



30 APRIL 2026

Manager, Content and Media Reform
Australian Communications and Media Authority

By email: camr@acma.gov.au

SUBMISSION BY LION TO THE AUSTRALIAN COMMUNICATION AND MEDIA AUTHORITY'S REVIEW INTO ALCOHOL ADVERTISING RESTRICTIONS IN THE FREE TV CODE

EXECUTIVE SUMMARY

Lion welcomes the opportunity to contribute to the ACMA Review into alcohol advertising restrictions in the Free TV Code.

It is important to note from the outset that Lion did not support or advocate for any expansion of the M-rated programming timeslots that was the precursor to this inquiry. Further, Lion does not support any expansion of the times during which alcohol advertising is permitted under the Commercial Television Industry Code of Practice.

To that end, this submission sets out how the current framework already delivers strong, effective safeguards. The evidence points to clear, positive trends: risky drinking has steadily declined, particularly among young people, while exposure to alcohol advertising on free-to-air television has also fallen. Importantly, these improvements have taken place under the existing system, which combines robust content rules, placement controls, and audience protections. Importantly:

- Alcohol advertising is already subject to one of the most comprehensive multi-layered regulatory frameworks in Australia and is already one of the most regulated product categories on television
- Ad Standards' 2026 Community Sentiment research showed Australians rate alcohol advertising 13th on their list of issues of concern in advertising, with only 1% rating it as their number one issue¹
- In addition, from a community sentiment perspective, alcohol advertising does not rank on the Ipsos *Issues Monitor* which each month provides insights on the top 20 issues facing Australia. The top issues, remain as cost of living, housing and crime ²
- Evidence shows that television alcohol advertising and placement volume is actually declining and the overwhelming majority of viewers during permitted advertising times are adults. In fact it is worth noting that younger audiences are moving away from free-to-air television with their viewership declining over 22% from 2024 to 2025³.
- Australians are drinking more responsibly. Australian Government data shows alcohol consumption is decreasing, with marked declines in risky or harmful alcohol consumption and significant falls in underage drinking⁴
- Alcohol manufacturing industry, wider retail and hospitality industries, advertising, broadcasting and sporting industries play a significant role in Australia's economy. Beer alone, generates \$17 billion a year for the Australian economy and supports around 100,000 FTE jobs. In beer excise alone, \$2.7 billion is provided to the Federal Government in the 2025-2026 Budget⁵

¹ Ad Standards Community Sentiment Tracker Report produced by Ad Standards and Roy Morgan (Wave 1 - Q2 FY26)

² <https://www.ipsos.com/en-au/issuesmonitor>

³ Source: OzTaM VO Mar 26

⁴ Australian Institute of Health and Welfare, National Drug Strategy Household Survey 2022–23 (AIHW, 2024)

⁵ https://budget.gov.au/content/bp1/download/bp1_bs-4.pdf

- The alcohol industry and Lion in particular take its role in responsible consumption and harm reduction seriously by funding DrinkWise initiatives, developing low, no and mid strength ranges and adhering strictly to internal and industry codes.
- Lion is a company with a sophisticated marketing approach, where every dollar is carefully allocated. Our strategies are guided by modelling and evidence-based theory to ensure investment is directed toward specific over 18yrs target markets. Any expenditure that does not reach our intended audience is considered inefficient, meaning there is no desire or benefit in exposing anyone under 18 to our advertising.

LION

LION is an international beverages company headquartered in Sydney, Australia. Lion is known for its commitment to quality, craftsmanship, community and sustainability. We are proud to be part of the Australian beer industry, which generates \$17 billion a year for the Australian economy and supports roughly 100,000 jobs from grain growing through to pouring a pint in the pub or club.⁶ Lion operates a network of breweries and distilleries across the country, including the Castlemaine Perkins Brewery in Brisbane, Tooheys Brewery in Sydney, James Boag Brewery in Launceston, Four Pillars distillery in Healesville, Stone & Wood breweries in Byron Bay and Murwillumbah, and Little Creatures breweries in Geelong and Fremantle. We employ more than 2500 people across our network of breweries and other operations in Australia and New Zealand.

Lion is a champion of responsible consumption through culture-changing products, programmes, and partnerships: We take immense pride in being a responsible marketer and abide by the spirit and letter of a broad range of global best practice self-regulatory codes, including AANA (Australian Association of National Advertisers) Codes of Ethics, AANA Food and Beverages Code and Alcohol Beverages Advertising Code (ABAC) . We were also a foundational supporter of DrinkWise, established in 2005 and through this avenue we have sought to promote a generational change in the way Australians consume alcohol. See below for further information regarding how Lion value and promote Drinkwise initiatives on TV, at sporting events and on streaming services. Lion is strongly supportive of to the responsible regulation that is evidence based, proportionate and effective, as reflected in its compliance record and ongoing participation in industry and government supported harm minimisation initiatives.

THE REVIEW

Lion understands that this inquiry arises following ACMA's decision not to register proposed amendments to the Free TV Code that would have expanded M-rated programming timeslots, with the unintended effect of increasing the availability of alcohol advertising. The alcohol beverage industry did not support that proposal and does not support any expansion of the times during which alcohol advertising is permitted under the Commercial Television Industry Code of Practice.

Lion recognises that the purpose of this review is to assess whether the existing alcohol advertising provisions in section 6.2 of the Free TV Code continue to provide appropriate community safeguards. The review should therefore be confined to broadcast-specific rules governing the timing and placement of alcohol advertising, including protections for children based on program classification and viewing times.

Alcohol advertising and marketing is already comprehensively regulated through multiple frameworks operating outside ACMA's jurisdiction. Issues that fall outside the ACMA's regulatory remit should therefore not form part of the ACMA's analysis or its conclusions.

THE CURRENT REGULATORY SYSTEM IS ROBUST

Alcohol advertising is already subject to one of the most comprehensive multi-layered regulatory frameworks in Australia and is already one of the most regulated product categories on television.

⁶ Australian Brewing – Our Economic Contribution, 2022, <https://www.brewers.org.au/submissions/australian-brewing-our-economic-contribution-report-2022/>.

Alcohol advertising in Australia operates under a regulatory framework administered by ABAC. ABAC provides a robust, nationally applied framework governing alcohol marketing across all media channels. It ensures that advertising:

- depicts responsible consumption;
- does not encourage excessive or unsafe drinking;
- does not associate alcohol with success or risky behaviour; and
- does not have strong or evident appeal to minors.

ABAC continues to demonstrate strong effectiveness with consistently reliable resolution timeframes and active compliance mechanisms. The *content* of alcohol advertisements is already subject to rigorous restrictions, and this is further reinforced by proactive controls. In 2025, ABAC's pre-vetting service rejected 282 marketing communications before they reached the market, helping prevent breaches at the earliest stage and reducing consumer harm⁷.

Within this framework, Lion demonstrates a very high level of compliance, with 25 complaints over 2021–2025, of which just three were upheld during this five-year period. This, combined with transparency through adjudications, evidences Lion's strong alignment with ABAC's responsible marketing standards.

ABAC's processes require the findings to be public, resulting in both a transparent process with public and industry accountability measures applied to all signatories to ABAC.

Beyond ABAC, alcohol advertising in Australia is also regulated through a broader system of consumer and advertising standards. The Australian Association of National Advertisers (AANA) Code applies to all advertising across every channel and requires that marketing be legal, honest and socially responsible. The Australian Consumer Law, enforced by the Australian Competition and Consumer Commission (ACCC), prohibits misleading or deceptive conduct in alcohol marketing and applies to all promotional activity, both online and offline. State and territory liquor promotion guidelines add further restrictions on promotions that may encourage rapid or excessive consumption, particularly within licensed venues. In addition, media-specific codes- such as Outdoor Media Association placement policies - help control when and where alcohol advertising can appear, especially to limit exposure to minors. Alcohol advertising is therefore subject not only to specific content and placement restrictions, but also to general advertising standards that apply to all products and services across all platforms.

Given the already comprehensive regulatory framework governing alcohol advertising - spanning ABAC, the AANA Code, the Australian Consumer Law, state liquor-promotion rules, and existing media standards (such as the Free TV Code), there are comprehensive safeguards in place to protect the community, demonstrating that any further changes or intervention is unnecessary.

⁷ ABAC Scheme Ltd, Annual Report 2025 (Report, 2026) <https://abac.org.au/wp-content/uploads/2026/04/ABAC-Annual-Report-2025-FINAL.pdf>

EXPOSURE TO TELEVISION ADVERTISING

The placement of alcohol commercials on television channels requires numerous checks to ensure compliance with the relevant codes. The industry must comply with the highest standards of each applicable code, including ABAC, the Free TV Code and the AANA Code of Ethics.

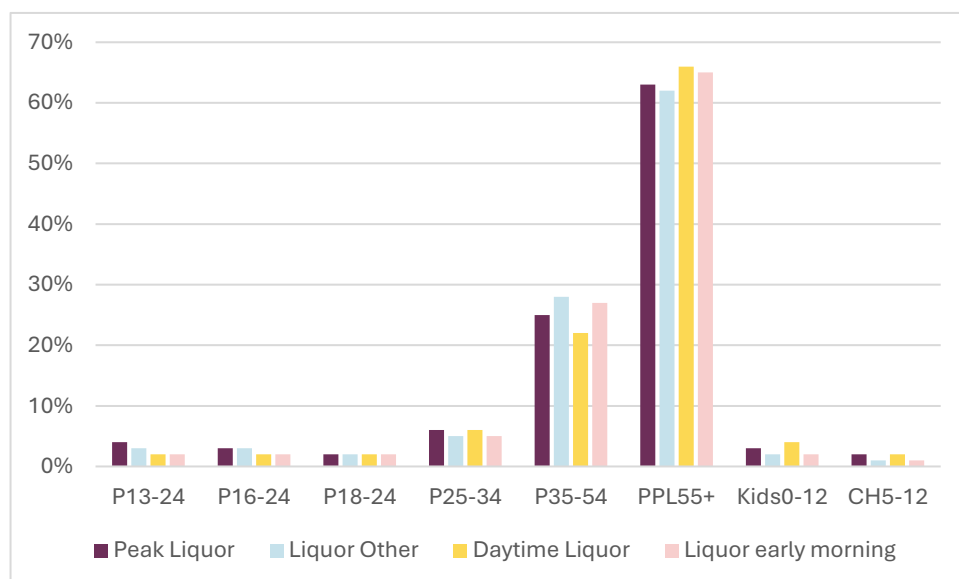
Much of the alcohol advertising we see in Australia relates to new brands of alcohol products in the market. Over recent decades we have seen a significant increase in the number of brewers, winemakers and distillers, with approximately 700 brewers, 2,200 small winemakers and 300 distillers now operating across Australia. Advertising and marketing is essential for these businesses to grow their brands and provide a choice to existing consumers, rather than to increase overall consumption.

As a company our marketing approach is data-driven and targeted, with investment directed specifically toward adult audiences. Expenditure that does not reach this audience is inefficient, meaning there is no intent or benefit in exposing individuals under 18 to our advertising.

Community concern about alcohol advertising remains low and continues to decline. National research indicates that only 12% of Australians consider alcohol marketing a significant issue, while 64% report no concerns at all⁸. At the same time, Australian Institute of Health and Welfare data shows fewer young people are drinking, and Australians are continuing to delay the age at which they start drinking, demonstrating that current frameworks are effective.⁹

Assertions that alcohol advertising or sports sponsorship targets youth or contributes to underage drinking are not supported by the evidence, with free-to-air TV audiences overwhelmingly aged 18+, and the vast majority of audiences during liquor-allowed timeslots are composed of those aged 35-55+¹⁰

AUDIENCE% COMPOSITION DURING LIQUOR ALLOWED TIMESLOTS¹¹



⁸ J01607 – ABAC – Community Standards Research Report – December 2025. https://abac.org.au/wp-content/uploads/2026/03/J01607_ABAC_Community_Standards_Research_Report_1225.pdf

⁹ Australian Institute of Health and Welfare, Alcohol, Tobacco & Other Drugs in Australia, <https://www.aihw.gov.au/reports/alcohol/alcohol-tobacco-other-drugs-australia/contents/drug-types/alcohol>

¹⁰ Source: OzTaM VO Mar 26

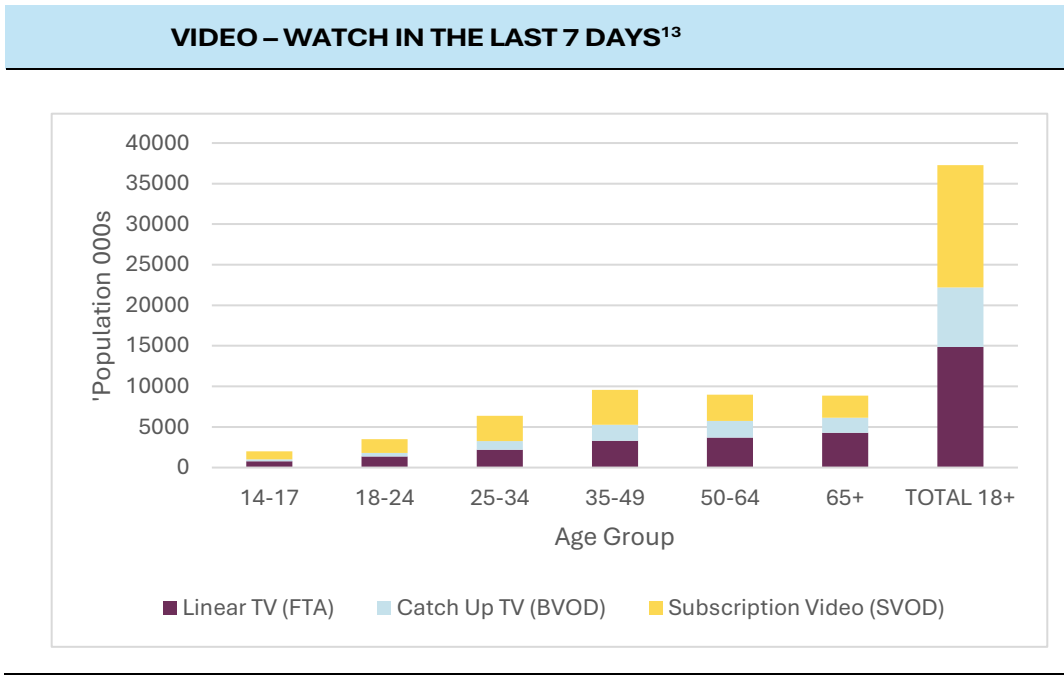
¹¹ Ibid

Changing Media Landscape

The media landscape is rapidly evolving, with younger audiences increasingly shifting away from free-to-air television showing a decline of over 22% from 2024 to 2025.

YOUNGER DEMOGRAPHIC AUDIENCE DECLINES ¹²		
TV AVERAGE AUDIENCE	25 VS 23	25 VS 24
P25-39	-9.13%	-22.66%
P13-24	-21%	-12%

As a result, restricting television advertising would have limited impact on youth exposure, while disproportionately affecting broadcasters and the wider beneficiaries of this revenue. Advertising contributes to the commercial sustainability of broadcasters operating in an increasingly competitive and fragmented media environment. This is particularly important in the context of live sport, where advertising and sponsorship revenue directly supports media rights agreements.



As the numbers highlight, viewership is now fragmenting across varied platforms with the majority of remaining TV audiences being over 18. It is worth noting too that the existing industry codes are platform neutral and as such the regulatory framework already applies to all advertising, not only television, but including radio, print, digital, social media and outdoor advertisements.

¹² Source: OzTaM VO Mar 26
¹³ Source: Roy Morgan Single Source Australia: Jan 2021 - Dec 2025

In-Stadia, jersey signage and sponsored collaborations

While noting that this is outside ACMA's jurisdiction, in-stadia signage and jersey sponsorship are long-standing, integral features of Australian sport and significant areas of investment. Unlike traditional broadcast advertising, they stem from commercial partnerships between sporting organisations and sponsors, rather than placement decisions within programming.

These partnerships are a vital revenue stream for sporting codes, clubs and venues, supporting competitions, grassroots and community sport, and the growth of women's and emerging sports. Sponsor visibility through signage and team apparel reflects these arrangements and is embedded in the structure of sporting events.

Importantly, these promotions occur in environments largely attended and viewed by adults. Audiences for major sporting events are predominantly adult, and existing safeguards—such as the ABAC Responsible Alcohol Marketing Code—impose strict content standards, particularly against appeal to minors.

RESPONSIBLE CONSUMPTION EVIDENCE

Australians are drinking less and more responsibly

Australians are drinking less and more responsibly, reflecting both changing consumer behaviour and the industry's longstanding support for moderation. Lion has invested significantly in no, low and mid-strength options and today these products account for more than 30 per cent of all beer sales in Australia. Long-term data shows that per capita alcohol consumption has fallen by more than 25% since the 1970s¹⁴, alongside sustained reductions in drinking frequency and indicators of harmful use across all age groups. According to Australian Government data, risky or harmful consumption in Australia has declined from 38.1% in 2001 to 30.7% in 2022–23.¹⁵

These trends are particularly pronounced among young people:

- The proportion of young people engaging in underage drinking has more than halved over the past two decades from 69.9% in 2001 to 31.8% in 2022–23¹⁶.
- According to the most recent AIHW data, young people drinking at risky levels is now at 5.5%, down from 30.7% 2001¹⁷.

Evidence also shows that advertising does not drive increased or harmful consumption, instead supporting brand choice and competition among existing consumers, with moderation messages continuing to resonate across the community.¹⁸

¹⁴ Australian Institute of Health and Welfare, Alcohol, Tobacco & Other Drugs in Australia, Figure ALCOHOL 1, <https://www.aihw.gov.au/reports/alcohol/alcohol-tobacco-other-drugs-australia/contents/drug-types/alcohol>

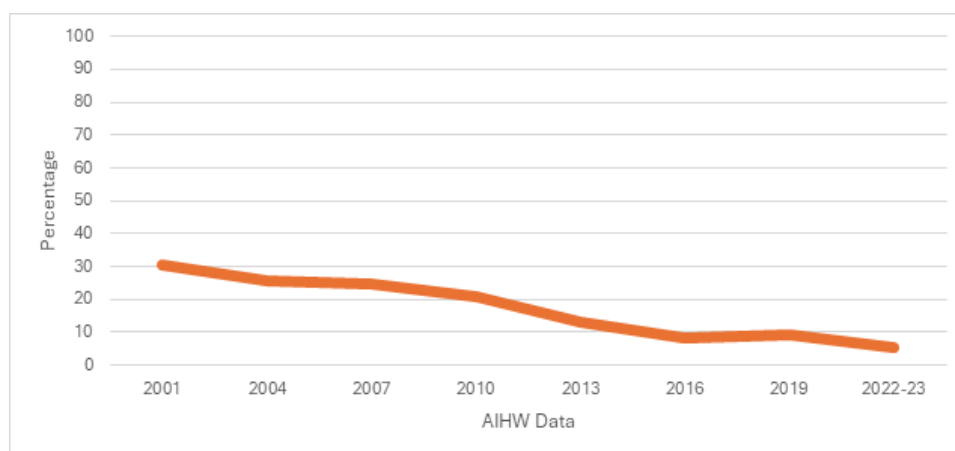
¹⁵ Australian Institute of Health and Welfare, Alcohol, Tobacco & Other Drugs in Australia, <https://www.aihw.gov.au/reports/alcohol/alcohol-tobacco-other-drugs-australia/contents/drug-types/alcohol>

¹⁶ Ibid

¹⁷ Ibid

¹⁸ Duffy, M. (1989). Measuring the contribution of advertising to growth in demand: An econometric accounting framework. *International Journal of Advertising*, 8(2), 95-110.

RISKY DRINKING BY 14-17 YEAR OLDS¹⁹



These outcomes have occurred under the current regulatory framework, including the rules governing alcohol advertising. The evidence suggests that existing policy settings, alongside industry initiatives, are contributing to a culture of moderation in Australia.

In addition to complying with codes and regulation the industry also supports alcohol harm reduction initiatives. LION proudly continues to support the work of DrinkWise – an independent, not-for-profit organisation that takes a whole-of-community approach to developing evidence-based alcohol education programs. These initiatives, delivered in partnership with governments, sporting organisations and media, have demonstrated strong reach and contribute to ongoing improvements in attitudes and behaviours around alcohol consumption.

Since its inception in 2005, DrinkWise has developed and delivered campaigns that focus on reducing alcohol related harm. DrinkWise advertising and the DrinkWise banner is shown prominently in-stadia across many national sporting fixtures and events, including the AFL and NRL – it is almost unmissable for those attending the events or watching on TV.

Recent Drinkwise research found:

- 94% of Australian sports fans believe a sporting event can be ruined if people drink too much
- 69% of Australian sports fans said they adapted their behaviour to drink in moderation after seeing DrinkWise communications

Through LION's involvement in major events, including the National Rugby League State of Origin, we help amplify DrinkWise's message of moderation and respect.

The *Always respect, always DrinkWise* campaign has had a significant presence at major Australian sporting, music and cultural events over the past 12 months, including the NRL State of Origin series, AFL Gather Round, AFL and NRL Finals Series and even the Taylor Swift concert in Sydney. DrinkWise partnered with governments, police, sporting organisations, media, stadiums, licensed venues and support services to deliver a unified message. This impactful campaign reminded fans of the importance of moderation and respect, no matter where they were watching the action – at the stadium, at the pub, at a mate's place or from home.

In 2024, this campaign continued to help set expectations around acceptable behaviour, having appeared in mainstream media, digital platforms, geo-targeted social messages and via endorsements from sports stars. Fans at stadiums saw reminders on screens and outdoor billboards, while posters in pubs, mobile messaging trucks and

¹⁹ Australian Institute of Health and Welfare, Alcohol, Tobacco & Other Drugs in Australia, Figure ALCOHOL 3, <https://www.aihw.gov.au/reports/alcohol/alcohol-tobacco-other-drugs-australia/contents/drug-types/alcohol>

even baggage collection carousels at airports reinforced the message. LION helped to amplify the *Always respect, always DrinkWise* message by donating outdoor advertising assets near supermarkets and bottle shops.

This broad reaching, whole-of-community approach to moderation and respect messaging continues to drive the cultural shift towards responsible consumption for those choosing to drink. More information about the organisations work can be found on the DrinkWise website to find out more about the organisation’s work.

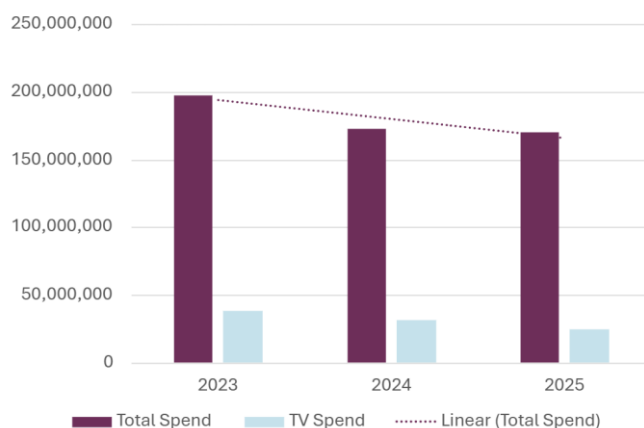
ECONOMIC CONTRIBUTION OF ADVERTISING

As acknowledged by the National Alcohol Strategy (2019-2028)

*the alcohol manufacturing industry, wider retail and hospitality industries, advertising, broadcasting and sporting industries play a significant role in Australia’s economy and social fabric.*²⁰

The industry supports sports broadcasting, where advertising revenue helps sustain jobs and production capabilities. Importantly, this spending can have a broader impact on regional broadcasters and local communities, where advertising revenue contributes to the viability of local media services and associated employment opportunities.

ALCOHOLIC BEVERAGES AD SPEND PAST 3 YEARS²¹



Alcohol advertising on free-to-air television has declined across both metropolitan and regional markets, in both nominal and real terms. Between 2019 and 2025, alcohol advertising on Free TV reduced by 71% in metro areas and 61% in regional areas²². Regardless of the decline, if alcohol advertising was banned on Free TV, the AANA estimate it would reduce Free TV funding by nearly \$12m, including stripping over \$2m from regional TV. Reduction in revenue would have consequences in terms of public access to free sport coverage and Australian-made content and the value of sport broadcasting rights which in turn fund the sports themselves, including grassroots and women’s leagues.

According to the Advertising Pays report²³, in 2023 Free-to-air TV broadcasting employed 14,313 people in Australia and advertising makes up 83% of that funding.

²⁰ Department of Health, *National Alcohol Strategy 2019-2028* (Canberra: Australian Government, November 2020), 4, <https://www.health.gov.au/sites/default/files/documents/2020/11/national-alcohol-strategy-2019-2028.pdf>

²¹ Source: <https://apollo.standardmediaindex.com/au>

²² Nielsen Ad Intel data 2019 and 2025. Source AANA

²³ Deloitte Access Economics, *Advertising Pays: Second Edition* (Report, 2023) <https://advertisingpays.com.au/>

The value of sports sponsorships is similarly far-reaching. Revenue generated through sponsorship arrangements contributes to the funding of broadcast rights, enabling sporting events to be televised and accessible to wider audiences. It also plays a critical role in supporting grassroots sport, providing essential resources for community-level participation and development. Furthermore, sporting organisations benefit directly from sponsorship income, which helps sustain operations, invest in talent, and grow their reach and impact. This includes investment in junior and community sport, regional competitions, club development, coaching and officiating pathways, and infrastructure. Importantly this also includes the continued growth of women's sport and the development of inclusive participation opportunities.

Policy settings should recognise these broader benefits. Measures that constrain or limit the sports broadcasting media rights ecosystem risk unintended consequences including reduced revenue, lower investment in Australian content, and weakened support for community and grassroots sport.

CONCLUSION

In addition to the robust advertising regulatory environment, relating to how and where we can advertise our products there are a number of other measures that further protect and inform the community including: strictly regulated labelling through FSANZ on product strength, pregnancy warnings and ingredients, State liquor licensing regulations and tax settings. The available evidence indicates that the current co-regulatory framework is operating effectively.

We exist in a very competitive market and like other industries under incredible commercial pressure in the current environment, as a company we have had to make difficult commercial decisions to maintain viability and support the jobs in our team and throughout the supply chain. Further reductions or imposts on business including where and how we can advertise our legal and heavily regulated products will have an impact.

Alcohol advertising is not a primary concern for the majority of Australians. At the same time, Australia has seen sustained declines in overall consumption, underage drinking, and risky drinking behaviours—demonstrating that existing regulatory settings, combined with broader cultural shifts, are delivering positive outcomes.

There is no compelling evidence establishing a causal relationship between alcohol advertising and increased consumption or harm. Rather advertising encourages competition between brands and highlights choice for consumers. In this context, introducing further broadcast-specific restrictions risks adding complexity without delivering meaningful additional safeguards.

At the same time advertising revenue remains critical to the sustainability of Australia's broadcasting sector and sporting ecosystem. Restrictions in this area risk unintended consequences, including reduced investment in Australian content and diminished support for community and grassroots sport.

The existing framework provides appropriate safeguards, delivers both high compliance and strong community protections and should be maintained.

Yours Sincerely



Chris Allan
Marketing Director-Australia, LION