

14 May 2026

Committee Secretariat
Justice Committee
Parliament Buildings
Wellington

Submitted via: [Sale and Supply of Alcohol \(Improving Alcohol Regulation\) Amendment Bill - New Zealand Parliament](#)

Dear Members of the Justice Committee,

Re: Submission from the Manawatū District Council on the Sale and Supply of Alcohol (Improving Alcohol Regulation) Amendment Bill

The Manawatū District Council (MDC) thanks the Justice Committee for the opportunity to provide feedback on the Sale and Supply of Alcohol (Improving Alcohol Regulation) Amendment Bill (“the Bill”).

MDC supports the intent of the Bill and acknowledges the objective of improving alcohol regulation while reducing unnecessary regulatory burden and supporting economic growth. From an operational perspective, Council sees clear benefits in terms of efficiency, clarity, and alignment with current industry practice.

Council recognises that a well-functioning licensing system is important for community wellbeing and economic activity. However, MDC considers it important that the proposed changes are implemented in a way that maintains the primary objective of minimising alcohol-related harm, while supporting effective local decision-making and providing clarity for licensing authorities.

Introduction

Territorial authorities play a key role in the alcohol licensing system through District Licensing Committees (DLCs), enforcement functions, and the development of Local Alcohol Policies (LAPs). Councils are also directly impacted by the social, environmental, and community effects of alcohol-related harm.

From a local government perspective, it is important that any changes to the regulatory framework are practical to implement, clearly understood, and able to support effective decision-making at a local level.

Overview of Supported Amendments

MDC supports a number of the amendments proposed in the Bill, particularly those that:

- Improve the efficiency and clarity of licensing processes;
- Reflect modern business models and practices, including provisions for dual licences and producer tasting rooms;

- Clarify responsibilities for rapid delivery services to reduce the risk of supply to minors and intoxicated persons;
- Enable the promotion and availability of zero-alcohol products; and
- Provide a low-risk exemption for hairdressers and barbers under defined conditions.

These changes represent practical improvements and align with harm minimisation objectives.

Considerations

Balance and Proportionality

MDC considers that the overall effectiveness of the Bill will depend on how well it maintains an appropriate balance between improving efficiency and minimising alcohol-related harm.

While many of the proposed changes are individually reasonable, their cumulative effect has the potential to increase alcohol availability and shift how decision-making is undertaken across the licensing system. Council notes that while some amendments, such as the restriction on objections, strengthen the role of local communities, other changes move key aspects of the framework into regulations or reduce the influence of local tools such as Local Alcohol Policies.

Council considers that the overall impact of these combined changes is as important as the individual amendments, and that careful consideration should be given to how they interact in practice.

Changes to Licensing Processes

MDC supports the aspects of the Bill that aim to improve efficiency and clarity of licensing processes, including providing applicants with a right of reply to objections and clarifying procedural requirements.

MDC also supports the proposal to limit objections to persons who reside or have a business within the district or in close proximity to the premises. Council considers that licensing decisions should be informed by those communities most directly affected by the operation of a premises.

Focusing objections on local perspectives is likely to improve the relevance and quality of information presented to District Licensing Committees and contribute to more efficient and targeted decision-making processes.

MDC notes that, while this approach appropriately prioritises local input, it will be important to ensure that licensing committees retain access to relevant expertise and evidence where appropriate.

Special Licensing Framework

MDC acknowledges the intent to streamline special licensing and introduce a risk-based framework.

However, Council notes that key criteria and conditions for special licences are proposed to be set out in regulations rather than in the Act. At present, the detail of this framework is not available.

From a local government perspective, this creates uncertainty for licensing committees responsible for applying the framework in practice. It also reduces transparency and may limit local discretion in decision-making.

MDC recommends that sufficient clarity and guidance are provided, and that territorial authorities are appropriately involved in the development of this framework to ensure it is workable and consistently applied.

There is a risk that, without sufficient detail in primary legislation, the framework could be applied inconsistently across districts, reducing predictability for applicants and undermining confidence in the licensing system.

Increased Availability and New Licensing Pathways

The Bill introduces a number of changes that expand the ways in which alcohol can be sold and supplied, including:

- Allowing certain premises to hold both on- and off- licences;
- Expanding producer tasting rooms;
- Enabling restaurants to obtain off-licences in additional circumstances; and
- Allowing extended trading for significant events.

MDC recognises that these changes reflect modern business models and may provide economic and operational benefits.

At the same time, Council notes that collectively these changes may increase the availability of alcohol. It will be important that this is carefully managed to ensure alignment with the objective of minimising alcohol-related harm.

Local Alcohol Policies and Local Decision-Making

MDC notes that the Bill reduces the influence of Local Alcohol Policies (LAPs) on certain licensing decisions, including renewals.

LAPs are an important tool for territorial authorities to reflect community views and respond to local conditions over time. While MDC does not currently have a LAP in place, Council recognises the importance of maintaining the effectiveness of these tools across the sector. It is important that the interaction between LAPs and the proposed changes is clearly understood, and that their role in supporting local decision-making is not unintentionally weakened.

Implementation and Local Government Interface

MDC considers that the practical effectiveness of the proposed changes will depend on how they are implemented and how they interface with local government responsibilities.

The Bill introduces new processes and requirements that will impact DLCs and council staff. This includes changes to licensing procedures, new regulatory frameworks, and transitional arrangements where different rules apply at different times.

Effective implementation will also rely on enforcement and regulatory agencies having sufficient capacity and resourcing to respond to increased licensing activity and compliance requirements.

From a local government perspective, it will be important that:

- Clear guidance is provided to support consistent decision-making.
- Implementation is supported with appropriate resources and information.
- The interaction between national regulations and local decision-making is well understood.

Without this clarity, there is a risk of inconsistency, increased administrative complexity, and uncertainty for applicants and communities.

Recommendations

MDC recommends that:

- Clear guidance is developed to support the consistent and practical implementation of the new licensing framework, particularly for District Licensing Committees.
- Further detail is provided on the proposed risk-based framework for special licences before it is implemented.
- Territorial authorities are appropriately consulted on regulatory changes affecting licensing processes.
- The interaction between Local Alcohol Policies and the proposed changes is clarified.
- The impacts of increased alcohol availability resulting from the Bill are actively monitored and reviewed.

Conclusion

The Manawātū District Council supports the Sale and Supply of Alcohol (Improving Alcohol Regulation) Amendment Bill in principle.

The Bill introduces a range of practical changes that aim to improve the efficiency and clarity of the licensing system and better reflect current practices.

However, MDC notes that the Bill would benefit from greater clarity in key areas, particularly in relation to the special licensing framework, local decision-making, and implementation at a local government level.

With this clarity, the Bill has the potential to improve the effectiveness of the alcohol licensing system while maintaining appropriate safeguards to minimise alcohol-related harm.

Yours sincerely



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Mayor