16 October 2026

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ATTN: Ms Nerida O'Loughlin
Chair and Agency Head
The Australian Communications and Media Authority (ACMA)
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To Ms Nerida O'Loughlin

Subject: Review of alcohol advertising rules in the Free TV Code

Healthway is pleased to provide our response to the *Review of Alcohol Advertising Rules in the Free TV Code*.

Protecting Australians, especially children and young people, from alcohol harm is a priority for Commonwealth and State Governments. The evidence shows that the current industry-developed Code for managing alcohol advertising on TV does not provide appropriate community safeguards. Community expectations are clear — multiple surveys show Australians support less alcohol advertising on TV. Most recently, a public opinion survey in 2026 showed that three quarters of people surveyed agree that there should be less alcohol advertising on television. A program standard that legislates the advertising of alcohol on TV is an appropriate action to safeguard the community.

In addition to this submission and our recommendation, Healthway offers its continuing support to maximise opportunities for preventing harm caused by alcohol products to improve the health and wellbeing of all Australians, and particularly the Western Australian community.

Should you wish to discuss any aspect of our submission further, please do not hesitate to contact me on 08 9488 6839 or email carina.tan-vanbaren@healthway.wa.gov.au.

Yours sincerely

Carina Tan-Van Baren
Executive Director, Healthway

GOVERNMENT OF WESTERN AUSTRALIA

healthway

Review of alcohol advertising rules in the Free TV Code, 2026

Submission



Creating a healthier WA together

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Submission: Review of alcohol advertising rules in the Free TV Code, 2026

About Healthway

Healthway is a State Government agency dedicated to health promotion and preventative health efforts in Western Australia (WA). Our interest in this review focuses on prevention of harm from alcohol products, in line with our Strategic Plan 2024-2029*: Creating a heathier Western Australia together.*

Healthway partners with arts, sports, motor racing, research and community organisations, as well as schools, to fund community programs and high-quality health promotion research to support good health and wellbeing in the community. It is a requirement of Healthway funding that organisations do not receive financial or other support from the alcohol industry or promote alcohol products or brands.[3]

Conflicts of interest declaration

Healthway declares no conflicts of interest in relation to this submission. It is an independent statutory body with its own Act,[4] Board[5] and government funding.[5] Healthway has never accepted funding support in any capacity from the alcohol industry, or any third-party allies.

Definitions and language

Healthway uses constructive and inclusive language that reflects best practice evidence to help reduce stigma and negative stereotypes and promote help-seeking. Alcohol is a drug, rather than an everyday consumable product. In this submission, we refer to 'alcohol products' instead of 'alcohol consumption' to treat alcohol as a harmful product. Definitions are available in the Healthway Glossary.

Submission: Review of alcohol advertising rules in the Free TV Code, 2026

Overall recommendation

The existing industry-developed Code does not provide adequate community safeguards, especially for children. A government-led 'program standard' is needed to manage alcohol advertising during free-to-air television broadcasting.

Alcohol advertising contributes to the normalisation of alcohol as an everyday product, rather than as a harmful product.[6-8] Based on the evidence in the forthcoming pages, the current co-regulatory approach[9, 10] for alcohol advertising on free-to-air television (TV) is not providing adequate community safeguards or meeting community expectations.[2, 11]

In particular, it is clear that, under the current Code, industry has failed to strengthen protections for children from alcohol advertising. Children continue to watch alcohol adverts on TV regularly.[12, 13] Young people continue to be a key target for alcohol advertisers,[14] normalising alcohol products to young people.[15]

Given this, a program standard (i.e., a legally binding legislative instrument under s125 of the *Broadcasting Services Act 1992*) that mandates specific requirements for commercial TV broadcasters[10] would be more appropriate.[16] A program standard should be developed using a government-led process, based on the best available independent evidence that prioritises public health. At minimum, the program standard should reduce permitted alcohol advertising hours, remove any exemption for alcohol advertising during sports programming, and capture all forms of alcohol marketing seen on broadcast TV, inclusive of program sponsorship, master brand advertising and zero-alcohol products. The scope should be inclusive of all commercial broadcasters' services, including broadcast video on demand (BVOD) channels such as 7Plus and 9Now.

Context

In 2024, an estimated 1,765 people died in Australia because of alcohol[17] – 33 people per week.[17] This is the highest rate of alcohol-induced death in Australia in more than 20 years.[18] Most deaths from alcohol are longer-term conditions caused by alcohol products, such as liver cirrhosis, rather than the immediate impacts of alcohol.[17]

A significant influence on the culture and normalisation of alcohol is the pervasive advertising of alcohol products.[15]

The World Health Organization recommends implementing comprehensive bans and restrictions on alcohol advertising, promotion and sponsorship as a way to reduce exposure and related harms.[19] Comprehensive restrictions on exposure to alcohol advertising is one of its three 'best buys' to reduce the harmful use of alcohol.[20] Globally, some jurisdictions have achieved advertising restrictions on alcohol.[21] For example, Finland, France, Ireland, Lithuania, Norway and Sweden have all banned alcohol advertising in specific settings or forms of media, and most restrict the content of alcohol advertising — resulting in reductions in exposure to alcohol marketing, alcohol sales and early death.[21]

In Australia, the National Preventive Health Strategy 2021–2030[22] sets an ambitious target to reduce underage drinking to less than 10 per cent by 2030. The Federal Government's report on prevention approaches to end family and domestic violence (FDV)[23] has recommended alcohol advertising be restricted during sporting events to prevent harm. Achieving these goals will require stronger regulatory measures, including limits on alcohol advertising.[24]

Currently, restrictions on the advertising of alcohol products are managed through the Commercial Television Industry Code of Practice (the Code)[16]. The Code was developed by Free TV Australia, the peak industry body representing commercial TV broadcasters.[25] A key function of Free TV Australia is to advocate for the interests of free TV broadcasters.[25] The fiduciary duty of the free TV industry is to maximise profits for shareholders.[26]

By comparison, the role of the Australian Communications and Media Authority (ACMA) under the Federal Government, is to regulate Australian communications and media services and ensure consumer safeguards are in place.[27]

In the context of advertising of harmful products such as alcohol, industry-managed systems have been shown to be ineffective.[28] The Code has been criticised as supporting the profits of the TV and alcohol industry over public health, for example, creating loopholes for sport that expose children to alcohol advertising and creating loopholes for master brand and zero-alcohol product adverts.[26] It is therefore in the public interest that the current industry-developed Code is replaced by a Government-led standard, to protect the health and wellbeing of consumers of free-to-air TV.

We have structured our response to address each of the terms of reference.

Term of reference 1: The operation and outcomes of current Free TV Code provisions, including the volume, frequency and placement of alcohol advertising in sport and non-sport programming on commercial TV.

Prevalence of alcohol advertising, key issues for community safeguarding with the Code.

The Code has been in place since 2015. In this section, Healthway presents the key issues relating to its application, resulting in significant volume, frequency and placement of alcohol advertising in sport and non-sport programming.

Prevalence of alcohol advertising on free-to-air TV

More than half of Australians watch live free-to-air TV on a weekly basis.[29] Researchers reviewed alcohol advertising placement over a one year period from November 2018 to October 2019[30] and found that the top 10 alcohol advertisers placed an average of 179 alcohol ads per day (66,298 over 53 weeks) on free-to-air TV in major Australian metropolitan areas.[30] Of these advertisements, almost half (45%) of ads were shown during viewing times where children were highly likely to be watching and 16% (10,660) were during sport broadcasts.[30]



The impact of this advertising, particularly among younger audiences, is demonstrated by research including a Healthway-funded survey by Curtin University researchers in 2024.[31] The researchers surveyed 102 young people aged 18 to 25 years in WA[31] and found that seven in 10 participants recalled seeing alcohol advertisements 'sometimes' or 'often', with strongest recall for TV and streaming services.[31] This study concluded that alcohol industry marketing was normalising alcohol product use among young people.[31] Several earlier studies in Australia have confirmed similar findings.[12] For example, teenage children were exposed to an average of around four alcohol advertisements per week on Australian Free-to-Air TV.[13] Teenage children aged 13-17 years old were exposed to similar volumes of alcohol advertisements as 18-24 year old young adults.[13]

Widespread advertising of alcohol floods the information environment, creating an alcogenic environment.[7] An alcogenic environment has been defined as "…settings characterised by high alcohol consumption, easy access to alcohol, and permissive alcohol marketing and supply, which collectively normalise [alcohol] drinking behaviours".[32]

Key issue 1: Overall failure to protect young people from alcohol advertising

As noted by ACMA, Free TV Australia's public consultation on the draft Code surfaced long-standing concerns about the existing alcohol advertising rules.[33] Existing advertising regulations and policies have proven ineffective, failing to protect young people and keep up with the contemporary media and communications landscape.[34]

A study of industry-developed alcohol advertising rules globally found that self-regulations were consistently violated, for example, by containing themes considered inappropriate for children, adolescents and other vulnerable populations.[12,13] Researchers reviewing alcohol industry internal documents concluded that '"…self-regulatory codes do not protect young people; they just hone the advertiser's skills – either in camouflage or creativity."[14]

In 2006, children from primary and secondary schools in WA were asked about their recall of the character "Bundy R. Bear" – used in advertising of Bundaberg Rum.[35] Three-quarters of children recognised Bundy R. Bear.[35] By comparison, a similar proportion of children recognise Mickey Mouse – highlighting that alcohol brands were reaching children with the same impact as tailored children's content.[36] Twenty years on from this study, alcohol advertising is still reaching children through regular advertising. While regulation of advertising content is outside of the scope of the current review, the evidence provided here strengthens the need for ensuring the separation of alcohol advertising from times where children are likely to be watching TV.

Key issue 2: Loophole for sporting broadcasts

One quarter of alcohol ads on TV are shown during sport broadcasts.[37] At any time of the day, including when children are more likely to watch TV, it is not possible to enjoy a sports game without alcohol advertisements, as live sport is exempt from the time-based restrictions in the current Code.[16] In addition to live sport loopholes, there are further time-based loopholes for 'sports programs' – including sports replays and highlights, commentary, analysis, interviews and ceremonies.

For context, see Table 1 for a summary of the general time-based restrictions included in the current Code[16] and proposed revised Code in 2024[38] that was rejected by ACMA. The time-based restrictions shown in Table 1 are the permissible times for alcohol commercials on TV, but they do not apply during live sport events nor during 'sports programs' from 6pm on Friday night to midnight on Sunday. The draft revised code, that was rejected in 2024 by ACMA, would have led to considerably larger alcohol advertising windows.

Table 1: Summary of time-based restrictions for general programming, in the Code.

Current code[16]	**Draft revised code, rejected by ACMA**[38]
School Days 12 noon to 3.00 pm 7.30 pm to 6.00 am	*All days* 10:00am and 3:00pm 7.30pm and 6:00am
Weekends and School Holidays 7.30 pm to 6.00 am	
Public Holidays 7.30 pm to 6.00 am	

The sports loophole provides an exemption resulting in children and young people's exposure to alcohol advertising during daytime hours when watching sport.[39] Analysis of the free TV coverage of the 2017 Australian Football League (AFL) Grand Final revealed 50 marketing episodes for beer, wine, cider or alcohol retailers.[40] Marketing episodes - defined as a brand, name, logo, slogan or readily identifiable imagery or messaging - were clearly visible for at least one second per exposure.[40] The study demonstrated that viewers were exposed to one episode of alcohol marketing every 2 minutes and 32 seconds.[40] Typical AFL or National Rugby League (NRL) broadcasts have been found to have one or two alcohol advertisements on TV per game, without counting the presence of logos, banners in-stadia or on-jersey, highlighting the need for comprehensive approaches to regulating alcohol marketing.[41] There is no indication of any reduction in alcohol advertising exposure since this study.[42]

The utility of sport as a vehicle for marketing harmful products is well established.[7, 8] Sportswashing is defined as the exploiting of the credibility, emotion and cultural power of sport to normalise harmful products.[43, 44] When alcohol is advertised during sporting events, it creates a highly problematic association between healthy activities and alcohol.[45] Australia's unhealthy and deeply embedded relationship between alcohol and sport is reinforced through extensive advertising and sponsorship arrangements, as recently highlighted by WA's Commissioner for Children and Young People.[46]

> *"**The relationship between sport and alcohol in the Australian community is strong and many children and young people are exposed to this from a young age,** from witnessing parents and caregivers consuming alcohol within their homes and communities, to **seeing advertising from alcohol companies on television**, at sporting events and in other community spaces. The association is consistently reinforced through alcohol companies' advertising and sponsorship of sporting events, consumption by spectators and in post-game celebrations."*
>
> Commissioner for Children and Young People, Western Australia[46]. (Bolding emphasis added)

Sportswashing has been addressed previously in relation to tobacco, where the reach of that product was curtailed through a tobacco advertising ban.[47]

There is compelling evidence that violence against women and children spikes during milestone sporting events, when alcohol ads on TV are most frequent.[45, 48-51] Women and children are at particular risk of harm during live sports broadcasts and events, including aggressive behaviour, physical violence, verbal abuse and increased incidents of family and domestic violence (FDV).[23, 45, 48-53] Alcohol has been identified as a key contributor to increasing the frequency, severity, and likelihood of physical injury in violent incidents.[50, 54] In response to this evidence, a 2024 rapid review for the Federal Government recommended stricter regulations to prevent domestic, family, and sexual violence, including calls for Federal, state and territory governments to tighten controls on alcohol marketing, particularly during sporting events.[23]

Restricting alcohol advertising during sporting broadcasts[23], particularly during family viewing times, would go some way to reducing exposure to alcohol marketing to children and young people, the unhealthy association of alcohol product use and sport, and related harms including exacerbation of family and domestic violence.

Key issue 3: Loopholes for narrow definition of 'Commercial for Alcoholic Drinks' and Sponsoring programs

The Code defines an alcohol commercial narrowly.[16] For example, the definition includes an exemption for 'program sponsorship' announcements for alcohol, provided the announcement makes no reference to the price of the alcohol (see section 8, page 23 of the Code[16]). This is a significant loophole that allows for master brand advertising and adverts that don't include a price. Another exemption is for zero and low-alcohol products (below 1.15% ABV). The Code also includes an exemption loophole for licensed restaurant or club, entertainment venue, tourist attraction or dining establishments that directly promotes the use or purchase of alcoholic drinks. It is unclear why the Code includes such exemptions and no rationale is provided to justify them. Clearly these exemptions lead to more children and young people being exposed to adverts promoting alcohol brands.

Key issue 4: Undermining public health messages

While alcohol product use among people under 18 years in Australia has declined in recent years, there are concerns that ineffective controls on alcohol advertising may undermine this trend.[18] Free-to-air TV is a channel used for public health campaigns, including those aimed at preventing and reducing high risk alcohol product use, such as the 'Alcohol. Think Again' campaign in WA (see Box 1).[55] The impact of those campaigns is undermined when they are seen alongside ads for alcohol.[55, 56] Widespread advertising of alcohol products continues to undermine public health messages for young people.[55, 57, 58]

Box 1: **Alcohol. Think Again**

The Alcohol. Think Again[55] public education program is delivered in WA by the Mental Health Commission in partnership with Cancer Council WA. Campaigns are delivered via statewide, TV-led media strategies designed to maximise exposure and promote behaviour change across three streams: Alcohol and Health (Figure 1); Alcohol, Parents & Young People (Figure 2); and Alcohol & Pregnancy (Figure 3).[55]



Figure 1: 'What's your poison?' campaign highlights alcohol as a cause of cancer.[1]



Figure 2: 'We all need to say no' campaign raises awareness that no one should give alcohol to under 18s.[1]



Figure 3: 'Amazing' campaign encourages people to abstain from alcohol during pregnancy.[1]

Public health messaging forms only a small proportion of total advertising on free-to-air TV[40], as alcohol companies are able to spend large amounts of tax-deductible[59] money on advertising, putting them at a significant financial advantage.[30] A study of Australian adolescents found they were regularly exposed to alcohol advertising, typically being exposed to an alcohol advertisement every other day.[57]

The introduction of a Government-led standard is an opportunity to create an advertising environment more conducive to airing evidence-based public health campaigns that are in the public interest.[6] Research has shown that industry developed campaigns through Social Aspects/Public Relations Organisations (SAPROs) are less effective than campaigns developed by public health organisations.[60] SAPROs often present themselves as 'independent' charities and nonprofit companies, despite being almost entirely funded by the alcohol industry.[60-62]

Community sentiment towards alcohol advertising

There is strong and ongoing community concern regarding the lack of regulation of alcohol marketing in Australia, demonstrated across multiple surveys.[2, 11, 63] In 2023, findings from a national survey found that most Australians are worried about the volume of alcohol advertising, particularly during sports broadcasts, on TV, billboards and across social media.[2] The research also found 75% of Australians believe alcohol companies should not be allowed to set their own advertising rules, with only 6% opposing greater oversight.[2] There was also widespread support for restricting alcohol advertising on TV and streaming services when children are likely to be watching.[2]

77% of Australians support restricting alcohol advertising on TV during times when children are likely to be watching, including during live sports broadcasts.[2]

Another poll in January 2026 had similar findings that the Australian community wants to see stronger protections on alcohol advertising.[11] In particular:

- 75% of Australians support less alcohol advertising on TV (only 8% oppose)
- 82% of Australians agree that alcohol advertising should be restricted during children's viewing hours, even during live sports broadcasts (only 6% disagree).[11]

Term of reference 2: Available data and research that is directed towards establishing a direct or indirect link between alcohol advertising on television, increased alcohol consumption and broader social harms

Alcohol advertising, normalisation, alcohol product use and harms

In this section, Healthway reviews available evidence on alcohol advertising on TV in relation to normalisation, alcohol product use and alcohol product harms.

Alcohol product use and harms

In Australia, 1,765 people die each year because of alcohol[17] – equating to 33 people per week.[17] This is the highest rate of alcohol-induced death in more than 20 years.[18] Alcohol product use is the sixth leading risk factor for disease in Australia, alongside overweight and obesity, tobacco use, dietary risks, high blood pressure and high blood glucose.[64]

Alcohol has well-documented links to numerous health (Figure 4) and social harms,[65, 66] including as a cause of at least 7 types of cancer[67], heart and liver diseases,[65] fatal road traffic crashes[68], drownings[65], suicide and self-harm behaviours[18]. Alcohol puts pressure on healthcare systems.

In WA, alcohol is responsible for more than 400 hospitalisations each week.[69] Around one in five Saturday-night emergency department presentations are alcohol-related.[70] Around 40% of alcohol and other drug treatment episodes are for alcohol as a primary drug of concern.[71]

Alcohol not only causes harm to the drinker, but also to those around them. In 2025, a study found that one in two people were negatively affected by another person's alcohol product use.[72] For example, alcohol is often a factor in FDV[23, 50, 52], with violence against women and children spiking during milestone sporting events, when alcohol adverts on TV are most frequent.[49, 51, 53] Alcohol has been identified as a key contributor to increasing the frequency, severity, and likelihood of physical injury in violent incidents.[50, 54] Alcohol-related violence represents a substantial and

ongoing harm in WA, with approximately 180 alcohol-related family violence assaults occurring each week.[73, 74]

More than three-quarters (77%) of Australians drink alcohol. Nearly one third (31%) of the population that uses alcohol products do so at high-risk levels.[75] The National Health and Medical Research Council's Australian Guidelines to Reduce Health Risks from Drinking Alcohol (Guidelines) recommend that healthy adults should drink no more than 10 standard drinks per week, and no more than four standard drinks on any single day, to reduce the risk of alcohol-related harm, injury and disease.[65] The Guidelines recommend that people under the age of 18 should not drink alcohol.[65] While alcohol product use among young people has declined in Australia, those who do drink often do so at high-risk levels, resulting in 5.5% of 14–17 year olds drinking at levels considered high risk for an adult.[76]

The power of alcohol advertising

Advertising forms part of marketing, which is one of seven overlapping commercial sector practices for unhealthy commodities.[8] Marketing as a practice serves two broad functions.

The first function is to influence behaviours, that is, to increase demand for and purchasing of products.[8, 77, 78] There is consistent evidence that children and young people's exposure to alcohol-related content increases early initiation to drinking, risky behaviours and harmful drinking patterns.[34, 77-82] For example, a recent systematic review by researchers in New Zealand found that children were widely exposed to alcohol marketing and this has a role in shaping attitudes and behaviours leading to alcohol consumption.[82] Taken together, advertising is a key driver of alcohol use.[15]

The second function is to frame alcohol as a normal everyday product and to reduce the demand for public health laws.[7, 8] This framing includes 'denialism' (for example, that alcohol is not unhealthy), 'post-denialism' (for example, that alcohol is good for you), and 'normalisation' of alcohol (for example, that it's always been part of our culture).[7, 14] Together, these advertising frames shape societal attitudes by emphasising a "drink responsibly" narrative that can crowd out support for public health laws[83-85], such as a minimum unit price.[7, 8] Together, marketing helps frame and shape attitudes that alcohol is about 'problem drinkers' (shifting responsibility) and that solutions can be developed through industry-government partnerships, such as DrinkWise.[60-62] Researchers from Cancer Council Victoria have shown that alcohol harm reduction advertisements developed by the alcohol industry using Social Aspects/Public Relations Organisations (SAPROS) reported lower motivation to reduce alcohol consumption compared to those developed by public health organisations.[8, 60, 86]

Alcohol can be advertised at the product or retailer level, or as master brand advertising for a parent company or brand name. Research into promotion of zero-alcohol (a beverage containing less than 0.5% alcohol by volume) products reveals that master brand advertising is being used to shape societal attitudes. For example, one study by Australian researchers in 2024, that surveyed Australian adolescents, found that those who see and like zero-alcohol advertisements have more favourable attitudes towards parent alcohol brands.[87] Zero-alcohol advertisements are effectively serving as surrogate alcohol marketing.[87] A study interviewing parents of 12-17

year olds in 2021 revealed that parents are concerned about alcohol companies exposing children to zero-alcohol adverts and normalising alcohol brands.[88]

Other studies have reviewed comments about zero-alcohol products by major beer companies in online publications.[89, 90] Healthway-funded research conducted by researchers in Western Australia reviewed beer companies' public-facing comments and industry-facing comments. The public-facing comments framed zero-alcohol products as tools for moderation and corporate social responsibility initiatives, whereas industry-facing channels emphasised the opportunity to increase profits by expanding markets and targeting new drinking occasions.[89] This research provides strong evidence that alcohol industry tactics "not only fail to reduce harms from alcohol but are actively used to influence the framing of alcohol issues in line with industry interests, mitigating regulatory pressures and negative public perceptions to drive product acceptability and desirability".[89] The research concluded that established alcohol brands appear to be using the marketing of zero alcohol products sharing alcohol brands to promote alcohol branding in new drinking contexts. This highlights the importance of a comprehensive government-led approach to the development of a program standard that does not include loopholes, for example, for zero/low alcohol products or brand-only advertising.

Building community sentiment for alcohol harm prevention

Policy change is essential to alcohol control. The *Integrative Public-Policy Acceptance* (IPAC) framework[91] outlines six key components to the acceptance of a policy. These are outlined in Table 2, adapted from the original framework[91]. Public education campaigns are a tool for raising awareness of alcohol harms, such as Alcohol. Think Again[55], whereas alcohol advertising is a tool for widespread normalising of alcohol products. Therefore, reducing advertising is a goal of building policy acceptance – by reducing competing messaging for harmful product advertising.

Table 2: Definitions of the IPAC Framework's key components and examples of its application to the acceptance of an example alcohol product policy (adapted from source[91])

Component	Definition	Example: laws to cap alcohol outlets
Problem awareness	The extent to which people are aware of or concerned about a certain politically relevant problem.	The extent to which people are aware that alcohol is an issue for public health and the economy, crime and other related issues.
Support seeking characteristics	Personal characteristics that affect people's desire for governmental support in a certain domain, that is personal and political attitudes and beliefs, such as trust in government and the extent to which people attribute control and responsibility to government versus themselves.	The extent to which people trust the government to act in a way that promotes their health and wellbeing in the context of alcohol harm prevention. The extent to which people attribute control and responsibility to mitigate alcohol harm to the government versus themselves.
Desire for governmental support	The extent to which people are motivated to seek support from the government in a certain politically relevant domain.	The extent to which people are motivated to desire governmental support to reduce population levels of alcohol product use.
Policy qualities	How people evaluate a specific policy regarding certain qualities, including the effectiveness, transparency, intrusiveness, perceived fairness, costs, and benefits attached to the policy, that is how transparent, effective, fair and intrusive people perceive the policy to be.	The extent to which people perceive that a law to cap alcohol outlets is transparent, effective, fair, non-intrusive and a better option as an alcohol control measure.
Policy acceptance	The extent to which people accept the introduction of a specific public policy addressing a certain politically relevant problem (attitudinal component).	The extent to which people accept a law to cap alcohol outlets to reduce alcohol product harms.
Policy compliance	The extent to which the policy is effective.	The extent of alcohol outlets.

Footnote: table adapted from source.[91]

Term of reference 3: The economic contribution of alcohol advertising on commercial TV.

Alcohol advertising as a driver of avoidable economic costs

In this section, Healthway discusses the revenue for free TV companies in the context of the economic harms of alcohol advertising on public health outcomes.

Alcohol marketing is often defended on economic grounds, particularly its purported revenue and job creation value, but arguments that stronger regulation of alcohol advertising would damage the economy are not widely supported by evidence.[92] The preliminary results of economic modelling, conducted by researchers from Deakin University, for a comprehensive ban on alcohol advertising across all media, found that such a policy would generate long-term healthcare savings that exceed implementation costs.[92]

Alcohol advertising provides just a fraction of TV networks' overall revenue, ignoring the economic reality that the much larger costs related to alcohol harm are borne by the public, not the advertiser or TV company.[6, 92, 93]

Advertising revenue

In 2019, alcohol ads on metropolitan TV generated an estimated $42.3 million in revenue for four major free-to-air TV providers (listed below).[30] About one third of these alcohol ads on free TV ($14.4 million annually) were during sports broadcasts.[30] In 2018-2019, the revenue from alcohol advertising in metropolitan areas for free-to-air TV networks was as follows[30]:

1. Seven Network – $20.8m (more than half of which was during sport broadcasts)
2. Nine Network – $14.8m
3. Network 10 – $5.4m
4. Special Broadcasting Service – $1.3m

By reviewing Seven Network's annual report[94], it is clear that alcohol advertising represents a small fraction of the total revenue from TV advertising — $1.1 billion (specifically, $1,081,364,000). That is, alcohol advertising represents less than 2% of TV advertising revenue for Seven Network.[94]

To put revenue from alcohol advertising in perspective, Figure 5 illustrates the size of the ad revenue in comparison to the intangible and tangible economic costs of alcohol product use in Australia, as well as taxation revenue.[95] As shown, ad revenue for the TV industry is dwarfed by the economic harms of alcohol, as well as the revenue from taxation of alcohol.

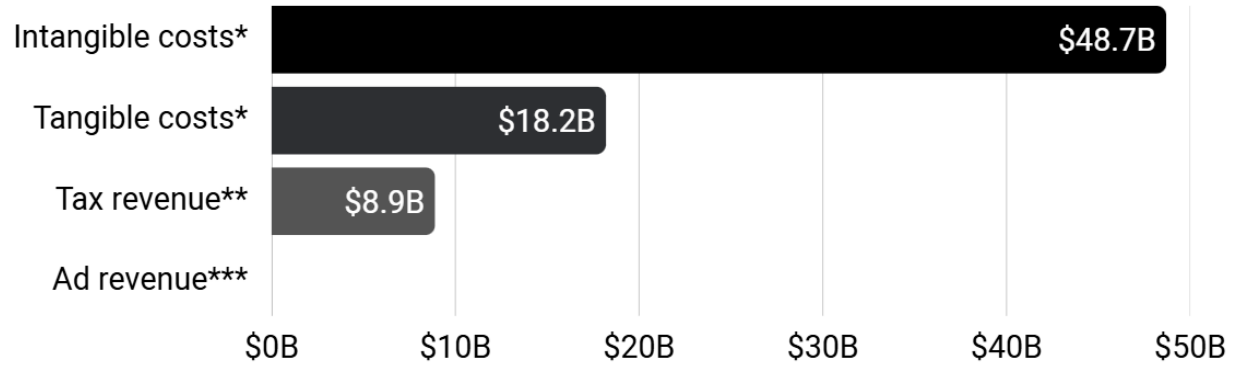


Figure 5: A comparison of the government tax revenue, free-to-air TV ad revenue, and tangible and intangible economic costs of alcohol product use in Australia. The data is unadjusted data for inflation.

Footnotes: *Intangible economic costs of alcohol in Australia ($2017-18)[96], *Tangible economic costs of alcohol in Australia ($2017-18)[96]; **Tax revenue on alcohol in Australia ($2024-25)[95]; ***Revenue from alcohol advertising on free-to-air TV in Metropolitan areas ($2019)[30] - noting the value ($0.04B) is not visible on this scale.

Government revenue from alcohol taxation was $8.9 billion in 2024-2025.[95] The relatively small amount spent on alcohol ads on TV,[30] suggest an opportunity for government to use some of the alcohol tax revenue to consider a time-limited buy-out (e.g., 3-5 years) for unhealthy alcohol advertising, to partly or completely replace it with public health messaging. This would support the commercial TV industry to diversity revenue streams, by smoothly transitioning away from any purported dependence on alcohol advertising. For example, the legislation that established Healthway dictated that Healthway was "to provide [some of its] funds to replace tobacco advertising with health promotion advertising".[97] If a small proportion of the revenue from alcohol taxation were used to fund, in a time-limited way, government-funded public information campaigns, these could be used to raise awareness of the immediate benefits of the policy to reduce alcohol advertising on TV. It could also be used to raise awareness of the harms of alcohol products, to build further policy acceptance for public health laws.

Economic harms

The economic harms from alcohol are far larger than the revenue from the alcohol advertising industry. The annual costs related to alcohol harm in Australia in 2017-18 was estimated to be $67 billion.[96] The economic harms of alcohol comprise both tangible and intangible costs, at $18 billion and $49 billion, respectively.[96]

Tangible costs include those in which a market price exists as they can effectively be traded in the market economy. These include the value of lost expected lifetime labour in paid employment; costs to employers of workplace disruption; the lifetime value of lost labour in the household; and medical expenditure by government. Intangible costs are those costs that cannot be traded such as the value placed on the lost years of being alive.

A further $42.7 billion in tentative costs were not included in the total – these related to workplace presenteeism, harms to others (partners and children), and fetal alcohol spectrum disorder. Figure 4 provides a further breakdown of the tangible and intangible economic harms of alcohol overview.

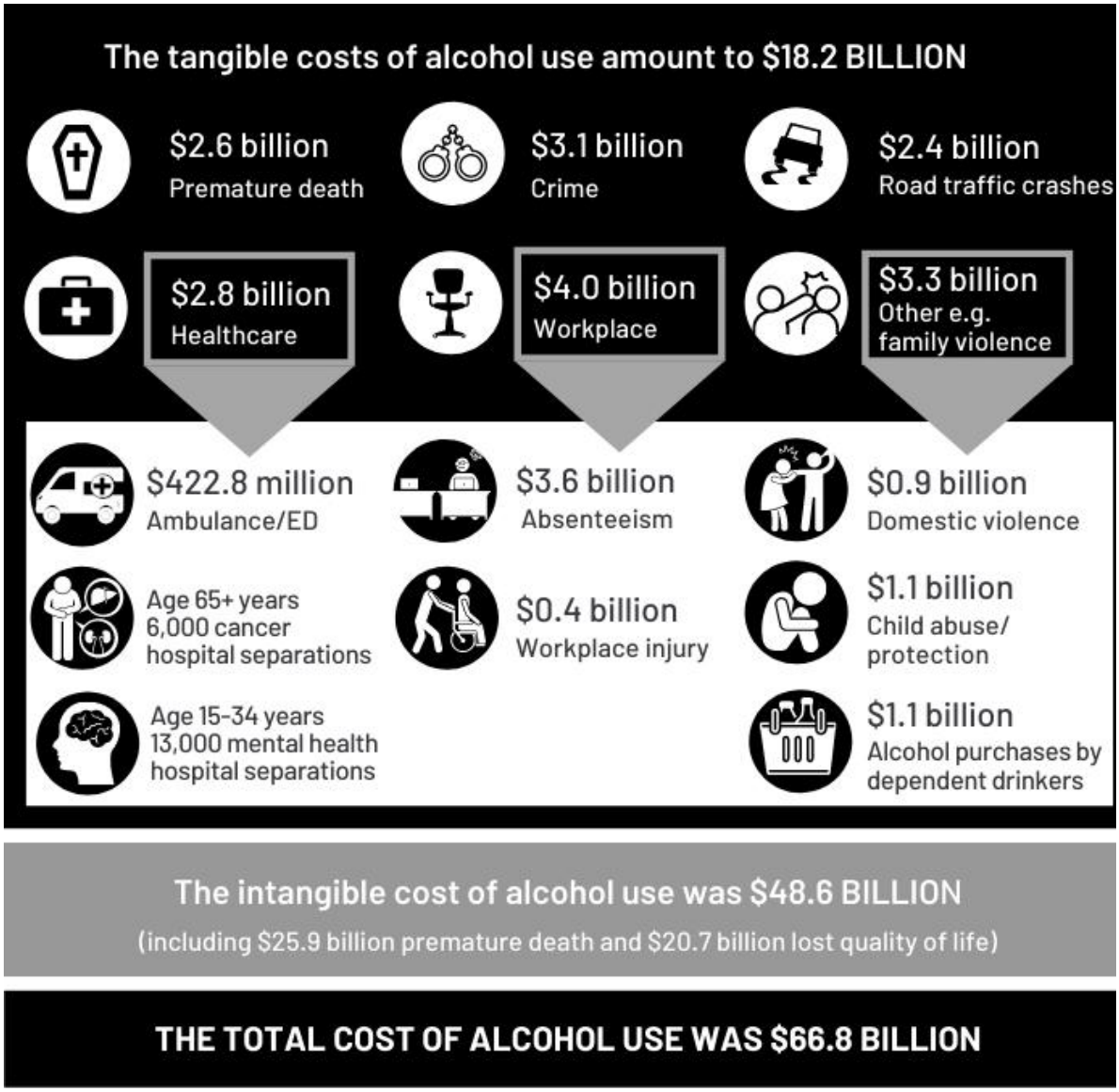


Figure 4: The annual economic harms of alcohol in Australia (year). Reproduced from original source: Examining the Social and Economic Costs of Alcohol Use in Australia: 2017/18. Perth, WA, National Drug Research Institute, Curtin University[96]

Tax and advertising

Alcohol companies use advertising as a corporate tax deduction.[59] Because advertising is tax-deductible as a business expense, the Federal Government is subsidising the promotion of a product associated with significant social and economic harm.[98] For example, according to the Australian Taxation Office Corporate Transparency Report[99], in 2023-2024, rather than paying the 30% corporate tax rate ($206.1 million), Diageo Australia Limited paid an effective rate of 3.6%, representing a tax subsidy of $182.1 million.[99] Bundaberg Brewed Drinks PTY LTD paid 0.35% tax and Coopers Brewery Limited paid 2.78%. From a review of freely available public financial records, it is not clear how much advertising spend was used as a tax deduction in these two examples. Reviewing the tax deduction eligibility for health-harming product

advertising could also be considered by government as part of broader reforms for unhealthy products, in addition to implementation of a program standard for advertising.

Anticipating alcohol industry and TV industry response

Given the fiduciary duty[26] of companies to prioritise profits for shareholders, any restrictions on advertising that threaten alcohol product profits and TV industry profits will be hard fought by both industries. The current approach of seeding doubt about the community and economic impacts of banning alcohol advertising was a long-standing tactic used by Big Tobacco (see Figure 5) in earlier debates about tobacco advertising. However that industry's fearmongering, including claims there would be "no more Test cricket in Perth", was proven to be unfounded following the ban on tobacco advertising[100]. Accordingly, an evidence-informed public health approach should be adopted to develop legislation for alcohol advertising.[101]



Figure 5: Examples of tobacco industry campaigns regarding the then proposed ban on tobacco advertising in Western Australia. Source[100].

Term of reference 4: In-stadia and integrated content advertising, such as alcohol advertising in sporting stadiums, signage on jerseys and sponsored collaborations within programming

Integrated alcohol advertising

In this section, we briefly review dynamic, fixed and integrated content advertising, such as alcohol advertising in sporting stadiums, signage on jerseys and sponsored collaborations within programming.

As mentioned above, a typical AFL or NRL broadcast features one or two video alcohol advertisements per game.[40, 41] However, this does not count the presence of all marketing episodes in-stadia or on-jersey. Marketing episodes can be defined as a brand, name, logo, slogan or readily identifiable imagery or messaging that is clearly visible for at least one second.[40] When other forms of alcohol advertising are counted, such as in-stadia and on-jersey marketing episodes, 50 alcohol ads per game can be counted, translating into viewers being exposed to one episode of alcohol marketing every 2 minutes and 32 seconds.[40, 41] It is clearly important that all types of alcohol advertising are included as part of a comprehensive approach to alcohol advertising regulations.

Box 2 outlines how local approaches to integrated alcohol advertising, taken by Healthway in WA, can be undermined when corresponding advertising regulations do not provide safeguards for community.

Box 2: **Healthway approaches undermined by current advertising codes**

Since 2009, Healthway has pioneered policy approaches to remove unhealthy sponsorship at the local and statewide levels using the Healthway's Co-Supporters Policy.[102] The policy outlines that "Healthway will generally not enter into funding agreements with organisations that have arrangements with co-supporters (direct, indirect, financial or in kind) resulting in the promotion of unhealthy brands [including alcohol]"[102]. All grant applicants and recipients must declare any existing arrangements with organisations that are associated with the promotion and/or supply of unhealthy brands or products, including alcohol.[102]

One example of the success of the Co-Supporters Policy was the removal of alcohol advertising from the Western Australian Cricket Association (WACA) Ground. The impact of this can be seen on the iconic WACA scoreboard in Figure 6 A and B below.



Figure 6: WACA scoreboard before (left, A) and after (right, B) removal of alcohol advertising due to Healthway's Co-Supporters Policy.

While the policy removes advertising of alcohol in relation to Healthway funded partners, it does not extend to other organisations not funded by Healthway. For example, for cricket, the national representative body (Cricket Australia) is exempt and can promote alcohol partnerships.

Stronger restrictions on alcohol advertising on TV would go a long way to enhancing Healthway's existing policy approaches to protect community wellbeing.

While the WACA is an iconic case study, the policy has been used in partnership with thousands of organisations since the policy was introduced in 2009.[102, 103]

Healthway also uses health messages to replace unhealthy messages. For example, the Healthway Perth Heat baseball team use the message "Alcohol. Think Again", see figure 7.



Figure 7: Healthway Perth Heat baseball team using the message Alcohol. Think Again.

Term of reference 5: Insights about alcohol advertising placement on mediums, including video-on-demand services, that is subscription video on demand, advertising-based video on demand and broadcaster video on demand.

Advertising placement on mediums

In this section, we provide insights on alcohol advertising related to video-on-demand services, including subscription-based, advertising-based and broadcaster video-on-demand (BVOD).

Healthway supports a comprehensive approach to regulating alcohol advertising across all mediums, including but not limited to TV, BVOD (e.g., 7Plus, 9Now, 10Play), video on demand (VOD, e.g., Netflix, Disney+), online, social media, radio, and out of home advertising.

An independent evidence-informed review of advertising is warranted across all modes of advertising of alcohol and other health-harming products, using evidence independent of commercial interests. However, such a review should not be used as justification to delay a new standard on free-to-air TV, given that TV is one of the largest advertising platforms for alcohol.[29-31] As TV remains a key platform for alcohol advertising, the current review of the Code is an important opportunity to introduce a program standard with stronger community protections.

Over the last decade, there has been a decline in free-to-air TV viewing, coinciding with an increase in on-demand and paid subscription platforms.[29] Despite this, the potential for broad reach and exposure to alcohol advertising on free-to-air TV remains. For example, a 2017 study of Year 7-12 students from Victoria found that TV (61%), the internet (56%) and sporting events (50%) were the most common channels for consuming alcohol adverts.[57]

Video On Demand

Viewer numbers are growing[29] on BVOD services, including internet-delivered catch-up and streaming services via channels 7Plus, 9Now and 10Play. The Code applies to live, free-to-air commercial broadcasting channels and not to BVOD.[16]

The community has made extensive complaints about alcohol advertising appearing during family friendly shows on BVOD services such as 7Plus, 9Now and 10Play (see Appendix 1). These complaints report alcohol advertising being placed during shows like The Today Show, Young Sheldon (rated PG) and The Chase (rated PG). It is clear that ACMA should include BVOD services under a new program standard to ensure the community is appropriately safeguarded from harms caused by alcohol advertising.

BVOD is excluded by regulation, *Broadcasting Services ("Broadcasting Service" Definition — Exclusion) Determination 2022*[104], from the definition of 'broadcast services'. Specifically, it states that[104]:

> *"For the purposes of paragraph (c) of the definition of 'broadcasting service' in subsection 6(1) of the Act, the following class of services does not fall within that definition: (a) a service that makes available television programs or radio programs using the internet, other than a service that delivers television programs or radio programs using the broadcasting services bands".*[104]

A 2022 consultation on the regulation failed to overturn this exemption for BVOD.[105] With the legislative exclusion of BVOD services from the Act due to end in September 2027, BVOD could be brought into a new program standard developed by ACMA over the next year.

In 2024 and 2025, ACMA publicly requested the commercial broadcasters to extend the Code to cover their BVOD services, but there has been no voluntary change to the Code by Free TV.

Appendix 1

Examples of Alcohol ads on broadcast video on demand services, collated by FARE.

All the alcohol ads listed below would not be permitted on live free-to-air TV at the times they were seen. However, as the Commercial Television Industry Code of Practice does not apply to BVOD, there are no rules preventing alcohol ads being shown during family friendly shows on 7Plus, 9Now, or 10Play.

Alcohol ad	Company	Program, channel, and time	Date of complaint	Complaint	Determination
Tooheys Beer	Lion – Beer, Spirits & Wine Pty Ltd	Lego Masters on 9Now (no time specified).	6 May 2024	Lego Masters is a show children watch, and alcohol ads should not be placed during it.	Dismissed
Tooheys Beer	Lion – Beer, Spirits & Wine Pty Ltd	Everybody Loves Raymond (rated PG) on 9Go at 6.26pm.	18 April 2024	Children would be watching	Dismissed
Penfolds Wine	Treasury Wine Estates	Australian Idol on 7Plus (no time specified).	28 April 2023	Alcohol ads shouldn't be aired when children are watching.	Dismissed
Brewery Duty	Lion – Beer, Spirits & Wine Pty Ltd	Home & Away (rated PG) on 7Plus (no time specified).	30 January 2023.	Home & Away is directed at children and teenagers.	Dismissed
Grey Goose Vodka	Bacardi Martini	The Today Show on 9Now at 8.35am.	13 January 2023	Why is alcohol being advertised at 8.30am – the segment of The Today Show following the ad featured children.	Dismissed
Hahn Beer, Uber Eats Alcohol Delivery	Lion – Beer, Spirits & Wine Pty Ltd	Carols in the Domain on 7Plus at 7pm.	2 January 2023	Was watching Carols in the Domain with 7- and 4-year-old daughters – the program is aimed towards families and children. Performers included The Wiggles, Cinderella, Mickey & Minnie Mouse.	Dismissed
Smirnoff Seltzer, Johnnie Walker	Diageo	10Play between 4.30 and 5pm, and The Amazing Race Australia on 10Play at 6.30pm.	8 and 24 November	10-year-old should not be exposed to regular alcohol ads during our occasional evening tv shows.	Dismissed
Smirnoff Seltzer	Diageo	Australia's Got Talent on 7Plus (no time specified)	17 October 2022	Advertising alcoholic drinks that appear as a 'normal' drinking during a family show is abhorrent.	Dismissed
White Claw Hard Seltzer	Lion	Sunrise on 7Plus during the day.	6 December 2021	Placed when it shouldn't be. Lives with an ex-alcoholic who is distressed by alcohol ads.	Dismissed
Grey Goose Vodka	Bacardi-Martini	Lego Masters Bricksmas Special on 9Now during the day.	30 November 2021	Lego Masters is a family show rated PG and the ads were seen during the day.	Dismissed
Actual Vodka Seltzer, Smirnoff Vodka	CUB Premium Beverages and Diageo	The Voice on 7Plus at 6pm.	Three complaints between 6 and 21 September 2021	- The Voice is a family show with a young audience. - One complainant was watching with two young children during dinner.	Dismissed.

				- One complainant was watching with 6-year-old daughter.	
Peroni Beer	Carlton and United Breweries	Millionaire Hot Seat and Channel 9 News from 5pm on Channel 9 BVOD channels.	17 September 2021	Ad was shown during every advert from 5pm, alcohol advertising shouldn't be allowed during this time slot.	Dismissed
Vodka Cruiser Spritz, Jack Daniels, Cellarbrations & BWS	Asahi Beverages, Brown-Forman, Australian Liquor Marketers & Endeavour Drinks	Nine complaints, including for: - Vodka Cruiser Spritz during Lego Masters on 9Now from 6.30 – 8.15pm. - BWS during Lego Masters on 9Now at 7.30pm - Vodka Cruiser Spritz during The Surgeon on 7Plus at 4pm	Nine complaints between 27 April and 24 May 2021	- Lego Masters is a show for children. - One complainant was watching Lego Masters with their 10 yr old child – other ads during the show were for the Peter Rabbit movie. - One complainant was watching with their 12 yr old son.	Dismissed
James Squire, Furphy, & Heineken	Lion	Sunrise on 7Plus from 8.30am.	23 March 2021	Too early in the morning for alcohol ads.	Dismissed
Carlton Zero and Stella Artois	Asahi Beverages	Young Sheldon (rated PG) and Dance Moms (rated PG) on 9Now during daytime hours.	4 January 2021	Ads were shown during daytime hours in programming that is widely watched by children.	Dismissed
Jimmy Brings, Carlton Dry, Great Northern, Thirsty Camel	Endeavour Drinks/ Asahi Beverages/ Australian Liquor Marketers and Liquor Alliance	Sunrise on 7Plus between 6am and 9am and The Project on 10Play.	21 December 2020	Too early for this type of advertising, and many families/kids are awake getting ready for school at this time.	Dismissed
Bundaberg Rum, Tanqueray Gin, Johnnie Walker & Captain Morgan's Rum	Diageo	The Chase (rated PG) on 7Plus between 5 and 6pm.	29 June 2020	Four different alcohol ads with 2-3 shown in each ad break from 5 to 6 pm seemed excessive.	Dismissed
Gordons Gin, Baileys, & Johnnie Walker	Diageo	Lego Masters on 9Now between 7 and 8.30pm.	25 May 2020	Lego Masters is a children's show	Dismissed

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