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Manager, Content and Media Reform  
Australian Communications and Media Authority  
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To: [Australian Communications and Media Authority](#)

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

Golf Australia, the PGA of Australia, and the WPGA Tour of Australasia thank you for the opportunity to provide a submission to the review of alcohol advertising rules within the Commercial Television Industry Code of Practice.

**About Our Organisations**

Golf is one of Australia's largest participation sports, with 4 million Australians playing annually. Together, our industry provides **\$3.3 billion in total annual benefits** to the Australian community, economy, and environment, derived from more than **\$10 billion in household expenditure on golf**. This includes \$1.4 billion in direct economic value and over \$1 billion in social benefits, underpinned by the financial stability of our professional and community programs.

- **Golf Australia** is the national governing body for the sport, responsible for overseeing the Rules of Golf, the national handicapping system for 470,000 members, and driving participation through grassroots programs like *MyGolf* and *Get Into Golf*, and delivering National, State and Local tournaments.
- **PGA of Australia** represents professional golfers and vocational experts, providing the coaching and management essential to the industry. Through the **PGA Tour of Australasia** elite pathways and high-quality professional tour for men and mixed events for Australian and International athletes, raising the global audience, profile and financial sustainability.
- **WPGA Tour of Australasia** is the governing body for women's professional golf, focused on creating elite competition and career pathways for female athletes. Through its professional tournament circuit, the WPGA Tour elevates the profile of women's sport and secures the long-term financial sustainability of the professional game.

**Role of Advertising – Media Rights and Sponsorship**

Media rights and sponsorship revenue are critical to our business model. Golf Australia and the PGA of Australia advise caution against the proposed changes, as the commercial impact would be significant. Our sports rely on approximately \$[REDACTED] annually in direct alcohol partnership revenue.

Beyond direct investment, the "Value-in-Kind" (VIK) impact is substantial. Pourage agreements at our major events are delivered by partners; if these were made unfeasible, it would cost our organisations approximately \$[REDACTED] annually to fund these services ourselves. We use this



commercial revenue to reinvest into the sporting ecosystem, and we urge the ACMA to be fully aware of this economic impact before proceeding.

Furthermore, the expansion of the code to encompass in-stadia activity would threaten these major event partnerships. These collaborations elevate the on-site experience for attendees and create better events for Australians. Restricting them would significantly harm our ability to invest in our sport at all levels.

### **Existing Safeguards**

Our organisations are committed to responsible consumption.

We currently operate under a robust national framework. As a large-scale simulcast sport across both free-to-air and subscription TV, our arrangements with the Nine Network and Foxtel require us to comply concurrently with:

- The Commercial Television Industry Code of Practice (Free TV Australia); and
- The Subscription Broadcast Television Codes of Practice (ASTRA).

Both of these overarching codes refer directly to the **ABAC Responsible Alcohol Marketing Code (ABAC)**, which provides specific, stringent guidelines for alcohol marketing to which we strictly adhere.

Data indicates that key statistics around consumption and behaviour are already trending positively across the country. This trajectory suggests that the current co-regulatory model is effective and that further significant intervention is not necessary.

### **Conclusion**

While we understand the ACMA's focus on community safeguards, we are concerned that the proposed changes would result in a combined annual loss exceeding \$■ million in revenue and VIK support. We remain committed to promoting responsible consumption through our adherence to the ABAC code and our partnerships with bodies like DrinkWise, while maintaining the commercial viability of Australian golf.

Yours sincerely

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Golf Australia

**GAVIN KIRKMAN**  
Chief Executive Officer  
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**KAREN LUNN**  
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