

22 May 2025

Committee Secretariat
Justice Committee
Parliament Buildings
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Retail NZ submission: Sale and Supply of Alcohol (Sales on Anzac Day Morning, Good Friday, Easter Sunday, and Christmas Day) Amendment Bill

1. Retail NZ is a membership organisation that represents the views and interests of New Zealand's retail sector. We are the peak body representing retailers across Aotearoa, with our membership accounting for nearly 70% of all domestic retail turnover. New Zealand's retail sector comprises approximately 30,000 businesses and employs around 227,000 Kiwis.
2. Retail NZ has long supported the liberalisation of Easter trading rules as the current legislation around Easter trading is no longer fit for purpose to meet the needs of consumers or retailers.
3. Our most recent Retail Radar survey of Retail NZ members, released on 17 April 2025, found that two-thirds (64%) of respondents thought that retailers should have the freedom to trade on Good Friday and Easter Sunday if they wished to.
4. Therefore, we believe the Sale and Supply of Alcohol (Sales on Anzac Day Morning, Good Friday, Easter Sunday, and Christmas Day) Amendment Bill does not go far enough, as it deals only with sales of alcohol by retailers already permitted to open on restricted trading days. It does not change anything for stores not permitted to open on those days.
5. Retail NZ recommends that the Bill's scope is widened to allow retailers to determine whether they open on restricted trading days (Anzac Day morning, Good Friday, Easter Sunday and Christmas Day) and furthermore have the ability to decide if they sell alcohol.
6. We are pleased to see that clause 6 of the Bill would repeal s48 of the Sale and Supply of Alcohol Act, meaning that off-licence holders would be permitted to sell alcohol on Good Friday, Christmas Day or Anzac Day morning. However, this would put it in conflict with the Shop Trading Hours Act which prohibits many shops from opening on those days, as well as Easter Sunday.
7. In 2016 some local Councils were given the power to allow shops in their districts to choose whether to open on Easter Sunday. This created further complexity and commercial inequity.
8. Adding to the complexity and inequity, even in those areas where off-licence premises are permitted to open, they are not allowed to sell alcohol. This is troublesome for retailers who have to prevent customers from buying alcohol, and inconvenient for customers who include long weekend holidaymakers.
9. The law is even less logical when we consider that consumers are able to shop online without restrictions on any day of the year at any time. This includes being able to purchase alcohol from online retailers on any restricted trading day, including Anzac Day morning, Good Friday, Easter Sunday and Christmas Day.
10. These restrictions on bricks-and-mortar stores are confusing, inconsistent and not responsive to the 2025 environment.

Conclusion

11. Thank you for the opportunity to make a submission. Retail NZ recommends that the committee extends the scope of the Bill to liberalise trading restrictions on restricted trading days.
12. Retail NZ is happy to discuss any aspect of this submission further. We would like the opportunity to make an oral submission to the committee.
13. No part of this submission should be withheld under the OIA.

Sincerely,



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