

31 May 2021

The Ministry of Health  
Wellington

By email: [smokefree2025@health.govt.nz](mailto:smokefree2025@health.govt.nz)

Tēnā koe

## Proposals for a Smokefree Aotearoa 2025 Action Plan

Tōpūtanga Tapuhi Kaitiaki o Aotearoa, New Zealand Nurses Organisation (NZNO) welcomes the opportunity to comment on the proposed Smokefree Aotearoa 2025 Action Plan.

NZNO is the leading professional nursing association and union for nurses in Aotearoa New Zealand, representing 51,000 nurses, midwives, students, kaimahi hauora and health workers on professional and employment matters. NZNO embraces Te Tiriti o Waitangi and contributes to the improvements of the health status and outcomes of all people of Aotearoa New Zealand through influencing health, employment, and social policy development.

Furthermore, we share the intent of the Ministry of Health's definition of equity which equally applies to NZNO work across professional, industrial and member activities.

NZNO has consulted its members and staff in the preparation of this submission, in particular members of the College of Respiratory Nurses, Te Rūnanga o Aotearoa (Te Rūnanga), and professional nursing and policy advisers.

- NZNO supports the Government's aims to achieve a Smokefree Aotearoa New Zealand.
- Te Rūnanga supports any Smokefree initiative that tautoko a Te Ao Māori perspective on helping whānau, hapū and iwi to quit as we are acutely aware of the burden of disease that Māori whānau suffer from smoking related products.
- As Smokefree coalition members (disestablished 2016) we remain committed to the vision of *Tupeka Kore Aotearoa 2020 Tobacco Free New Zealand*.

### Focus area 1: Strengthen the tobacco control system

- a). What would effective Māori governance of the tobacco control system look like? Please give reasons.

Suggestions include: Partnership in collaboration with current Maori healthcare providers (HCPs) who have well thought out and effective health promotion activities and governance in

place that needs to be enhanced and better resourced to deliver. Overall governance, of these HCP's may come from a Maori Advisory committee or a similar structure within existing DHBs, and Primary Care Health Organisations (PHOs). Furthermore, there are agencies such as - Regional Public Health Units, the Health Promotion Agency, Plunket, Schools who could take a primary role in Māori governance of the tobacco control system etc. and in partnership with the proposed Maori Health Authority.

b). What action are you aware of in your community that supports Smokefree 2025?

Local young hero's media campaign who support quitting. Pavilion based campaigns set up in the Far North at shopping centres, schools and Marae promoting quitting particularly targeted at young people. Pepe first – incentivised pregnancy quitting. District council e.g. Nelson, Smokefree Aotearoa campaigns. Everyone is doing some great work, but it is siloed.

c). What is needed to strengthen community action for a Smokefree 2025? Please give reasons.

NZNO supports a nationally co-ordinated approach with local input so that the neighbour perspective is captured to ensure a cohesive approach and the wise use resources. This target has been around for many years and although some groups have been performing well in the own areas, with many successes and positive results, the approach has not been cohesive or as supportive as it could have been.

Policy and regulation to reduce smoking among Māori and Pacific peoples, whānau or families experiencing deprivation, people with mental health conditions, and other groups where smoking prevalence is high.

Monitor online sales and purchases of ENDS products including requirements for registration and age verification at the point of purchase and requirements for verified R18 shipping delivery including enforcement of fines for online retailers who fail to comply

Provide advice and guidance for health professionals managing vulnerable health consumers who require mental health care and are challenged by not smoking in inpatient facilities

Ensure prohibition of advertising and sponsorship in a way that is focused on children, and restrict availability of products placement in shops

Fund future health research into the health and wellbeing effects of using ENDS products

Protect children from starting vaping and the advertisement of vaping

d). What do you think the priorities are for research, evaluation, monitoring and reporting? Please give reasons.

NZNO acknowledges that there is a large amount of existing research, where the findings have not been implemented. For example: Research into why young Wahine are taking up smoking and how we can help them quit. School smoking / vaping data may have been skewed as not all schools complete the information requested. Incentivising schools to have the research data completed may provide complete data (e.g. ASH survey) that is more valid and provides usable information. These research findings should be disseminated to the audiences / providers that can best use this information to inform service delivery.

e). What else do you think is needed to strengthen New Zealand's tobacco control system? Please give reasons.

Limit the number of retail outlets that sell cigarettes and tobacco products. Ensure healthcare providers have sufficient and funded personnel trained to support those wanting to quit. Build quit information into school programs targeting young people. Make tobacco products less

appealing. Licencing sellers and providers of tobacco / vape products. Remove these products from food outlets.

**Focus area 2: Make smoked tobacco products less available**

a). Do you support the establishment of a licencing system for all retailers of tobacco and vaping products (in addition to specialist vaping retailers)?

Yes       No

Please give reasons:

Licencing ensures regulation and control of the products making sure that it is not sold to individuals who ae underage.

b). Do you support reducing the retail availability of smoked tobacco products by significantly reducing the number of retailers based on population size and density?

Yes       No

Please give reasons:

Tobacco and vape products cause harm and the number of suppliers should be limited.

c). Do you support reducing the retail availability of tobacco by restricting sales to a limited number of specific store types (eg, specialist R18 stores and/or pharmacies)?

Yes       No

Please give reasons:

NZNO do not support pharmacies selling tobacco, but we do think that a restricted type of premises should be able to sell tobacco/related products. E.g. in a rural area with limited retail outlets may see tobacco sales licensed to sell tobacco in another licensed premises. We agree that whoever is selling tobacco / tobacco products should also be certified quit providers with the appropriate resources available.

d). Do you support introducing a smokefree generation policy?

Yes       No

Please give reasons:

We agree with the substance of this policy but the details of implementation of this policy would be where the difficulty may be. This should include vaping as well.

e). Are you a small business that sells smoked tobacco products?

Yes       No

Please explain any impacts that making tobacco less available would have on your business that other questions have not captured. Please be specific:

Not applicable

### Focus area 3: Make smoked tobacco products less addictive and less appealing

a). Do you support reducing the nicotine in smoked tobacco products to very low levels?

Yes  No

Please give reasons:

Yes, NZNO supports this. The reduction of nicotine levels in vapes should also be regulated in line with any policy on reduction of nicotine in tobacco.

b). Do you support prohibiting filters in smoked tobacco products?

Yes  No

Please give reasons:

We are sympathetic to the environmental impact of these filters and removing them reduces this impact of this harm. We acknowledge the research which shows that filters do reduce tobacco harm on the body. Removing the filter also reduces the palatability of tobacco.

c). Do you support allowing the Government to prohibit tobacco product innovations through regulations?

Yes  No

Please give reasons:

Yes. We agree with the prohibition of innovative tobacco and vape products.

### Focus area 4: Make tobacco products less affordable

a). Do you support setting a minimum price for all tobacco products?

Yes  No

Please give reasons:

Yes, we support a minimum price for tobacco products

### Final questions

a). Of all the issues raised in this discussion document, what would you prioritise to include in the action plan? Please give reasons.

All the above implemented together with a well-funded and supported education campaign. The provision of adequate health and mental health services to prevent individuals starting to smoke and support those thinking about quitting, trying to quit and staying smoke free.

b). Do you have any other comments on this discussion document?

NZNO supports an increase in the allocation of resources to quitting smoking. The resources should be coordinated and targeted to the appropriate audience. E.g. Facebook, peer to peer, twitter, influencers. The use of co-design principles in developing sector responses to support Smokefree Aotearoa 2025 is a major consideration for any proposed initiative. We are very cognisant of the different cultures in New Zealand where smoking is more prevalent and accepted. E.g. Recognised Seasonal employees (RSE) workers and migrants. These people should be eligible for fully funded quitting support and programmes targeted at them.

Thank you for the opportunity to participate in the consultation process.

Nāku noa nā



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