

The Sale and Supply of Alcohol (Improving Regulation) Amendment Bill



New Zealand Council Of
Christian Social Services

May 2026

Tirohanga Whānui | Overview

The New Zealand Council of Christian Social Services (NZCCSS) welcomes the opportunity to provide feedback on The Sale and Supply of Alcohol (Improving Regulation) Amendment Bill. While we welcome amendments to the Sale and Supply of Alcohol Act, the proposed changes focus on improving the provision of alcohol by businesses, with limited improvements in protecting consumers and communities from alcohol related harm. Research released last year ranked New Zealand the lowest of 11 countries assessed for alcohol control policies (Casswell et al, 2025).

Taunakitanga | Recommendations

Our main points are:

Item One: The changes to the legislation are not in line with the expectations set out by the Government Policy Statement on Health 2024-2027

The Government Policy Statement on Health 2024-2027 released in 2024, sets an expectation for a reduction in the number of people engaging in hazardous drinking (Ministry of Health, 2024):

8.02	Increased action on five modifiable risk factors (alcohol consumption)	Percentage of people aged 15 years and over who engage in hazardous alcohol consumption	Year-on-year reduction in proportion of those aged 15 years and over who engage in hazardous alcohol consumption
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The 2024/25 New Zealand Health Survey reported that 16.6% adults were classified as hazardous drinkers, with alcohol related harm costing New Zealand an estimated \$9.1 billion in 2024 (Ministry of Health, 2025). Internationally research indicates that greater accessibility to alcohol is closely correlated with increased alcohol related harm (Blank et al, 2024). The World Health Organization SAFER Interventions recommend strengthening restrictions on alcohol availability, including avoiding extending the days and hours of alcohol sales, to reduce alcohol related harm (World Health Organization, 2018)

Despite this, the proposed amendments to the Sale and Supply of Alcohol Act focus on ‘cutting red tape’ for suppliers of alcohol, with little in the way of reducing risks for consumers and communities.

Recommendation 1: We strongly recommend New Zealand’s national alcohol strategy (NAS) be updated in line with the WHO Safer framework, with all alcohol policy changes aligned with this.

Item Two: Requirements for delivery of alcohol should be extended to delivery of alcohol from any service, not just rapid delivery services.

Clause 41 of the legislation clarifies requirements for rapid delivery services to “only complete the delivery if a person who is not a minor and not intoxicated is present to receive the alcohol” (*Sale and Supply of Alcohol (Improving Alcohol Regulation) Amendment Bill, 2026*). Rapid delivery consists of deliveries provided within 2 hours of ordering. Outside of this definition there are currently no

requirements in the legislation for alcohol delivered to be received by someone of legal age. A recent study in Auckland found that 49% of alcohol deliveries were left at the door, and in 73% of cases ID was not checked (Sneyd & Richardson, 2024). Given that when ordering from these sites customers are not asked to provide any form of ID, with only a tick box to confirm they are over 18, this raises significant concerns around the accessibility of alcohol to minors. The 2024/25 New Zealand Health Survey reported that 51% of minors aged 15-17 had consumed alcohol in the past year (New Zealand Alcohol Beverages Council, 2024).

Recommendation 2: We strongly recommend that this be extended to any and all delivers of alcohol, with delivery staff required to complete basic training to recognise intoxication and adequately identify permitted forms of ID.

Item Three: Buy Now, Pay Later options for alcohol purchases are increasing alcohol related harm and should not be available for this purpose.

New Zealand Council of Christian Social Services (NZCCSS) member organisation have reported increased reliance on buy now, pay later (BNPL) options by clients. A recent report (Consumer NZ, FinCap, & Victoria University of Wellington, 2026) found that despite regulatory reforms being introduced in September 2024 there has been no reduction in harm, particularly for those already experiencing financial hardship. These payment options can lead to a stacking effect where people take out multiple BNPL payments and end up with significant repayment instalments across these, leading to unmanageable debt and significantly deepening financial hardship (Ika, 2025).

While in 2025 only 22 BNPL merchants offered alcohol as part of their product range, the use of this option for the purchase of alcohol is at risk of increasing with the expansion of licensing proposed in this Bill. With BNPL, the cost of a standard drink at point of sale is a portion of the actual cost, making consumption of alcohol seem more affordable and accessible. Alcohol Healthwatch calculated the cost of a standard drink at the point of sale to be as low as 34c (Alcohol Healthwatch, 2021). Our members report a significant increase in the number of clients they support who have BNPL debt, with the Salvation Army reporting in 2025 that BNPL debt among financial mentor clients had risen from \$903 in 2022 to over \$230,000 in 2025 (Ika, 2025). Restricting the use of BNPL payment options for the purchase of alcohol has the potential to significantly reduce the risks of both alcohol related harm and worsening financial hardship.

Recommendation 3: We strongly recommend an amendment to the legislation to prohibit the use of Buy Now, Pay Later payment options for the purchase of alcohol.

Item Four: Digital ID should not be accepted as proof of age

While the current version of the Bill does not mention a change to permitted forms of ID, we note that the explanation document released as part of the Government's announcement on the Bill includes a change to add digitally verified drivers as a proof of age document when purchasing alcohol (New Zealand Government, 2026). As such, we highlight our concerns around this inclusion should it arise as an amendment to the Bill further through the legislative process.

Currently the New Zealand Transport Agency (NZTA) issues one physical drivers licence to an individual, with old licences destroyed when a new licence is issued (New Zealand Transport Agency | Waka Kotahi, n.d.). People with access to these digital licences will still have a physical licence, risking increasing problems already faced in New Zealand of minors fraudulently using fake IDs (Priestley, 2025), allowing people to give their physical ID to a friend while retaining their digital version.

The ability of the verifier app to verify driver licences from other countries including select states of America and Queensland, Australia (Department of Internal Affairs, n.d.) may also create confusion around what driver's licence (both physical and digital) are allowed to be accepted as proof of age. Currently no international driver's licences are accepted for this purpose (Alcohol.org.nz, n.d.), however, with the app able to verify international driver's licences it risks creating confusion for servers and customers alike.

Recommendation 4: We strongly recommend that no amendments are made to the legislation to allow digital ID to be accepted as proof of ID for purchase of alcohol

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Ko wai tātou | Who we are

NZCCSS has six foundation members; the Anglican Care Network, Baptist Churches of New Zealand, Catholic Social Services, Presbyterian Support and the Methodist and Salvation Army Churches.

Through this membership, NZCCSS represents over 100 organisations providing a range of social support services across Aotearoa. Our mission is to call forth a just and compassionate society for Aotearoa, through our commitment to our faith and Te Tiriti o Waitangi.

Further details on NZCCSS can be found on our website - www.nzccss.org.nz.

Ingoa whakapā | Contact Name

Alicia Sudden ceo@nzccss.org.nz

Lead Analyst

Analyst who contributed