Social Policy & Parliamentary Unit
Working for the eradication of poverty in New Zealand

BOOZE NOW, PAY LATER

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INTRODUCTION

In 2022, the Panmure Bottle-O[1] sparked public backlash when it advertised Afterpay, a buy now, pay later (BNPL) service, as a payment option for alcohol. Following media coverage and widespread criticism on social media, the store removed Afterpay from its offerings. The backlash was not unwarranted. BNPL is a minimally regulated form of consumer credit, typically associated with clothing, electronics and household essentials—not immediate consumables and certainly not alcohol, the most harmful drug in New Zealand which is responsible for an estimated $9 billion in social harm annually. The convergence of these two products raises serious concerns for increasing financial hardship alongside health and social harms.

As a provider of both financial mentoring and alcohol and other drug (AOD) services through our Bridge programme, The Salvation Army sees firsthand the damage caused by BNPL-related debt and alcohol misuse. While BNPL use in alcohol retail is currently limited, the lack of safeguards and regulation means this issue is brewing beneath the surface. The risk is particularly acute in off-licence stores, which are disproportionately concentrated in high-deprivation areas across the country. Compounding this is the rise of rapid delivery and remote licences—alcohol retailers with no physical storefronts that deliver directly to consumers—a model that has grown rapidly since 2018 and sits in a regulatory grey area.

This paper explores the convergence of BNPL services and alcohol availability, focusing on the risks posed by their intersection, especially in vulnerable communities. It argues for proactive regulation to prevent a worsening storm of financial and social harm.

WHAT IS BNPL?

BNPL is a form of short-term credit that allows customers to receive a product or service immediately and spread the cost over a series of instalments. Unlike traditional credit, BNPL is interest-free if payments are made on time.

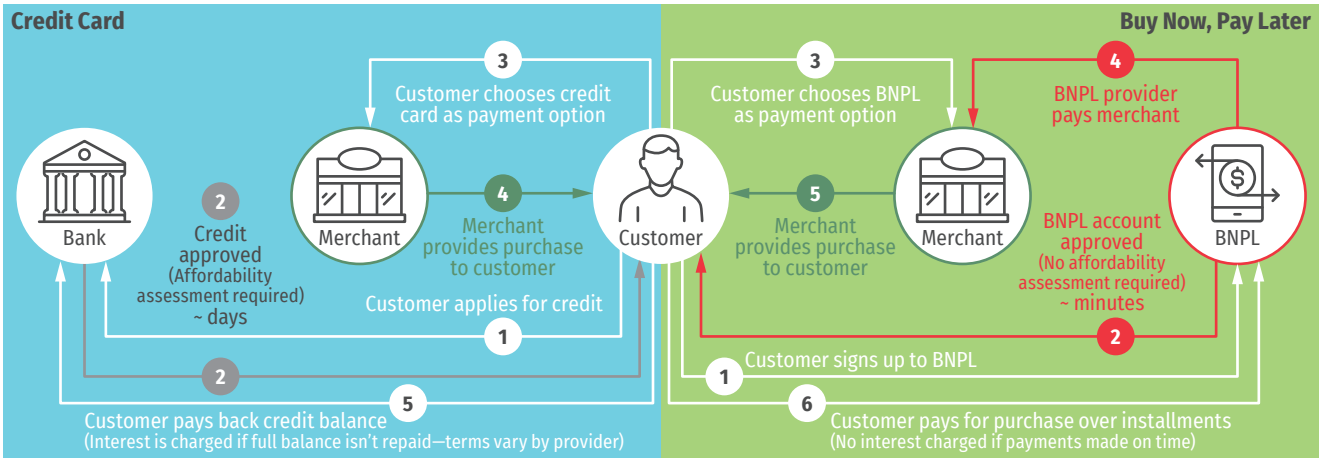
BNPL relies on a digital platform and is a financial technology (fintech) product. These platforms integrate directly with retailers and give customers mobile apps to manage purchases and repayment schedules. In this way, BNPL is part of the broader fintech movement, which uses digital innovation to reshape traditional services like banking, lending and payments.

HOW BNPL WORKS

BNPL is offered as a payment option at checkout—both online and in stores. Customers who have signed up with a BNPL provider (see **Table 1**) can select it at the time of purchase. The amount a customer can spend is subject to a provider-set credit limit, which is typically modest at first and gradually increased based on the customer's repayment history. The BNPL provider pays the retailer (merchant), allowing the customer to receive the product/service or get it delivered immediately. BNPL can be used not only for physical products but also for services, activities and travels. At the time of purchase, the customer pays the first instalment—typically 25 percent of the total cost—to the BNPL provider. The remaining balance is usually repaid in equal instalments over six weeks, primarily through automatic deductions from their debit or credit card. Merchants typically pay BNPL providers a transaction fee ranging from 2 percent to 8 percent of the purchase amount, sometimes with an additional fixed fee per transaction (eg, $0.30). The process of BNPL is outlined in **Figure 1**.

1 Rob Stock, 'Liquor Store Does U-Turn on Allowing Customers to Use Afterpay', Stuff, 8 July 2022, https://www.stuff.co.nz/business/129218992/auckland-liquor-store-does-uturn-on-accepting-afterpay-after-community-backlash.

Figure 1: Buy now, pay later (BPNL) and credit cards process



There are currently three primary BNPL providers in New Zealand—Afterpay, ZIP, and Klarna. These three main providers function similarly, however, they differ in late fee structures and bonus features, such as deferred payments or deferred first instalments. Ultimately, they operate on the same core model, but some are more accessible than others due to having partnerships with a larger number of merchants. Table 1 provides a summary of these providers.

Table 1: Buy now, pay later providers in New Zealand

Provider	Merchants	Payment term	Late fee
Afterpay[2]	6000+	First instalment: Paid immediately at time of purchase. Three fortnightly payments over six weeks.	Capped at 25% of order value or $68 max. Orders below $40: one late fee up to 25%. Orders $40 or more: initial $10 late fee, plus further partial fees after 7 days, up to the 25% cap. Fees stop once cap is reached.
Zip[3]	3000+		$10 per week until repaid. Capped at $40.
Klarna[4]	632		Orders under $25: No late fees. $25–$59.99: $2 per late repayment, max $6. $60–$99.99: $4 per late repayment, max $12. $100–$199.99: $6 per late repayment, max $18. $200+: $8 per late repayment, max $24.

2 'Buy now, pay later with Afterpay', accessed 26 August 2025, https://www.afterpay.com/en-NZ.

3 'Zip Now, Pay Later over 3,000 Stores | Home | Zip New Zealand', Zip, accessed 26 August 2025, https://zip.co/nz.

4 'Pay Your Way with Klarna | Klarna New Zealand', accessed 26 August 2025, https://www.klarna.com/nz/.

BNPL VERSUS TRADITIONAL CREDIT

Despite operating as a form of credit, BNPL previously fell outside the full protections of the Credit Contracts and Consumer Finance Act 2003 (CCCFA).[5] This was because BNPL arrangements typically do not involve interest charges, credit fees or security interests—key criteria outlined in section 11 of the CCCFA that define a 'consumer credit contract'. As a result, BNPL contracts did not automatically trigger responsible lending obligations or consumer protections, such as affordability assessments. However, as of September 2024, BNPL contracts are now formally regulated under the CCCFA, with proportionate obligations tailored to their low-cost structure. While BNPL providers are exempt from some requirements, such as full affordability assessments, they must still comply with key consumer protections, including fair treatment, disclosure obligations and access to hardship relief.[6]

In practice, BNPL remains far more accessible than traditional credit products. The absence of full affordability assessments means customers can sign up with a BNPL provider in just minutes. Because BNPL providers are not required to consider a customer's income or existing debts, individuals can easily sign up with multiple providers. Some BNPL services, depending on a customer's repayment history, offer credit limits of up to $4000. By contrast, applying for a credit card or personal loan involves a more rigorous process—requiring proof of income, disclosure of existing debt and an affordability assessment. As illustrated in **Figure 1**, BNPL sign-up is near instant, while credit card/loan approval can take several days or even weeks, depending on the lender.

BNPL AND FINANCIAL HARDSHIP

The 2024 regulatory changes to BNPL were informed by consultations led by the Ministry of Business, Innovation and Employment (MBIE)[7] in 2021, which highlighted the benefits of BNPL such as providing consumers with a low-cost, interest-free way to manage purchases and boosting sales for businesses. However, BNPL's low upfront cost and ease of use can obscure the true cost of purchases and encourage overspending, especially as customers can sign up with multiple providers without disclosing existing debts, leading to fragmented debt and increased risk of financial hardship from missed payments.

Consultation findings revealed that around 75 percent of BNPL users were aged 45 and under, with growing uptake among those over 60. Women were more likely to use BNPL than men, and many held multiple accounts across different providers. Further research[8] commissioned by MBIE shows that BNPL is disproportionately used by low-income households, younger consumers and those already experiencing financial hardship. Notably, 13 percent of users reported delaying essential expenses such as rent, power, or groceries to meet BNPL repayments, and 8.4 percent were already in arrears. While BNPL is commonly used for discretionary purchases like clothing and electronics, financial mentors are increasingly seeing it used for essentials particularly groceries, highlighting a shift towards dependence. Some users even use credit cards to repay BNPL instalments, compounding their debt and deepening financial vulnerability.

Although BNPL is now partially regulated under the CCCFA, the 2024 changes do not fully protect vulnerable consumers. Many stakeholders called

5 'Credit Contracts and Consumer Finance Act 2003 No 52 (as at 12 April 2022), Public Act Contents—New Zealand Legislation', accessed 27 August 2025, https://www.legislation.govt.nz/act/public/2003/0052/latest/dlm211512.html.

6 'Buy now, pay later | Ministry of Business, Innovation & Employment', accessed 27 August 2025, https://www.mbie.govt.nz/business-and-employment/consumer-protection/buy-now-pay-later.

7 'Buy-Now, Pay-Later | Ministry of Business, Innovation & Employment', accessed 27 August 2025, https://www.mbie.govt.nz/have-your-say/bnpl.

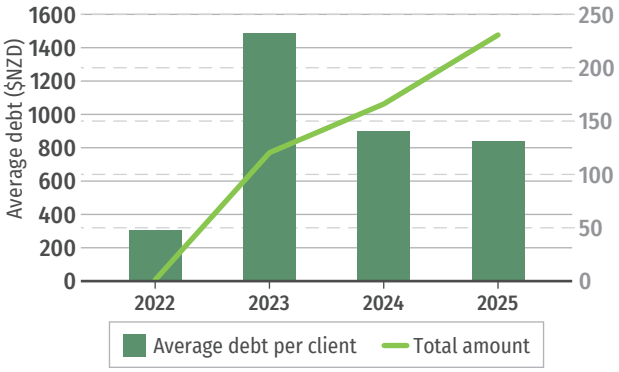
8 *Preventing Financial Hardship Caused by the Use of Buy-Now, Pay-Later*, n.d., https://www.mbie.govt.nz/dmsdocument/25586-preventing-financial-hardship-caused-by-the-use-of-buy-now-pay-later-proactiverelease-pdf.

for mandatory affordability assessments, citing the ease with which consumers can accumulate debt across multiple platforms. Without shared credit checks or oversight, providers cannot assess whether a customer is already using other BNPL services or can manage additional repayments. Missed payments may lead to late fees and debt collection, disproportionately affecting those already in financial hardship. Since the 2021 consultation, BNPL providers have added more safeguards on their apps for limiting spending and financial hardship options for customers.

THE SALVATION ARMY AND BNPL

Our financial mentors have extensive frontline experience supporting whānau who are increasingly reliant on BNPL to manage household expenses. We regularly see the hardship BNPL can cause, particularly when clients hold multiple accounts and use BNPL to bridge gaps in their income. Many use BNPL not only for food but for petrol, school uniforms and clothing. Instalments to multiple providers can leave families without essential, forcing them to rely on hardship grants and food banks. The financial strain is compounded by a psychological burden. Clients often underestimate how several small BNPL agreements stack up. Some only discover how much they owe when contacted by debt collectors; others cannot say because payments are fragmented across different BNPL providers. The stacking effect of multiple accounts and multiple purchases made with BNPL can quickly lead to unmanageable debt. BNPL often becomes a default budgeting tool for those already in financial distress. **Figure 2** shows the total BNPL debt across our financial mentoring clients who have disclosed their BNPL debt with our financial mentors and the average BNPL debt per client. It shows a sharp rise in BNPL debt among our financial mentoring clients, growing from just $903 in 2022 to over $230,000 in 2025. While average debt per client peaked in 2023, the steady increase in the client numbers reflects growing dependence on BNPL to manage financial hardship.

Figure 2: Total BNPL debt and average debt per client—2022–2025[9]



We acknowledge that for many of the whānau we support, access to Tier 1 or Tier 2 lending is simply not an option due to income and credit history. In these cases, BNPL often becomes the only available form of credit. However, our primary concern which we raised in our submission to MBIE,[10] is that BNPL's use for fast-moving consumer goods (FMCGs), such as groceries, food, toiletries and cleaning products, poses serious risks. These items are consumed quickly and need to be replaced often, which can lead to a cycle where people are still repaying BNPL instalments for goods they have already used, even as they take on new debt to cover the next purchase. Many of those we support report using BNPL to buy fuel and food from butchers, discount stores and even takeaway outlets, highlighting how normalised and accessible these services have become. However, the convenience comes at a cost as many find themselves juggling multiple repayments, falling behind on other bills and relying on food parcels.

9 BNPL was first recorded as a separate liability in our system in 2022, in response to the growing prevalence of BNPL-related hardship among those we support.

10 'Submission on Buy Now Pay Later Consultation (BNPL)—The Salvation Army NZFTS', Articles, https://www.Salvationarmy.org.nz/, n.d., accessed 27 August 2025, https://www.salvationarmy.org.nz/submission-buy-now-pay-later-consultation-bnpl/.

BNPL AND ALCOHOL

These patterns of hardship and dependence raise concerns about the accessibility of BNPL when it extends beyond retail into high-risk environments. One such example is the availability of BNPL for alcohol purchases. Alcohol is New Zealand's most harmful drug, driving a myriad of health, social and economic issues.[11] A 2024 estimate puts the annual cost of alcohol-related harm at NZ$9.1 billion, encompassing direct spending on healthcare, ambulance callouts, and policing and courts, as well as indirect costs such as lost productivity, absenteeism and damage to public infrastructure.[12] An important layer to this issue is the disproportionate impact of alcohol access and availability on vulnerable communities, many of the same communities that are also struggling with the financial hardship. Approximately 75 percent of alcohol is sold through off-licence outlets, which are disproportionately concentrated in areas of high deprivation (more on this later).[13] These communities face a double burden: increased exposure to alcohol-related harm and financial stressors that compound social and health inequities.

Almost half of the submissions to MBIE's BNPL review raised concerns about alcohol sales, with widespread agreement that deferred payment credit such as BNPL should not be available at bottle stores or for online alcohol deliveries.[14] Health agencies, iwi, local boards and community groups argued that BNPL undermines public health goals by lowering the upfront cost of alcohol, encouraging bulk buying and masking the true price. Submitters called for urgent reform: bringing all BNPL providers under the Act and banning its use for alcohol purchases, both in-store and online, alongside restrictions on fractional cost advertising and a broader inquiry into digital alcohol marketing.

Alcohol Healthwatch calculated that a customer could take home six bottles of wine equivalent to 46.7 standard drinks after paying only the first instalment, reducing the perceived cost to just 72 cents per drink.[15] This is particularly concerning for low-income and heavy drinkers, including Māori and Pasifika communities, where BNPL may increase consumption and exacerbate harm, including foetal alcohol exposure. The risks are amplified by the rise in remote licences and online alcohol sales (discussed later), where rapid delivery have been linked to increased home drinking.[16]

A BREWING STORM

The convergence of alcohol and BNPL is a storm quietly brewing on the horizon. The appeal of spreading payments over time with BNPL can mask the true cost of consumption, particularly for younger consumers or those already facing financial hardship. As BNPL becomes more normalised across retail sectors, its expansion into alcohol sales could exacerbate issues related to debt, addiction and public health. Across the BNPL platforms operating in New Zealand, only 22 merchants currently offer alcohol as part of their product range as shown in **Table 2**. Of these, approximately one-third are primarily alcohol retailers, and all of them offer Afterpay. Within this group, four merchants are considered specialised alcohol retailers, offering curated or boutique product selections and three are traditional bottle stores with physical retail

11 'The New Zealand Drug Harms Ranking Study: A Multi-Criteria Decision Analysis - Rose Crossin, Lana Cleland, Chris Wilkins, Marta Rychert, Simon Adamson, Tuari Potiki, Adam C Pomerleau, Blair MacDonald, Dwaine Faletanoai, Fiona Hutton, Geoff Noller, Ian Lambie, Jane L Sheridan, Jason George, Kali Mercier, Kristen Maynard, Louise Leonard, Patricia Walsh, Rhys Ponton, Sue Bagshaw, Suresh Muthukumaraswamy, Tracey McIntosh, Edward Poot, Paul Gordon, Patrick Sharry, David Nutt, Joseph Boden, 2023', accessed 26 August 2025, https://journals.sagepub.com/doi/10.1177/02698811231182012.

12 *Costs of Alcohol Harms in New Zealand*, n.d., https://www.health.govt.nz/publications/costs-of-alcohol-harms-in-new-zealand-updating-the-evidence-with-recent-research.

13 'Types of Licences—ActionPoint', accessed 27 August 2025, https://www.actionpoint.org.nz/types_of_licences.

14 'Buy Now Pay Later | Ministry of Business, Innovation & Employment'.

15 'Alcohol Healtwatch Buy Now Pay Later Submission', n.d., accessed 27 August 2025, https://www.mbie.govt.nz/dmsdocument/18960-alcohol-healtwatch-buy-now-pay-later-submission-pdf.

16 Rose Crossin et al., 'Quantifying Access to On-Demand Alcohol in New Zealand', Drug and Alcohol Review 43, no. 2 (2024): 416–24, https://doi.org/10.1111/dar.13785.

locations: Thirsty Liquor Tauranga, Grafton Liquor in Auckland and Merchants Liquor in Queenstown.

In addition to these specialised retailers, four supermarket chains also offer BNPL. New World, Woolworths and Gilmours accept Klarna, while Farro accepts Afterpay. These supermarkets sell alcohol alongside general groceries. Beyond these, several other merchants offer alcohol only as part of gift baskets or hampers, representing a small portion of their overall product range. Most of these merchants operate exclusively online, with only seven of the 22 alcohol-selling BNPL merchants maintaining physical retail stores—the bottle stores and the supermarkets.

Table 2: Alcohol availability with BNPL

	Merchants who sell alcohol	Alcohol primary product	Physical off-licences[17]
Afterpay	13	7	4
ZIP	5	0	0
Klarna	4	0	3

While direct BNPL availability at alcohol merchants is limited, delivery platforms who partner with off-licences are increasingly circumventing this barrier. BNPL options are now widely available through services such as Uber Eats,[18] DoorDash,[19] Delivereasy,[20] Order Meal,[21] and alcohol-specific platforms like GIMME.[22] Although BNPL is offered on Uber Eats and Delivereasy, it cannot be used for restricted items such as alcohol. However, loopholes exist for other delivery services. For example, DoorDash vouchers purchased via Afterpay can be used to buy alcohol, and GIMME (an alcohol-only delivery service) offers Afterpay and Klarna on its app and can enable them on its website upon request. GIMME also promotes BNPL availability in its text-message advertising. These workarounds mean that, although BNPL access to alcohol may appear limited on the surface, delivery platforms are enabling indirect access, raising concerns about remote licensing and regulatory gaps, which will be discussed further below.

Table 3: Rapid delivery services and BNPL

Delivery platform	BNPL provider(s)	BNPL use for alcohol
Uber Eats	Afterpay	Vouchers can be purchased using Afterpay, but they cannot be used for restricted products such as alcohol.
Delivereasy	Afterpay	Afterpay is not available as a payment option when used for restricted items, such as alcohol.
DoorDash	Afterpay	Vouchers can be purchased using Afterpay and used to buy alcohol.
GIMME	Afterpay, Klarna	BNPL is available directly through the app, can be enabled on the website upon request and is actively promoted via SMS advertising.

Although direct BNPL use in alcohol retail remains limited, its availability is increasing through delivery platforms, which raises concerns as it converges with alcohol. The potential for increased impulsivity, reduced financial barriers and broader accessibility signals a brewing storm with implications for public health and consumer protection. The current low uptake in physical bottle stores may not last, especially as retailers seek to remain competitive and cater to consumer demand for flexible payment options, and when off-licences can opt-in for rapid delivery services already offering BNPL.

17 BNPL is available at major retail chains, meaning alcohol can potentially be accessed at all their store locations nationwide.

18 'Afterpay—Love the Way You Pay.', accessed 15 September 2025, https://www.afterpay.com/en-NZ/gift-cards/UBER_NZ.

19 'DoorDash—Afterpay', accessed 15 September 2025, https://www.afterpay.com/en-NZ/gift-cards/DOORDASH_NZD.

20 'Delivereasy—Leave a Better Taste in Your Mouth', Delivereasy, accessed 15 September 2025, https://www.delivereasy.co.nz/support/customer/faq.

21 'Order Food Online from Best Restaurants in New Zealand. Takeaway/Home Delivery—Order Meal', accessed 15 September 2025, https://www.ordermeal.co.nz/.

22 'Terms of Service', GIMME Beverage Delivery, accessed 15 September 2025, https://gimmedelivery.co.nz/policies/terms-of-service.

ACCESSIBILITY, AFFORDABILITY AND AVAILABILITY

The question is no longer if BNPL will become more common in alcohol retail—it's when, at what cost and what we'll do about the storm brewing on the horizon. BNPL platforms are expanding access to alcohol in ways that bypass traditional safeguards, making it easier for people to purchase alcohol they cannot immediately afford. This trend amplifies long-standing concerns about the structural drivers of alcohol harm: availability, accessibility and affordability.

Reducing alcohol harm means looking beyond individual choices to the wider conditions that shape them. Harm clusters in communities already facing social and economic deprivation—the same places where alcohol is most aggressively marketed and sold at low cost. High outlet density and long trading hours normalise heavy drinking and increase rates of violence, injury and chronic illness.[23] Cheap alcohol, often promoted through bulk deals and discounts, drives up consumption, especially among youth and heavy drinkers. In low-income households, alcohol spending competes with essentials like rent and food, often leading to debt and financial hardship.

The Law Commission's 2010 report *Alcohol in Our Lives: Curbing the Harm*[24] laid out a clear roadmap for reform, calling for stronger controls on outlet density, trading hours, and pricing—all key levers of accessibility, availability, and affordability. Yet the current Sale and Supply of Alcohol Act 2012 falls short of these recommendations. It has not meaningfully addressed affordability or saturation, nor anticipated new purchasing models like BNPL or increased availability through remote licences (discussed later) and rapid delivery. Without confronting these structural drivers, efforts to reduce alcohol harm will remain piecemeal. A serious response must address not only how alcohol is sold, but how easily and cheaply it can be obtained and by whom.

PHYSICAL OFF-LICENCES AND HARM IN VULNERABLE COMMUNITIES

The structural drivers of alcohol harm are most visible in the density of off-licence outlets across the country. Bottle stores and supermarkets account for around 75 percent of all alcohol sold, and their distribution is far from random. Research commissioned by councils for local alcohol policies (LAPs) consistently shows that off-licences are most densely clustered in neighbourhoods with the highest levels of deprivation. These areas also experience longer trading hours, more aggressive discounting and disproportionately high rates of alcohol-related harm.

Across the country, the pattern repeats: more outlets, earlier openings and later closings in communities least equipped to absorb the consequences. Hospital admissions, police call-outs and financial stress all rise in tandem with outlet density. Community voices echo the data, describing daily exposure to discount signage, unsafe streets and the normalisation of cheap alcohol. **Table 4** provides a summary of off-licence density and deprivation from LAP research reports across the country.

23 'Case for Change', ActionPoint, accessed 28 August 2025, https://www.actionpoint.org.nz/local_alcohol_policy_case_for_change.

24 'Alcohol in Our Lives: Curbing the Harm', n.d., accessed 28 August 2025, https://www.lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf.

Table 4: Off-licence trends for LAP reports—2016–2025

District	Key findings
Rotorua (2025)[25]	Rotorua has 56 off-licences, and many are concentrated in areas of high deprivation. The concentration of off-licences in deprived areas increases alcohol harm, including crime and emergency department visits.
Christchurch (2025)[26]	In Christchurch, off-licence alcohol outlets are disproportionately concentrated in areas of high deprivation, particularly in the eastern suburbs. Licensing data shows that high-deprivation areas have more off-licences and longer trading hours compared to low-deprivation areas (27 bottle stores in NZDep10 compared to 11 in NZDep1). Police data also shows that alcohol-related incidents are disproportionately concentrated in high-deprivation zones.
Porirua (2024)[27]	In Porirua, alcohol harm is also disproportionately concentrated in areas of high deprivation, particularly in the city centre, Cannons Creek and Elsdon. Nearly half of all alcohol licences are located in these areas. Alcohol-related hospitalisations, injuries and crime are high, especially among Māori and Pacific communities.
Matamata-Piako (2023)[28]	Areas with higher deprivation, particularly in Te Aroha and parts of Morrinsville, tend to have a greater concentration of off-licence premises, such as bottle stores. This increased availability of alcohol in vulnerable communities contributes to elevated rates of hazardous drinking, alcohol-related harm and emergency department presentations.
Eastern Bay of Plenty (2023)[29]	In the Eastern Bay of Plenty, off-licence alcohol outlets are heavily concentrated in areas of high deprivation. For example, Kopeopeo has three off-licences within 500 meters, and Kawerau has three within 300 meters. These areas are among the most socioeconomically deprived in New Zealand. Whakatāne Central has seven off-licences serving just over 2600 people—equating to 129 licences per 10,000 residents, which is over four times the national average of 31.1.
Waikato (2022)[30]	In the Waikato district, off-licences are more concentrated in areas with higher deprivation, such as Huntly and Ngaruawahia. These communities also have younger populations and a higher proportion of Māori residents, who are disproportionately affected by alcohol-related harm. Emergency department data shows that nearly half of alcohol-related presentations come from the most deprived areas, highlighting a strong link between alcohol outlet density, deprivation and health inequities.
Wairarapa (2023)[31]	In Wairarapa, off-licence numbers have increased in South Wairarapa and Carterton since 2014, with new bottle stores and remote sales outlets emerging. Masterton, which has the highest concentration of deprivation (24% of areas rated NZDep9–10), also shows the highest rates of alcohol-related hospital admissions and police-recorded harm. Areas like Featherston and Carterton, with pockets of deprivation, also experience elevated alcohol-related harm, highlighting a clear link between outlet density, deprivation and health and social impacts.
Whanganui (2016)[32]	In Whanganui, 45% of all alcohol licences, including 59% of on-licences and 45% of off-licences, are located in areas of high socioeconomic deprivation. These areas, such as Whanganui Central, Gonville, Castlecliff and Whanganui East, also experience higher rates of alcohol-related harm including drunk custodies, violence events and emergency department presentations.
Tauranga (2021)[33]	In Tauranga, the number of off-licences increased by 19% between 2015 and 2021, outpacing the city's population growth of 16% over the same period. As of 2021, there were 81 off-licences, including bottle stores, supermarkets and remote sellers. Notably, areas with high deprivation such as Gate Pa, Greerton, Kairua, Matapihi, Tauranga Hospital and Yatton Park experience higher levels of alcohol-related harm.

25 'Rotorua Lakes Council Local Alcohol Policy Research Report', Rotorua Lakes Council Local Alcohol Policy Research Report, accessed 28 August 2025, https://letstalk.rotorualakescouncil.nz/local-alcohol-policy.

26 'Christchurch LAP Research Report', n.d., accessed 28 August 2025, https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Policies/LAP2024_ResearchReport_January2025-v2.pdf.

27 'Porirua LAP Social Impact Assessment', Porirua LAP Social Impact Assessment, accessed 28 August 2025, https://haveyoursay.poriruacity.govt.nz/local-alcohol-policy.

28 'Matamata-Piako LAP Research Report', n.d., accessed 28 August 2025, https://www.mpdc.govt.nz/filelink/fileman-files/CouncilDocuments/Policies/Alcohol/LAP-ResearchReport.pdf.

29 'Eastern Bay of Plenty Local Alcohol Policy Review—Ōpōtiki District Council', Eastern Bay of Plenty Local Alcohol Policy Review—Ōpōtiki District Council, https://www.odc.govt.nz/our-council/have-your-say/closed-consultations/eastern-bay-of-plenty-local-alcohol-policy-review.

30 'Waikato District Local Alcohol Policy', Shape Waikato, accessed 28 August 2025, https://shape.waikatodistrict.govt.nz/local-alcohol-policy.

31 'Wairarapa LAP Background Report', n.d., accessed 28 August 2025, https://www.mstn.govt.nz/repository/libraries/id:2jr77ddvv17q9sn6a3db/hierarchy/Documents/Consultations/Wairarapa%20Local%20Alcohol%20Policy/LAP%20Background%20Report%20FINAL%202024.pdf.

32 *Whanganui Local Alcohol Policy Research Report*, n.d., https://www.whanganui.govt.nz/files/assets/public/v/1/consultations/lap-research-report-final.pdf.

33 'Tauranga LAP Background Report', n.d., accessed 28 August 2025, https://www.tauranga.govt.nz/Portals/0/data/council/policies/files/local-alcohol-policy-background-report.pdf.

Off-licence saturation is disproportionately concentrated in high-deprivation communities. This means that availability, affordability and access to alcohol are not equitably distributed across the country. When this landscape is overlaid with the rise of BNPL, the potential for harm increases.

REMOTE OFF-LICENCES: A GROWING AND UNDER-REGULATED THREAT

The Law Commission's 2010 report anticipated the rise of online alcohol sales and recommended adaptable legislation. At the time, remote sales involved bulk orders with delayed delivery, posing less risk of impulsive or youth-driven consumption. The Commission stressed the need for safeguards such as age verification, physical premises for enforcement and delivery time restrictions. These principles were later reflected in Section 59 of the Sale and Supply of Alcohol Act 2012, which requires remote sellers to avoid deliveries between 11pm and 6am, verify age and display licence details. However, these provisions were designed for a slower, more limited online market and now fall short of regulating today's fast-paced, app-driven alcohol delivery services.

Since 2018, remote licences have surged, offering alcohol via websites and apps with delivery times as short as 10 minutes. These licences are rarely subject to the local controls that govern physical outlets such as density caps, trading-hour limits or ID-on-entry checks, allowing the remote and rapid delivery market to expand rapidly with fewer safeguards. Alcohol Healthwatch found that 73 percent of deliveries failed to check ID, and nearly half were left unattended. Their study also highlighted how rapid delivery extends binge drinking sessions and increases harm in homes.[34]

Research by the University of Otago also quantified access to on-demand alcohol services in major cities and found that high-risk drinkers are nearly three times more likely to use same-day delivery, however there were no clear socio-economic patterning.[35] Council data shows remote licences now make up a significant share of off-licences in cities like Christchurch, Hastings and Marlborough. The ease of ordering alcohol from a phone removes traditional barriers to late-night drinking. Without consistent national standards for delivery windows, age checks and licence density, remote alcohol sales risk undermining the harm-reduction gains achieved through physical outlet regulation.

Without intervention, the combination of remote licences, rapid delivery and BNPL payments could significantly amplify alcohol-related harm, especially in communities already facing high levels of deprivation.

BAN ON BNPL IN OFF-LICENCES FOR NEW ZEALAND

The Sale and Supply of Alcohol Act 2012 provides the national framework for regulating how alcohol is sold in New Zealand. Its object, as stated in Section 4, is to ensure that the sale, supply and consumption of alcohol is undertaken safely and responsibly, and that harm caused by excessive or inappropriate alcohol consumption is minimised. However, BNPL services are not currently regulated under this national framework, leaving a gap in protections against financial harm linked to alcohol purchases.

There are three primary regulatory avenues through which BNPL use in alcohol sales can be addressed:

34 Sarah Sneyd and Molly Richardson, 'Online Alcohol Deliveries: Age Verification Processes of Online Alcohol Delivery Companies in Auckland, New Zealand', *New Zealand Medical Journal* 137, no. 1606 (2024): 13–21, https://doi.org/10.26635/6965.6433.

35 Crossin et al., 'Quantifying Access to On-Demand Alcohol in New Zealand'.

1. National legislation (Sale and Supply of Alcohol Act 2012)

While the Act sets overarching principles, it does not explicitly prohibit BNPL as a payment method for alcohol. Amendments to the Act would be required to introduce a nationwide ban or restriction on BNPL services in alcohol transactions.

2. Local alcohol policies (LAPs) under Section 77 of the Act

Section 77 of the Sale and Supply of Alcohol Act allows territorial authorities to include discretionary conditions in their local alcohol policies (LAPs), including conditions related to licensing and payment methods. These discretionary conditions are important because they enable councils to respond to emerging risks and tailor licensing requirements to local contexts. Many LAPs have already included discretionary conditions restricting BNPL use at off-licences, as shown below in **Table 5**. However, relying solely on discretionary conditions can result in inconsistent application across regions. Given the increasing availability of BNPL through delivery platforms and its convergence with alcohol, BNPL restrictions should not be optional. Instead, they should be made a mandatory provision within LAPs to ensure consistent and effective safeguards across all off-licences.

Table 5: Discretionary conditions in LAPs on BNPL

Council	Discretionary condition
Rotorua Lakes Council[36]	No alcohol sales relating to method of payment using a BNPL contract, as that term is defined under the Credit Contracts and Consumer Finance Regulations 2004.
Porirua City[37]	Restriction on the use of buy now pay later options (eg, Laybuy or Afterpay) in bottle stores.
Waipa District Council	No alcohol may be purchased either remotely or on the premises using a BNPL contract, as that term is defined under the Credit Contracts and Consumer Finance Regulations 2004.

3. District licensing committees (DLCs)

DLCs are independent bodies established under the Act to decide on alcohol licence applications, renewals and variations. DLCs consider objections from the police, medical officer of health, licensing inspectors, and/or the public in respect to alcohol licences. They have the authority to impose discretionary conditions on individual licences, including prohibiting BNPL as a payment method. This lever is particularly responsive, as DLCs can act on a case-by-case basis and tailor conditions to specific contexts or concerns raised during hearings.

In 2023, the Hamilton DLC became the first DLC to impose a condition prohibiting BNPL services on an off-licence Merchants Liquor Te Rapa, citing concerns, 'about the use of BNPL options that postpone the consequences of payment as it may encourage poor decision-making. This is particularly relevant for those with alcohol addictions.'[38] Since then, Hamilton DLC has applied similar conditions to multiple off-licences.

36 'Rotorua Lakes Council—Local ALcohol Policy 2025', n.d., accessed 15 September 2025, https://r3nk7o.digitalcityplatform.online/RedPublishPROD/api/docs/21375726?f=inline.

37 'Porirua_City_Local_Alcohol_Policy_2025.Pdf', n.d., accessed 15 September 2025, https://storage.googleapis.com/pcc-wagtail-media/documents/Porirua_City_Local_Alcohol_Policy_2025.pdf.

38 'Merchants Liquor Te Rapa', Merchants Liquor Te Rapa, accessed 28 August 2025, https://www.nzlii.org/cgi-bin/sinodisp/nz/cases/NZDLCHAM/2023/2422.html.

While the Hamilton DLC was the first to impose a condition prohibiting BNPL services in an off-licence, this was part of broader concerns about the licence holder's suitability and trading practices. The BNPL prohibition was included among other conditions, rather than being the sole focus of the hearing. In contrast, in 2024 the Auckland DLC held a hearing for Siya NZ Limited, trading as Bottle-O Queens Road, which marked the first time a DLC hearing in New Zealand was held specifically to determine whether BNPL should be permitted as a payment method for alcohol. The applicant had refused to accept a BNPL prohibition as a licence condition during the renewal process, prompting formal opposition from the alcohol licensing inspector and the medical officer of health, and triggering a full hearing.

The Auckland DLC determined that allowing BNPL services at Bottle-O Queens Road would be inconsistent with the object of the Act,[39] which requires alcohol to be sold safely and responsibly, and for harm to be minimised. The Committee was persuaded by strong public health evidence, including testimony from The Salvation Army and Alcohol Healthwatch, that BNPL schemes increase alcohol affordability and accessibility, particularly in high-deprivation communities. These services were shown to contribute to financial hardship, impulse purchasing and increased alcohol-related harm. The Committee also noted the precedent set by the Hamilton DLC and agreed that permitting BNPL could 'open the floodgates' across the industry. While the applicant eventually accepted the BNPL prohibition, the Committee made clear that its decision was grounded in the need to prevent harm and uphold the integrity of the licensing system.

LICENCE CONDITIONS

Another way to prevent the use of BNPL in alcohol sales is through the objection process that occurs before a licence decision is made by the DLC. During this stage, the agencies and/or objectors can request that a condition prohibiting BNPL be included in the off-licence application or renewal. If the applicant agrees to the proposed condition, a memorandum of understanding can be submitted to the DLC outlining the agreed terms. Once this is received, the objection may be formally withdrawn, allowing the licence to proceed with the BNPL restriction in place.

This approach has already been used in practice. For example, New World Point Chevalier[40] accepted the following condition as part of its licence: 'There will be no sales of alcohol via "buy now, pay later" payment options. This condition does not prevent the use of credit cards issued by registered trading banks (or American Express).' Other off-licences have also adopted similar conditions in response to community concerns, demonstrating that there is both regulatory flexibility and public support for limiting risky payment methods in alcohol sales.

These examples show that practical tools already exist within the licensing framework to restrict the intersection between BNPL and alcohol. If supermarkets and bottle stores are already operating under licence conditions that prohibit BNPL purchases for alcohol, then a broader, nationwide ban is not only feasible, but it aligns with current practice. The licensing system provides a legitimate and enforceable mechanism to protect communities from the financial and social harms associated with deferred payment options for alcohol.

39 'Bottle O Queens Road', accessed 26 August 2025, https://www.nzlii.org/cgi-bin/sinodisp/nz/cases/NZDLCAK/2024/100507.html.

40 'New World Point Chevalier—Alcohol Licence', n.d., accessed 28 August 2025, https://s3-ap-southeast-2.amazonaws.com/prod-prod-grability-bucket/documents/000010/4279/liquor-license.pdf.

REGULATORY GAPS

While the licensing process allows for BNPL restrictions to be negotiated and included as licence conditions, this mechanism is time-consuming and places a heavy burden on communities. Objectors must monitor public notices, prepare submissions and engage in negotiations often without legal or procedural support. This is particularly challenging for off-licences and remote licences, where the risks of alcohol-related harm are higher and community oversight is often limited. In Auckland alone, over 800 licence application notices were issued between January and June 2025. With such volume, it is unrealistic to expect communities to stay engaged and respond to every application. Many simply do not have the capacity or capability to track and intervene in these processes consistently.

To prevent the 'floodgate' effect that the Auckland DLC has already warned about, it is more effective and equitable to pursue broader regulatory reform. Amending the Sale and Supply of Alcohol Act 2012 to prohibit BNPL for alcohol purchases would apply uniformly across all alcohol retailers and remove the burden from communities to fight these battles one licence at a time.

Currently, there is no explicit prohibition on the use of BNPL for alcohol purchases in New Zealand. While the CCCFA has undergone recent reforms, it still does not fully regulate BNPL in the same way as other forms of credit, leaving consumers exposed to financial risk. Meanwhile, alcohol legislation remains largely focused on traditional, outlet-based retail models, with limited capacity to address the evolving digital landscape of alcohol sales and marketing. This creates several overlapping regulatory gaps:

- No national ban on BNPL for alcohol purchases.
- No mandatory affordability or creditworthiness checks for BNPL users.
- Limited data-sharing obligations across BNPL providers.
- No requirement for alcohol retailers to report sales by payment type.
- No comprehensive national regulation specifically governing on-demand alcohol delivery protocols, as current oversight relies heavily on voluntary industry compliance.
- On-demand delivery services facilitate alcohol delivery but do not hold liquor licences themselves, creating accountability and enforcement gaps.

These gaps collectively undermine efforts to reduce alcohol-related harm, particularly among financially vulnerable consumers and younger demographics targeted by digital platforms.

RECOMMENDATIONS

To address these gaps, minimise alcohol harm and strengthen consumer protections, the following regulatory actions are recommended:

1. Prohibit BNPL under the Sale and Supply of Alcohol Act 2012.

To address the growing risks associated with deferred payment options like BNPL for alcohol, it is recommended that the Sale and Supply of Alcohol Act 2012 be amended to explicitly prohibit the use of BNPL services in alcohol transactions. This would establish a clear national standard and prevent the financial and social harms linked to 'booze now, pay later' marketing.

Three regulatory options could be considered under this amendment:

I Full prohibition: BNPL is prohibited as a payment method across all alcohol licences. This option provides the strongest protection and ensures consistency across the entire alcohol retail sector.

II Targeted prohibition: BNPL is prohibited for all off-licence and remote licence holders, where alcohol is sold for consumption off the premises. These licence types are more likely to be used for bulk purchases and online transactions, increasing the risk of financial harm.

III Primary alcohol retailer prohibition: BNPL is prohibited for off-licence and remote licence holders whose primary business is the sale of alcohol (eg, bottle stores and online liquor merchants) and supermarkets. This option targets high-risk retailers while allowing flexibility for smaller retailers, such as gift basket companies.

Each option offers a pathway to reduce harm and close regulatory gaps, with varying levels of coverage and enforcement complexity. A full prohibition would provide the most comprehensive protection against alcohol and financial harm.

2. Enable BNPL restrictions through local alcohol policies (LAPs).

LAPs offer a valuable tool for tailoring alcohol regulation to the unique needs of each community. By allowing councils to set conditions on licence types, trading hours and outlet density, LAPs can also be used to prohibit BNPL as a payment method either across all licences or targeted to off-licence and remote sellers, as mentioned prior. Councils could adopt a tiered approach, similar to Recommendation 1, where BNPL is prohibited at levels deemed appropriate for local conditions. This could include full prohibition, restrictions on off-licences and remote sellers, or targeted bans on retailers whose primary business is alcohol sales.

The strength of LAPs lies in their ability to reflect local context, including community concerns, alcohol-related harm and retail patterns. However, the process of developing and implementing a LAP is resource-intensive, requiring extensive consultation and legal review. Moreover, LAPs must be reviewed and renewed periodically, adding to the administrative burden. Many councils face significant funding and staffing constraints, limiting their ability to develop or enforce robust policies. Despite these challenges, even having BNPL listed as a discretionary condition—whether applied voluntarily by applicants or recommended by licensing inspectors or DLCs—would provide a practical lever for communities to address emerging risks.

3. Strengthen regulations around BNPL.

Australia now leads the way in regulating BNPL. Under the Treasury Laws Amendment (Responsible Buy now, pay later and Other Measures) Act 2024, all BNPL contracts have been brought under the National Consumer Credit Protection Act from June 2025.[41] This means BNPL providers must hold a credit licence, conduct affordability checks and meet responsible lending standards.

New Zealand should follow suit by bringing BNPL services fully under CCCFA. This would ensure that BNPL providers are subject to the same obligations as other credit lenders, including affordability assessments. Such reform would not only help prevent financial overextension linked to alcohol purchases but would also have positive domino effects across other sectors, particularly fast-moving consumer goods where BNPL is increasingly used for everyday essentials. Without regulation, BNPL risks deepening financial vulnerability for households already under pressure.

CONCLUSION

The convergence of BNPL services and alcohol presents a growing and underregulated risk to public health and financial wellbeing. As this paper has outlined, BNPL is a minimally regulated credit product that, when paired with alcohol—a substance responsible for billions in social harm—creates a dangerous pathway for increased consumption and financial hardship. The recommendations proposed aim to close this regulatory gap through national legislation, local policy tools and strengthened consumer protections. Amending the Sale and Supply

41 'Buy-Now Pay-Later Reform: What You Need to Know', Hall & Wilcox, accessed 28 August 2025, https://hallandwilcox.com.au/news/buy-now-pay-later-reform-what-you-need-to-know/.

of Alcohol Act 2012 to prohibit BNPL, enabling restrictions through Local Alcohol Policies, and aligning BNPL regulation with the Credit Contracts and Consumer Finance Act 2003 would provide a layered and effective response. These actions would not only reduce harm in high-deprivation communities where off-licences and remote sellers are concentrated but also prevent the normalisation of alcohol purchases through deferred payment schemes. Proactive regulation now will help prevent the brewing storm of social and financial harm, and ensure that alcohol remains subject to the caution and control its risks demand.

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