

Submission to the Justice Committee on the Sale and Supply of Alcohol (Improving Alcohol Regulation) Amendment Bill

Introducing Mana Mokopuna – Children's Commissioner

Mana Mokopuna – Children's Commissioner (Mana Mokopuna) is the independent Crown entity with the statutory responsibility to advocate for the rights, interests, participation and wellbeing of mokopuna¹ (all children and young people) under 18 years old in Aotearoa New Zealand, and young people under 25 years of age if they are, or have been, in care or custody. The Children's Commissioner is Dr Claire Achmad.

We independently advocate for and with mokopuna within the context of their families, whānau, hapū, iwi and communities, based on evidence, data and research, including the perspectives of mokopuna.

Our work is grounded in the United Nations Convention on the Rights of the Child (the Children's Convention), Te Tiriti o Waitangi and other international human rights instruments. We are a National Preventative Mechanism under the Optional Protocol to the Convention Against Torture, meaning we monitor places where mokopuna are deprived of their liberty, including in the care and protection, youth justice, youth mental health and intellectual disability facilities.

We have a statutory mandate to promote the Children's Convention and monitor the Government's implementation of its duties under the Convention, and to work in ways that uphold the rights of mokopuna Māori including under Te Tiriti o Waitangi. We place a focus on advocating for and with mokopuna who are experiencing disadvantage, and we recognise and celebrate the diversity of mokopuna in all its forms.

Our moemoeā (vision) is *Kia kuru pounamu te rongō – All mokopuna live their best lives*, which we see as a collective vision and challenge for Aotearoa New Zealand.

When it comes to the rights of mokopuna, our advocacy for their rights is a focus across our four strategic advocacy areas:

- A strong start in life (first 2000 days)
- Growing up safe and well (free of all forms of child maltreatment in all circumstances; thriving mental health and wellbeing)
- Thriving families and whānau (living free of poverty, with resources needed to support mokopuna to thrive), and
- Participating in what matters to me (mokopuna have told us, for example, about the importance of participating in their education, culture and identity, sport and recreation, and caring for the natural environment).

¹ At Mana Mokopuna we have adopted the term 'mokopuna' to describe all children and young people in Aotearoa New Zealand. 'Mokopuna' brings together 'moko' (imprint or tattoo) and 'puna' (spring of water). Mokopuna describes that we are valued descendants and members of families. We acknowledge the special status held by mokopuna in their families, whānau, hapū and iwi and reflect that in all we do. Referring to children and young people we advocate for as mokopuna draws them closer to us and reminds us that who they are, and where they come from, matters for their identity, belonging and well-being at every stage of their lives.



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Background

1. All mokopuna have the right to grow up in environments that protect and promote their health, development, safety, and wellbeing.
2. Mokopuna in New Zealand face harms due to their own alcohol use, including heightened risk of injury, adverse educational and mental health outcomes, and impaired brain development.^{2,3} Indirectly, they also suffer significant harm from the alcohol use of others, including maltreatment, exposure to domestic violence, and the lasting impacts of fetal alcohol spectrum disorder.^{4,5,6,7,8} These exposures create a cycle of disadvantage that threatens long-term social, physical and psychological wellbeing.
3. A stated objective of the Sale and Supply of Alcohol Act 2012 is that “the harm caused by the excessive or inappropriate consumption of alcohol should be minimised”.⁹ Similarly, the Government Policy Statement on Health 2024–2027, recognises the need to reduce alcohol harm.¹⁰
4. The World Health Organisation identifies restricting alcohol availability as one of the most cost-effective ways to reduce alcohol-related harm and limit access for young people and other high-risk groups.¹¹
5. A 2010 Law Commission report (following its review of the regulatory framework for the sale and supply of liquor) similarly notes that regulating the availability of alcohol through restrictions on time, place and density of outlets is an important lever in reducing alcohol harm.¹²
6. The Law Commission report also highlights that New Zealanders have been too tolerant of the risks associated with drinking to excess, and that unbridled commercialisation of alcohol as a commodity has made the problem worse.¹³

Summary of our position

7. Mana Mokopuna is concerned this Bill continues the prioritising of commercial interests over prevention of harm to mokopuna. By making alcohol easier to sell, easier to deliver, and more present in everyday settings, this Bill risks increasing children’s exposure to harm,

² [Harms from drinking in adolescence - ActionPoint](#)

³ [Alcohol in Adolescence – what the research tells us - Brainwave Trust Aotearoa](#)

⁴ [Alcohol Marketing Exposure to Children in New Zealand: A Systematic Narrative Review \(2026\)](#)

⁵ [Estimating child maltreatment cases that could be alcohol-attributable in New Zealand - Huckle - 2023 - Addiction - Wiley Online Library](#)

⁶ [2015_engl_second-hand-effects-of-alcohol-consumption-alcohol-and-society-2015-report-en.pdf](#)

⁷ [Effect of Parental Drinking on Adolescents - PMC](#)

⁸ [Wai+2575+#C5\(a\)+Summary+R+Mutch+\(1\).pdf](#)

⁹ [Sale and Supply of Alcohol Act 2012 | New Zealand Legislation](#)

¹⁰ [About the alcohol harm reduction programme | Ministry of Health NZ](#)

¹¹ [SAFER - alcohol control initiative](#)

¹² [Law Commission report: Alcohol in our lives: Curbing the harm \(2010\)](#)

¹³ [Law Commission report: Alcohol in our lives: Curbing the harm \(2010\)](#)

and deepening inequities for mokopuna Māori and a range of groups of children already disproportionately affected by alcohol harm.¹⁴

8. The Bill is inconsistent with the Children’s Convention because it fails to give proper effect to a range of children’s rights, as outlined below. These rights require the State to protect children from discrimination and harm, to prioritise their best interests, to support their healthy growth and development, and to ensure their views are considered in decisions that affect them.
9. The Bill is also inconsistent with Te Tiriti o Waitangi, as it weakens tino rangatiratanga, partnership, active protection and may deepen inequity in an area where mokopuna Māori, whānau and hāpori already bear a disproportionate burden.^{15,16}
10. Mana Mokopuna also has specific concerns about:
 - restricting who can make objections to licence applications or renewals
 - the likely increase in the number of alcohol outlets, the supply of cheaper alcohol, and mokopuna exposure to alcohol marketing
 - the expansion of settings in which alcohol can be offered or sold, which will further normalise alcohol consumption, and
 - the failure to address known weaknesses in restricting the sale of alcohol to minors.
11. As highlighted in advice from officials, the proposed changes, which will increase access to alcohol, and therefore increase social and health harms, will lead to increased indirect costs to consumers and government agencies.¹⁷

Recommendations

12. Mana Mokopuna strongly recommends the Bill does not proceed. Instead, to better protect children from alcohol harms we recommend the Sale and Supply of Alcohol Act 2012 is amended to implement the World Health Organisation’s SAFER framework of evidenced-based and cost-effective policies to reduce alcohol harm and its widespread costs. These include restricting the availability of alcohol, banning all alcohol advertising, increasing the price of alcohol, better enforcing drink-driving countermeasures, and making screening and treatment more widely available.¹⁸
13. If the Bill does proceed, we recommend it be amended to ensure:
 - community rights to object to licensing decisions are not narrowed – instead, the Act should enable anybody to object to the granting or renewal of a licence, regardless of where they are based in New Zealand

¹⁴ [The Alcohol ABC approach: The Counties Manukau experience](#) Health New Zealand (2025)

¹⁵ [New research puts lived experience at centre of Māori alcohol harm prevention](#) Kaupapa Te Rapu (2024)

¹⁶ [The Alcohol ABC approach: The Counties Manukau experience](#) Health New Zealand (2025)

¹⁷ [Ministry of Justice RIS Improving Alcohol Regulation Further Proposals for Off and Club Licences](#)

¹⁸ [SAFER - alcohol control initiative](#)

- no increase to outlet density, off-licence proliferation, or take-home alcohol sales
- no expansion of on-licence eligibility to clubs, hairdressers and barbers - all places where there may be mokopuna, and
- widened scope of regulations relating to home delivery, to include all alcohol sold online and delivered (e.g. supermarkets and bottle stores) and restrictions on rapid delivery
- mandatory, enforceable measures for age verification (at sale and point of delivery) and intoxication checks
- measures are added to strengthen the oversight of alcohol regulation, currently fragmented across multiple agencies, and the level of enforcement which is low compared to other sectors, and
- a clear child-rights and Te Tiriti o Waitangi impact assessment for all alcohol law reform is completed.

This Bill poses multiple risks to the rights of mokopuna, with particular impacts on mokopuna Māori

14. All mokopuna in Aotearoa New Zealand have the right to experience all of their rights, in all circumstances, at all times. These rights are primarily protected under New Zealand's duties and obligations under the Children's Convention¹⁹, Te Tiriti o Waitangi, the UN Convention on the Rights of Persons with Disabilities, the United Nations Declaration on the Rights of Indigenous Peoples, and a range of provisions in New Zealand domestic law.
15. Mana Mokopuna is concerned this Bill has the potential to significantly increase the density and availability of alcohol in communities, thereby increasing the risk of violence and harm against children and normalising the consumption of alcohol. It will also restrict the ability of mokopuna and their representatives who live outside of the imposed boundary to share their knowledge and raise any concerns about impacts a proposed licence may have on mokopuna and their whānau.
16. These impacts run contrary to the Government's obligations to upholding children's rights under the Children's Convention. Because alcohol harm is so pervasive, it has potential to impact the rights of all mokopuna to grow up safe and well within their families, whānau, hapū, iwi, and communities.
17. In particular, the following articles of the Children's Convention are engaged:
 - **Article 2 requires children to enjoy their rights without discrimination.** Mana Mokopuna is concerned the Bill risks widening existing inequities and compounding harm for certain groups of mokopuna, by increasing alcohol availability without consideration for the unequal burden of alcohol harm. Mokopuna Māori, Pacific

¹⁹ [Convention on the Rights of the Child | OHCHR](#)

children, and those in deprived communities are disproportionately susceptible to alcohol harm, often living in over-saturated alcohol environments.^{20,21,22}

- **Article 3 requires the best interests of the child to be a primary consideration in all actions concerning children.** This Bill makes alcohol easier to sell, easier to deliver, and more normalised in everyday settings, meaning it has the potential to increase consumption and harm. Convenience for sellers and consumers should not outweigh children's interests, particularly given foreseeable risks to children's safety, health, and development.
- **Article 6 protects children's right to life, survival and development.** These rights can be affected by a parent's alcohol consumption both before and after birth in a number of ways, including the risk of underweight birth, fetal alcohol syndrome, and increased risks to children's physical, emotional, and developmental wellbeing. These are issues highlighted in the government's *Nurture the Future Within* campaign.²³
- **Article 12 requires children to have their views taken seriously in matters affecting them.** Limiting objections to people within narrow geographic boundaries would reduce the ability of young people who are exposed to alcohol outlets in the places they live, learn, and recreate to have their say. It also weakens children's practical right to have their voices represented through parents, caregivers, schools, iwi, and local advocates. Mokopuna have the right to directly participate in having a say on this. (See section below for more detail.)
- **Article 19 requires the State to protect children from all forms of physical and mental violence, injury, abuse, neglect, and maltreatment.**
 - i This Bill does not just affect adult choice, it affects the safety of children living with the consequences of adult drinking. Alcohol is responsible for a range of social problems directly affecting the health and well-being of New Zealanders. It is a well-established driver of family violence and child maltreatment, so laws that make alcohol more available can increase the likelihood of mokopuna experiencing harm at home and in our communities.²⁴
 - ii Research links caregiver alcohol use with higher risk of child maltreatment, and alcohol harm in the home is shown to contribute to neglect, instability, and stress that undermine development.²⁵

²⁰ [Waitangi Tribunal Claim Wai2624](#) (2021)

²¹ [Alcohol Harm to Māori - ActionPoint](#)

²² [Building a fairer and healthier future for Aotearoa New Zealand](#) Alcohol Healthwatch (2020)

²³ [Nurture the future within](#)

²⁴ [Study finds caregiver alcohol use linked to higher risk of child maltreatment - Massey University](#) (2025)

²⁵ [Estimating child maltreatment cases that could be alcohol-attributable in New Zealand \(2022\)](#)

- iii Recent data continues to confirm the availability of alcohol is an important influence on alcohol-related harm, while close proximity to alcohol outlets is associated with increased crime and hazardous drinking.²⁶
- iv In relation to harmful family dynamics and behaviours, mokopuna have shared with us the negative impacts on their wellbeing of growing up in unsafe environments exposed to violence, abuse, drugs, alcohol and addiction, and strangers in the house.²⁷ (Refer to examples below)
- o **Article 24 gives children the right to the highest attainable standard of health.** That includes protection from environmental and social conditions that damage health, such as heavy alcohol exposure, family alcohol misuse, and unsafe neighbourhoods saturated with alcohol outlets. Alcohol-related harm also has long-term health consequences, including risks linked to prenatal exposure, injuries, mental distress, and disrupted caregiving. A law that increases cheap alcohol supply and weakens controls on access runs counter to the State’s duty to promote children’s health.



“Alcohol, parties and violence – don’t want our kid in that sort of environment.”

“How my family operates – instead of confronting problems and trying new ways, they bottle things up and rely on drugs and alcohol. I didn’t want that in my life.”

“The one message I want to get across is for children who do not have their parents in their life because of drugs and alcohol. For me this is a big problem and has caused my life to feel embarrassed and traumatised.”²⁸

– Mokopuna voices from a Mana Mokopuna engagement, June 2024

The Bill negatively impacts mokopuna Māori rights under Te Tiriti o Waitangi

18. Under Te Tiriti o Waitangi, the Government has a duty to actively protect the rights, wellbeing, and development of mokopuna Māori children and young people, including their rights to equitable outcomes. This means not only preventing harm but taking deliberate, sustained action to address inequities and ensure mokopuna Māori can thrive as Māori. It also requires genuine partnership with iwi and hapū in decisions that affect them.
19. Ongoing concerns have been raised about the disproportionate harms from alcohol that Māori experience compared to non-Māori. This inequity is influenced by a range of systemic factors, including intergenerational trauma from colonisation, socioeconomic disparities, and high access to substances in some communities.²⁹

²⁶ [Close proximity to alcohol outlets is associated with increased crime and hazardous drinking: Pooled nationally representative data from New Zealand](#) (2020)

²⁷ [“You need to get in early, as soon as you see people struggling”](#): Understanding the life-course journey (2024)

²⁸ [“You need to get in early, as soon as you see people struggling”](#): Understanding the life-course journey (2024)

²⁹ [Issues of tobacco, alcohol, and other drug abuse for Māori](#)

20. The Waitangi Tribunal Wai2624 Claim highlights that Māori suffer more harm from the sale and supply of alcohol than any other demographic group in Aotearoa New Zealand.³⁰
21. Under Te Tiriti o Waitangi, tino rangatiratanga requires recognition of Māori authority and decision-making over matters that affect mokopuna Māori, their whānau, and their hapori. Reducing community objection rights and expanding alcohol access, limits the ability of Māori communities to exercise meaningful influence over the local alcohol environments. The proposed changes fail to account for key cultural consideration, including whakapapa (ancestral ties), the role of hapū, or the status of kaumatua (respected elder). These connections often extend beyond the boundaries of a territorial authority. Many Māori maintain strong links to places and communities outside where they currently live and should have the right to contribute to alcohol licencing decisions in areas with which they have close ties.
22. Kāwanatanga, the right to governance and partnership, is strongest when it reflects genuine shared decision-making. As the Crown considers this Bill, there is an important opportunity, and an obligation, to work in close collaboration with Māori to ensure the approach actively protects mokopuna Māori, whānau, and communities from alcohol-related harm, and reduces inequity.^{31,32}
23. Ngā tikanga katoa rite tahi, ensuring equity, means responding to unequal burdens with proportionate protection. As highlighted above, mokopuna Māori experience disproportionate alcohol harm and over-exposure to alcohol outlets and alcohol marketing. This Bill has the potential to deepen these existing inequities. Active protection requires the Crown to act, to the fullest extent practicable, to achieve equitable health outcomes for Māori.³³ We should be taking positive steps to prevent foreseeable harm to mokopuna Māori, not make alcohol easier to obtain.
24. The Wai2624 Claim goes on to assert that, by legislatively omitting any reference to Te Tiriti o Waitangi in the Sale and Supply of Alcohol Act, the Crown has failed in its Te Tiriti o Waitangi obligations. Those empowered under the Act (such as District Licensing Committees and the Alcohol Regulatory and Licencing Authority) are neither guided by nor bound by the principles of Te Tiriti o Waitangi, to the ultimate detriment of Māori.³⁴ This Bill is an opportunity to correct this.

The Bill represents a significant reduction in community voice and local accountability

25. Limiting who can object to licence applications or renewals to those living or working in the same territorial authority area, or within one kilometre of the proposed premises, is a serious reduction in community voice and local accountability. Community participation,

³⁰ [Waitangi Tribunal Claim Wai2624](#) (2021)

³¹ [New research puts lived experience at centre of Māori alcohol harm prevention](#)

³² [https://www.ahw.org.nz/Portals/5/Resources/Presentations/Defining%20Our%20Future%202023/1 %20Kristen%20Maynard .pdf](https://www.ahw.org.nz/Portals/5/Resources/Presentations/Defining%20Our%20Future%202023/1%20Kristen%20Maynard.pdf)

³³ [Te Tiriti o Waitangi Framework](#) Ministry of Health (2024)

³⁴ [Waitangi Tribunal Claim Wai2624](#) (2021)

including by mokopuna, is a right and safeguard against harmful licensing decisions and it should not be limited.

26. This change is particularly concerning for children and whānau who are affected by outlet density, alcohol-related nuisance, and unsafe environments even when they live just outside a formal boundary. The impacts of alcohol outlets are not confined to a neat radius. Children travel to school, sports, shops, and public spaces, where they are exposed to alcohol marketing, alcohol litter, intoxicated adults, and antisocial behaviour across wider neighbourhoods.
27. Limiting the ability to object will make it harder for communities to prevent decisions that increase children and young people's exposure to alcohol-related harm in environments where they live, learn and enjoy recreational activities.

The Bill is likely to increase the number of alcohol outlets, the supply of cheaper alcohol, and mokopuna exposure to alcohol marketing

28. This Bill would expand where and how alcohol is sold by enabling more take-home sales, widening cellar-door provisions, allowing clubs to serve the public, and simplifying licensing. These changes are likely to increase the density and accessibility of alcohol outlets.
29. There is strong evidence linking increased alcohol outlet density with increased alcohol consumption and harm, including among adolescents.^{35,36} In Aotearoa New Zealand, increased density is associated with higher youth drinking and, as mentioned above, alcohol is a known risk factor in child maltreatment and family violence. By lowering barriers to alcohol sales, the Bill risks increasing these harms.
30. The Bill also will also increase the availability of cheaper alcohol by embedding sales in more everyday settings. Greater convenience and competition typically drive higher consumption, increasing risks for mokopuna, including the likelihood of earlier initiation, heavier use, and exposure to intoxication in homes and communities.
31. Research consistently shows that increased availability and exposure, through higher outlet density, visible consumption, lower prices, and pervasive marketing are associated with greater risk of earlier and heavier drinking, and higher levels of alcohol-related harm.^{37,38,39}
32. For example, a recent review of New Zealand literature reports that children in the highest-density neighbourhoods are more likely to engage in binge or high-quantity drinking. These impacts fall unevenly, with Māori and Pacific children and families living in poverty exposed to significantly higher alcohol marketing and experiencing disproportionate harm.⁴⁰

³⁵ [Alcohol Marketing Exposure to Children in New Zealand: A Systematic Narrative Review - PMC 2026](#)

³⁶ [Adolescents Growing Up in Neighbourhoods with More Liquor Stores are More Likely to Drink – Recovery Research Institute](#)

³⁷ [The potential adverse effects of minors' exposure to alcohol-related stimuli via licenced venues: A narrative review - Booth - 2024 - Drug and Alcohol Review - Wiley Online Library](#)

³⁸ [Alcohol availability and adolescent drinking - ActionPoint](#)

³⁹ [Alcohol Marketing Exposure to Children in New Zealand: A Systematic Narrative Review - PMC 2026](#)

⁴⁰ [Alcohol Marketing Exposure to Children in New Zealand: A Systematic Narrative Review - PMC 2026](#)

The Bill would further normalise alcohol consumption by expanding the settings in which alcohol can be offered or sold

33. Expanding where alcohol can be sold embeds it more deeply into everyday life. This matters because children learn from the environments around them. Increased exposure to alcohol in everyday settings normalises its use and undermines the core public health message that alcohol, a group 1 cancer-causing carcinogen, is a harmful product requiring strong regulation.
34. Extending alcohol sales into places such as hairdressers, barbers, events, and retail-adjacent premises frames alcohol as a routine part of everyday life. This reinforces the perception that alcohol use is harmless and culturally expected – messages children absorb from what adults model in everyday spaces.⁴¹
35. Greater availability also increases children’s exposure to alcohol advertising and cues in the places where they live, learn, and spend time. Research on children’s exposure to alcohol marketing in New Zealand, reveals widespread exposure is playing a significant role in shaping attitudes and behaviours leading to alcohol consumption.
36. This is particularly concerning given that young people are highly responsive to environmental influences. Normalising cues and positive associations with alcohol will shape expectations and increase the likelihood of early or underage use.^{42,43}

The Bill doesn’t go far enough to address known failures in restricting the sale of alcohol to minors

37. Online alcohol purchasing has become commonplace since the COVID-19 lockdowns, with rapid delivery services further increasing access. These models are associated with higher-risk drinking behaviours. New Zealand is currently behind comparable jurisdictions and requires stronger regulation—particularly prohibiting contactless delivery and mandating in-person ID checks at the point of delivery.
38. Current delivery practices allow alcohol to be supplied without robust age verification. In this context, simply clarifying responsibility between parties is insufficient. Strong, enforceable safeguards are needed to prevent children and young people from accessing alcohol through delivery services, and the Bill does not provide this level of protection.
39. Evidence from New Zealand highlights the scale of the problem. Research in Auckland found that most alcohol deliveries did not involve age verification at the door, and many

⁴¹ [Effect of Parental Drinking on Adolescents - PMC](#)

⁴² [The potential adverse effects of minors' exposure to alcohol-related stimuli via licenced venues: A narrative review - Booth - 2024 - Drug and Alcohol Review - Wiley Online Library](#)

⁴³ [The potential adverse effects of minors' exposure to alcohol-related stimuli via licenced venues: A narrative review - Booth - 2024 - Drug and Alcohol Review - Wiley Online Library](#)

orders were left unattended.⁴⁴ This demonstrates a clear and existing gap in protections for children and young people.

40. To prevent the sale of alcohol to minors, the law must require reliable, face-to-face age verification at delivery. Reliance on purchaser self-declaration or inconsistent delivery practices is inadequate.
41. Additionally, the level of law enforcement is weak, with limited controlled purchasing operations (sting operations) and low penalties for selling alcohol to minors when compared to other jurisdictions and sectors.
42. Recently released OIA data shows that since March 2022, there have been 126 underage alcohol sting operations nationwide, with a high failure rate of 8.5%. In one sting operation in February 2025, 8 of the 13 liquor sellers failed.⁴⁵
43. The OIA also revealed that the most common penalties after CPO sting operations were premises having their licence suspended for 48 hours, and for managers' certificates being suspended for 28 days. The maximum fine for liquor store staff selling alcohol to minors is \$2,000 (\$10,000 for a manager), compared to a maximum \$100,000 fine for businesses selling vapes to minors.⁴⁶
44. As it stands, the Sale and Supply of Alcohol Act 2012 falls short of what is required to effectively safeguard mokopuna, and adults, from alcohol-related harm. This Bill will further weaken the Act.

Conclusion

45. The evidence of alcohol's pervasive harmfulness has been unequivocal for a generation – so too have the simple and proven policies to limit these harms. This Bill represents a step in the wrong direction, from both children's rights and public health perspectives, and especially for mokopuna Māori.
46. The recommendations in the Law Commission's 2010 report *Alcohol in Our Lives: Curbing the Harm* remain as relevant and evidence-based today as they were in 2010.⁴⁷ They are also consistent with the World Health Organisations recommendations in the 2018 SAFER initiative.⁴⁸ Alongside the Children's Convention and Te Tiriti o Waitangi, these provide a clear template for the kind of alcohol reforms we should be progressing so that mokopuna in New Zealand can grow up safe from alcohol harms.

⁴⁴ [Sneyd and Richardson 2024. "Online Alcohol Deliveries: Age Verification Processes of Online Alcohol Delivery Companies in Auckland, New Zealand."](#)

⁴⁵ [Selling liquor to minors is rife - and the potentially fatal consequences. The Post 27 Feb 2026](#)

⁴⁶ [Selling liquor to minors is rife - and the potentially fatal consequences. The Post 27 Feb 2026](#)

⁴⁷ [lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf](#)

⁴⁸ [SAFER - alcohol control initiative](#)