

Submission to the **Ministry of Business, Innovation and Employment** on the

**Buy-Now, Pay-Later Discussion Document** 

Name: Simon Cayley Occupation: BAF CEO

Email: Date: 16<sup>th</sup> December 2021

## Thank you for the opportunity to make this submission on behalf of BAF.

BAF is a charitable organisation working to create and sustain flourishing communities. We identify the root cause of community and social issues and develop partnerships that can create lasting solutions to them. We have three core action areas of Research, Collaboration and Service. We like to see ourselves as a catalyst for change, developing collaborations and solutions that can thrive beyond our involvement so that we can continue to look for more good to be done. To achieve this we require good national policies and legislation that supports the wellbeing of people in the community.

## BAF would like to signify their support for Alcohol Healthwatch's submission.

We agree with Alcohol Healthwatch that alcohol is not an ordinary commodity and should not be treated as such. We acknowledge their assertion that economic accessibility of alcohol is a key driver of alcohol use, harm and inequities in harm.

'We are strongly concerned that purchasing alcohol (online or in-store) by using BNPL services may further increase its economic accessibility, fueling increases in alcohol use (or maintaining high levels of drinking) and result in alcohol harm to drinkers and others'

We too believe that it is imperative to put in place a set of robust regulations to protect consumers from any financial hardship and harm from increased drinking, and agree with Alcohol Healthwatch's recommendations of:

- Alcohol products should be excluded from any BNPL services or other unregulated creditlike services;
- Alcohol products should not be advertised or sold with fractional costing;
- Apply the Credit Contracts and Consumer Finance Act 2003 to regulate the BNPL sector (i.e. option 3); and
- Conduct a public inquiry into the online promotion, sale and delivery of alcohol.

Thank you again for this opportunity to complete a submission on the Buy-Now, Pay-Later Discussion document.

Ngā mihi

CEO

BAF