



NCETA
National Centre for Education
and Training on Addiction

28 April 2026

Ms Nerida O'Loughlin
Chair and Agency Head
The Australian Communications and Media Authority (ACMA)
PO Box Q500
Queen Victoria Building
New South Wales 1230
C/O CAMR@acma.gov.au

Dear Ms O'Loughlin

**RE: Submission to the Australian Communications and Media Authority (ACMA)
public consultation on alcohol advertising restrictions in the Free TV Code**

The National Centre for Education and Training on Addiction (NCETA) is a national research centre focused on alcohol and other drug (AOD) prevention, early intervention and workforce development. Our work examines the behavioural, social and environmental drivers of AOD use, with a particular focus on reducing population-level harm through evidence-based policy and practice.

This consultation is important, and we are pleased to provide a response given the significant burden of harm associated with alcohol use in Australia, including injury, chronic disease, and social harms such as family and domestic violence. Among young people, alcohol use contributes substantially to morbidity and mortality, with harms primarily driven by acute outcomes such as injury and risk-taking behaviours.^{1 2}

Alcohol advertising represents a modifiable environmental influence on alcohol consumption, particularly among young people. Strengthening regulatory approaches to advertising has the potential to support prevention efforts and reduce long-term alcohol-related harm at a population level.

Key points

We submit the following key points, informed by the evidence on alcohol-related harm and the role of advertising in shaping consumption patterns.

1. The current alcohol advertising provisions may not fully provide appropriate community safeguards in practice.
2. Alcohol advertising is an established environmental driver of consumption, influencing attitudes, norms and behaviours over time.
3. Exposure to alcohol advertising, particularly among young people, is associated with earlier initiation and higher levels of consumption.
4. The effectiveness of advertising restrictions depends on how well they limit exposure in practice.
5. Features of the current Code permit or exclude forms of advertising in ways that may reduce its effectiveness in limiting exposure.
6. Strengthening regulatory approaches may be necessary to ensure safeguards operate effectively in contemporary media environments.

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Response to the Terms of Reference

1. Do current provisions provide appropriate community safeguards?

NCETA is of the view that the the current alcohol advertising provisions in the Free TV Code do not provide appropriate community safeguards in practice.

While the Code includes time- and context-based restrictions intended to limit exposure, these are shaped by provisions such as exemptions for sports programming, classification rules, and the scope of advertising captured. Evidence on how advertising influences behaviour, together with the way these provisions operate, suggests that exposure is not consistently reduced in practice. Key aspects of how these provisions operate in practice are outlined below.

From a public health perspective, the World Health Organization SAFER initiative highlights the importance of enforcing bans or comprehensive restrictions on alcohol advertising, sponsorship and promotion.³ This reflects strong evidence that reducing exposure to alcohol marketing is a key lever for preventing harm, particularly among children and adolescents.

Comprehensive restrictions are recognised as more effective than partial approaches, particularly where the latter allow continued exposure through exemptions, time-based provisions, or differences across media environments. In this context, the structure and scope of the current Code are important considerations in assessing whether it effectively limits exposure and aligns with approaches shown to reduce harm at a population level.

2. What is the evidence linking alcohol advertising, consumption and harm?

Alcohol use is a leading cause of preventable death and disease in Australia,⁴ it is linked chronic conditions including cancer and harms including injury, and family and domestic violence. ² These health and social harms highlight the importance of prevention approaches that extend beyond individual behaviour and address broader environmental influences on alcohol use, including those that shape patterns of consumption across the population.

Alcohol advertising is one such environmental influence, consistent with broader evidence on the role of mass media in shaping health behaviours. **There is strong evidence that exposure to alcohol marketing shapes attitudes, perceived norms and expectations about drinking, and is associated with earlier initiation and higher levels of consumption over time.** ⁵ This positions advertising as a modifiable driver of behaviour and a relevant target for population-level intervention. Given the well-established relationship between alcohol consumption and a range of health and social harms, including injury, chronic disease, cancer and family and domestic violence, factors that increase consumption are also likely to contribute to these harms at a population level.²

Advertising influences behaviour by embedding alcohol within socially valued contexts, including sport and entertainment, reinforcing its association with everyday life. In high-reach

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media environments such as television, this contributes to the normalisation of alcohol use and strengthens perceptions of it as routine and socially endorsed.⁷

These effects are particularly relevant for young people. **Longitudinal evidence shows that exposure to alcohol advertising during adolescence is associated with earlier initiation of drinking and a greater likelihood of heavier consumption patterns.**⁶

3. How do current provisions operate in practice to limit exposure?

From a prevention perspective, the effectiveness of advertising restrictions depends on how provisions operate in practice to limit exposure. Several structural features of the Code are relevant in this regard.

Timing and classification-based restrictions

Time-based restrictions are intended to limit exposure during periods when children are more likely to be watching. However, their effectiveness depends on how classification rules interact with programming and associated advertising provisions. Sports programs, along with news and current affairs, are not subject to standard classification requirements and may be broadcast at any time. In addition, alcohol advertising may be permitted in connection with sports programming outside standard time-based restrictions.

This interaction means that high-reach programming can fall outside the usual structure used to limit advertising exposure. Evidence indicates that regulatory approaches relying on partial restrictions, including time-based provisions, may not fully limit exposure in practice.⁸

From a prevention perspective, this suggests that **time-based restrictions may not consistently limit exposure where exemptions allow advertising in widely viewed programming such as sport.**

Sports programming provisions

The Code explicitly permits alcohol advertising in connection with sports programming, including during weekends and public holidays. The definition of “weekend” extends from 6 pm Friday through to midnight Sunday, effectively expanding the window during which such advertising may occur.

Given the large and diverse audiences associated with sporting events, this design feature concentrates exposure within high-reach contexts. Evidence indicates that the association between alcohol marketing and sport is linked to increased consumption and more favourable attitudes toward drinking.⁷

From a prevention perspective, this concentration of advertising within widely viewed programming may reduce the effectiveness of restrictions intended to limit population-level exposure. **Where alcohol marketing is embedded within sport, exposure is both repeated and normalised, particularly for younger audiences.**⁷



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Scope of advertising captured

The Code distinguishes between traditional advertising and other forms of commercial content. Product placement and commercial integration within programs are not counted within advertising limits.

From an exposure perspective, this means that audience contact with alcohol-related branding is not limited to discrete advertising slots. Evidence on alcohol marketing highlights the cumulative impact of repeated exposure across multiple channels and formats, including embedded and integrated content.⁸

In addition, emerging evidence suggests that branding associated with zero or low alcohol products may reinforce recognition and appeal of parent alcohol brands, particularly among younger audiences.⁹

Taken together, this indicates that current provisions may not fully capture the range of alcohol-related marketing to which audiences are exposed, and therefore may underestimate total exposure.

Consistency across platforms

The Code applies to broadcast television services, while material delivered via online platforms is not covered. As viewing patterns increasingly span broadcast and on-demand environments, differences in how restrictions apply across platforms may influence overall exposure.

From a prevention perspective, **inconsistencies in how advertising restrictions apply across platforms may reduce their overall effectiveness, particularly where exposure can occur across multiple viewing environments.**

4. Overall assessment of current safeguards

Taken together, these features suggest that while the current Code establishes a framework for restricting alcohol advertising, there are limitations in how effectively it limits exposure in practice.

In particular, the interaction of classification rules, sports programming provisions, exemptions for certain forms of marketing, and differences across platforms may result in continued exposure in high-reach contexts, including among younger audiences.

This is relevant to the assessment of whether the current provisions provide appropriate community safeguards.

5. Regulatory considerations

Under the co-regulatory framework, industry codes are expected to provide appropriate community safeguards. Where there is evidence that these safeguards are not operating effectively in practice, further regulatory consideration may be warranted.



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In this context, strengthening regulatory approaches may assist in ensuring that advertising restrictions more effectively limit exposure and align with current evidence on prevention.

Conclusion

Alcohol advertising is a modifiable environmental influence on consumption, and its regulation is an important component of a comprehensive prevention approach. Evidence indicates that exposure to alcohol marketing shapes attitudes, norms and increased drinking behaviours over time, particularly among young people, contributing to associated harms such as injury, risk-taking behaviours and other acute alcohol-related harms.

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This submission has highlighted several features of the current Code that are relevant to how advertising restrictions operate in practice, including the interaction of time-based provisions with programming exemptions, the concentration of advertising within sports contexts, the scope of marketing captured, and differences in how restrictions apply across platforms.

Taken together, these factors suggest that the current Code may not fully provide appropriate community safeguards in practice.

In this context, we recommend that ACMA consider strengthening regulatory approaches, including whether a program standard may be required, to ensure that advertising restrictions operate effectively and align with contemporary evidence on prevention.

Sincerely

Professor Jacqueline Bowden

Director, National Centre for Education and Training on Addiction

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