

10 February 2023

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Tēnā koe,

**Re: Sale and Supply of Alcohol (Community Participation) Amendment Bill**

Thank you for the opportunity to make a submission on Sale and Supply of Alcohol (Community Participation) Amendment Bill.

The Royal Australasian College of Surgeons (RACS) is a not-for-profit organisation that represents more than 7000 surgeons and 1300 surgical trainees and Specialists International Medical Graduates across Aotearoa New Zealand and Australia. RACS trains in nine surgical specialties, being Cardiothoracic Surgery, General Surgery, Neurosurgery, Orthopaedic Surgery, Otolaryngology Head and Neck Surgery, Paediatric Surgery, Plastic and Reconstructive Surgery, Urology and Vascular Surgery. It also supports healthcare and surgical education and the Asia-Pacific region and is a substantial funder of surgical research.

RACS strongly advocates for three key areas to reduce alcohol-related harm: restriction on trading hours, reduction of outlet density, and application of a stepped volumetric tax. RACS believes that the wide availability of alcohol is a strong contributor to alcohol-related harm. There is substantial evidence in Aotearoa New Zealand and internationally that regulating the physical availability of alcohol is one of the most effective ways to reduce its negative impacts. Some jurisdictions (eg. Canada) recommend only 2 standard drinks per week.

Health professionals witness first-hand the damage that alcohol-related harm causes daily. Alcohol-related harm places a considerable burden on Aotearoa New Zealand health resources, through added strain on busy emergency departments, extra surgical time in operating rooms, postoperative care and long-term suffering caused by non-communicable disease.

RACS supports the Sale and Supply of Alcohol (Community Participation) Amendment Bill and its purpose to improve communities' ability to influence alcohol regulation in their area by making targeted changes to the alcohol licensing process provided for in the Sale and Supply of Alcohol Act 2012.

Communities that are experiencing high levels of alcohol-related harm are struggling to influence the way alcohol is regulated in their locale and RACS supports the amendment proposed in the Act that enables them to set local alcohol policy and licensing decisions. While RACS does not wish to impact unfairly upon private business, the responsibility of protecting their commercial viability should not supersede the importance of



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Indigenous health

addressing the detrimental effects of alcohol related harm on individuals, families, and the broader community.

Further, we support the targeted changes to the licensing process and how local alcohol policies (LAPs) are adopted and applied. Over 60% of New Zealand's population live in a council area that does not have an LAP. Changes to how LAPs are implemented will ensure that they are more easily implemented and effective once they are in force, serving as a tool to reduce alcohol harm in their area.

RACS hopes that this is the first step towards improving alcohol laws in Aotearoa New Zealand and further work will be done to look at licensing structures and processes, marketing and sponsorship, pricing, and changes to ensure the law is responsive to new products and retail models.

Nāku noa, nā

**Associate Professor Andrew MacCormick, FRACS  
Chair, Aotearoa New Zealand National Committee**