

Preventive Health SA Strategic Plan for Preventive Health Action 2026–2034

Australian Beverages Council Limited

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The Australian Beverages Council Limited (ABCL) is the leading peak body representing Australia's non-alcoholic beverages industry.

For over 75 years, the ABCL has been the only dedicated advocate for this industry, representing approximately 95 per cent of the industry's production volume. Our members range from Australia's largest drinks manufacturers to small and micro beverages companies whose drinks are enjoyed nationally as well as around the world. These beverages include carbonated soft drinks, energy drinks, sports and electrolyte drinks, frozen drinks, bottled and packaged waters, 100 per cent juice and fruit drinks, cordials, iced teas, ready-to-drink coffees, kombuchas, flavoured milk products and plant milks.

The non-alcoholic beverages industry contributes more than \$10.4 billion to Australia's GDP, employing more than 70,000 FTEs across the country. This includes jobs across the supply chain from beverage manufacturing to transport and logistics and retail and grocery.

Executive Summary

The ABCL recognises the ongoing challenge of non-communicable diseases and intent for government to address growing rates of disease through targeted preventive health policy measures. The non-alcoholic beverages industry advocates for the implementation of evidence-based policies that reflect the most current and available scientific understanding of the relevant factors that contribute to the burden of disease.

Government policy should be proportionate to the risks addressed and should consider dietary intake as one factor within a broader set of health and lifestyle influences. To address these challenges, governments must carefully evaluate the relevant policy levers and implement proven measures that will address these fundamental challenges. Responses that disproportionately target one factor fail to address the cumulative impact of the health environment and the relative influence of any one factor on this.

Industry has an important role to play in navigating these complex health issues. This has been evidenced through the ABCL's Sugar Reduction Pledge, achieving a 21 per cent reduction in sugar from 2015 to 2025 across signatory portfolios. Industry engagement, such as this, is critical to supporting the success of government policies and ensuring there remains a balanced approach to consideration of the role of industry. Neglecting to do so will limit the ability to achieve real, tangible results and ultimately fail to meet the objectives of preventive health strategies.

Finally, the strategy must be underpinned by a clear, objective evaluation framework that presents transparent metrics to determine success. These metrics should be clearly articulated and understood by all relevant stakeholders to ensure decision-making is guided by objective data. There must also be clear and transparent processes to review policy measures and development of an effective system of accountability.

Response to Consultation Questions

Overall, Clarity: Overall, how well does the draft Strategic Plan explain what Preventive Health SA is trying to achieve and how they plan to achieve it? What would make it clearer or easier to understand?

The Strategic Plan clearly outlines the objectives of Preventive Health SA and the issues it is seeking to address. The Plan recognises the multifactorial challenge of non-communicable diseases and reflects the need for a coordinated, holistic approach to address the burden of disease.

The ABCL supports strategies in the Strategic Plan relevant to improving nutrition and physical activity including a whole of diet approach to addressing unhealthy diets rather than focusing narrowly on unhealthy foods and drinks. Framing the issue in this way would better reflect the broader determinants of health and help align policy measures with the wider preventative health agenda. These strategies should also encourage increased physical activity.

We encourage the Plan to explicitly link each proposed intervention to the risk it is intended to address, and reference to the evidence supporting that intervention. It is important for the Plan to be proportionate. Implementing blunt regulatory approaches that do not reflect current scientific evidence will unlikely result in improved public health outcomes. For instance, inclusion of “intense” or non-sugar sweetened beverages in the current restrictions on public transit advertising does not appropriately reflect the risk factor of consuming these drinks. Rather, evidence highlights the role of non-sugar sweetened beverages in reducing the consumption of sugar-sweetened beverages.

The Plan should also reflect the role of industry in delivering practical, evidence – informed solutions. To succeed, industry must be involved in the development of responses to facilitate improvements in health behaviours and environments. Across the non-alcoholic beverages industry, there are a number of voluntary initiatives that have delivered demonstrable changes to consumer behaviours including the Sugar Reduction Pledge¹, the ABCL Marketing and Advertising Code², the Energy Drink Commitment³ and our ongoing support for the Health Star Rating system⁴. These reflect a responsible industry seeking to provide consumers with relevant information to make

¹ <https://www.australianbeverages.org/initiatives-advocacy-information/sugar-reduction-pledge/>

² <https://www.australianbeverages.org/initiatives-advocacy-information/marketing-advertising/>

³ <https://www.australianbeverages.org/initiatives-advocacy-information/energy-drinks-commitments/>

⁴ <https://www.australianbeverages.org/initiatives-advocacy-information/health-star-rating/>

informed decisions. Success is evident in an analysis of 28-years of beverage sales data⁵ as well as recent data from the Australian Bureau of Statistics (ABS) which demonstrate a decline in sugar-sweetened beverages and a reduction in sugar content. While reductions in beverage sugar are evident, broader dietary patterns and energy balance remain key drivers of health outcomes.

In respect of the Sugar Reduction Pledge, signatories committed to reduce sugar by 20 per cent by 2025 off a 2015 baseline. Data, aggregated by KPMG, revealed a 21 per cent reduction across portfolios by conclusion of the Pledge on 31 December 2025 supporting Australian consumers to avoid more than 255,000 tonnes of sugar.

Further the 28-year analysis of beverage sales highlights emerging consumer trends with the sale of sugar-sweetened beverages halving from 70 per cent of water-based beverages in 1997 to 35 per cent in 2024. Conversely, the sale of low- and no-sugar beverages increased from 30 per cent to 65 per cent. This has been underpinned by significant growth in the sale of bottled water, accounting for 36 per cent of all water-based beverage sales, and supported by industry shifting marketing and advertising to promote low- and no-sugar varieties. Over this same period, the sugar content in water-based beverage has decreased by 54 per cent. These findings align with the ABS Apparent Consumption Data and the results of the National Nutrition and Physical Activity Survey in 1995, 2011-12 and 2023 which show a decline in the consumption of sugar-sweetened beverages.

Finally, the Plan would benefit from a more transparent evaluation and accountability framework. Clear metrics, timeframes and review processes would help ensure that policy measures are assessed against objective evidence and that any unintended consequences are identified early. This is particularly important where proposed measures may have broader implications for consumer choice, market substitution or consistency with existing policy settings. A clearer framework for monitoring outcomes would make the plan easier to understand, stronger in implementation and more credible in demonstrating progress over time.

⁵ Starck CS, Cassettari T, Beckett E, Fayet-Moore F. [Evolving Sweet Preferences: Temporal Trends in Australian Non-Alcoholic Beverage Sales from 1997 to 2024](#). Nutrients 2026.

Communities and partners: How well does the draft Strategic Plan reflect the needs and experiences of the people and communities you know or work with, including Aboriginal people and other groups who experience inequity? What does success look like and what changes would make it more relevant and workable in practice for you or your organisation?

The ABCL supports targeted interventions that address specific health concerns of priority population groups, including Aboriginal people and other communities experiencing inequity. Interventions appropriately tailored to their intended objective will be far more effective than widespread policy changes that do not adequately reflect the circumstances of the populations they are intended to support. The Draft Strategic plan would therefore benefit from a clearer emphasis on community- informed design, culturally safe implementation and measurable outcomes that demonstrate genuine improvements in health and wellbeing.

Anything else? Is there anything else you would like to tell us about the draft Strategic Plan, or any other suggestions you have to strengthen preventive health action in South Australia?

The ABCL reiterates the importance of recognising the role of industry in supporting existing, proven and voluntary measures that have delivered demonstrable results in relation to the consumption of beverages. The ABCL's Sugar Reduction Pledge has avoided more than 255,550 tonnes of sugar from the diets of consumers through voluntary measures implemented by signatory members including product reformulation and innovation, shifts in marketing and advertising, offering a broader range of pack sizes and introducing more low- and no-sugar varieties. This 21 per cent reduction in sugar between 2015-2025 was achieved without blunt regulatory implements and reflects the willingness of industry to be a constructive partner in supporting government's prevention and control of non-communicable diseases.

Further, the ABCL recommends the use of robust, scientific evidence to inform decision-making and the adoption of clear, transparent evaluation framework to assess the impact of policies. This is particularly important where interventions may affect consumer choice, product availability or market behaviour, and where policy success should be measured against defined outcomes rather than assumptions about effectiveness.

Finally, it is important that any consumer education initiatives are aligned with a national approach to ensure clear, consistent and credible messaging across jurisdictions. This is especially relevant in light of ongoing consideration of mandating the Health Star Rating system, where consistency in labelling and public communication will be important to support consumer understanding and avoid unnecessary duplication or confusion.

Preventive Health SA's strategy would benefit from stronger alignment with existing national frameworks, including the Australian Dietary Guidelines and FSANZ risk-based regulatory approach. Policy interventions should be proportionate to the magnitude of risk and designed to minimise unintended substitution effects within the broader diet. A nutrient-based, system-wide approach—supported by clear evaluation metrics and national consistency—will maximise public health impact while enabling effective partnership with industry in implementation.

Conclusion

The ABCL supports preventive health policies that are evidence-based, present clear objectives with an evaluation framework and importantly recognise the role of industry. Arresting rates of non-communicable disease is a significant challenge for government and policies must be underpinned by a robust, evidence-base that reflects the latest and most relevant scientific understanding of the multifaceted burden of disease. Measures must be proportionate and incorporate transparent evaluation mechanisms. Preventive Health SA strategies must also be consistent with national frameworks and regulatory settings.

The non-alcoholic beverages industry has demonstrated its support for improving public health outcomes through targeted, industry-led initiatives that support consumer choice, achieving meaningful results and shifting behaviour. Our industry continues to develop and engage in initiatives that support improved public health outcomes, including Preventive Health SA's Strategic Plan, and support system-wide approaches that bring together nutrition, physical activity, and consumer education to achieve supportive health environments.