

30 April 2026

**PERNOD RICARD AUSTRALIA PTY LTD SUBMISSION  
TO THE  
AUSTRALIAN COMMUNICATIONS AND MEDIA AUTHORITY (ACMA)  
REVIEW OF ALCOHOL ADVERTISING RULES IN THE FREE TV CODE**

Pernod Ricard Australia appreciates the opportunity to make a submission on the Australian Communication and Media Authority's (ACMA) Review of alcohol advertising rules in the Free TV Code. As a member of Alcohol Beverages Australia (ABA), we support ABA's submission. We welcome the opportunity to reinforce key points and provide additional perspective based on our experience as a responsible advertiser operating within Australia's co-regulatory framework.

**Summary:**

- Pernod Ricard does not support an expansion, nor a reduction, in times during which alcohol advertising is permitted under the Free TV Code.
- Pernod Ricard is a responsible advertiser and undertakes rigorous due diligence to ensure advertising is placed only where audiences are reasonably expected to comprise at least 80 per cent adults.
- The existing co-regulatory framework is effective, proportionate, and reflective of Australians' views regarding alcohol promotion.
- Long term trends show Australians are drinking better with declines in risky drinking particularly among young people.
- Alcohol advertising in mature markets is primarily about brand choice and market share, not increasing consumption.

**Pernod Ricard Australia**

As one of Australia's leading spirits and Champagne companies, managing a portfolio of internationally recognised brands including Absolut Vodka, Chivas Regal, Jameson Irish Whiskey, Kahlua and G.H. Mumm Champagne. Pernod Ricard has a longstanding commitment to the responsible marketing of our products. This includes carefully structured brand partnerships such as with Collingwood Football Club, Tennis Australia and Scuderia Ferrari HP which are subject to strict audience, placement and responsible marketing requirements.

Pernod Ricard is a signatory to the Alcohol Beverages Advertising Code Scheme (ABAC) through Spirits & Cocktails Australia. We take compliance with the ABAC Responsible Alcohol Marketing Code, the Free TV Code and all relevant advertising codes and laws

seriously. These obligations apply to all advertising channels including TV, radio, print, digital, social, and outdoor.

Globally, all Pernod Ricard employees are required to comply with the Pernod Ricard Code for Commercial Communications<sup>1</sup> when marketing or otherwise communicating about our products or brands. This Code sets out responsible alcohol marketing requirements that mirror or complement the ABAC Code (noting that the Pernod Ricard Code stipulates that local codes prevail in the event of any inconsistency). All marketing, communications, legal, public affairs and communications staff are required to complete internal training on the Pernod Ricard Code. This training is also made available to marketing agencies.

### **Current Free TV Code provisions:**

Pernod Ricard Australia does not support changes to the existing time-based restrictions for alcohol advertising under the Free TV Code. The current provisions operating alongside ABAC, are effective in minimising the exposure of minors to alcohol advertising while allowing responsible communication with adult audiences.

Alcohol advertising on commercial television is subject to multiple overlapping safeguards, including:

- Free TV Code placement and timing rules
- ABAC Responsible Alcohol Marketing Code
- Australian Association of National Advertisers (AANA) Code of Ethics.

Together these mechanisms ensure that alcohol advertising placement only occurs where the majority of the audience is adult.

Consistent with ABAC requirements, Pernod Ricard conducts due diligence prior to all advertising placement to confirm audience composition can be reasonably expected to be at least 80 per cent adults. Audience composition data provided for certain AFL broadcasts in 2024 indicated that more than 95 per cent of viewers were aged 18 or over across Foxtel's broadcast and Kayo's streams. This reflects the effectiveness of existing audience based placement rules.

### **Advertising, market share and consumption**

Australia is a mature and highly regulated market. In this context, alcohol advertising serves to increase brand awareness, brand switching and market share among existing adult consumers, rather than increasing consumption. For example:

- Pernod Ricard's partnership with Collingwood Football Club is designed to position Jameson Irish Whiskey as the preferred choice among adult dark-spirit enthusiasts aged 25-39.
- Our partnership with Tennis Australia, activating Altos Tequila at the Australian Open, aims to build brand awareness within an existing spirits category, not to expand total alcohol consumption.

This approach is consistent with the position of the World Federation of Advertisers' (WFA) that alcohol advertising in mature markets primarily influences brand competition rather than

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<sup>1</sup> Pernod Ricard: Our Role in Society. Available here: <https://www.pernod-ricard.com/en/our-group/our-role-society>

population-level consumption. The WFA argues that harmful drinking should be addressed through targeted, evidence-based regulation rather than blanket advertising bans.

Alcohol advertising is an important part of how we communicate with our customers which is key to our commercial success. Brand partnerships are also key to the commercial viability of media organisations and the success of sporting codes and events in Australia.

### **Evidence on consumption and harm**

Trends in Australia demonstrate that alcohol consumption patterns are improving, particularly among young people:

- The proportion of young people aged 14-17 years who consumed alcohol in the previous 12 months fell from 69 per cent in 2001 to 31 per cent in 2022/2023.
- The proportion of young people aged 14-17 years drinking alcohol at levels defined as “risky” has fallen from 30.7 per cent in 2001 to 5.5 per cent in 2022/2023.
- Across all age groups, “risky” or harmful consumption has fallen from 38 per cent in 2001 to 30.7 per cent in 2022/2023.<sup>2</sup>

These long term trends have occurred within the existing advertising regulatory framework. International evaluations of alcohol advertising bans in comparable OECD countries have not consistently demonstrated reductions in overall alcohol consumption or harm. This indicates that advertising restrictions are a blunt and ineffective policy lever when compared with targeted and evidence based measures.

### **Effectiveness of the co-regulatory framework**

The ABAC Scheme provides robust controls over alcohol advertising content and placement. ABAC ensures that alcohol advertising:

- Does not strongly or evidently appeal to minors
- Does not encourage excessive or rapid consumption
- Is subject to independent complaints handling and adjudication

ABAC standards are regularly reviewed to ensure they reflect evolving community standards and expectations. A JWS Research study undertaken in November 2025 found that alcohol marketing is the lowest ranked concern of 14 tested societal issues, with only 12 per cent of Australians surveyed viewing it as a significant concern, down from 16 per cent in 2021. JWS Research concluded that the ABAC Code and standards remain an accurate reflection of Australians’ views regarding standards for alcohol promotion and there are no salient issues that are not already covered by the Code.<sup>3</sup>

At Pernod Ricard, our commitment to responsible marketing within the co-regulatory framework is taken seriously. In addition to the Pernod Ricard Code for Commercial Communications, all marketing staff are directed to complete the ABAC online training course, to attend annual ABAC Industry Briefings, and sign up to receive ABAC email updates. Our agency contacts are asked to do the same. Pernod Ricard’s legal team provides an induction programme for all new marketing staff which covers the ABAC Code and responsible marketing obligations. We have contractual terms in place with our marketing agencies requiring compliance with the ABAC Code.

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<sup>2</sup> Australian Institute of Health and Welfare: National Drug Strategy Household Survey 2022-23. Available here: [Alcohol, tobacco & other drugs in Australia, Alcohol - Australian Institute of Health and Welfare](#)

<sup>3</sup> ABAC: JWS Research Community Perceptions Report 2025. Available here: <https://abac.org.au/abac-media-reports/research/>



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### **Broader harm reduction efforts**

Pernod Ricard supports evidence-based programs to address harmful drinking. We are a significant financial supporter of DrinkWise, an independent, not for profit organisation with a board of directors comprised of both community and industry members. DrinkWise campaigns, such as “You Won’t Miss a Moment if you DrinkWise”, encourage moderation at events including AFL and NRL where they are very prominent, as well as at music festivals. This demonstrates how the current framework provides opportunities for moderation messaging as well as commercial imperatives.

### **Conclusion**

Pernod Ricard appreciates the opportunity to contribute to ACMA’s Review of Alcohol Advertising Rules in the FreeTV Code. Pernod Ricard does not support changes to current time-based restrictions on alcohol advertising in the Free TV Code. The existing framework is effective, enforceable and proportionate. Objectives of protecting minors and supporting community standards are best achieved through targeted, evidence-based measures rather than altering television advertising rules that are working as intended.

**Kevin Mapson**  
Managing Director  
Pernod Ricard Pacific