

13 May 2025

Committee Secretariat
Justice Committee
Parliament Buildings
Wellington

Submitted via: [Sale and Supply of Alcohol \(Sales on Anzac Day Morning, Good Friday, Easter Sunday, and Christmas Day\) Amendment Bill Submission - New Zealand Parliament](#)

Tēnā tātou Members of the Justice Committee

Submission from the Manawātū District Council on the Sale and Supply of Alcohol (Sales on Anzac Day Morning, Good Friday, Easter Sunday, and Christmas Day) Amendment Bill

The Manawātū District Council (MDC) thanks the Justice Committee for the opportunity to provide feedback on the *Sale and Supply of Alcohol (Sales on Anzac Day Morning, Good Friday, Easter Sunday, and Christmas Day) Amendment Bill* (“the Amendment Bill”).

MDC does not support the Amendment Bill in its current form. We acknowledge the potential economic benefits to parts of the hospitality sector. However, we have several concerns that we wish to bring to the Committee’s attention, particularly in relation to our role as a territorial authority and alcohol licensing body, and the potential for increased alcohol-related harm in our community.

We support the position of the New Zealand Institute of Liquor Licensing Inspectors (NZILLI) in opposing the repeal of Anzac Day morning trading restrictions for on-licence premises, and the removal of restrictions for all off-licence premises on Good Friday, Easter Sunday, Christmas Day, and Anzac Day. However, we disagree with NZILLI’s support for amending the Sale and Supply of Alcohol Act 2012 (the Act) to relax current restrictions for on-licence premises on Good Friday, Easter Sunday, and Christmas Day.

Introduction

MDC plays a regulatory and monitoring role under the *Sale and Supply of Alcohol Act 2012*, primarily through our licensing inspectors, who oversee compliance with the conditions attached to on- and off-licence premises in the district. We do not currently have a Local Alcohol Policy in place.

In our district, most restaurants and on-licence venues choose to close on the public holidays mentioned above, recognising these days as significant for families and the wider community. In 2018, MDC consulted the community on the appetite for Easter Sunday Trading and found that 59 percent of submitters were opposed to allowing trading on that day. Feedback from submitters largely fell into two broad categories: first, a desire to be respectful of religious beliefs; and second, the desire to preserve family time.

From 1 July 2024 to 30 April 2025, MDC issued 77 special licences for various functions. For ANZAC day we typically receive no more than two special licence applications, which are generally approved where they meet the statutory criteria. The fact that a special licence is required acts as a natural control, limiting the number of on-licence premises that open on these days and ensuring that any alcohol-related activity is deliberate, planned, and subject to oversight.

MDC have no history of non-compliance with the current public-holiday restrictions, which suggests the framework is understood, manageable, and generally well respected by our local licensees.

Concerns with the Amendment Bill

While the Amendment Bill proposes greater trading flexibility, we are concerned it will disproportionately benefit one sector (hospitality) at the expense of the wider community wellbeing and social cohesion. These days have significant cultural importance for many New Zealanders and lifting the alcohol-sale restrictions could be seen as undermining that significance.

From a public health and safety perspective, we are particularly concerned about:

- Potential for increased alcohol-related harm on days already associated with stress and social pressures for some individuals and whānau.
- The lack of a Local Alcohol Policy, which limits our ability to apply more tailored, community-specific controls if the national framework is loosened.
- Rural policing constraints: MDC is a largely rural district with limited police presence. The proposed changes may increase pressure on frontline police, especially during holiday periods when staffing is already stretched.
- The removal of these restrictions could create commercial pressure on premises that currently close, leading to reduced time off for workers and diminishing the value of these public holidays.

While there may be economic benefits to some businesses, we urge the Committee to consider whether this justifies a change to long-standing protections that reflect shared cultural values. We also note that the Shop Trading Hours Act 1990 continues to place some constraints on trading on these days, and changes to alcohol law should be consistent with the broader legislative context.

MDC does not anticipate significant resourcing implications as licence applications would still need to meet the existing criteria for hours and responsible service. However, we note that any increase in alcohol-related incidents or disorder would likely place pressure on police and health services in our area.

Decision sought:

- MDC ask that the Members of the Justice Committee reject the proposed amendments set out in the *Sale and Supply of Alcohol (Sales on Anzac Day Morning, Good Friday, Easter Sunday, and Christmas Day) Amendment Bill*.

Conclusion

In summary, the Manawātū District Council generally opposes the Amendment Bill. We believe the current legislative restrictions strike an appropriate balance between economic activity and safeguarding social wellbeing, cultural values, and public health.

Nāku noa, nā

A handwritten signature in blue ink, appearing to read 'Helen Worboys', with a large loop at the end.

Helen Worboys, JP
Mayor