

Local Alcohol Policy 2025 Amendment Full Submission Catalogue

Redacted

ROTORUA
LAKES COUNCIL
Te Kaunihera o ngā Roto o Rotorua

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Response No:
1

Contribution ID: 16282

Member ID:

Date Submitted: Jan 28, 2026, 03:45 PM

Q1 Option 1: Should the 9pm maximum closing time apply to all off-licence holders?

Multi Choice

Ãe
Yes I agree

Q2 Option 2: Should the reduction in maximum trading hours from 10.15pm to 9pm apply during the renewals process?

Multi Choice

Q3 Do you have any other feedback?

Long Text

Q4 First Name

Short Text

Deepak Reddy

Q5 Last Name

Short Text

Kukunuru

Q7 Do you wish to present your submission publicly in front of elected members at a hearing?

Multi Choice

Ãe
Yes

Q9 I agree to the Terms of Use and Privacy Policy for using Social Pinpoint

Single Checkbox

Yes

Response No:
2

Contribution ID: 16281

Member ID:

Date Submitted: Jan 28, 2026, 02:35 PM

Q1 Option 1: Should the 9pm maximum closing time apply to all off-licence holders?

Multi Choice

Yes
Yes I agree

Q2 Option 2: Should the reduction in maximum trading hours from 10.15pm to 9pm apply during the renewals process?

Multi Choice

Q3 Do you have any other feedback?

Long Text

Q4 First Name

Short Text

Roger

Q5 Last Name

Short Text

Wong

Q7 Do you wish to present your submission publicly in front of elected members at a hearing?

Multi Choice

Kao
No

Q9 I agree to the Terms of Use and Privacy Policy for using Social Pinpoint

Single Checkbox

Yes

Response No:
3

Contribution ID: 16166

Member ID:

Date Submitted: Jan 19, 2026, 09:18 AM

Q1 Option 1: Should the 9pm maximum closing time apply to all off-licence holders?

Multi Choice

Yes
Yes I agree

Q2 Option 2: Should the reduction in maximum trading hours from 10.15pm to 9pm apply during the renewals process?

Multi Choice

Q3 Do you have any other feedback?

Long Text

Q4 First Name

Short Text

Meriana

Q5 Last Name

Short Text

Haldane

Q7 Do you wish to present your submission publicly in front of elected members at a hearing?

Multi Choice

Kao
No

Q9 I agree to the Terms of Use and Privacy Policy for using Social Pinpoint

Single Checkbox

Yes

Response No:
4

Contribution ID: 16134

Member ID:

Date Submitted: Jan 15, 2026, 08:19 PM

Q1 Option 1: Should the 9pm maximum closing time apply to all off-licence holders?

Multi Choice

Yes
Yes I agree

Q2 Option 2: Should the reduction in maximum trading hours from 10.15pm to 9pm apply during the renewals process?

Multi Choice

Q3 Do you have any other feedback?

Long Text

Q4 First Name

Short Text

Manu

Q5 Last Name

Short Text

Scott

Q7 Do you wish to present your submission publicly in front of elected members at a hearing?

Multi Choice

Kao
No

Q9 I agree to the Terms of Use and Privacy Policy for using Social Pinpoint

Single Checkbox

Yes

Response No:
5

Contribution ID: 16125

Member ID:

Date Submitted: Jan 15, 2026, 12:28 PM

Q1 Option 1: Should the 9pm maximum closing time apply to all off-licence holders?

Multi Choice

Äe
Yes I agree

Q2 Option 2: Should the reduction in maximum trading hours from 10.15pm to 9pm apply during the renewals process?

Multi Choice

Q3 Do you have any other feedback?

Long Text

Q4 First Name

Short Text

Te Taiawatea

Q5 Last Name

Short Text

Knight

Q7 Do you wish to present your submission publicly in front of elected members at a hearing?

Multi Choice

Kao
No

Q9 I agree to the Terms of Use and Privacy Policy for using Social Pinpoint

Single Checkbox

Yes

Response No:
6

Contribution ID: 16124

Member ID:

Date Submitted: Jan 15, 2026, 10:37 AM

Q1 Option 1: Should the 9pm maximum closing time apply to all off-licence holders?

Multi Choice

Yes
Yes I agree

Q2 Option 2: Should the reduction in maximum trading hours from 10.15pm to 9pm apply during the renewals process?

Multi Choice

Q3 Do you have any other feedback?

Long Text

Q4 First Name

Short Text

Teresa

Q5 Last Name

Short Text

Hurae

Q7 Do you wish to present your submission publicly in front of elected members at a hearing?

Multi Choice

Kao
No

Q9 I agree to the Terms of Use and Privacy Policy for using Social Pinpoint

Single Checkbox

Yes

Response No:
7

Contribution ID: 16105

Member ID:

Date Submitted: Jan 14, 2026, 04:11 PM

Q1 Option 1: Should the 9pm maximum closing time apply to all off-licence holders?

Multi Choice

Ãe
Yes I agree

Q2 Option 2: Should the reduction in maximum trading hours from 10.15pm to 9pm apply during the renewals process?

Multi Choice

Q3 Do you have any other feedback?

Long Text

Q4 First Name

Short Text

Dawn

Q5 Last Name

Short Text

Meertens

Q7 Do you wish to present your submission publicly in front of elected members at a hearing?

Multi Choice

Kao
No

Q9 I agree to the Terms of Use and Privacy Policy for using Social Pinpoint

Single Checkbox

Yes

Response No:
8

Contribution ID: 16104

Member ID:

Date Submitted: Jan 14, 2026, 03:51 PM

Q1 Option 1: Should the 9pm maximum closing time apply to all off-licence holders?

Multi Choice

Yes
Yes I agree

Q2 Option 2: Should the reduction in maximum trading hours from 10.15pm to 9pm apply during the renewals process?

Multi Choice

Q3 Do you have any other feedback?

Long Text

Q4 First Name

Short Text

Sariah

Q5 Last Name

Short Text

Box

Q7 Do you wish to present your submission publicly in front of elected members at a hearing?

Multi Choice

Kao
No

Q9 I agree to the Terms of Use and Privacy Policy for using Social Pinpoint

Single Checkbox

Yes

Response No:
9

Contribution ID: 16103

Member ID:

Date Submitted: Jan 14, 2026, 03:49 PM

Q1 Option 1: Should the 9pm maximum closing time apply to all off-licence holders?

Multi Choice

Yes
Yes I agree

Q2 Option 2: Should the reduction in maximum trading hours from 10.15pm to 9pm apply during the renewals process?

Multi Choice

Q3 Do you have any other feedback?

Long Text

Q4 First Name

Short Text

Gevana

Q5 Last Name

Short Text

Dean

Q7 Do you wish to present your submission publicly in front of elected members at a hearing?

Multi Choice

Kao
No

Q9 I agree to the Terms of Use and Privacy Policy for using Social Pinpoint

Single Checkbox

Yes

Response No:
10

Contribution ID: 16102

Member ID:

Date Submitted: Jan 14, 2026, 03:07 PM

Q1 Option 1: Should the 9pm maximum closing time apply to all off-licence holders?

Multi Choice

Yes
Yes I agree

Q2 Option 2: Should the reduction in maximum trading hours from 10.15pm to 9pm apply during the renewals process?

Multi Choice

Q3 Do you have any other feedback?

Long Text

Q4 First Name

Short Text

Lynne

Q5 Last Name

Short Text

Dobbs

Q7 Do you wish to present your submission publicly in front of elected members at a hearing?

Multi Choice

Kao
No

Q9 I agree to the Terms of Use and Privacy Policy for using Social Pinpoint

Single Checkbox

Yes

Q1 Option 1: Should the 9pm maximum closing time apply to all off-licence holders?

Multi Choice

Ãe
Yes I agree

Q2 Option 2: Should the reduction in maximum trading hours from 10.15pm to 9pm apply during the renewals process?

Multi Choice

Q3 Do you have any other feedback?

Long Text

Q4 First Name

Short Text

Te Pora

Q5 Last Name

Short Text

de Loree

Q7 Do you wish to present your submission publicly in front of elected members at a hearing?

Multi Choice

Ãe
Yes

Q9 I agree to the Terms of Use and Privacy Policy for using Social Pinpoint

Single Checkbox

Yes

Response No:
12

Contribution ID: 16096

Member ID:

Date Submitted: Jan 14, 2026, 09:26 AM

Q1 Option 1: Should the 9pm maximum closing time apply to all off-licence holders?

Multi Choice

Yes
Yes I agree

Q2 Option 2: Should the reduction in maximum trading hours from 10.15pm to 9pm apply during the renewals process?

Multi Choice

Q3 Do you have any other feedback?

Long Text

Q4 First Name

Short Text

Sally

Q5 Last Name

Short Text

Wilson

Q7 Do you wish to present your submission publicly in front of elected members at a hearing?

Multi Choice

Kao
No

Q9 I agree to the Terms of Use and Privacy Policy for using Social Pinpoint

Single Checkbox

Yes

Response No:
13

Contribution ID: 16081

Member ID:

Date Submitted: Jan 13, 2026, 03:41 PM

Q1 Option 1: Should the 9pm maximum closing time apply to all off-licence holders?

Multi Choice

Yes
Yes I agree

Q2 Option 2: Should the reduction in maximum trading hours from 10.15pm to 9pm apply during the renewals process?

Multi Choice

Q3 Do you have any other feedback?

Long Text

Q4 First Name

Short Text

Rose

Q5 Last Name

Short Text

Robson

Q7 Do you wish to present your submission publicly in front of elected members at a hearing?

Multi Choice

Kao
No

Q9 I agree to the Terms of Use and Privacy Policy for using Social Pinpoint

Single Checkbox

Yes

Response No:
14

Contribution ID: 16073

Member ID:

Date Submitted: Jan 13, 2026, 02:28 PM

Q1 Option 1: Should the 9pm maximum closing time apply to all off-licence holders?

Multi Choice

Yes
Yes I agree

Q2 Option 2: Should the reduction in maximum trading hours from 10.15pm to 9pm apply during the renewals process?

Multi Choice

Q3 Do you have any other feedback?

Long Text

Q4 First Name

Short Text

Emille

Q5 Last Name

Short Text

Hoods

Q7 Do you wish to present your submission publicly in front of elected members at a hearing?

Multi Choice

Kao
No

Q9 I agree to the Terms of Use and Privacy Policy for using Social Pinpoint

Single Checkbox

Yes

Response No:
15

Contribution ID: 16072

Member ID:

Date Submitted: Jan 13, 2026, 02:27 PM

Q1 Option 1: Should the 9pm maximum closing time apply to all off-licence holders?

Multi Choice

Yes
Yes I agree

Q2 Option 2: Should the reduction in maximum trading hours from 10.15pm to 9pm apply during the renewals process?

Multi Choice

Q3 Do you have any other feedback?

Long Text

Q4 First Name

Short Text

Darnielle

Q5 Last Name

Short Text

Hoods

Q7 Do you wish to present your submission publicly in front of elected members at a hearing?

Multi Choice

Kao
No

Q9 I agree to the Terms of Use and Privacy Policy for using Social Pinpoint

Single Checkbox

Yes

Q1 Option 1: Should the 9pm maximum closing time apply to all off-licence holders?

Multi Choice

Yes
Yes I agree

Q2 Option 2: Should the reduction in maximum trading hours from 10.15pm to 9pm apply during the renewals process?

Multi Choice

Q3 Do you have any other feedback?

Long Text

Q4 First Name

Short Text

James

Q5 Last Name

Short Text

Cooney

Q7 Do you wish to present your submission publicly in front of elected members at a hearing?

Multi Choice

Kao
No

Q9 I agree to the Terms of Use and Privacy Policy for using Social Pinpoint

Single Checkbox

Yes

Response No:
17

Contribution ID: 16055

Member ID:

Date Submitted: Jan 13, 2026, 11:02 AM

Q1 Option 1: Should the 9pm maximum closing time apply to all off-licence holders?

Multi Choice

Yes
Yes I agree

Q2 Option 2: Should the reduction in maximum trading hours from 10.15pm to 9pm apply during the renewals process?

Multi Choice

Q3 Do you have any other feedback?

Long Text

Q4 First Name

Short Text

Hayley

Q5 Last Name

Short Text

Adamson

Q7 Do you wish to present your submission publicly in front of elected members at a hearing?

Multi Choice

Kao
No

Q9 I agree to the Terms of Use and Privacy Policy for using Social Pinpoint

Single Checkbox

Yes

Response No:
18

Contribution ID: 16053

Member ID:

Date Submitted: Jan 13, 2026, 09:49 AM

Q1 Option 1: Should the 9pm maximum closing time apply to all off-licence holders?

Multi Choice

Yes
Yes I agree

Q2 Option 2: Should the reduction in maximum trading hours from 10.15pm to 9pm apply during the renewals process?

Multi Choice

Q3 Do you have any other feedback?

Long Text

Q4 First Name

Short Text

Samuel

Q5 Last Name

Short Text

Hennessy

Q7 Do you wish to present your submission publicly in front of elected members at a hearing?

Multi Choice

Kao
No

Q9 I agree to the Terms of Use and Privacy Policy for using Social Pinpoint

Single Checkbox

Yes

Q1 Option 1: Should the 9pm maximum closing time apply to all off-licence holders?

Multi Choice

Yes
Yes I agree

Q2 Option 2: Should the reduction in maximum trading hours from 10.15pm to 9pm apply during the renewals process?

Multi Choice

Q3 Do you have any other feedback?

Long Text

Q4 First Name

Short Text

Renee

Q5 Last Name

Short Text

Bolkowy

Q7 Do you wish to present your submission publicly in front of elected members at a hearing?

Multi Choice

Kao
No

Q9 I agree to the Terms of Use and Privacy Policy for using Social Pinpoint

Single Checkbox

Yes

Response No:
20

Contribution ID: 16050

Member ID:

Date Submitted: Jan 12, 2026, 09:38 PM

Q1 Option 1: Should the 9pm maximum closing time apply to all off-licence holders?

Multi Choice

Yes
Yes I agree

Q2 Option 2: Should the reduction in maximum trading hours from 10.15pm to 9pm apply during the renewals process?

Multi Choice

Q3 Do you have any other feedback?

Long Text

Q4 First Name

Short Text

Kodie

Q5 Last Name

Short Text

Rolfe

Q7 Do you wish to present your submission publicly in front of elected members at a hearing?

Multi Choice

Kao
No

Q9 I agree to the Terms of Use and Privacy Policy for using Social Pinpoint

Single Checkbox

Yes

Response No:
21

Contribution ID: 15953

Member ID:

Date Submitted: Jan 06, 2026, 11:26 AM

Q1 Option 1: Should the 9pm maximum closing time apply to all off-licence holders?

Multi Choice

Äe
Yes I agree

Q2 Option 2: Should the reduction in maximum trading hours from 10.15pm to 9pm apply during the renewals process?

Multi Choice

Q3 Do you have any other feedback?

Long Text

Q4 First Name

Short Text

Hamiora

Q5 Last Name

Short Text

Werahiko

Q7 Do you wish to present your submission publicly in front of elected members at a hearing?

Multi Choice

Kao
No

Q9 I agree to the Terms of Use and Privacy Policy for using Social Pinpoint

Single Checkbox



Submission on the Rotorua Lakes Council Local Alcohol Policy 2025 – Off-licence Trading Hours

13 February 2026

Kia ora

Thank you for the opportunity to provide feedback on the Rotorua Lakes Council Local Alcohol Policy Off-licence Trading Hours changes that came into force on 1 November 2025.

We would like the opportunity to speak (virtually) to our submission.

If you have any questions on the comments we have included in our submission, please contact:

Jennifer Lamm
Policy Advisor
Alcohol Healthwatch

[REDACTED]

[REDACTED]

About Alcohol Healthwatch

Alcohol Healthwatch is an independent national charity working to reduce alcohol-related harm and inequities. We provide a range of regional and national health promotion services such as providing evidence-based information and advice on policy and planning matters, supporting community action projects, and coordinating networks to address alcohol-related harm such as the Cross-council Local Alcohol Policy Network.

General Comments

1. We support **Option 1** and agree that *all* off-licences should be subject to the maximum trading hour of 9pm from the date the permitted trading hour in the Local Alcohol Policy (LAP) comes into force (ie three months after it has been adopted).
2. We support wording that will clarify that *all* off-licence premises are subject to the same maximum trading hour of 9pm, regardless of individual licence renewal dates. We do not consider that Option 2 is compatible with the object of the Act or that it complies with section 45 of the Act.

3. The standardisation of trading hours provides certainty for licensees, licensing bodies and regulatory agencies and the public. It also creates a more level playing field and enhances the effectiveness of the policy and assists with the monitoring and evaluation of the LAP.
4. Availability remains one of the most effective levers to reduce and prevent alcohol harm. Keeping the closing hour consistent, (i.e. 9pm) will give the Council the ability to minimise harm in line with the object of the Sale and Supply of Alcohol Act 2012 (the Act).
5. We reiterate the feedback in our submission in March 2025, and we continue to be supportive of the reduction in the off-licence maximum closing time in the LAP.

Alcohol-related harm

6. Our submission in March 2025 on the draft LAP included health data that demonstrated the fact that alcohol is Aotearoa New Zealand's most harmful drug^{1 2 3} and is a leading cause of preventable death, injury and ill health⁴ and a significant contributor to the social and health inequities experienced by Māori, Pacific peoples and other impacted groups⁵. The harm attributable to alcohol in the district is detailed in the Local Alcohol Policy Review Research Report⁶ and, as with other areas in the country, the harms are far-reaching and deeply felt by many families and communities.
7. As we also noted in our 2025 submission, studies have shown that hazardous drinking increases with longer hours and greater availability^{7,8}. Reducing trading hours is a key strategy for addressing alcohol-related harms⁹ (including assaults, unintentional injury, drink driving), and this is particularly important for off-licences as the vast majority of alcohol is purchased from these premises (over 80%) and often cheaply.¹⁰

Section 77(1)(e) – Trading Hours

8. When developing a LAP, councils must follow the process set out in the Act and this includes the option of setting trading hours, rather than relying on default maximum hours (section 17(1)(e)). Section 45 of the Act confirms that the trading hours permitted for any licensed premises are the applicable maximum trading hours in the LAP. Section 90 ensures that an amendment to the LAP's maximum trading hours cannot come into force immediately but only takes effect three months after the date of the public notice (section 80). This enables new and existing licensees to prepare for the change in trading hours.
9. The Council followed the required process (including the special consultative procedure) and resolved to adopt the draft LAP with the 9pm closing time for off-licences¹¹. The

decision to reduce the maximum trading hours by 75 minutes reflected community preferences¹² and followed the trend in LAPs across Aotearoa New Zealand for reduced trading hours with many councils also opting for a 9pm closing time.

10. This decision is also supported by the Supreme Court ruling on the Auckland Council's Provisional LAP that a "9pm closing time was not unreasonable in light of the object of the 2012 Act"¹³ and "that bringing the closing hour for all off-licences back to 9pm was likely to reduce alcohol-related harm"¹⁴.
11. As with other LAPs¹⁵, it was, and is, expected that the general 9pm trading hour would apply to *all* off-licences in the Rotorua Lakes district. It is also expected that there will be a positive public response to the 9pm closing time for all off-licences, as there has been in Tāmaki Makaurau-Auckland after the 9pm off-licence maximum trading hour came into force in 2024¹⁶.

Additional comments

12. As we noted, the trend in LAPs across Aotearoa-New Zealand is for a 9pm closing time for off-licences, but we are also aware that Councils are increasingly setting a later off-licence opening hour in their LAPs, typically 9am. We strongly recommend that the Council consider a later opening hour for off-licences in the next review of the LAP and would also recommend that the LAP include the full range of policies under section 77(1) of the Act.

Conclusion

16. The 2025 LAP maximum trading hour of 9pm for all off-licences:
 - aligns to the object of the Act,
 - is supported by evidence for reducing alcohol-related harm,
 - addresses local conditions and reflects community preferences and needs,
 - ensures greater consistency and synergy with LAPs in the Bay of Plenty and Waikato regions (eg Matamata-Piako District Council LAP¹⁷ and Thames-Coromandel District Council LAP¹⁸) and across Aotearoa New Zealand, and importantly
 - ensures that *all* off-licence premises are subject to the same maximum trading hour of 9pm, regardless of individual licence renewal dates.

References

- 1 Crossin R, Cleland L, Wilkins C, Rychert M, Adamson S, Potiki T, et al. The New Zealand drug harms ranking study: A multi-criteria decision analysis. *J Psychopharmacol (Oxf)*. 2023 Jun 23; 02698811231182012. Nutt DJ, King LA, Phillips LD. Drug harms in the UK: A multicriteria decision
- 2 The total societal cost of alcohol harms in 2023 is approximately \$9.1 billion based on the increased risk of morbidity and mortality, with over half (\$4.8 billion) due to fetal alcohol spectrum disorder (FASD). New Zealand Institute of Economic Research (NZIER). Cost of alcohol harms in New Zealand: Updating the evidence with recent research (2024): www.health.govt.nz/system/files/documents/publications/costs-of-alcohol-harms-in-new-zealand-2may24-v2.pdf.
- 3 Environmental Health Intelligence New Zealand. Alcohol-related harm indicators: <https://ehinz.ac.nz/indicators/alcohol-related-harm/about-alcohol-related-harm/#alcohol-related-harm-indicators>
- 4 Rehm J, Baliunas D, Borges GL, et al. The relation between different dimensions of alcohol consumption and burden of disease: an overview. *Addiction* 2010; 105: 817–43.
- 5 Institute for Health Metrics and Evaluation (IHME). GBD Compare Data Visualization 2019, New Zealand. Seattle: WA: University of Washington, 2022. <https://www.healthdata.org/data-visualization/gbd-compare>
- 6 Rotorua Lakes Council-Te Kaunihera o ngā Roto o Rotorua. Local Alcohol Policy Review Research Report. February 2025. https://hdp-au-prod-app-rlc-participate-files.s3.ap-southeast-2.amazonaws.com/4017/4175/8060/8e4bfbadaecec135ab94322a9809ec4c_Local20Alcohol20Policy20Research20Report202025.pdf.
- 7 Casswell S, Huckle T, Wall M, Yeh LC. International alcohol control study: pricing data and hours of purchase predict heavier drinking. *Alcoholism: Clinical and Experimental Research* [Internet]. 2014. 38(5):1425-31: <https://doi.org/10.1111/acer.12359>
- 8 Connor, J., MacLennan, B., Huckle, T., Romeo, J., Davie, G., & Kypri, K. (2021). Changes in the incidence of assault after restrictions on late-night alcohol sales in New Zealand: evaluation of a natural experiment using hospitalization and police data. *Addiction*, 116(4), 788-798.
- 9 Hahn RA, Kuzara JL, Elder R, Brewer R, Chattopadhyay S, Fielding J, Naimi TS, Toomey T, Middleton JC, Lawrence B, Task Force on Community Preventive Services. Effectiveness of policies restricting hours of alcohol sales in preventing excessive alcohol consumption and related harms [Internet]. *American Journal of Preventive Medicine*. 2010;39(6):590-604: <https://doi.org/10.1016/j.amepre.2010.09.016>.
- 10 Nepal S, Kypri K, Tekelab T, Hodder RK, Attia J, Bagade T, Chikritzhs T, Miller P. Effects of extensions and restrictions in alcohol trading hours on the incidence of assault and unintentional injury: systematic review [Internet]. *Journal of studies on alcohol and drugs*. 2020;81(1):5-23: <https://doi.org/10.15288/jsad.2020.81.5>
- 11 Rotorua Lakes Council meeting 11 June 2025, off-licence trading hours, resolution C25/06-107. <https://www.rotorualakescouncil.nz/repository/libraries/id:2e3idno3317q9sihrv36/hierarchy/Meetings/Council%20Meeting/2025-06-11/public-minutes-council-meeting-11-june-2025.pdf>
- 12 See submissions on the draft Rotorua Lakes LAP: <https://www.rotorualakescouncil.nz/repository/libraries/id:2e3idno3317q9sihrv36/hierarchy/Meeting%20s/Council%20Meeting/2025-06-11/redacted-full-submissions-catalogue-for-local-alcohol-policy-review-2025.pdf> and see Community Alcohol Survey, Question 11. Rotorua Lakes Council-Te Kaunihera o ngā Roto o Rotorua. Local Alcohol Policy Review Research Report. February 2025, page 80. https://hdp-au-prod-app-rlc-participate-files.s3.ap-southeast-2.amazonaws.com/4017/4175/8060/8e4bfbadaecec135ab94322a9809ec4c_Local20Alcohol20Policy20Research20Report202025.pdf

- 13 Courts of New Zealand. *Woolworths New Zealand Limited v Auckland Council and Foodstuffs North Island Limited v Auckland Council* [2023] NZSC 45 at [92]
<https://www.courtsofnz.govt.nz/assets/cases/2023/2023-NZSC-45.pdf>
- 14 Courts of New Zealand. *Woolworths New Zealand Limited v Auckland Council and Foodstuffs North Island Limited v Auckland Council* [2023] NZSC 45 at [93]
<https://www.courtsofnz.govt.nz/assets/cases/2023/2023-NZSC-45.pdf>.
- 15 Examples of LAPs with 9pm off-licence closing time:
 - Auckland Council LAP <https://www.aucklandcouncil.govt.nz/content/dam/ac/docs/policies/local-alcohol-policy.pdf>
 - Central Hawkes Bay District Council (draft) LAP [https://hdp-au-prod-app-chbdc-koreromai-files.s3.ap-southeast-2.amazonaws.com/7717/6360/9774/Draft Local Alcohol Policy FINAL.pdf](https://hdp-au-prod-app-chbdc-koreromai-files.s3.ap-southeast-2.amazonaws.com/7717/6360/9774/Draft%20Local%20Alcohol%20Policy%20FINAL.pdf)
 - Christchurch City Council LAP <https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Policies/WEB-Local-Alcohol-Policy-2025.pdf>
 - Gisborne District Council LAP [9pm since 5 March 2018]
<https://www.gdc.govt.nz/services/alcohol-and-food/local-alcohol-policy>
 - Hasting District Council LAP
<https://www.hastingsdc.govt.nz/assets/Documents/LAP/Local-Alcohol-Policy-2025.PDF>
 - Hurunui District Council LAP
[https://www.hurunui.govt.nz/repository/libraries/id:23wyoavbi17q9ssstcjd/hierarchy/Support Services/Policies/Alcohol/LAP%202023%20valid%20from%20March%201%202024](https://www.hurunui.govt.nz/repository/libraries/id:23wyoavbi17q9ssstcjd/hierarchy/Support%20Services/Policies/Alcohol/LAP%202023%20valid%20from%20March%201%202024)
 - MacKenzie, Timaru, Waimate District Councils Joint LAP [9pm since 2016]
https://www.mackenzie.govt.nz/_data/assets/pdf_file/0006/868074/Local-Alcohol-Policy-adopted-February-2024.pdf
 - Matamata-Piako District Council LAP [9pm since 2017]
<https://www.mppdc.govt.nz/filelink/fileman-files/CouncilDocuments/Policies/Alcohol/DraftLAP2023.PDF>
 - Porirua City Council LAP - [https://storage.googleapis.com/pcc-wagtail-media/documents/Porirua City Local Alcohol Policy 2025.pdf](https://storage.googleapis.com/pcc-wagtail-media/documents/Porirua%20City%20Local%20Alcohol%20Policy%202025.pdf)
 - Selwyn District Council LAP [9pm since 2017]
<https://www.selwyn.govt.nz/services/licensing/alcohol/local-alcohol-policy/documents/LAP-final-2025-07-21.pdf>
 - Thames-Coromandel District Council LAP [9pm since 2016]
<https://www.tcdc.govt.nz/files/assets/public/v/1/our-council/policies/adopted-local-alcohol-policy.pdf>
 - Wairoa District Council <https://www.wairoadc.govt.nz/assets/Document-Library/Policies/Local-Alcohol-Policy.pdf>
 - Whanganui - <https://www.whanganui.govt.nz/files/assets/public/v/2/policies/2025-local-alcohol-policy.pdf>
- 16 Alcohol Healthwatch. Aucklanders Praise New Alcohol Trading Hours. September 2025. Available from Auckland Council Regulatory and Safety Committee 2 September 2025.
[https://infocouncil.aucklandcouncil.govt.nz/Open/2025/09/20250902_RSCCC_ATT_11351.HTM#PDF3 Attachment 109047_2](https://infocouncil.aucklandcouncil.govt.nz/Open/2025/09/20250902_RSCCC_ATT_11351.HTM#PDF3_Attachment_109047_2). The Auckland LAP off-licence trading hours came into force 9 December 2024. Community feedback suggests that earlier off-licence closing times are already having a positive impact with improvements in family-friendly environments, reduced alcohol-related presentations to emergency departments, quieter, safer neighbourhoods, fewer incidents of public intoxication, and cleaner public spaces since the implementation of the LAP.
- 17 Matamata-Piako District Council Local Alcohol Policy 2023, clause 4.6.
<https://www.mppdc.govt.nz/filelink/fileman-files/CouncilDocuments/Policies/Alcohol/DraftLAP2023.PDF>
- 18 Thames-Coromandel District Council Local Alcohol Policy 2022, clause 4.1.
<https://www.tcdc.govt.nz/files/assets/public/v/1/our-council/policies/adopted-local-alcohol-policy.pdf>

11 February 2026

Attn: Local Alcohol Policy
Rotorua Lakes Council
DX Mailbox (JX 10503)
ROTORUA 3046

By email: letstalk@rotorualc.nz

**SUBMISSION ON THE ROTORUA LOCAL ALCOHOL POLICY OFF-LICENCE TRADING HOURS -
STATEMENT OF PROPOSAL**

Summary

1. As an off-licence holder in Rotorua, General Distributors Limited ("GDL") welcomes the opportunity to submit on the Rotorua Lakes Council Local Alcohol Policy 2025 Amendment ("LAP Amendment").
2. The LAP Amendment proposes to correct a technical issue with the interpretation of the maximum trading hours for off-licences under the current LAP (which came into force 1 August 2025).
3. GDL supports Option 1 in the Statement of Proposal: Off-licence Trading Hours dated November 2025 which will impose maximum trading hours of 7:00 am to 9:00 pm for all off-licences.
4. GDL wishes to be heard in relation to this submission.

GDL as an off-licence holder

5. GDL is a wholly owned subsidiary of Woolworths and is responsible for operating Woolworths stores nationwide. GDL owns and operates over 180 supermarkets under the Woolworths (formally operating as Countdown supermarkets) and Metro banners, and 4 "eStores" across New Zealand. Another subsidiary of Woolworths, Wholesale Distributors Limited, is the franchisor for over 70 SuperValue and FreshChoice supermarkets, which are locally owned and operated businesses.
6. As a holder of over 180 off-licences in New Zealand, GDL is an experienced licence holder and is committed to being a responsible retailer of alcohol. GDL acknowledges that it has a shared responsibility to prevent alcohol-related harm and ensure that consumption of alcohol is undertaken safely and responsibly.
7. GDL holds two off-licences in the Rotorua district:
 - (a) Woolworths Fairy Springs (which has trading and opening hours of Monday to Sunday 7:00 am to 10:00 pm); and
 - (b) Woolworths Rotorua which trades Monday to Sunday 7:00 am to 10:00 pm, with licensed hours of Monday to Sunday 7:00 am to 10:15 pm (except during the period of 11 December to 24 December where it trades Monday to Sunday 7:00 am to 11:00 pm).

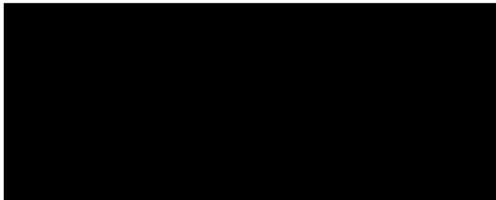
Consistent application of trading hours for off-licences

8. The current LAP (which came into force 1 August 2025) limits trading hours to 7:00 am to 9:00 pm only for premises that have had their off-licence issued or renewed after 1 November 2025. Premises who were granted an off-licence prior to this date are not subject to the reduced trading hours, until their off-licence is renewed. As outlined in the Statement of Proposal, it may not be until 2028 that all off-licence premises are subject to the same maximum closing time.¹
9. The LAP Amendment seeks to reduce the maximum off-licence trading hours to 7:00 am to 9:00 pm for all off-licence holders regardless of when the licence is renewed.
10. GDL understands a blanket approach was the original intention of the Rotorua Lakes District Council when the LAP came into force in August 2025.² However, due to a technical issue in its interpretation, the reduced trading hours are only triggered when a licence is issued or renewed. The Council now seeks to amend this to ensure all off-licence premises cease trading at 9.00 pm. GDL considers it is appropriate that the maximum trading hours are applied consistently across the district and accordingly, supports Option 1 in the Statement of Proposal.

Relief sought

11. GDL supports Option 1 in the Statement of Proposal which proposes amendments to policy 3.4 "[m]aximum trading hours for premises holding off-licences and deliveries" to ensure all off-licences (regardless of when they were granted) are subject to the maximum trading hours of 9:00 pm three months following public notification of the adopted LAP.³

Yours faithfully,



Paul Radich
General Distributors Limited

¹ Local Alcohol Policy Statement of Proposal November 2025, page 3.
² Local Alcohol Policy Workshop 2 Presentation, page 47.
³ Local Alcohol Policy Statement of Proposal November 2025, page 3.

11 February 2026

Rotorua Lakes Council
Civic Centre
1061 Haupapa Street
ROTORUA

Tēnā koutou Rotorua Lakes Council,

TECHNICAL ADVICE: Local Alcohol Policy 2025 Amendment

1. Health New Zealand –Te Whatu Ora National Public Health Service (Health NZ) in Te Manawa Taki region is providing technical advice on the Local Alcohol Policy (LAP) 2025 Amendment. National Public Health Service (NPHS) Te Manawa Taki services Taranaki, Waikato, Bay of Plenty, Rotorua, Taupō, Tūrangi and Tairāwhiti areas. Our National Public Health Service purpose is to:

Manaakitia ngā whānau mō pae ora

Enable whānau and communities to lead lives of wellness

2. NPHS recognises its responsibilities to improve, promote and protect the health and wellbeing of people and communities of Aotearoa New Zealand under the Pae Ora (Healthy Futures) Act 2022 and the Health Act 1956. To achieve healthy communities and health equity across population groups, we work together across Health NZ and with other sectors to address the determinants of health.¹
3. Medical Officers of Health² have a responsibility to reduce conditions within their local community that are likely to cause injury and disease, including alcohol-related harm. The following advice to Council is provided in accordance with the responsibilities pursuant to the Sale and Supply of Alcohol Act 2012 (SaSA 2012) to ensure the safe and responsible sale, supply, and consumption of alcohol.
4. This document reiterates the advice that we provided during the LAP Review (see **Appendix 1**).
5. We welcome the opportunity to share public health advice and evidence in planning and decision making with Rotorua Lakes Council (RLC). We wish to speak to our advice at the hearing. The primary contact point for this technical advice is Health Improvement Advisor, Renee Bolkow [REDACTED]

General Comments

6. NPHS Te Manawa Taki acknowledges Council for consultation on a proposed amendment to the LAP 2025. This allows for communities to have more say on access to alcohol along with the potential to help reduce alcohol harm.

TeWhatuOra.govt.nz

[REDACTED]
[REDACTED]

7. As highlighted in our previous advice, alcohol causes significant harm to individuals, whānau and communities. Every year in Aotearoa NZ, alcohol causes approximately 900 deaths, 1250 cancer diagnoses and 30,000 hospitalisations.³ Alcohol related harm in New Zealand is estimated to cost \$9.1 billion each year.⁴ These harms are not distributed equitably as Māori are twice as likely to die from alcohol-related causes compared to non-Māori.³ People in the most socio-economically deprived areas are also at greater risk of harm from alcohol. Of note, people in these areas are also exposed to more off-licence premises as they have three times as many outlets compared to the least deprived areas.⁵
8. Off-licences sell over 80% of alcohol in Aotearoa NZ⁶ and they are considered to cause the most harm in communities because of the ease of access to alcohol and it then being consumed in environments where there may be no supervision.
9. In the 2023/24 financial year, an estimated 566 alcohol attributable hospitalisations occurred within the Rotorua District. This figure serves as the baseline data set for monitoring purposes. NPHS Te Manawa Taki will continue to track alcohol attributable hospitalisations to evaluate the impact of the LAP over time. We are also strengthening our monitoring systems to enable the provision of updated data to Council as it becomes available.

Specific Comments

From a public health perspective, recent legal findings, and council-led policy developments across Aotearoa New Zealand demonstrate increasing alignment between regulatory settings and evidence-based approaches to reducing alcohol-related harm, including earlier off-licence trading hours.

Off-licence trading hours

10. NPHS Te Manawa Taki strongly supports the proposed wording clause amendment to ensure that all off-licence premises are subject to the same maximum trading hours of 9:00pm, regardless of individual licence renewal dates. We support applying the reduction of maximum default trading hours to *all* off-licence types to create standardization for industry and to enhance the effectiveness of the policy in reducing alcohol-related harm.
11. The Supreme Court's 2023 ruling on Auckland City Council's Provisional LAP indicated that a 9pm closing time (for off-licence premises) was not unreasonable considering the object of the Sale and Supply of Alcohol Act 2012. The Court also found that the Alcohol Regulatory and Licensing Authority had extensively reviewed the evidence which indicated that changing the closing time to 9:00pm was likely to reduce alcohol-related harm.⁷
12. Auckland's LAP is showing early signs of reducing alcohol-related harm, after only six months, with residents reporting quieter, safer neighbourhoods, fewer incidents of public intoxication, and cleaner public spaces since its implementation. Initial community feedback gathered early last year through Alcohol Healthwatch, highlights improvements in family-friendly environments and reduced alcohol-related presentations to emergency departments, suggesting that earlier off-licence closing times are already having a

positive impact.⁸

13. For several years, Councils throughout the motu have been implementing a maximum 9:00pm closing time. Currently there are around 14 Councils with a maximum closing time of 9:00pm for off-licences. We recommend RLC joins this trend to support communities in reducing alcohol harm.
14. In 2025, Hauraki District Council put in force a maximum closing time of 8:00pm for all off-licences.
15. Research from Aotearoa NZ and international based studies support the reduction of alcohol license hours with respect to reducing alcohol-related harms. These studies show that extending hours (i.e., closing hours being later) results in more harm and reducing hours (i.e., closing hours being earlier) decreases harm. Harms include hazardous consumption, physical and sexual assault, and police offences.⁹⁻¹³

Other comments

16. NPHS Te Manawa Taki notes that this consultation does not address off-licence opening times. For future reviews, we recommend a 9:00am opening time for all off-licences to reduce alcohol-related harm, support the object of the Act, limit children's exposure to alcohol on the way to school, and better support people living with alcohol dependence. This aligns with community feedback, with 84% of respondents in Council's *Community Alcohol Survey* reporting they never purchase alcohol before 9:00am.
17. In 2025, Hastings and Porirua Councils implemented a 9:00am opening time for off-licences, and off-licences within the Hauraki District open at 8:00am.

In summary, we support the decision to standardise the closing time for all off-licences across the Rotorua district to 9:00pm. Measures that reduce the availability of alcohol can lead to positive outcomes for communities and whānau within Rotorua.

Ngā mihi,



Dr Lynne Lane

Public Health Medicine Specialist | Medical Officer of Health
National Public Health Service Te Manawa Taki

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Appendix 1

31 March 2025

Rotorua Lakes Council
Civic Centre
1061 Haupapa Street
ROTORUA

Tēnā koutou, Rotorua Lakes Council

TECHNICAL ADVICE: Draft Local Alcohol Policy

As required by the Sale and Supply of Alcohol Act (2012) the Health New Zealand National Public Health Service (NPHS) Te Manawa Taki Medical Officer of Health is providing advice on the Draft Local Alcohol Policy (LAP).

National Public Health Service Te Manawa Taki services Taranaki, Waikato, Bay of Plenty, Rotorua, Taupō and Tairāwhiti communities. Our National Public Health Service purpose is:

Manaakitia ngā whānau mō pae ora |

Enable whānau and communities to lead lives of wellness.

NPHS recognises its responsibilities to improve, promote and protect the health and wellbeing of people and communities of Aotearoa New Zealand under the Pae Ora (Healthy Futures) Act 2022 and the Health Act 1956 and other legislation. To achieve healthy communities and health equity across population groups, we work together across Health NZ and with other sectors to address the determinants of health.¹

Medical Officers of Health² have a responsibility to reduce conditions within their local community that are likely to cause injury and disease, including alcohol-related harm. The following advice to Council is provided in accordance with the responsibilities pursuant to the Sale and Supply of Alcohol Act 2012 (SaSA 2012) to ensure the safe and responsible sale, supply, and consumption of alcohol.

We welcome the opportunity to share public health advice and evidence in planning and decision-making with Rotorua Lakes Council. We wish to speak to our advice.

General Comments

The determinants of health

1. The determinants of health are the circumstances in the environments in which people are born, grow up, live, learn, work and age. These conditions can be described as environmental, economic, commercial and social.³ They have a significant influence on

¹ Determinants of health. (2017, February 3). World Health Organization.

² Section 7A, Health Act 1956

³ Public Health Advisory Committee. (2004). *The Health of People and Communities. A Way Forward: Public Policy and the Economic Determinants of Health*. Public Health Advisory Committee.

health outcomes.

2. Commercial determinants of health are private sector activities that influence health, directly or indirectly, positively or negatively.⁴ The alcohol industry is a commercial determinant of health because its actions contribute to a range of health and social impacts.⁵ Rotorua Lakes Council's LAP is an ideal opportunity to influence this commercial determinant of health through policy initiatives aimed at minimising alcohol-related harm in the community. Initiatives to improve health outcomes and overall quality of life must involve organisations and groups beyond the health sector, such as Councils, Iwi/hapū/whānau, Pacific peoples, and Police if they are to achieve their greatest impact.

Alcohol-related harm

3. In the Rotorua district between 2018 and 2023, there was a significant increase in the population living in deprivation decile 10 areas, with the population gain in these areas surpassing the total population gain for the district.⁶ Notably, just over a quarter (i.e., 26%) of Rotorua's population resides in high deprivation areas.⁷
4. Nationally, high deprivation communities are at greater risk of adverse health outcomes, including alcohol-related harm. In addition, the density of off-licence outlets is three times higher in areas of high deprivation (94.6 per 100,000 people) compared to areas of low deprivation (31.0 per 100,000 people).⁸ Communities with a higher proportion of Māori also experience relatively higher off-licence density, with 74.5 alcohol outlets per 100,000 people, compared to 56.4 per 100,000 people in communities with a high proportion of non-Māori.⁸
5. A report by the New Zealand Institute of Economic Research (NZIER) for the Ministry of Health estimates that the total societal cost of alcohol-related harm in New Zealand is \$9.1 billion annually (\$4.8 billion of this is due to fetal alcohol spectrum disorder (FASD)).⁹ A healthier community is a more productive and prosperous one.
6. There is no safe level of alcohol consumption.¹⁰ A recent study evaluated and ranked drug harms using a multi-criteria decision analysis (MCDA) framework. The findings demonstrated alcohol causes more harm than any other drug in Aotearoa New Zealand.¹¹

⁴ World Health Organization (WHO) Fact Sheets on the Commercial Determinants of Health[Internet]. 2023 March 21. Available from <https://www.who.int/news-room/fact-sheets/detail/commercial-determinants-of-health>

⁵ de Lacy-Vawdon, C., & Livingstone, C. (2020). Defining the commercial determinants of health: a systematic review. BMC Public Health, 20, 1-16.

⁶ Health New Zealand | Te Whatu Ora. 2025. Alcohol Related Harm: Rotorua District. Wellington: Health New Zealand | Te Whatu Ora

⁷ University of Otago. n.d. Socioeconomic Deprivation Indexes: NZDep and NZiDep, Department of Public Health. <https://www.otago.ac.nz/wellington/research/groups/research-groups-in-the-department-of-public-health/hip/socioeconomic-deprivation-indexes-nzdep-and-nzidep-department-of-public-health>

⁸ Chambers T, Mizdrak A, Herbert S, Davies A, Jones A. The estimated health impact of alcohol interventions in New Zealand: a modelling study. Addiction. 2023. <https://doi.org/10.1111/add.16331>

⁹ NZIER. 2024. Costs of alcohol harms in New Zealand: Updating the evidence with recent research. A report for the Ministry of Health. Available from [Costs of alcohol harms in New Zealand: Updating the evidence with recent research | Ministry of Health NZ](#)

¹⁰ World Health Organization. Europe. 2023. "No Level of Alcohol Consumption Is Safe for Our Health." <https://www.who.int/europe/news/item/04-01-2023-no-level-of-alcohol-consumption-is-safe-for-our-health>

¹¹ Crossin, R., Cleland, L., Wilkins, C., Rychert, M., Adamson, S., Potiki, T., Pomerleau, A.C., et al. 2023. "The New Zealand Drug Harms Ranking Study: A Multi-Criteria Decision Analysis." Journal of Psychopharmacology 37 (9): 891–903. <https://doi.org/10.1177/02698811231182012>.

7. In 2018 alone, alcohol caused an estimated 901 deaths (cancers contributed the greatest number of these deaths, at 376, followed by injuries, at 296), 1,250 cancers (13% [n=464] of breast cancers and 12.6% [n=401] of colorectal cancers were attributed to alcohol), 29,282 hospitalisations (injuries accounted for 44% of these), 49,742 Disability Adjusted Life Years, and 128,963 Accident Compensation Corporation (ACC) claims.⁸
8. Alcohol-related harms are unevenly distributed by ethnicity in Aotearoa New Zealand. Māori are disproportionately affected, and twice as likely to die from alcohol-related causes compared with non-Māori.⁸ Locally, Māori account for a disproportionate number of alcohol-related presentations to Rotorua Hospital Emergency Department.⁶
9. Efforts to reduce alcohol-related harm in the Rotorua district, particularly among Māori communities, align with the Rotorua Lake Council's obligations under Article 3 of Te Tiriti o Waitangi. Implementing our recommendations will promote equitable health outcomes.
10. Alcohol use contributes to serious mental health problems. The World Health Organization (WHO) identifies alcohol as a major risk factor for suicide.¹² Research shows that over a quarter of people who die by suicide in Aotearoa New Zealand are acutely affected by alcohol at the time of their death.¹³ Aotearoa New Zealand also has one of the highest rates of suicide in the Organisation for Economic Co-operation and Development (OECD) for children aged 15-18 years of age (14.9 deaths per 100,000 adolescents, more than twice the average among 41 OECD countries).¹⁴

Global health viewpoint

11. The following policies recommended by the WHO are proven to reduce alcohol-related harm, and are relevant to Local Alcohol Policies:¹⁵
 - a. Raising the price of alcohol to make it less affordable.
 - b. Strengthen restriction on availability.
 - c. Limiting alcohol advertising and promotion.

Government viewpoint

12. The current Government has placed great importance on addressing the high levels of alcohol-related harm, evidenced by the fact that alcohol is one of the five modifiable risk factors prioritised in the Government Policy Statement on Health 2024 – 2027.¹⁶

Specific Comments

This section of our advice follows the structure of the Draft LAP and addresses Council's consultation questions.

On-Licences:

¹² World Health Organization. Preventing suicide: A global imperative. Geneva: World Health Organization, 2014.

¹³ Crossin R, Cleland L, Beutrais A, et al. Acute alcohol use and suicide deaths: An analysis of New Zealand coronial data from 2007–2020. *New Zealand Medical Journal* 2022;135(1558):65-78.

¹⁴ UNICEF. (2020, September). *New Report Card shows that New Zealand is failing its children*. Retrieved from UNICEF: <https://www.unicef.org.nz/stories/new-report-card-shows-that-new-zealand-is-failing-its-children>

¹⁵ The SAFER technical package: five areas of intervention at national and subnational levels. Geneva: World Health Organization; 2019.

¹⁶ Minister of Health. 2024. Government Policy Statement on Health 2024 – 2027. Wellington: Ministry of Health.

13. NPHS Te Manawa Taki supports the reduction in trading hours for on-licences within the Inner City. However, we recommend the maximum trading hours to be 9:00am to 1:00am for both the Inner City and outside the Inner City. This will not only simplify the LAP, but also further reduce the potential for alcohol-related harm. Intoxicated people outside the Inner City will be less likely to migrate or drink drive to the Inner City to consume more alcohol. As indicated in a Health NZ Intelligence report, presentations involving alcohol to the Rotorua Hospital Emergency Department peak between 11:00pm and 3:00am.⁶ Earlier closing times for on-licence premises is supported by evidence that closing bars and pubs earlier leads to reduced alcohol-related physical harms including the incidence of assault and hospitalisation.^{17,18}
14. The current LAP has no restrictions for new on-licences in relation to sensitive facilities. We recommend no new on-licence applications (excluding cafes or restaurants) are granted if the premises are to be located within a 200m radius of any sensitive facility.
15. Also, we recommend any new on-licence premises are required to conduct a pre-application engagement with sensitive facilities within a 200m radius. NPHS Te Manawa Taki would like to work with Council to develop the pre-application engagement process, and we suggest the new LAP to include this process as an appendix or link on RLC's website (i.e., template letter and meeting agenda). We recognise, evidence of pre-application engagement would ensure that the concerns of communities and sensitive facilities are considered in licensing decisions.

On-licence discretionary conditions:

16. We recommend a mandatory one-way door restriction is included for on-licence premises that operate as a pub, tavern or nightclub. One-way door restrictions are considered a policy tool to mitigate alcohol-related issues at late-night premises and reduce alcohol-related harm. These restrictions can potentially lessen the strain on police, ambulance, and hospital services, benefiting not only the patrons of these venues but also the wider community.¹⁹ A systematic review of eight studies published before June 2017 found that two studies reported a decline in assaults following the implementation of one-way door policies. One study showed reductions in assaults only within licenced premises, two studies indicated an increase in assaults, and three studies found no significant difference.²⁰
17. Our above recommendation is to include premises on 'Eat Street.'

Off-Licences:

¹⁷ Connor J, MacLennan B, Huckle T et al. Changes in the incidence of assault after restrictions on late-night alcohol sales in New Zealand: evaluation of a natural experiment using hospitalization and police data. *Addiction*. 2021 Apr;116(4):788-98.

¹⁸ Nepal S, Kypri K, Tekelab T, Hodder RK, Attia J, Bagade T, Chikritzhs T, Miller P. Effects of extensions and restrictions in alcohol trading hours on the incidence of assault and unintentional injury: systematic review [Internet]. *Journal of Studies on Alcohol and Drugs*. 2020;81(1):5-23. Available from: <https://doi.org/10.15288/jsad.2020.81.5>

¹⁹ Alcohol Healthwatch. (2024). A guide to inform Local Alcohol Policy development. Auckland. New Zealand: Alcohol Healthwatch.

²⁰ Nepal S, Kypri K, Pursey K, Attia J, Chikritzhs T, Miller P. Effectiveness of lockouts in reducing alcohol-related harm: systematic review [Internet]. *Drug and alcohol review*. 2018;37(4):527-36. Available from: <https://doi.org/10.1111/dar.12699>

18. NPHS Te Manawa Taki strongly supports the proposed stipulation that no new off-licences will be issued for 36 months from the date the new LAP is implemented. Furthermore, a strengthened approach would be implementing a permanent freeze in areas of deprivation 7 to 10 (outside the Inner City) with the consideration of a sinking lid. As noted earlier, over a quarter of Rotorua's population lives in high deprivation areas.
19. We support the reduction of off-licence trading hours; however, we recommend a further reduction of 9:00am to 9:00pm. A robust LAP which limits trading hours is crucial to mitigate alcohol-related harm. Literature highlights that an increase in hazardous drinking occurs with longer trading hours and increased availability of alcohol.²¹
20. A recent modelling study, estimated that implementing stricter limits on off-licence trading hours (reduced to 50 hours per week) and density (reduced to 5 outlets per 100,000 people) could decrease overall alcohol consumption in Aotearoa New Zealand by 17.9%, resulting in a gain of 450,000 health-adjusted life years (HALYs) over the lifetime of the 2018 population.⁸ Limiting trading hours aligns with the WHO's recommendations of strengthening restrictions on alcohol availability mentioned earlier. In addition, there is local public support for off-licences operating from 9:00am to 9:00pm. We note that from Council's *Community Alcohol Survey*, 84% of respondents indicated they 'Never' purchase alcohol before 9:00am from off-licence premises. Furthermore, 63% of respondents purchase alcohol between 9:00am and 9:00pm.
21. We agree with Council's proposal to align delivery hours with off-licence trading hours to remove any loopholes. We support the courier warning and associated wording for the outside of the alcoholic delivery package.
22. We support Council's proposed definition of a sensitive facility to include places of worship, residential activity, youth centres, rehabilitation treatment facilities, community facility, educational facility, hospital, marae or urupā. NPHS Te Manawa Taki recommends a sensitive facility to include areas of cultural significance, health facilities, high deprivation areas (i.e., 7-10), and recreational facilities. Furthermore, we suggest amending the wording of 'hospitals' to 'health care facilities.' The recommendation of including a broader range of sensitive facilities, aims to protect the most underserved population groups within the Rotorua district.
23. After the 36-month freeze, we recommend that outside the Inner City to expand the current requirements of new off-licences by reference to proximity to sensitive facilities to 400m. This will ultimately have a significant effect on reducing alcohol-related harm within our communities. Specifically, areas such as Ngongotahā, Mamaku, Reporoa, and Kaingaroa Forest will not have any new off-licence outlets within the timeframe of this new policy.
24. A restriction of 400m for any new off-licence applications regarding proximity to sensitive facilities, compares to the distance of any specialist vape retailer (SVR) stores to schools or marae. An SVR store must be more than 300m from a school or marae.²²
25. A nationwide study by the University of Canterbury showed that proximity to alcohol outlets is associated with increased hazardous drinking and crime, including common assault and

²¹ Casswell, S., Huckle, T., Wall, M., & Yeh, L.C. (2014). International alcohol control study: Pricing data and hours of purchase predict heavier drinking. *Alcoholism: Clinical and Experimental Research*, 38(5), 1425-1231.

²² Ministry of Health 2024. [Recent changes to Smokefree laws | Ministry of Health NZ](#)

sexual assault.²³ This suggests that having off-licence outlets near schools could contribute to a more hazardous environment for students. Furthermore, this highlights the importance of Local Authorities implementing strong restrictions to protect young people and the wider community.

26. Our recommendation of 400m may be modest in relation to reducing alcohol-related harm in young people. For instance, a study conducted in Perth, Australia, involving 14-year-old students, revealed that the presence of a bottle store within 800m of their school was significantly linked to them having consumed alcohol at some point. Additionally, having a bottle store within 800m of either their home or school (or both) was associated with a higher likelihood of engaging in heavy drinking.²⁴
27. We agree with Council's proposal for all new off-licence applicants to conduct a pre-application engagement with sensitive facilities. As mentioned earlier, evidence of the engagement process will ensure that the concerns of communities and sensitive facilities are considered in licensing decisions.

Off-licence discretionary conditions:

28. NPHS Te Manawa Taki supports the inclusion of the mandatory condition of off-licensees to develop, display, and maintain a Social Responsibility Policy. As the draft LAP indicates such a policy should demonstrate the measures in place at the premises to minimise alcohol-related harm.
29. NPHS Te Manawa Taki supports including the condition for off-licence outlets to maintain an alcohol incident register or book. An incident register is a way to track the incidents on licenced premises and is a means to definitively assess alcohol-related harm.
30. NPHS Te Manawa Taki commends Council's mandatory condition of restricting the use of after pay services to procure alcohol from off-licences. There is evidence that buy now/pay later schemes (e.g. "Layby®" or "Afterpay®") are seen to promote impulse spending, therefore are not appropriate payment mechanisms for addictive or harmful products.²⁵
31. NPHS Te Manawa Taki strongly supports the proposal to ban alcohol advertising including promotions on the premises' exterior and signage so that no alcohol advertising is visible from outside the premises.
32. Children's exposure to alcohol marketing is a significant concern. Research from the University of Otago's Kids'Cam study, which used digital cameras, found that children aged 11-13 years were exposed to alcohol marketing an average of 4.5 times a day.²⁶ Furthermore, the Kids'Cam study revealed, tamariki Māori and Pacific children were

²³ Hobbs, M., Marek, L., Wiki, J., Campbell, M., Deng, B. Y., Sharpe, H., McCarthy, J., & Kingham, S. (2020). Close proximity to alcohol outlets is associated with increased crime and hazardous drinking: Pooled nationally representative data from New Zealand. *Health & Place*, 65, 102397.

²⁴ Trapp GS, Knuiman M, Hooper P, Foster S. Proximity to liquor stores and adolescent alcohol intake: A prospective study [Internet]. *American Journal of Preventive Medicine*. 2018;54(6):825-30. Available from: <https://www.sciencedirect.com/science/article/abs/pii/S074937971831599X>

²⁵ O'Brien L, Ramsay I, Ali P. Innovation, Disruption and Consumer Harm in the Buy Now Pay Later Industry: An Empirical Study. *University of New South Wales Law Journal*. 2024;47:2, 2024 (forthcoming), Retrieved from https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4635958

²⁶ Chambers T, Stanley J, Signal L, et al. Quantifying the nature and extent of children's real-time exposure to alcohol marketing in their everyday lives using wearable cameras: Children's exposure via a range of media in a range of key places. *Alcohol* 2018; 53: 626–633.

exposed to alcohol advertising at rates of five and three times higher, respectively, compared to non-Māori and non-Pacific children.²⁶ Additional research has found there is a causal relationship between alcohol marketing and drinking among young people.²⁷ Young people's exposure to alcohol advertising is associated with earlier uptake of drinking and heavy drinking among adolescents who already drink.²⁸

33. Other vulnerable populations such as people recovering from alcohol dependence are also negatively impacted by alcohol advertising. Research indicates that heavy and problem drinkers are more responsive and therefore more vulnerable to alcohol advertising than others.²⁹ While there is limited research on other subgroups of adults vulnerable to alcohol marketing and its harms, the Royal Australian and New Zealand College of Psychiatrists³⁰ has noted other vulnerable adult groups may include:

- People suffering from mental health issues
- Individuals with anger management issues
- Adults with intellectual disabilities
- People at risk of dementia and neuropsychiatric conditions
- Women who may or may not know they are pregnant and are unaware of the risks of fetal alcohol spectrum disorders.

34. Again, NPHS Te Manawa Taki commends RLC's proposed mandatory condition of not allowing external alcohol advertising, signs or chattels. Limiting alcohol advertising and promotion is an important step towards reducing alcohol-related harm which is one of the WHO's proven policy recommendations.

35. NPHS Te Manawa Taki recommends adopting an additional discretionary condition regarding single sales. Specifically, included in recent District Licencing Committees (DLC) and or case law,³¹ we suggest including a no single sales condition on off-licenced premises.

36. We recommend no drinking games to be sold at off-licenced premises, specifically bottle stores.

37. An additional recommendation we have is to include FASD warning signage within the single sale alcohol area in supermarkets and grocery stores, and at the point of sale at bottle stores. As previously stated, the annual societal cost of FASD is \$4.8 billion in Aotearoa New Zealand.⁹

Club Licences:

38. NPHS Te Manawa Taki recommends shortening the opening hours for club licences to 9.00am. As mentioned earlier, longer trading hours is associated with an increase in hazardous drinking.

²⁷ Sargent, J. D., & Babor, T. F. (2020). The relationship between exposure to alcohol marketing and underage drinking is causal. *Journal of Studies on Alcohol and Drugs, Supplement*, (s19), 113-124.

²⁸ Brown K. Association Between Alcohol Sports Sponsorship and Consumption: A Systematic Review. *Alcohol Oxf* 2016; 51: 747–55.

²⁹ Babor T, Robaina K, Noel J, Ritson E. Vulnerability to alcohol-related problems: a policy brief with implications for the regulation of alcohol marketing. *Addiction* 2017; 112: 94–101.

³⁰ Alcohol Healthwatch 2021: Alcohol Marketing: Retrieved from: Factsheet - Alcohol Marketing Feb 2021_1.pdf

³¹ Communities Against Alcohol Harm (2024). Improving Practice for Single Sales including High Strength Low-Cost Beer

Club licence discretionary conditions:

39. NPHS Te Manawa Taki recommends RLC to consider adopting additional discretionary conditions similar to which are included in Tauranga City Council's (TCC) LAP.³² These conditions are considered to help promote more responsible alcohol consumption.

Special Licences:**Special licence discretionary conditions**

40. In addition to the current discretionary conditions for special licences, again, we recommend RLC incorporates similar conditions which are included in TCC's LAP.³² Alcohol-related harm will reduce with the inclusion of these conditions for special licenced events.
41. Furthermore, we recommend prohibiting licences for events focused on children and young people under 18 years of age to limit their exposure to alcohol. There is evidence to suggest the negative impacts of children witnessing a parent or primary carer consume alcohol. A 2014 study found that the 'European approach' to drinking increases young people's likelihood to drink hazardously at an earlier age.³³ Another study from 2017 found that children who had witnessed their parents tipsy or drunk were less likely to perceive their parent as a positive role model. Moreover, children were more likely to report a parent being more unpredictable and more argumentative than usual.³⁴

Conclusion

42. In conclusion, the new Draft LAP proposed by the Rotorua Lakes Council represents a significant step towards reducing the relatively high levels of alcohol-related harm and promoting public health in the community. We urge the Council to consider our evidence-based advice, our recommendations in response to the consultation questions, and to rigorously enforce the LAP provisions. By doing so, we can create a safer, healthier, and more vibrant Rotorua for all residents and visitors.

Nāku iti nei, nā,



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³² Tauranga City Council 2024 [Local Alcohol Policy](#)

³³ Kaynak, Ö., Winters, C., Cacciola, J., Kirby, C., & Arria, M. (2014). Providing alcohol for underage youth: what messages should we be sending parents? *Journal of Studies on Alcohol and Drugs*, 75(4), 590-605.

³⁴ Institute of Alcohol Studies, (2017). Like sugar for adults: The effect of non-dependent parental drinking on children and families. <http://www.ias.org.uk/uploads/pdf/IAS%20reports/rp28102017.pdf>