

30 April 2026

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

To whom it may concern,

**RE: SUBMISSION TO THE AUSTRALIAN COMMUNICATIONS AND MEDIA AUTHORITY'S  
REVIEW INTO ALCOHOL ADVERTISING RESTRICTIONS IN THE FREE TV CODE**

**Background and Introduction**

Endeavour Group (**Endeavour**) is an ASX-listed entity which operates more than 1,700 retail stores including BWS and Dan Murphy's. Our hotels group, ALH, consists of around 350 hotels in regional and metro communities throughout Australia. We have a 30,000 strong team of hospitality and retail workers located in over 1,500 communities across Australia.

As Australia's largest drinks and hospitality business, we are committed to making a positive difference across all aspects of the retail and hospitality industry and welcome every opportunity to work with all levels of Government. We take our social licence to operate seriously and are committed to our team members and the communities we serve.

**Community and Responsibility Commitment**

In addition to our co-regulatory compliance measures (described in detail below), Endeavour uses advertising to reinforce our responsibility and adherence to the responsible marketing and sale of alcohol. This includes employing a range of specific measures, for example:

- Efforts to eliminate the sale of alcohol to minors with our national ID25 retail program;
- Promoting responsible consumption through in-store media channels to promote respectful behaviour. For example, campaigns from various advocates (including DrinkWise, 1800RESPECT, 13YARN, the Men's Referral Service, the NRL and various State Governments) is run during major sporting events;
- Seeking to stop secondary supply through our "Don't Buy It For Them" policy in stores;
- Team training programs such as mental health first aid, family and domestic violence support awareness and advanced responsible service of alcohol;
- Partnerships with Drinkwise Australia responsible consumption of alcohol campaigns, GIVIT to fund on the ground domestic violence organisations (as one example), Mental Fitness Gym for community wellness and Gotcha4life public activities; and
- Establishing a Darwin-based Community Advisory Committee that helps us invest in local projects and partnerships for harm reduction and community connection.

Advertising leadership position

As a signatory to the ABAC scheme since 2013, Endeavour is committed to the ABAC Responsible Alcohol Advertising Code (**Code**) and its objectives and to ensuring that alcohol



advertising does not contravene the Code or the Commercial Television Industry Code of Practice 2015 (**FreeTV Code**). These codes, alongside others, work together to prevent the marketing of alcohol products in an irresponsible way or in a way that appeals to minors, and regulates the volume, frequency and placement of ads across mediums.

We view compliance as a baseline, with significant additional internal requirements building on the foundation of the co-regulatory scheme. Endeavour is committed to maintaining its position as an industry leader in the responsible service of alcohol. As a business, compliance with the Code (and applicable laws) is embedded into our day-to-day planning, buying and governance processes for advertising before, during and following the distribution of advertising. We maintain strict processes in addition to those required by the Code and have in place a range of initiatives to ensure our customers are engaging with alcohol in a responsible manner, supported by our ongoing partnership with DrinkWise.

In addition to and in parallel to our compliance with the Code, we also comply with other codes including the Retail Drinks Australia (**RDA**) Online Code of Conduct and the Australian Association of National Advertisers (**AANA**) Code of Ethics.

### **Working Under Australia's Comprehensive Regulatory Framework**

The current Free TV Code and Code work effectively together to deliver responsible advertising across all broadcasts. Under both codes, alcohol advertising is carefully considered to incorporate:

- Placement limits for specific times of day and night and during or around children's programming;
- Frequency and volume limits; and
- Conditions on the advertising content and style.

As part of our responsibility commitment, we have incorporated significant internal and external processes to meet the requirements of these co-regulatory frameworks and to ensure we are ahead of the curb with advertising processes for television. This commitment extends beyond television broadcast, with Endeavour working under the same strict parameters on digital channels and out of home.

In practice, this means:

- We regularly engage with ABAC's pre-vetting service and are the nation's largest user of the service;
- We create content based on the ABAC requirements, with the requirements guiding our creative and advertising briefs;
- Our teams are regularly trained on ABAC requirements and we have prepared useful resources for our teams on Code compliance;
- We have strict controls in place with our third party media agencies, working together to ensure scheduling systems apply specific limitations, restriction rules operate effectively and manual restriction checks take place to ensure advertising does not reach broadcast in contravention of the FreeTV Code; and
- Outside broadcast advertising, we act as a trusted partner of ABAC, meeting with them regularly as part of the Digital Working Group to develop and discuss digital best practice guidelines.

As an advertiser, through our regular compliance checks we can track broadcast advertising placements to actively ensure Endeavour continues to meet relevant regulatory requirements, including compliance with the *Broadcasting Services Act 1992* (Cth) (**BSA**), and the requirements under the Code and FreeTV Code.

Coupled with this, the industry has seen a decline in risky drinking behaviours, with the mindset and approach to alcohol consumption of younger generations changing. Data on this behaviour is provided for in the Alcohol Beverages Australia (**ABA**) submission.

### **Economic Contribution to Australian Television**

As recognised in the Australian Communications and Media Authority (**ACMA**) report on commercial TV spending for FY23, broadcast advertising on Australian free to air television is critical to its sustainability.

Endeavour operates nationwide, in metropolitan and regional communities, big and small. We support direct spend with broadcasting stations across the country. Our national advertising commitment directly impacts commercial broadcast and regional stations and contributes to the continued access to sports, news and current affairs programs by Australians on their home television.

### **Conclusion and Recommendation**

Endeavour acknowledges the significant body of work currently underway by the ACMA. We believe it is important to ensure regulatory compliance reflects modern standards and is working to meet its goals.

Endeavour supports the evidence and position of the AANA and the submission made by the ABA that the current co-regulatory framework under the BSA is operating effectively as designed, and is providing appropriate community safeguards such that the ACMA should not determine a program standard under section 125 of the BSA.

Endeavour appreciates the opportunity to engage with the ACMA as part of its review and would be more than happy to meet with your team to provide additional context to our submission. Please feel free to reach out to Maddie Church our Senior Manager Policy and Government Relations at [madeleine.church@edg.com.au](mailto:madeleine.church@edg.com.au) or on 0409 693 997 to discuss any of the issues highlighted in this submission or to arrange a suitable time to meet.

Yours sincerely



Robert Malinauskas  
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Endeavour Group