



23 March 2025

Manager, Content and Media Reform
Australian Communications and Media Authority
PO Box 78, Belconnen ACT 2616

Email: camr@acma.gov.au.

Via upload

Dear ACMA,

We are writing in response to the public consultation regarding the current alcohol advertising rules in the Commercial Television Industry Code of Practice 2025 (Free TV Code).

The Independent Brewers Association represents the approximately 620 small Australian owned breweries across the country. Independent breweries contribute \$3.53 billion to the Australian economy employing 8,367 people directly and creating a further 31,991 in downstream sectors such as agriculture, tourism and logistics. Our members are overwhelmingly small businesses and 56% of Australian independent breweries are located in regional and rural Australia.

The Alcohol Beverages Advertising Code (ABAC) is a comprehensive scheme that applies to all forms of marketing – including television. ABAC is widely recognised as a world leading scheme. Our members have access to a wide range of best practice guides and training through ABAC and it is well accepted as the industry standard.

“Beer moderation has been a key contributor to Australia’s reduction in per capita alcohol consumption over the past half-century”. Independent breweries led the craft beer revolution that supported a shift to premiumisation and drove the consumer trend of no and low alcohol options.

IBA members are clearly committed to a culture of moderation in drinking and IBA member venues provide social hubs that are not surrounded by gambling.

We do not support any changes to the Free TV code that would expand when alcohol advertising can be shown on free-to-air TV. I am not aware of any demand for expansion from within our membership.

Due to the nature of the beer industry in Australia - with 85% of taps being tied to two foreign owned multinationals – our members have sought to differentiate their products through sponsorship and advertising with causes and activities that align with their brand. This may include sponsorship of a downhill mountain biking events, the national squash championships, pro surfing or a local soccer, AFL or netball team. Any advertising resulting from that sponsorship is undertaken in accordance with ABAC guidelines and there is a process by which complaints about advertising can be made to ABAC.

The data is clear that Australian alcohol consumption has reduced significantly particularly amongst young people. Overall alcohol consumption has reduced by more than 25% since the 1970s, and in 2023 69% of young people have reported abstaining from alcohol.

Any further changes to the Free TV code needs to balance the data around Australia’s actual alcohol consumption with the role that independent breweries play in supporting community sporting events and clubs and raising the profile of “second tier” sporting events.



We strongly oppose any changes that would have the impact of restricting independent breweries from supporting sporting clubs or events. Restrictions could have significant unintended consequences beyond the top tier sports – and impact the much smaller clubs and events that otherwise struggle to get funding.

We are available to discuss any of the issues in this submission at any time.

Regards,

A handwritten signature in black ink that reads "Sabrina Kunz".

Sabrina Kunz
Chief Executive Officer

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