

ABAC Adjudication Panel Determination 124/25

Determination Date	8 September 2025
Brand/Company	Carlton Draught/Asahi Beverages
Media	Facebook and Instagram
ABAC Code provision	Part 3 (c)(i), (c)(ii)
Outcome	Dismissed

Part 1 - Determination Overview

Complaint:

The complainant is concerned about three social media posts, which it is argued:

- Suggest the presence of alcohol provides comfort and a positive environment, implying mood improvement – Post 1.
- Position the presence of alcohol as a form of personal success or life milestone – Post 2.
- Imply that alcohol can fulfil social needs – Post 3.

Key findings:

The Panel dismissed the complaint, finding that the posts do not show or suggest alcohol is a cause or contributor to success or improved mood. The complainant's interpretation of the posts requires a series of extrapolations that a reasonable person is unlikely to make.

Marketing Communications:

Post 1	Post 2	Post 3

Part 2 - The Panel's View

1. This determination considers three social media posts promoting Carlton Draught (the product) by Asahi Beverages (the Company). The complainant contends the social media posts breach the standards found in Part 3 (c) of the Code. These standards provide inter alia that an alcohol marketing communication must not:
 - suggest that alcohol causes or contributes to an improvement in mood or environment; and
 - show alcohol as a cause or contributor to the achievement of personal, social or other success.
2. The key concept in Part 3 (c) is causation. It is not permitted to suggest that alcohol is a cause or contributor to the achievement of success or that alcohol improves mood or environment. Alcohol can be placed with attractive, successful people and a happy occasion, provided it is not suggested that the mood or the success was caused or contributed to by alcohol.
3. The consistency of a marketing communication with an ABAC standard is assessed from a reasonable person's probable understanding of the marketing. A 'reasonable person' refers to the life experiences, values, and opinions held by most members of the community, serving as the benchmark.

Post 1

4. Post 1 depicts a glass of Carlton Draught, which has had two eyes and a heart added to it. Next to the glass are the words *"Sometimes home isn't four walls, it's 2 eyes and a heartbeat"*, and the text accompanying the image reads *"We'll always beer here for you..."*.
5. In relation to Post 1, the complainant argues that:
 - The tagline "Sometimes home isn't 4 walls, it's 2 eyes and a heartbeat" can be seen to imply emotional closeness.
 - By visually showing a beer with 'eyes and a heart', it personified the drink, making it a 'home' or emotional safe space.
 - This suggests the presence of alcohol provides comfort and a positive environment – implying mood improvement.
6. The Company argues the post is consistent with the Part 3 (c)(i) standard, submitting:
 - A reasonable person would see these posts as a playful attempt at humour and engaging with our audience, not a breach of ABAC standards.
 - The three static images do not portray a previous environment that was changed by the introduction of alcohol.

- There is no suggestion that any person's actual mood or environment is low and then uplifted by consuming the Carlton Draught pictured.
7. The Panel believes Post 1 does not breach Part 3 (c)(i) of the Code as:
- The post does not depict a movement in mood or environment from one state to an improved state.
 - The depiction of intimate closeness perceived by the complainant does not suggest an improvement in mood or environment.
 - The complainant's interpretation of the post requires a series of extrapolations that it is unlikely a reasonable person would make from the content of the post.

Post 2

8. Post 2 depicts a hand holding a glass of beer, alongside the words *"Every decision you made in life led you to seeing this beer"*. The text accompanying the post reads *"Must be some kind of destiny"*.
9. The complainant argues in relation to Post 2 that:
- The advertisement phrase *"every decision you made in life led you to seeing this beer"* frames the drink as the culmination of life's journey – as if reaching it is an accomplishment.
 - This positions the presence of alcohol as a form of personal success or life milestone.
10. The Company argues the post is consistent with the Part 3 (c)(ii) standard, submitting:
- No person is actually better off/more successful having seen an Instagram post featuring a picture of a beer. There is no reward for seeing a picture of a beer on the internet.
 - 'Destiny' does not mean success – it means 'the events that will necessarily happen to a particular person or thing in the future.'
 - There is no causation between a person's circumstances before 'seeing the beer' and after 'seeing the beer' – nor is any success or failure attached to this.
11. The Panel believes that Post 2 does not breach Part 3 (c)(ii) of the Code as:
- The post does not show the achievement of success caused by alcohol.
 - The complainant's interpretation of the post requires a series of extrapolations that it is unlikely a reasonable person would make from the content of the post.

Post 3

12. Post 3 depicts two glasses of beer being clinked together. The words superimposing the image read “*Sometimes all you need in life is a MATE. M - Pint of Draught*” The remaining letters of mate, being A, T, E, are also shown without any words following them. The text accompanying the post reads “*Just beautiful :)*”.
13. The complainant contends that the advertisement implies that alcohol can fulfil social needs. This concern enlivens both Part 3 (c)(i) and (c)(ii) of the Code.
14. The Company argued the post does not breach the Code. It does not suggest that alcohol improves mood, leads to friendship, or brings personal or social success. Instead, it uses humour and misdirection based on internet memes, with the caption and acrostic playing on expectations for comic effect. A reasonable viewer would see the post as light-hearted and satirical, not as implying that drinking beer leads to success or achievement.
15. The Panel does not believe the post breaches the Part 3 (c) standards. The post shows two people clicking glasses of beer. It doesn’t show an improvement in mood or the achievement of success.
16. The complaint is dismissed.

Part 3 - Supporting Information

Panel Process

This complaint was received from Ad Standards (the common entry point for all marketing complaints by members of the Australian community). The Chief Adjudicator referred it to the ABAC Adjudication Panel for consideration against the ABAC Responsible Alcohol Marketing Code. The complaint process is explained [here](#).

The Panel operates in accordance with the [ABAC Rules & Procedures](#) and has regard to the principles of procedural fairness.

The Panel comprised Chief Adjudicator Michael Lavarch, Health Sector Panelist Professor Richard Mattick AM and Panelist Cristiano Lima.

Applicable ABAC Responsible Marketing Code Standard

Code Part 3 (c) of the Code requires that an Alcohol Marketing Communication must NOT:

- (i) *Suggest that the consumption or presence of alcohol may cause or contribute to an improvement in mood or environment.*

- (ii) *Suggest that the consumption of alcohol offers any therapeutic benefit or health (including mental health) benefit, is needed to relax or helps overcome problems or adversity.*

Company Response

The Company was provided with an opportunity to respond to the complaint, and its principal comments were:

General comments

- Carlton Draught has long been known as a light-hearted brand that leans into humour and a classic Aussie voice to connect with its audience. Sharing a pint with mates at the pub is quintessentially 'Carlton'. Social media provides a platform for the brand to speak in a tongue-in-cheek, light-hearted way – something our followers have come to expect and enjoy. Carlton has consistently championed the idea that beer and the pub are about camaraderie and connection.
- The social media posts in question use humour and irreverence in a light-hearted, satirical manner. They are intended as a joke, not a serious commentary or statement. A reasonable person, considering the tone and context, would likely understand that the posts are meant to be humorous and not taken literally or deeply. Their intent is comedic, falling within the bounds of acceptable and compliant content standards, and in line with most other brand personas and trends on social media (alcohol or otherwise). We note that, bar this complaint, no negative commentary about any of the three posts has been received either in the comments section or by direct message to the Carlton Draught page – the majority of the public has found these posts to be in line with community expectations. The three static images do not portray a previous environment that was changed by the introduction of alcohol.
- While Asahi Beverages takes responsible alcohol marketing extremely seriously, a reasonable person would see these posts as a playful attempt at humour and engaging with our audience, not a breach of ABAC standards.

Post 1

- Post 1 does not breach Part 3 (c)(i) of the Code by suggesting that the consumption or presence of Alcohol may cause or contribute to an improvement in mood or environment.
- The Instagram post is a parody of an 'inspirational quote', and a reasonable person would clearly understand this image to be tongue-in-cheek. The post does not suggest that beer fosters emotional closeness or a positive environment. The emoji placement of eyes and a heart on a pint of beer would not 'personify' the product – it is intentionally ridiculous and unrealistic. A beer cannot have '2 eyes and a heartbeat'. The cursive, small font is reminiscent of 'inspirational' quotes made popular by sites such as Tumblr in the early 2000s. Now, quotes in the font used

are a recognised play on 'deep' quotes that are meaningless and 'cringe'. The addition of emojis and a pun in the caption contributes to the overall effect.

- There is no suggestion that any person's actual mood or environment is low and then uplifted by consuming the Carlton Draught pictured.

Post 2

- Post 2 does not breach Part 3 (c)(ii) of the code by showing the consumption or presence of Alcohol as a cause of or contributing to the achievement of personal, business, social, sporting, sexual or other success.
- The post is a call to the nature of Instagram 'scrolling' and seeing a picture come up online. It would be seen in the feed of an adult following the Carlton Draught Instagram page. It references 'seeing [a] beer' (the picture of the product), **not** drinking or consuming a beer. It would be understood that no person is actually better off/more successful having seen an Instagram post featuring a picture of a beer. There is no reward for seeing a picture of a beer on the internet. There is also no suggestion that the person viewing the post is becoming more successful. The use of the word 'destiny' is an exaggerated term and does not imply that someone has found the Instagram post or will drink beer as an accomplishment. 'Destiny' does not mean success – it means 'the events that will necessarily happen to a particular person or thing in the future.' The post satirically states that a person must have logged onto Instagram, found the Carlton Draught page, and this post to see a picture of a beer. Any person could do this. There is no causation between a person's circumstances before 'seeing the beer' and after 'seeing the beer' – nor is any success or failure attached to this.

Post 3

- Post 3 does not breach Part 3 (c)(i) of the Code by suggesting that the consumption or presence of Alcohol may cause or contribute to an improvement in mood or environment or Part 3 (c)(ii) of the Code by showing the consumption or presence of Alcohol as a cause of or contributing to the achievement of personal, business, social, sporting, sexual or other success.
- The post does not suggest that drinking alcohol can lead to an improvement in mood or lead to friendship or social success. Again, this post is a play on common memes/internet trends, and is assisted by the satirical 'Just beautiful :)') caption. The post does not suggest that drinking a pint of Draught will get you through life or lead to success – there is no causation shown. There is no context provided about what the viewer is/is not going through in life – the post is just suggesting the viewer may want a beer. Considered as a whole, a viewer would see a picture of two beers cheers-ing, captioned 'sometimes all you need in life is a MATE' – they think this relates to the picture. There is then an acrostic spelling of MATE – with M saying 'Pint of Draught' next to it. The post has used misdirection – the joke sets up an expectation and then twists it unexpectedly, causing surprise because the punchline defies the setup. This is another example of exaggerated 'inspirational'

humour that consumers connect with the Carlton Draught brand. We do not believe a reasonable person would conclude that the post is suggesting that alcohol consumption leads to friendship, personal success or achievement.

Marketing Best Practice

The Company was asked how it demonstrates a commitment to alcohol marketing best practices. It advised:

- Asahi Beverages takes the responsible advertising of alcohol seriously. We are aware of the Code requirements, and our policy and practice are in line with ensuring compliance with all relevant alcohol and marketing guidelines.
- Asahi Beverages is an ABAC signatory and has committed to meet ABAC Code Standards and comply with Panel determinations.
- Asahi Beverages team members have completed the current ABAC online training course.
- Asahi Beverages has taken other steps to ensure marketing practices and materials meet community expectations for responsible alcohol marketing.
- The social media posts were not submitted for pre-vetting approval.
- Asahi Beverages is committed to ensuring our promotional and marketing material, and that of our associated entities, does not promote or encourage any irresponsible or illegal consumption of alcohol. Our goal is for adults to enjoy our products responsibly and in moderation.