



E TIPU E REA
WHĀNAU SERVICES

***Submission to the Auckland Council Consultation on
Alcohol Signs and Advertising at Liquor Stores***

“E tipu, e rea, mo nga ra o tou ao, ko to ringa ki nga rakau a te Pākehā hei ora mo te tinana, ko to ngakau ki nga taonga a o tipuna” (Young People, thrive in the days destined for you) Apriana Ngata.

E Tipu E Rea Whānau Services is a kaupapa Māori organisation that upholds the mana and hauora of mātua taiohi (young parents), young hapū māmā and their tamariki. E Tipu E Rea Whānau Services mission statement is: Supporting mātua taiohi, hapū māmā and their pēpi to grow, thrive and be rangatira within their whānau and community.

We work across the Auckland Region in partnership with mātua taiohi and hapū māmā to navigate services and systems to get the tautoko they deserve, and to develop their leadership skills so that they are able to enact their own rangatiratanga within their whānau and community.

E Tipu E Rea Whānau Services also has a policy and advocacy team that works to advocate for changes at a policy and systems level to address inequities for mātua taiohi, hapū māmā and their pēpi/tamariki.

E Tipu E Rea Whānau Services thank Auckland Council for the opportunity to have a say on signs and advertising at liquor stores. If there is an opportunity to speak to this submission E Tipu E Rea Whānau Services would like to do so. We believe that there are urgent and pressing reasons to restrict signs and advertising at liquor stores for mātua taiohi, hapū māmā and their pēpi and tamariki. These reasons are:

a) To act as a korowai (protection) for mātua taiohi, hapū māmā and their pēpi/tamariki

Large numbers of mātua taiohi, hapū māmā and tamariki at risk of harm from alcohol signs and advertising:

1. In 2018 there were over half a million (537,525) children and young people living in Tāmaki Makaurau Auckland, including 313,836 children aged 0 to 14 years and 223,689 young people aged 15 to 24 years.¹ Mātua taiohi and hapū māmā we work with are between the ages of 13-24, and their tamariki range from 0-10.

Children and young people (including mātua taiohi and young hapū māmā and their tamariki) experience disproportionately more alcohol harm:

2. Tamariki and taiohi experience disproportionately more harm from alcohol use than other age groups. This occurs due to a combination of factors including the typically higher quantities of alcohol consumed as well as different sensitivities to alcohol in relation to brain development, metabolism and developing hormonal and neurotransmitter systems.² This has irreversible consequences for the pēpi and tamariki of mātua taiohi and hapū mātua in regard to Fetal Alcohol Spectrum Disorder (FASD). This impacts on the emotional, social, educational, and economic wellbeing of our future generations.
3. Adolescence presents a heightened risk to the development of alcohol use disorders. Research has shown that almost 50% of alcohol abuse and dependence cases in Aotearoa are developed by the age of 20 years and 70% by age 25.³ Mātua taiohi and young hapū māmā are already at high risk of alcohol use disorders, because of the range of unique stresses they face in addition to other taiohi without tamariki.
4. For mātua taiohi and young hapū māmā, alcohol should be clearly viewed as **not** an ordinary product. Reducing the normalisation of alcohol, especially through restricting the advertising and availability of alcohol, is essential to promoting the message that alcohol is not an ordinary product, therefore reducing the risk of harm for mātua taiohi, hapū māmā and their tamariki and pēpi.

Exposure to alcohol marketing harms children and young people (including mātua taiohi, young hapū māmā and their pēpi and tamariki)

5. High quality research shows that alcohol marketing is a cause of youth drinking,⁴ and the more alcohol marketing a young person sees, the greater the likelihood they will start to drink earlier, and to drink larger amounts of alcohol.^{5,6} This signals that extra protections are needed to reduce exposure to alcohol advertising among children and young people. This is particularly important for mātua taiohi and young hapū māmā in their journey as new parents. Alcohol, due to colonisation, has impacted the lives of many whānau Māori. Ensuring extra protections are in place to contribute to disrupting the normalisation of alcohol in Māori communities, is vital to the wellbeing of the pēpi and tamariki that our young parents are raising.
6. As such, there is a clear rationale to place stronger restrictions on signs and advertising for alcohol than for signs for non-harmful and non-addictive products. Without such restrictions on alcohol promotion in our neighbourhoods, we risk as a society of neglecting the role we can play to create safe environments for mātua taiohi and young hapū māmā to be the best parents they can be. Auckland Council can also contribute to healthy hapūtanga, free of alcohol consumption by way of removing alcohol advertising in our communities.

b) To support equity

7. Inequities in neighbourhood exposures to alcohol advertising have been documented in Aotearoa, with tamariki Māori and Pacific children having significantly higher levels (five and three times respectively) of exposure levels than European children.⁷ This inequity in exposure to alcohol marketing is clearly inconsistent with Te Tiriti principles of active protection.

8. Recent Stats NZ figures, highlight that although teenage pregnancies are decreasing, Māori hapūtanga at a young age, remains higher than their Pākehā counterparts. This again highlights the need for Auckland Council to consider the impacts alcohol has on Māori young parents, hapū māmā and their tamariki. Young Māori parents and hapū māmā at E Tipu E Rea Whānau Services, talk often about the layering of discrimination they experience as young brown parents. The discrimination is experienced in housing, health care, education, social services, and during simple tasks like doing the grocery shopping. Inequalities in alcohol advertising where young Māori parents live, further adds to the discrimination they experience on the daily.
9. Restrictions to signs and advertising at liquor outlets must be considered as pro-equity. These measures can assist Auckland Council to achieve its goal “for Tamaki Makaurau to be inclusive so that all can share in its benefits and reach their potential.” Mātua taiohi and hapū māmā, have much potential, as a society we just need to create the supportive environments that allow them to thrive. Alcohol advertisement is currently a barrier to their thriving.

Recommendations

10. Given the critical reasons to protect mātua taiohi, young hapū māmā and their tamariki from alcohol marketing, E Tipu E Rea Whānau Services, would like Auckland Council to apply the strongest restrictions possible to signs and advertising at off-licences.
11. **Recommendation #1:** Prohibit all alcohol advertising signs at liquor stores. This includes signs on the footpath, windows, walls and verandas of the store. Stores should be able to display their business name on one small sign, but the outside of the building should not be used to extend brand livery. No alcohol marketing signs, logos, or branding on liquor store exteriors should be allowed. This approach aligns with current legislated restrictions in Aotearoa New Zealand for tobacco and vaping retailers.
12. In addition, it is recommended that windows and other transparent surfaces to be clear and transparent above 1.2 metres, and frosted below 1.2 metres.
13. **Recommendation #2:** In the event that Recommendation #1 is not fully implemented, the following is recommended:
 - all alcohol marketing signs at liquor stores should be banned. This would include all wall-mounted signs, veranda signs, window signs. It would allow a liquor store to only display their own business branding – e.g. name of store, logo and brand colours.
14. **Recommendation #3:** In the event that Recommendations #1-2 are not fully implemented, the following is recommended so that signs displaying alcohol brands, alcohol products, drinking occasions and product prices are not permitted:
 - signs at liquor stores should be restricted so they can only display objective product information (such as type of beverage being sold).
15. **Recommendation #4:** In the event that Recommendations #1-3 are not fully implemented, the following is recommended:

- The number and size of signs and advertising at liquor stores should be restricted and all alcohol advertising signs at liquor stores should be banned from public places. Footpaths need to be clear from portable signs such as sandwich boards and flags.
16. **Recommendation #5:** Auckland Council must work together with the New Zealand Government to enable stronger action to control signs and advertising displayed at liquor stores. This includes developing legislation that empowers local government to specifically restrict signs and advertising at liquor stores.
 17. **Recommendation #6:** Auckland Council must prioritise compliance activity to ensure that every liquor store in their region is compliant with the Signage Bylaw 2015/the proposed Signs Bylaw 2022, and/or any other bylaw, policy, or plan implemented in the future that relates to signs and advertising.
 18. **Recommendation #7:** Compliance with any signage bylaw (e.g. Signs Bylaw 2022) or related policy must be routinely considered by District Licensing Committees in decisions regarding new and renewal applications for off-licences. Non-compliance with any signage rules must result in the licence application being declined until compliance is achieved.
 19. **Recommendation #8:** Auckland Council must advocate to the central Government for stronger national restrictions on alcohol marketing across all media and marketing channels, so that it is regulated in a manner consistent with the regulatory frameworks for tobacco and vaping products.

References

- 1 Roberts, L. Children and young people in Auckland: Results from the 2018 Census (Technical Report 2020/017). Auckland, N.Z.: Research and Evaluation Unit (RIMU): Auckland Council, 2020 <https://knowledgeauckland.org.nz/media/1923/tr2020-017-children-and-young-people-in-auckland-results-from-the-2018-census.pdf> (accessed Sept 29, 2021).
- 2 Spear LP. Adolescents and alcohol: acute sensitivities, enhanced intake, and later consequences. *Neurotoxicol Teratol* 2014; 41: 51–9.
- 3 Rapsey CM, Wells JE, Bharat MC, Glantz M, Kessler RC, Scott KM. Transitions Through Stages of Alcohol Use, Use Disorder and Remission: Findings from Te Rau Hinengaro, The New Zealand Mental Health Survey. *Alcohol Alcohol* 2018; 54: 87–96.
- 4 Sargent JD, Babor TF. The Relationship Between Exposure to Alcohol Marketing and Underage Drinking Is Causal. *J Stud Alcohol Drugs Suppl* 2020; 113–24.
- 5 Anderson P, de Bruijn A, Angus K, Gordon R, Hastings G. Impact of Alcohol Advertising and Media Exposure on Adolescent Alcohol Use: A Systematic Review of Longitudinal Studies. *Alcohol Alcohol* 2009; 44: 229–43.
- 6 Jernigan D, Noel J, Landon J, Thornton N, Lobstein T. Alcohol marketing and youth alcohol consumption: a systematic review of longitudinal studies published since 2008. *Addiction* 2017; 112: 7–20.
- 7 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 Alcohol* 2018; 53: 626–33.