



Submission to the Ministry of Business, Innovation & Employment on the Buy-Now, Pay-Later Discussion Document

Turanga Health is built on a vision of 'kia whai oranga-a-whanau mo nga whakatipuranga' - 'building family wellness for future generations'. The organisation's mission is to achieve Mauri Ora by engaging with whānau in their whare and in their kainga. Our staff offer holistic care for all who live within the tribal boundaries of the three Turanga iwi: Ngāi Tāmanuhiri, Rongowhakaata, and Te Aitanga a Māhaki. We have dozens of health and wellness programmes helping you and your whānau with smoking cessation, mental health support, nutrition, health and fitness, Well Child services and more.

Te Hauora o Tūranganui a Kiwa thanks the Ministry of Business, Innovation and Employment for the opportunity to have a say on the policy options to regulate the emerging and dynamic Buy-Now, Pay-Later (BNPL) sector, and recognises the importance of placing people experiencing financial hardship in the centre of the discussion.

A major concern of our organisation is that low-income areas here in Tūranganui a Kiwa and across the motu are already highly targeted by the industry and our whanau living in those communities are exposed to greater alcohol outlet density and as a consequence greater alcohol harm. In Tairāwhiti, there is a much higher number of off-licences compared with the rest of Aotearoa (14.8 vs 10.0 per 100 000), 65% of which are located in areas that have a deprivation score of 7 or greater and we have the second- highest rates of any region for hazardous drinking. Having Buy Now Pay Later services for alcohol purchase will only increase this access and harm.

Additionally, tamariki Māori have five times greater exposure to alcohol marketing than New Zealand European children and we know exposure to marketing increases risk of harm, especially for young people. Whilst you will be aware of the many types of harm alcohol causes, one statistic that is close to our hearts is that alcohol is a significant factor in at least half of all deaths in people under 24 years. We need safe and healthy environments for our tamariki, rangatahi, whanau and communities to thrive.

Firstly we recommend support option 3 in which the BNPL sector would be regulated by MBIE. Self-regulatory systems tend to be weak, ineffective in protecting people from harm and their ability to provide appropriate penalties is restricted. A good example of this is the Advertising Standards Authority voluntary code for alcohol marketing, as the evidence proves that the code is too weak to make any significant reductions in the exposure of alcohol marketing exposure and consequent harm.





Additionally, for the wellbeing of whanau, the sale of alcohol must not be permitted in a buy now pay later process nor any other kind of credit-like services. Alcohol is an addictive substance and remains the drug that causes the most harm in Aotearoa New Zealand. The use of these systems to sell alcohol would increase availability, reduce prices at least at the outset, and provide rapid delivery services. This type of easy access is out of alignment with public health interests and is likely to contribute to not only future financial hardship but increased consumption and alcohol related harm to both the drinker and others.

Thanks once again for the opportunity to give feedback on this important kaupapa.

