

Tax Working Group Public Submissions Information Release

Release Document

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Submission to the Tax Working Group on the Future of Tax

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☑ I am aware that my submission will be released on this website, with my email address withheld, and have noted the Official Information Act and privacy considerations that apply.

I do not wish to speak to my submission before the Tax Working Group.

This submission on the Future of Tax from the Waitemata Child and Youth Mortality Review Group solely reflects the view of the CYMRG Group and does not represent an official position of any of the employing organisations of the members of the Group.

The twenty-eight members of the Waitemata CYMRG support the Tax Working Group's review seeking to identify a fair tax system that positively impacts on the well-being of all New Zealanders because information gathered from Waitemata Child and Youth Mortality Reviews identifies alcohol-harm to be associated with a large number of deaths amongst 15 – 24-year-olds. Local Child and Youth Mortality Review Groups were set up in New Zealand with the purpose of reviewing deaths in their area of children and youth aged 28 days to 24 years with the aim of ensuring important high-quality data is collected and analysed, so that lessons are learned from these reviews and wherever possible, any process or system improvements are identified which may prevent similar deaths from occurring in the future. Child and Youth Mortality review is authorised under the New Zealand Health and Disability Act (2000) through the Minister of Health.

Data analysis of Waitemata DHB mortality data for the 5 year period from 2011 to 2015 shows the associated harm of alcohol intoxication. Below provides the supporting data from death reviews.

Suicide & Fatal Assaults on young people aged 10 years of age to 24yrs of age: 62 deaths - Excessive alcohol consumption was found in 24% of these deaths.

Transport-related deaths of young people aged 10 years of age to 24yrs of age: 28 deaths - Excessive alcohol consumption was found in 39% of these deaths.

A large body of literature and research has established that alcohol pricing and taxes are inversely related to drinking and subsequent alcohol-harm.

We believe that the current approach to alcohol excise tax in New Zealand is not fair for the majority of New Zealanders.

We believe that rates of alcohol excise tax should reflect the cost of alcohol-related harm to society. Alcohol causes more harm than any other drug available in society, e.g. tobacco, cannabis, heroin, methamphetamine.

Increases in alcohol excise rates are urgently required to address the growing number of hazardous drinkers in New Zealand. In 2016, there were 179,000 more hazardous drinkers than in 2012.

Almost every group defined by age, ethnicity, and sex has increased their drinking since 2011. The greatest increases are among our women. There remain significant inequities in alcohol-related harm between Māori and non-Māori - these are unjust.

To achieve fairness, alcohol excise taxes need to addressed

• Today, alcohol is more affordable than it has ever been.

- New Zealanders are missing out on millions of dollars of alcohol excise tax revenue each year because wine is taxed at a level equivalent to 10% alcohol, yet levels of alcohol in a bottle of wine are typically much higher than this (e.g. 12-14%). Taxpayers are losing out on this revenue which could be used to fund essential social services.
- Every year, the Government receives money from alcohol excise tax (\$1 billion in 2017) but this does not come close to the annual cost of alcohol-related harm to individuals and society (around \$5 billion in 2005/06).
- People who don't drink alcohol (20% of New Zealanders) and low-risk drinkers are unfairly burdened with these costs.

Recommendations

For a fairer and more equitable society, we recommend the following:

- Increase alcohol excise rates by at least 50% across all alcohol products to raise the price of alcohol by at least 10%.
- Annually adjust the excise rates to take into account changes in income (and to offset any strategies used by retailers to not pass on increased rates to consumers).
- Address rates of excise tax on wine all wine should be taxed by alcohol content, not the volume of beverage. If a producer is unable to determine the exact alcohol content in their product, then the level of excise tax should be raised from being based on 10% alcohol strength to 14%.
- It is preferable that all alcohol products (beer, wine, cider, spirits, etc.) be taxed by the exact amount of alcohol they contain. This is fair across all beverages. Currently, some products are taxed by volume whereas others are taxed by alcohol content. It is **alcohol** that causes the harm.
- Alcohol excise tax revenue should be allocated to the funding of the current underfunded national mental health and addiction services.

These recommendations are fair as low-income heavy drinkers are shown to benefit the most when prices of alcohol are increased.

Thinking outside the system, we recommend that a Minimum Unit Pricing Policy also is implemented to address the availability of very cheap alcohol. This policy is the fairest as it targets heavy drinkers and significantly reduces inequities in alcohol-related harms between income groups.

We would also like to take the opportunity to extend our gratitude for your time in considering our correspondence and appreciate your commitment to safer communities.

Signed: Michelle Frost on behalf of Waitemata's Child and Youth Mortality Group.

References:

Alexander C. Wagenaar, Matthew J. Salois & Kelli A. Komro. Effects of beverage alcohol price and tax levels on drinking: a meta-analysis of 1003 estimates from 112 studies. Addiction (2009); 104:179-90.

Thomas Babor, Raul Caetano, Sally Casswell, Griffith Edwards, Norman Giesbrecht, Kathryn Graham, Joel Grube, Linda Hill, Harold Holder, Ross Homel, Michael Livingston, Esa Österberg, Jürgen Rehm, Robin Room and Ingeborg Rossow. **Alcohol: No Ordinary Commodity – a summary of the second edition.** Addiction (2010); 105:769-779.

Child and Youth Mortality Review Committee, Te Ropu Arotake Auau Mate O te Hunga Tamariki, Taiohi. **Special Report: the involvement of alcohol consumption in the deaths of children and young people in New Zealand during the years 2005-2007.** Wellington: Child and Youth Mortality Review Committee (2011).

Mike Daube and Julia Stafford. **Alcohol and tax — time for real reform.** Medical Journal of Australia 2016; 204 (6): 218-219.