

Clubs New Zealand Submission – Sale and Supply of Alcohol (Sales on Anzac Day Morning, Good Friday, Easter Sunday, and Christmas Day) Amendment Bill

To the Justice Committee

Clubs New Zealand welcomes the opportunity to present this submission on the Sale and Supply of Alcohol (Sales on Anzac Day Morning, Good Friday, Easter Sunday, and Christmas Day) Amendment Bill.

Clubs New Zealand wishes to appear before the committee to speak to our written submission.

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INTRODUCTION

Clubs New Zealand represents more than 300 member clubs across the country, including RSAs, sports clubs, community clubs, and other affiliated organisations. These clubs play a vital role in their communities, fostering connection, service, and social participation.

We support efforts to simplify and modernise the Sale and Supply of Alcohol Act 2012. However, we have serious concerns about the unintended consequences of the Sale and Supply of Alcohol (Sales on Anzac Day Morning, Good Friday, Easter Sunday, and Christmas Day) Amendment Bill, particularly as it affects RSAs and other club licence holders.

REPEALING SECTION 47A IS A STEP BACKWARD

On the surface, the Bill appears to be a step in the right direction. It proposes repealing Sections 47 and 48 of the Act to allow licensed premises (on-licence holders) to open and trade as usual on Anzac Day morning, Good Friday, Easter Sunday, and Christmas Day without needing a special licence.

Club Licence holders are not subject to Section 47 or 48. Instead, they are able to operate on Anzac Day Morning, Good Friday, Easter Sunday and Christmas Day in accordance with their usual licensed hours. In effect this bill aims to extend one of the few privileges that clubs enjoy to all licence holders.

Despite not being subject to section 47 and 48 of the Sale and Supply of Alcohol Act 2012, most clubs and RSAs found that they were still required to apply for a special licence in order to operate



on Anzac Day morning, this is because their usual licence hours prohibit them from opening before 8am and in some cases later in the day. This anomaly was fixed with the introduction of Section 47A in 2015.

Section 47A allows RSA clubs to serve alcohol between 4am and 1pm on Anzac Day without needing a special licence, ensuring veterans and their families can be served a traditional tot of rum or a drink following dawn services.

Repealing Section 47A, which is what will happen if this bill proceeds in its current form, would mean that most RSAs will once again be required to apply for special licences to open early on Anzac Day, precisely the kind of unnecessary bureaucracy this Bill claims to remove.

KEY CONCERNS

- **The Bill mischaracterises the current situation**
The explanatory note claims the Bill will prevent the need to apply for special licences on Anzac Day. In fact, by repealing section 47 and subsequently Section 47A, it removes the very exemption that currently allows RSAs to avoid that requirement.
- **It reintroduces bureaucracy**
Clubs and RSAs will again need to apply for special licences simply to open early on one of the most significant days in our national calendar. This adds costs, delay, and uncertainty, particularly for smaller or rural clubs.
- **Many clubs operate under limited hours**
Local Alcohol Policies and licensing conditions often restrict club trading hours. Without Section 47A, some clubs may not be able to open at all on Anzac Day morning. A sample of member clubs' licence hours is included in Appendix A to demonstrate how the repeal of Section 47A would create new obstacles for early Anzac Day openings.
- **The Bill is a step backwards for RSAs and Clubs**
Anzac Day services and commemorations are central to the identity and purpose of RSAs. Repealing Section 47A threatens the ability of RSAs to uphold these traditions.

CLUBS NEW ZEALANDS POSITION

Clubs New Zealand fully supports the intent to simplify the Sale and Supply of Alcohol Act and remove confusion and unnecessary red tape. However, this Bill is misguided in its current form.

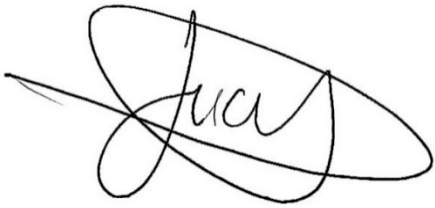
We can only support the Bill if it is amended to:

- Retain Section 47A, or
- Introduce an equivalent provision that ensures RSA clubs can continue to open between 4am and 1pm on Anzac Day without the need for a special licence.

CONCLUSION

This Bill, as it stands, reintroduces barriers for RSAs and club licence holders and undermines long-standing commemorative practices. If passed without amendment, it will have serious and adverse consequences for clubs that play a central role in Anzac Day observances.

Clubs New Zealand welcomes the opportunity to appear before the Committee to speak further to this submission and to ensure the potential impact on RSAs and clubs is fully understood by Parliament.

A handwritten signature in black ink, appearing to read 'Lucy', enclosed within a large, loopy, oval-shaped scribble.

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APPENDIX A: SAMPLE CLUB LICENCE HOURS

Note: The below examples are not isolated cases. Many clubs operate under limited or variable hours that do not align with the early morning nature of Anzac Day services. Repealing Section 47A would force these clubs to re-enter a licensing process that was deliberately resolved in 2015.

Club Name	Usual Licensed Hours	Will require a special licence to open early for dawn service if 47A is repealed?
Hibiscus Coast Community Returned & Services Association	<ul style="list-style-type: none"> • Mon-Fri: 9am – 1am • Sat-Sun: 9am – 1am 	Yes
Mount Maunganui Returned Services Association	<ul style="list-style-type: none"> • Mon-Fri: 9am – 1am • Sat-Sun: 9am – 1am 	Yes
Huntly Returned Services Association	<ul style="list-style-type: none"> • Mon-Fri: 11am – 1am • Sat-Sun: 11am – 1am 	Yes
Levin Returned Services Association	<ul style="list-style-type: none"> • Mon-Fri: 9am – 1am • Sat-Sun: 9am – 1am 	Yes
Far North (Kaitaia) RSA	<ul style="list-style-type: none"> • Mon-Fri: 8.30am – 1am • Sat-Sun: 8.30am – 1am 	Yes
Waipu Citizens & Services Club	<ul style="list-style-type: none"> • Mon-Thur: 10am – 11pm • Fri: 10am – 1am • Sat: 10am – 1am • Sun: 10am – 11pm 	Yes
Ashburton Returned Services Association	<ul style="list-style-type: none"> • Mon-Thur: 10am – 10pm • Fri: 10am – 12pm • Sat: 10am – 12pm • Sun: 10am – 10pm 	Yes
Birkenhead Returned Services Association	<ul style="list-style-type: none"> • Mon-Wed: 11am – 10pm • Thur: 11am – 11pm • Fri: 11am – 12am • Sat: 11am – 12am • Sun: 9am – 10pm 	Yes
Swanson Memorial RSA	<ul style="list-style-type: none"> • Mon-Thur: 11am – 11pm • Fri: 11am – 11.30pm • Sat: 8am – 11.30pm • Sun: 8am – 10pm 	Yes
Clutha District Returned Services Association	<ul style="list-style-type: none"> • Mon-Thur: 11am – 10pm • Fri: 11am – 12am • Sat: 11am – 12am • Sun: 11am – 10pm 	Yes
Greymouth RSA	<ul style="list-style-type: none"> • Mon-Sun: 11am – 12am 	Yes