025.

This inquiry is examining Australia's alcohol and other drugs policies, treatment services and community programs, as well as the workforce required to meet the high demand for services. The Issues Paper released by the Standing Committee on Health, Aged Care and Sport in March 2025 highlighted a range of views regarding alcohol advertising regulation:

- public health and research stakeholders indicated strong support for tighter regulation of alcohol advertising; with arrangements described as complex, fragmented and outdated
- submissions broadly agreed the current regulatory system is inadequate for digital marketing trends, online exposure and streaming services
- industry submissions defended existing controls, responsible drinking and the risks of over-regulation.

The 47th Parliamentary inquiry received 204 submissions and the 48th Parliamentary inquiry received 78 submissions. Alcohol marketing was mentioned in 65 submissions, with 13 explicitly referring to alcohol advertising on commercial TV. Multiple submissions have called for stricter regulation, including:

- prohibiting marketing that targets or appeals to children and young people
- limiting alcohol advertising and sponsorship at sporting events
- introducing advertising that outlines recommended consumption limits
- reviewing and updating codes to address digital and streaming platforms.

Further views may be expressed over the course of hearings, which are still underway at the time of writing. The department awaits the final report from this inquiry and welcomes recommendations that would strengthen alcohol advertising regulations.

Rapid Review of Prevention Approaches

In 2024, the Prime Minister convened a National Cabinet meeting in recognition of the need to escalate collective efforts to end gender-based violence. National Cabinet agreed to strengthen prevention efforts informed by an expert led rapid review of best practice approaches. Research underpinning the rapid review demonstrates alcohol consumption is a significant factor in DFSV incidents, with many perpetrators being under the influence of alcohol during assaults.

The *Rapid Review of Prevention Approaches* final report provides specific and practical advice, with 21 recommendations across 6 key areas for action by federal, state and territory governments. Recommendation 17 recommended Commonwealth and state and territory governments to work with industries positioned to prevent and reduce DFSV, including the alcohol industry, to review and strengthen regulatory environments to prioritise the prevention of gender-based violence (PMC, 2024). Under the auspices of Recommendation 17, the Foundation for Alcohol Research and Education has been funded to review and update the *National framework for action to prevent alcohol-related family violence*. This will support an integrated and focused effort to reduce the role of alcohol in domestic and family violence. Appropriate alcohol advertising restrictions aligns with cross-government commitments to end gender-based violence.

International best practice

WHO recommendations

The World Health Organization (WHO) has consistently identified alcohol marketing as a significant determinant of alcohol-related harm, with the exposure of children and adolescents to alcohol advertising of particular concern (WHO, 2024b). The *Global alcohol action plan 2022-2030* aims to reduce the harmful use of alcohol through effective, evidence-based strategies at national, regional, and global levels. The plan calls on governments to strengthen statutory regulation of alcohol marketing, and emphasises the need for comprehensive, enforceable regulatory frameworks to protect alcohol policymaking from industry interference (WHO, 2024a).

This is reinforced by the WHO SAFER technical package, which identifies the five most effective and cost-efficient policy interventions to reduce the harmful use of alcohol. One of the five key interventions is to 'Enforce bans or comprehensive restrictions on alcohol advertising, sponsorship, and promotion'. The SAFER technical package highlights the importance of restricting advertising to

protect children and adolescents from commercial pressures to consume alcohol, as well as contribute to whole of population public health gains (WHO, 2019).

A Free TV Code that fails to meaningfully reduce exposure to alcohol advertising, especially for children and adolescents, is therefore inconsistent with WHO guidance.

Conclusion

Alcohol advertising is a significant and well-established driver of alcohol consumption and related harms. On the balance of the evidence available, the current provisions of the Free TV Code enable exposure to alcohol advertising, which:

- leads to earlier initiation of drinking, higher levels of risky consumption, and exacerbation of existing harms
- negatively affects the health outcomes of the Australian public, with disproportionate impacts on children, young people and vulnerable communities
- prioritises commercial exposure over public health
- places substantial and growing pressure on individuals, communities, and the Australian health and social services system
- undermines Australia's public health efforts across all levels of government to reduce alcohol-related harm
- contradicts strong community expectations for change
- conflicts with commitments under national strategies to reduce exposure to alcohol marketing, along with expert recommendations
- conflicts with international guidance from the World Health Organisation.

In reviewing the Free TV Code, the ACMA has an opportunity to ensure industry standards operate effectively in the public interest and provide appropriate community safeguards. Any amendments to the Free TV Code should prioritise minimising exposure to alcohol advertising and protecting against alcohol-related harm.

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