

30.04.26

**To the Content and Media Reform team at the ACMA,**

My name is Tas Guichard. I am a Sydney-based filmmaker and digital communications professional. I am the writer, director and narrator of *Pieced Together*, winner of Best Open Entrant Short Film at the Focus on Ability Film Festival 2025 — a festival dedicated to giving voice to people the mainstream often overlooks. I am writing in that same spirit.

I am currently in pre-production on a feature documentary examining the alcohol subscription industry in Australia and its marketing practices targeting women. In the course of that research, I have observed something that I believe falls directly within the scope of this review and warrants the ACMA's attention.

The regulatory gap I am writing about is this: alcohol subscription services are conducting sophisticated, high-volume advertising campaigns on digital platforms — Facebook, Instagram, and via paid influencer content — with no responsible drinking messaging of any kind. Not a standard drink count. Not a health warning. Not a single reference to moderation guidelines. This is in direct contrast to traditional alcohol advertising, which carries obligations under the ABAC Responsible Alcohol Marketing Code.

These services appear to achieve this by marketing the subscription model itself — the "curation," the "discovery," the "membership" — rather than the alcohol contained within. The product being advertised is the box. The alcohol is simply what is inside it. This framing appears to place their marketing outside the scope of existing safeguards, creating a loophole that traditional advertisers do not enjoy.

I experienced this directly over the last couple of weeks. After researching alcohol subscription services for my documentary, I was immediately targeted by Good Pair Days advertising on Facebook. The ads were visually sophisticated, used lifestyle and wellness imagery, and contained no health messaging whatsoever. They are excessive, appearing many times per day, starting very early in the morning. This has all been documented with screenshots and screen recordings. Please see attached screenshots, and notice the time they were taken. The algorithmic targeting was precise and instantaneous. There was no ethical filter between my research activity and their recruitment of me as a customer.

The contrast with tobacco regulation is instructive. A cigarette packet is required by law to carry graphic health warnings on plain packaging specifically designed to strip away the seductive power of branding. An alcohol subscription box arrives at an Australian family's front door wrapped in floral tissue paper, rose gold foiling, and soft pink branding — with a free bottle included — and no health information of any kind.

While I understand this review is focused on commercial free-to-air television, I respectfully urge the ACMA to note this broader pattern in its findings. The safeguards designed for broadcast advertising are being rendered increasingly irrelevant by digital platforms and subscription models that have been structured specifically to sit outside them. Any strengthened regulatory framework that does not account for this gap will be addressing yesterday's problem.

I would welcome the opportunity to contribute further to this conversation, including through the documentary I am currently developing.

Thank you for the opportunity to submit.

Kindly,

Tas Guichard  
Director

