

30 April 2026

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

Via ACMA's consultation portal

Re: ACMA review of alcohol advertising rules in the Free TV Code

Turning Point is Australia's leading addiction, research, and education centre. We welcome the opportunity to contribute to the Australian Communications and Media Authority's (ACMA) review into alcohol advertising restrictions in the *Commercial Television Industry Code of Practice 2015* (Free TV Code).

Regulating how alcohol is advertised on free-to-air TV is essential to the public health of all Australians. This is because alcohol is a harmful, cancer-causing product¹ that plays a causal role in several chronic diseases,² and contributes to and exacerbates domestic, family, and sexual violence.³ People drinking at risky levels, or at risk of/currently experiencing alcohol dependence, are especially vulnerable to alcohol advertising, which can trigger a desire to drink,⁴ and increase cravings.⁵

Children and young people are frequently exposed to harmful alcohol advertising. It is estimated that in a single year, children are subject to more than 50 million alcohol advertising exposures during free-to-air sports broadcasts.⁶

Exposing children to alcohol advertising has a strong effect on their alcohol use patterns.⁷ Twelve to seventeen year-olds who see daily TV alcohol ads are twice as likely to already be drinking, and among those who witness daily alcohol advertising

¹ World Health Organisation, *Alcohol and Cancer in the WHO European Region: An Appeal for Better Prevention* (Report, 2020) 5 <<https://www.who.int/europe/publications/i/item/WHO-EURO-2020-1435-41185-56004>>.

² Kevin Shield, Charles Parry and Jürgen Rehm, 'Chronic Diseases and Conditions Related to Alcohol Use' (2014) 35(2) *Alcohol Research* 155.

³ Richelle Mayshak et al, 'Alcohol-Involved Family and Domestic Violence Reported to Police in Australia' (2022) 37(3-4) *Journal of Interpersonal Violence* NP1658.

⁴ Rachel Murray et al, 'A Rapid Literature Review of the Effect of Alcohol Marketing on People With, or at Increased Risk of, an Alcohol Problem' (2024) 59(4) *Alcohol and Alcoholism* 1.

⁵ Ross Hollett et al, 'Exposure to Preference-Matched Alcohol Advertisements From National Sports Broadcasts Increases Short-Term Alcohol Consumption Inclinations in Risky Drinkers' (2025) 36(1) *Health Promotion Journal of Australia* e894.

⁶ Sherilene Carr et al, 'Child and Adolescent Exposure to Alcohol Advertising in Australia's Major Televised Sports' (2016) 35(4) *Drug and Alcohol Review* 406.

⁷ Sandra Jones and Christopher Magee, 'Exposure to Alcohol Advertising and Alcohol Consumption Among Australian Adolescents' (2011) 46(5) *Alcohol and Alcoholism* 630; Agatha Faulkner, Denise Azar and Victoria White, 'Unintended' Audiences of Alcohol Advertising: Exposure and Drinking Behaviors Among Australian Adolescents' (2016) 22(1) *Journal of Substance Use* 108; Sherilene Carr et al, 'Child and Adolescent Exposure to Alcohol Advertising in Australia's Major Televised Sports' (2016) 35(4) *Drug and Alcohol Review* 406.

during televised sport, this group is 2.4 times more likely to be drinking.⁸ Adolescents' recent exposure to alcohol advertising on TV is also associated with earlier initiation of alcohol use and a higher prevalence of heavy and binge drinking.⁹ This is concerning, as early onset of alcohol use disrupts brain development¹⁰ and increases the likelihood of higher risk drinking and alcohol-related harms later in life.

Under the current regulation, alcohol advertising is permitted from 6.00pm Friday to midnight Sunday during sports programming,¹¹ as well as from 8.30pm - 5.00am every day of the week, and between 12.00pm - 3.00pm Monday to Friday on school days.¹² These are times when children are very likely to be watching.¹³

The Free TV Code does not capture other types of alcohol related marketing, including low- or no-alcohol products (<1.15% alcohol by volume), which can appear unrestricted on free-to-air TV. Young people's exposure to low- or no-alcohol product advertising is associated with increased intentions to consume alcohol from the parent brand,¹⁴ with companies often using identical branding to full-strength alcohol and promoting their products as healthy recovery drinks or 'sports beers'.¹⁵

The Free TV Code also excludes program sponsorship from the definition of a commercial for alcohol drinks.¹⁶ Among young Australians aged 18-30, exposure to alcohol sports sponsorship is associated with acute, binge, and hazardous alcohol consumption,¹⁷ as well as higher likelihood of alcohol consumption among children as young as 13.¹⁸

Finally, the Free TV code excludes broadcast video-on-demand or free-to-air catch up services (e.g. 7Plus, 9Now, 10Play), used by 47% of children aged 0-14.¹⁹ Since 2020, there have been several community complaints regarding the advertising of

⁸ Emily Bain et al, 'Association Between Single-Channel and Cumulative Exposure to Alcohol Advertising and Drinking Behaviours Among Australian Adolescents' (2023) 42(1) *Drug and Alcohol Review* 59, 63.

⁹ David Jernigan et al, 'Alcohol Marketing and Youth Alcohol Consumption: A Systematic Review of Longitudinal Studies Published Since 2008' (2017) 112(S1) *Addiction* 7; Lesley Smith and David Foxcroft, 'The Effect of Alcohol Advertising, Marketing and Portrayal on Drinking Behaviour in Young People: Systematic Review of Prospective Cohort Studies' (2009) 9(51) *BMC Public Health* 1.

¹⁰ Janette De Goede et al, 'Alcohol and Brain Development in Adolescents and Young Adults: A Systematic Review of the Literature and Advisory Report of the Health Council of the Netherlands' (2021) 12(4) *Advances in Nutrition* 1379.

¹¹ Free TV Australia, *Commercial Television Industry Code of Practice* (Code, 1 December 2015) s 6.2.1(b)

<https://www.freetv.com.au/wp-content/uploads/2019/07/Free_TV_Commercial_Television_Industry_Code_of_Practice_2018.pdf>.

¹² During M and MA15+ classified programming. Free TV Australia, *Commercial Television Industry Code of Practice* (Code, 1 December 2015) s 6.2.1(a) <https://www.freetv.com.au/wp-content/uploads/2019/07/Free_TV_Commercial_Television_Industry_Code_of_Practice_2018.pdf>.

¹³ Australian Communications and Media Authority, *Children's Television Viewing and Multi-Screen Behaviour: Analysis of 2005–16 OzTAM Audience Data and 2017 Survey of Parents, Carers and Guardians* (Report, August 2017) 10 <<https://www.acma.gov.au/sites/default/files/2019-08/Childrens-television-viewing-and-multi-screen%20behaviour.pdf>>; Kerry O'Brien et al, 'Alcohol Advertising in Sport and Non-Sport TV in Australia, During Children's Viewing Times' (2015) 10(8) *PLOSOne* 1, 5.

¹⁴ Ashlea Bartram et al, 'Adolescents' Exposure to Zero-Alcohol Advertisements and Attitudes and Consumption Intentions Towards Alcohol: A Cross-Sectional Study' (2026) 45(2) *Drug and Alcohol Review* e70125.

¹⁵ Mia Miller and Cassandra Wright, 'No- and Low-Alcohol Beer and the Sponsorship of Sport in Australia: An Audit of Sponsorship Partnerships and Analysis of Marketing Tactics' (2024) 43(6) *Drug and Alcohol Review* 1534.

¹⁶ Free TV Australia (n 12) s 8.

¹⁷ Sarah Kelly and Michael Ireland, 'The Alcohol–Sport Nexus and How Consumers Are Affected Through Sponsorship' (2019) 12(1) *International Journal of Sport Communication* 79.

¹⁸ Katherine Brown, 'Association Between Alcohol Sports Sponsorship and Consumption: A Systematic Review' (2016) 51(6) *Alcohol and Alcoholism* 747, 750.

¹⁹ Australian Communications and Media Authority (n 13).

alcohol during video-on-demand viewing of programs that appeal to children, including Lego Masters and Carols in the Domain.²⁰

Given the harms outlined here, Turning Point endorses Alcohol Change Victoria's submission to this inquiry and likewise recommends ACMA develop and implement a program standard for commercial free-to-air broadcasters to replace the Free TV Code, that:

1. Ensures *all* forms of alcohol advertising are covered by the standard, including low and no-alcohol products, as well as alcohol promoted through sponsorships or when shown on sports players' jerseys and sports stadiums;
2. Limits alcohol advertising to late night times when children are less likely to be watching (e.g. 10.00pm to 5.00am);
3. Prohibits alcohol advertising during all forms of sports programming, including but not limited to live broadcasts, replays, and talk shows; and
4. Includes broadcast video-on-demand services in its remit.

Kind regards,



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²⁰ See the Foundation for Alcohol Research and Education's (FARE) submission to this review.