

## **Submission on: Sale and Supply of Alcohol (Rugby World Cup 2023 Extended Trading Hours) Amendment Bill**

To: The Justice Committee

14 June 2023

### **Introduction**

This submission is by the Cancer Society of New Zealand. We are a registered charity with a mission to reduce the incidence and impact of cancer in New Zealand.

Thank you for the opportunity to provide feedback on this bill.

We would like the opportunity to speak to our submission.

If you have any questions on our submission, please contact:

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## We wish to make the following comments

### Alcohol is a cause of at least seven types of cancer

Alcoholic drinks are a Group 1 carcinogen and a preventable cause of many different types of cancer<sup>12</sup>. Alcohol increases the risk of cancers of the mouth, pharynx (throat), larynx (voice box), oesophagus, bowel, liver, and breast (in women)<sup>3</sup>.

Any regular alcohol use (even small amounts) increases the chances of developing cancer. The more alcohol, the greater the risk of cancer<sup>4</sup>. There is no safe minimum level of alcohol use in relation to cancer.

In Aotearoa, 2020, an estimated 943 cancers including 367 colorectal, 264 breast and 99 oral cavity cases were attributed to alcohol<sup>5</sup>. In 2016, an estimated 6.6% of cancers deaths were attributable to alcohol<sup>6</sup>. Māori are disproportionately affected by alcohol-attributable cancer with Māori 2.5 times more likely to die than non-Māori and suffering a greater average loss of healthy life than non-Māori<sup>7</sup>.



### Alcohol is too available in our communities

Despite alcohol causing considerable harm, such as cancer, it has become normalised and readily available, affordable and marketed in our neighbourhoods<sup>8,9,10,11</sup>. This is even more so in low-income communities<sup>12,13</sup>. Intergenerational experiences of colonisation, discrimination, and inequity in these structural and environmental factors have contributed to Māori being more burdened by alcohol-attributable cancers<sup>14,15</sup>.

### Longer trading hours increase the chance of alcohol-related harm

Trading hours are important measures to protect communities against alcohol-related harm. In many parts of the country, trading hours have been agreed upon following consultation with the community. Evidence shows that the consumption increases with increased trading hours<sup>16</sup>.

The Government-commissioned Law Commission report<sup>17</sup> from 2010 recommended that trading hours should not exceed the national trading hours. This was recommended because the longer trading hours are, the greater the chance for alcohol-related harm.

As a cancer charity, we've focused in our submission on the alcohol-related harm that causes cancer. However, we note that there are many other known alcohol-related harms that should be taken into account with regards to sporting events and alcohol including increased hospitalisations, increased domestic violence and violent behaviour among sports fans.

This Amendment bill is likely to breach the object of the Sale and Supply of Alcohol Act 2012

The object (section 4) of the Sale and Supply of Alcohol Act 2012,<sup>6</sup> is that:

- (a) The sale, supply, and consumption of alcohol should be undertaken safely and responsibly; and
- (b) The harm caused by the excessive or inappropriate consumption of alcohol should be minimised.

Extending the trading hours during the Men's Rugby World Cup 2023, would neither minimise alcohol-related harm or prevent further alcohol-related harm. As such, it is likely to be breach of the object of the Act.

#### Alcohol advertising causes tamariki and rangatahi to drink more

We are also concerned about children and young people's exposure to alcohol advertising and that the Rugby World Cup will lead to increased exposure. Alcohol, a Group 1 carcinogen, is aggressively marketed with industry spending millions on advertising, and sponsorship of sports and culture<sup>18</sup>. Children in Aotearoa are exposed to alcohol marketing over 4.5 times every day<sup>19</sup>. Greater marketing exposure increases the likelihood of earlier and more hazardous drinking<sup>20,21</sup>.

### We wish to make the following recommendations

1. People's health is put over profits, and that current trading hours be adhered to and not adjusted for certain events including, but not limited to, the Rugby World Cup 2023.
2. Considerations around trading hours for the Rugby World Cup 2023 be processed in a consistent manner through the special licencing process, as per other events.
3. Special licencing process be reviewed for its effectiveness with regards to the objectives of the Act.
4. A review of the special licencing process form part of a wider review of the Act in its entirety, to ensure that all parts of the legislation are functioning and implemented to reduce alcohol-related harm as intended.

Should the Bill proceed, we suggest the following:

1. Impose a risk-based fee on the licensees who notify their extended licensing hours during the Rugby World Cup 2023. This would help to cover the increased costs of monitoring and enforcement and increased levels of alcohol-related harms.
2. Any special arrangement for the Rugby World Cup 2023 should seek to limit the risk of alcohol advertising to tamariki

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- <sup>3</sup> Connor J. Alcohol consumption as a cause of cancer. *Addiction* 2017; 112: 222–228
- <sup>4</sup> Griswold MG, Fullman N, Hawley C, et al. Alcohol use and burden for 195 countries and territories, 1990–2016: a systematic analysis for the Global Burden of Disease Study 2016. *The Lancet* 2018; 392: 1015–1035
- <sup>5</sup> Rumgay H, Shield K, Charvat H, Ferrari P, Sornpaisarn B, Obot I, Islami F, Lemmens VEPP, Rehm J, Soerjomataram I. Global burden of cancer in 2020 attributable to alcohol consumption: a population-based study. *Lancet Oncol.* 2021 Aug;22(8):1071-1080. doi:10.1016/S1470-2045(21)00279-5. PMID: 34270924; PMCID: PMC8324483.
- <sup>6</sup> World Health Organisation. New Zealand Country Cancer Profile;2020. [https://www.who.int/cancer/country-profiles/NZL\\_2020.pdf](https://www.who.int/cancer/country-profiles/NZL_2020.pdf).
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- <sup>11</sup> 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. <https://academic.oup.com/alcalc/article/53/5/626/5056455>
- <sup>12</sup> Jamie Pearce, Peter Day & Karen Witten (2008) Neighbourhood Provision of Food and Alcohol Retailing and Social Deprivation in Urban New Zealand, *Urban Policy and Research*, 26:2, 213-227, DOI: <https://www.tandfonline.com/doi/abs/10.1080/08111140701697610>
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- <sup>18</sup> Alcohol Healthwatch, Alcohol advertising. Feb 2021. [https://www.ahw.org.nz/Portals/5/Resources/Fact%20Sheet/2021/Factsheet%20-%20Alcohol%20Marketing%20Feb%202021\\_1.pdf](https://www.ahw.org.nz/Portals/5/Resources/Fact%20Sheet/2021/Factsheet%20-%20Alcohol%20Marketing%20Feb%202021_1.pdf).
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