

Smokefree Environments and Regulated Products Act 1990

Proposals for regulations:
Summary of submissions

2021

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Introduction

The Smokefree Environments and Regulated Products (Vaping) Amendment Act 2020 came into force on 11 November 2020. This means that vaping products, in addition to tobacco products and herbal smoking products, are now regulated under the Smokefree Environments and Regulated Products Act 1990 (the Act).

The amended Act has regulation-making powers to bring the new provisions of the Act into effect. The Ministry of Health publicly consulted on a range of regulatory proposals to support these new provisions, including:

- defining an internal area
- specialist vape retailer approvals
- promotion, information and advice
- packaging
- product notification and safety
- annual reporting and returns
- fees.

This report summarises the submissions the Ministry received as part of the public consultation process.

Overview of submission feedback

The Ministry received a total of 2,521 submissions, comprising 227 individual submissions (from the general public, consumers, industry, researchers and the health sector); 919 submissions from engagement sessions with Māori and Pacific peoples facilitated by Hāpai te Hauora, which holds the Ministry's National Tobacco Control Advocacy contract, and Tala Pasifika; and an additional 1,375 largely pro-forma submissions from general retailers (such as dairies, supermarkets and petrol stations).

As expected, most submitters supported the need for regulations. Otherwise, feedback was wide-ranging on a number of proposals. In general, industry and consumers of vaping products wished to see less stringent requirements, while health professionals and the general public supported a more comprehensive approach.

Summary of submission analysis

Regulatory proposal 1: Defining an internal area

Context

The Act defines an internal area, which is an area where smoking and vaping are prohibited (for example, in a bar), as:

an area within or on the premises or vehicle that, when all its doors, windows and other closeable openings are closed, is completely or substantially enclosed by –

- (i) a ceiling, roof, or similar overhead surface; and
- (ii) walls, sides, screens, or other similar surfaces; and
- (iii) those openings.

For clarification purposes, a new regulation-making power enables the existing definition to be replaced if needed. The Ministry consulted on four options:

- (a) the status quo, as set out above
- (b) defining an internal area as an area completely or partially enclosed with a roof or overhead structure of any kind, whether permanent or temporary
- (c) prescribing the maximum percentage of roof/wall coverage for any premise or structure (for example, a space could be defined as an internal area if the total area of the roof and walls covered 50 percent of the perimeter)
- (d) establishing an assessment tool that considers air quality (an earlier model was found by the High Court to be inconsistent with the statutory definition of an open area, where smoking is allowed).

The Ministry's stated preference was option b, as it would be relatively simple to understand and administer.

Feedback

Just under half of all submitters responded to this proposal.

Half of submitters who responded (generally smokefree enforcement officers, public health units and health sector agencies) were in favour of option b. The remaining submitters (generally hospitality venues and organisations) were largely in favour of option a. A small number supported option c, and there was almost no support for option d.

All submitters considered that option b would effectively extend 'internal areas' (where smoking is prohibited) into outdoor dining and drinking areas.

Some submitters noted that hospitality venues had invested heavily in designing spaces to meet the current definition.

Summary

The Ministry does not propose regulations are made at this stage. The proposal to change the definition was intended to clarify current policy, not amend it (that is, by extending the definition of internal areas). Consultation highlighted that the Ministry's preferred option could change the current policy. The Ministry considers that further work and targeted consultation is needed to determine a preferred option.

Regulatory proposal 2: Specialist vape retailer approvals

Context

The Act prevents the Director-General of Health from approving a person's application to be a specialist vape retailer unless the Director-General is satisfied that:

- (a) the retail premises in which the vaping products are or will be sold are a fixed permanent structure; and
- (b) at least –
 - (i) 70% of the person's total sales from the retail premises are or will be from the sale of vaping products, or
 - (ii) 60% of the person's total sales from the retail premises are or will be from the sale of vaping products and the Director-General is satisfied that the lower threshold is appropriate in the circumstances, and
- (c) any requirements in regulations have been met.

In determining whether the lower threshold is appropriate in the circumstances, the Director-General must consider:

- (a) the geographic location of the retail premises; and
- (b) the population in relation to which the retailer carries out their business; and
- (c) any prescribed criteria.

The Ministry sought feedback on the extent to which the Director-General should consider rurality and other criteria when determining whether to approve a person's application to be a specialist vape retailer with the lower threshold of 60 percent of sales from vaping products.

Feedback

The majority of submitters responded to this proposal. Most indicated that regulations were necessary to determine whether the lower threshold is appropriate.

Two-thirds of these submitters, and almost all retailers who responded, did not agree that being in a rural location should be a consideration for the lower sales threshold.

A similar number of submitters proposed that the Director-General should take other criteria into account when assessing specialist vape retailer applications, including:

- proximity to schools, preschools, etc
- smokers' access to the full range of vaping products
- retailers being of good character
- limiting the density of vape shops in an area
- requiring staff to be trained
- limiting the range of non-vaping products that can be sold.

Summary

The Ministry does not propose setting additional criteria in regulations at this stage. However, the Director-General will take submitters' proposed considerations into account when setting the Ministry's operational policy for assessing specialist vape retailer applications, and will keep this matter under review.

Regulatory proposal 3: Promotion, information and advice

The Act prohibits the publication of advertisements for a regulated product. The definition of 'regulated product advertisement' covers multiple mediums and formats

(for example, words, pictures, devices, broadcasting and telecasting) that promote or encourage the sale or use of a regulated product.

The Act also sets out exemptions to this prohibition; the regulatory proposals focused on these provisions.

3.1 Display of vaping products in retail settings

Context

The Act allows the display of vaping products within any retail premises or on any website, subject to any regulations which may be in force. The Ministry proposed that the display of vaping products did not need to be regulated at this stage, as existing displays did not appear to be problematic.

Feedback

The majority of all submitters responded to this proposal.

One-quarter of these submitters agreed that regulations did not need to be made at this stage, as they believed the existing prohibitions were already too restrictive and reduced opportunities to promote the benefits of switching from smoking to vaping or other less harmful products.

The majority of submitters who disagreed with the proposal disagreed with the provision of the Act that enables vaping products to be displayed at all, rather than disagreeing with the proposal itself. Many of these submitters considered that vaping products should have the same prohibitions as tobacco products and not be visible in retail settings at all.

Summary

The Ministry does not propose regulations are made at this stage, and will keep this matter under review.

3.2 Price lists given to retailers for tobacco products only

Context

The Act allows manufacturers to provide their price lists to retailers if the price list:

- (i) complies with the regulations
- (ii) includes the health messages required by or under Part 3 of the Act.

The Ministry proposed restrictions on the content and form of information that can be included on tobacco product price lists. This was to stop price lists from being used by manufacturers to promote tobacco sales (for example, through incentive schemes for retailers).

Feedback

Under half of all submitters responded to this proposal.

Fourteen percent of submitters agreed with the proposal to restrict the content and form of information on tobacco price lists. These submitters were from the health sector, stop-smoking services and smokefree advocacy groups, as well as two major retailers. Submitters noted that access to this type of information without restrictions could be used for promotional purposes such as incentive schemes and product promotions.

The remaining majority of submitters disagreed with the proposal. These submitters were largely retailers who considered that price list information should not be restricted on the basis that all stakeholders, including their customers, should be able to access full information about tobacco products. Two tobacco companies also disagreed with the proposal.

A small number of submitters suggested other information that they considered should be allowed on manufacturers' price lists for tobacco products (for example, nicotine strength, other technical product details where the product was less harmful and reminders of the health benefits of switching to vaping).

Summary

The Ministry proposes no changes to the proposals based on consultation feedback.

3.3 Public health messages

Context

Under the Act, a public service, or an individual or organisation that is funded by a public service, may publish a public health message issued by the Director-General of Health for the purposes of the Act or any of its parts.

The intent of this provision is to enable public messaging to support the purposes of the Act, which includes supporting smokers to switch to less harmful regulated products and discouraging non-smokers, especially children and young people, from taking up vaping or using smokeless tobacco products.

Feedback

Only a small proportion of the total number of submitters responded to this proposal. Of these, approximately half thought there was additional information, beyond that already outlined on the Ministry's 'Vaping Facts' website (<https://vapingfacts.health.nz>), that should be designated as a public health message issued by the Director-General for public services and any publicly funded individuals to use.

Suggestions for additional information included a greater emphasis on the health risks of vaping and the fact these were unknown, coupled with more of a focus on not smoking (anything) as the best option. Some submitters highlighted the fact that some vaping products contained nicotine and might be as addictive as tobacco smoking.

Summary

The Ministry will take this feedback into account when it updates the 'Vaping Facts' website.

3.4 Vaping product information in retail settings

Context

The Act allows the provision of information relating to vaping products in retail settings in accordance with regulations. In the absence of regulations, a retailer may provide information within their retail premises or on their website about vaping being a less harmful alternative to smoking.

The Ministry proposed allowing harm-reduction notices with a specified wording and form, to ensure these notices did not cross over into advertising. Use of these notices would be optional for retailers.

Feedback

Over half of all submitters responded to this proposal.

A large majority of these submitters disagreed with the proposal to limit the information about vaping products in retail premises and on retailers' websites to the three written authorised statements as outlined in the consultation document.

The generic retailer groups generally disagreed with this proposal, because they wanted to be allowed to communicate more information about their products – particularly on how vaping works, its features, its pricing and its benefits.

Other respondents disagreed with this proposal because they opposed promotion of any kind by generic retail businesses.

Specifically, the three proposed statements generated a large volume of feedback. Half of submitters were unsupportive of the statements as they were presented. Concerns centred on:

- an opinion that the 'switch completely' message does not recognise the process and time it takes for someone to make the shift from smoking tobacco
- an opinion that any 'authorised messages' should be worded differently; for example, 'vaping is not healthy', 'vaping is harmful', 'quitting smoking is the safest option', 'quitting vaping is ideal' or 'vaping poses risks to non-smokers'
- messages are in English only.

With respect to the proposed format detailed in the consultation document, the large majority of submitters agreed with the parameters suggested.

Submitters unsupportive of the proposed format specifications noted that vaping and tobacco products are completely different, and therefore different approaches are required to support people to shift away from smoking tobacco.

Summary

The Ministry proposes updating the statement wording to reflect feedback and to ensure that the messages are available in te reo Māori and other languages commonly spoken in New Zealand.

3.5 Product availability notices in retail premises

Context

The Act allows product availability notices for vaping products in retail premises or on websites, and allows regulations to be made that specify the content and form of such notices. Use of these notices would be optional for retailers.

The Ministry proposed that regulations be made that align with those for tobacco products, with some amendments where necessary.

Feedback

A small number of submitters responded to this proposal; most were in agreement.

Of those who disagreed with the proposal, feedback ranged from an opinion that availability notices should not be allowed to an opinion that the requirements were too restrictive.

Summary

The Ministry proposes no changes to the proposals based on consultation feedback.

3.6 Point-of-sale information on purchase age

Context

The Act allows regulations to be made that require retailers to display R18 notices at each point-of-sale at their place of business or internet site. There are no mandatory requirements for R18 notices at point-of-sale for tobacco products.

The Ministry proposed a mandatory requirement for retailers to display R18 notices at each point-of-sale for vaping products. This is because, unlike tobacco products, vaping products may be on display and accessible to children and young people under the age of 18.

Feedback

Just under half of all submitters responded to this proposal; most were in agreement.

The small number of submitters who disagreed with the proposal largely focused on whether the requirement to display R18 notices at every point-of-sale was necessary. We note that this is a requirement of the Act itself.

Summary

The Ministry proposes no changes to the proposals based on consultation feedback.

3.7 Suitably qualified health workers

Context

Under the Act, a 'suitably qualified health worker' can provide any advice or messages to an individual or group for the purpose of supporting the individual or group to transition from smoking to vaping. A 'suitably qualified health worker' is defined in the Act as:

- (a) a registered health practitioner, or
- (b) a person who:
 - (i) has completed the Stop Smoking Practitioners Programme certified by the New Zealand Qualifications Authority (the **programme**), or
 - (ii) is undertaking the programme and is being supervised by a person who has completed the programme, or
 - (iii) is a peer support worker and is being supervised by a person who has completed the programme, or
- (c) a person specified by the Director-General by notice in the Gazette.

The Ministry proposed not adding any other category of person at this stage and sought feedback from stakeholders on whether they agreed with this proposal; if they disagreed, we asked what categories should be added and why.

Feedback

A small number of submitters responded to this proposal.

Just under one-quarter of these submitters agreed with this proposal.

Other submitters suggested that retailers should be added, as they have expertise with respect to supporting their customers to quit tobacco smoking by switching to vaping.

Submitters also noted other issues, such as the 'health worker' status of retail pharmacy staff (pharmacy technicians), the need for clarity on the definition of peer support workers and the need for supervisory oversight from suitably qualified health professionals.

Summary

The Ministry will take this feedback into account when considering additional categories.

Regulatory proposal 4: Packaging

Context

The Act requires the packaging of a regulated product to comply with any requirements set out in regulations. Standardised packaging requirements for tobacco products, which include pictorial health warnings, have been in place since 2017.

The Ministry considers the existing packaging requirements for tobacco products are not appropriate for products that are not smoked; that is, vaping and smokeless tobacco products.

The Ministry proposed to set tailored requirements for vaping products and smokeless tobacco products that acknowledge the relatively low risk of these products compared with smoked tobacco products. The proposals were based on the United Kingdom's packaging requirements, which are based on the European Union Tobacco Products Directive, tailored to the New Zealand context.

The proposed timeframe for implementation was aligned with that given when New Zealand standardised its tobacco packaging in 2018.

Feedback

Vaping requirements

The majority of submitters responded to this proposal; most were in agreement with the proposed wording of the health warning and panel proposals.

The small number of submitters that disagreed (primarily those who identified as members of the public) suggested a mix of stronger warnings, differently worded warnings, the inclusion of pictures and fewer or no warnings. Suggestions for additional wording included warnings that the products should only be used when quitting, that the long-term consequences of vaping are unknown and that use in pregnancy or by tamariki is unsafe. A small number of submitters suggested that the proposed warnings were too small and that information about how to contact Quitline could be included.

Many submitters directly or indirectly raised the use of te reo in the warning – many positive comments were received, but some industry submitters wanted fewer words, and were concerned about the space that the te reo warning would take up, especially on small containers/packaging media.

A large majority of submitters agreed with the product presentation proposals.

Of those who disagreed (less than one-quarter of submitters), some (mainly vaping product suppliers) were concerned about the prohibition on use of descriptive words, depiction of food and the use of the term 'organic'. One noted that vaping is an evolving technology and that manufacturers are competing to make better products, and said that these likely prohibitions removed the incentive for them to do so.

Other submitters were concerned about the restriction on communicating recycling information, and a further comment suggested the Ministry should also include a ban on the use of cartoon characters or imagery or names that resembled children's toys.

Most submitters did not respond to the proposal outlining five safety messages to be included on the label of vaping substance containers. Of those who did, the majority of submitters agreed with the safety messages as proposed. Of the very small number who disagreed, some submitters wanted the wording to make it clearer that vaping is harmful, that its long-term effects are unknown and that vaping substances are not safe for use by children, young people and pregnant women.

Smokeless tobacco requirements

The majority of all submitters responded to this proposal; most were in agreement with the proposed wording of the health warning. Most submitters did not respond to suggested specifications for the health warning panel for smokeless tobacco products.

A small number of submitters did not agree with this proposal (primarily those who identified themselves as members of the public). Some were broadly concerned with smokeless tobacco use, and felt this should not be encouraged in comparison with vaping. A number of submitters considered that the proposal did not capture the

differences between snus (an oral smokeless tobacco product which is usually placed behind the upper lip) and smokeless tobacco products such as heated tobacco sticks. Some thought that the warnings for these products should be the same as warnings for cigarettes, or suggested plain packaging.

Timeframes

Only a small number of submitters responded to this proposal.

Submitters had mixed views on to the proposed timeframes for compliance with the new packaging requirements. Those who supported a shorter timeframe included small retailers and others concerned about safety and access by children and young people. Others considered that a two-year timeframe was more appropriate, to allow time for offshore ordering and shipping.

Summary

The Ministry proposes minor amendments to product presentation (for example, allowing recycling information and prohibiting the use of cartoons and toys on packaging).

The Ministry also considers that 12 months provides sufficient time for manufacturers to implement the proposed packaging requirements.

Regulatory proposal 5: Product notification and safety

The Act requires manufacturers and importers to notify the Ministry of their intention to sell vaping products and smokeless tobacco products before the products can be sold in New Zealand.

As part of the notification requirement, these products must also meet safety requirements. The Act enables these requirements to be set out in regulations.

5.1 Product notification requirements

Context

The Ministry outlined proposals for what details a manufacturer or importer will be required to provide when they register on the Ministry's database and declare those details are accurate and comply with the new legislation.

Feedback

Less than 10 percent of submitters responded to this proposal.

Of those who responded, the vast majority agreed with the proposals for notification requirements.

The most common feedback from submitters that disagreed with the proposals related to the requirement to notify individual components, the effort required to notify large numbers of products and the commercial sensitivity of proprietary ingredients.

Some submitters appeared to have misunderstood that a single notification encompasses multiple sizes and strengths of a particular brand variant of a vaping substance.

Summary

The Ministry proposes to amend notification requirements to enable replacement parts for a device to be notified as part of a device notification, reducing the number of notifications needed. This will better align the notification requirements for vaping devices with those for vaping substances and smokeless tobacco products.

The Ministry will also clarify with the sector that different container sizes or nicotine strengths of the same brand of product can be notified under a single notification and will therefore attract only one notification fee.

The Ministry will also provide a facility through which a notifier can mark ingredients as proprietary so that recipes can be kept confidential.

5.2 Product safety requirements

Context

The Ministry proposed to base New Zealand's product safety regulations on the European Union (EU)'s and United Kingdom's (UK) legislation and guidance, tailored to the New Zealand context where appropriate.

Feedback

More than three-quarters of responses to this proposal were pro-forma responses from general retailers.

While submitters largely agreed with basing the vaping product safety requirements on the UK and EU legislation and guidance, a number of submitters provided additional comment on specific requirements, particularly in relation to nicotine concentration, nicotine salts, container size, sweeteners and flavours.

Some submitters questioned the inclusion of requirements regarding training, the handling of nicotine and the use of personal protective equipment, as these issues are covered by the Health and Safety at Work Act 2015 and the Hazardous Substances and New Organisms Act 1996. Submitters also sought clarification on product testing requirements.

Summary

The Ministry proposes to amend the product safety requirements to increase container sizes, restrict the ban on sweeteners to those known to be harmful and remove requirements covered in other legislation (such as the Health and Safety at Work Act).

Regulatory proposal 6: Annual reporting and returns

Context

The Act requires manufacturers, importers and specialist vape retailers to provide an annual return to the Ministry no later than 31 January each year showing sales-related information for the previous calendar year. This is consistent with existing requirements for tobacco products.

For manufacturers and importers, the Ministry proposed adapting existing tobacco product reporting requirements for vaping products.

Proposals for specialist vape retailers included the requirement to report annually, for each approved vaping premise and website, with detailed sales-related information.

The Ministry also proposed that reporting requirements define brand variants by different flavours and different nicotine strengths, because this information will enable the Ministry to develop a better understanding of product demand from vapers, which will in turn inform future review of the regulations.

In terms of format, the Ministry proposed to provide a spreadsheet template for notifiers and specialist vape retailers to complete and file annually (by 31 January each year).

Feedback

Submitters that responded to this proposal were largely manufacturers and importers.

The majority of these submitters supported the proposals for annual reports and returns requirements for both notifiers and for specialist vape retailers. Some

submitters were concerned about the effort such reporting would require. A few were concerned that sensitive information in the reports would be published.

Summary

The Ministry proposes no changes to the proposals based on consultation feedback.

Regulatory proposal 7: Fees

The Act provides for recovering the costs of establishing and operating the regulatory scheme from the industry through fees and/or levies. It also allows regulations to specify these fees and levies.

Context

The Ministry sought feedback on the design of the fees scheme, which aims to keep costs as low as possible while ensuring an appropriate level of safety and control for notifiable products. The Act requires a review of the fees and fee structure no more than three years after the Act comes into effect.

Fees will be collected by the Vaping Regulatory Authority within the Ministry of Health, which administers the scheme.

Feedback

Submitters that responded to this proposal were largely manufacturers, importers and transitional specialist vape retailers.

The majority of submitters agreed that the Ministry should charge for the processing of applications and notifications. Over half of all submitters agreed with the proposed structure of the fees, and slightly less agreed with the proposed level of each fee.

Submitters that did not agree with the proposed fees were concerned that:

- the proposed fees were too high
- the scheme should be partially or fully government-funded
- there would be too many products to notify
- parallel-imported products would be notified by each importer.

Some suggested that fees should be a proportion of a retailer's revenue, rather than fixed. Half of the submitters that responded gave an estimate of the number of products they would notify, indicating that the annual volume of notifications is likely

to be significantly higher than the Ministry originally estimated (approximately 30,000 per annum, compared to the Ministry's assumption of 10,000 per annum).

Half of all submitters did not think that notification fees should be reduced for very low volume products.

Summary

The Ministry proposes to amend the annual notification fee from \$140 per year to \$50 per year. The notification fee was based on 10,000 expected notifications per year. The new proposed fee reflects submitters' estimates of notification volumes.

The Ministry will review all fees within the first 12 months to ensure that they are set appropriately given actual volumes.

Appendix: List of submitters

#TAGs (Wainuiomata Rangatahi Advocacy Group)
2020 Vapes Ltd
561 Juices
Active West Coast
Allenton Foodmarket
AMV Ltd (T/A alt., VAPO, Myriad Pharmaceuticals)
Aotearoa Vapers Community Advocacy
Armada Vapour Ltd (T/A Rogue Wave Vapour)
ASH New Zealand
ASPIRE 2025 Centre, University of Otago
Asthma and Respiratory Foundation NZ
At Vape Ltd
Auckland District Health Board
Auckland Regional Public Health Service
Australasian College for Emergency Medicine
Battery Vape Ltd
Bay of Plenty District Health Board
British American Tobacco (New Zealand) Ltd
Buyer Works
Cancer Society
Cancer Society Auckland Northland
Cancer Society Wellington
Canterbury District Health Board
Capital and Coast District Health Board
Central Otago Drug and Alcohol
Central Vape Ltd
Centre of Research Excellence: Indigenous Sovereignty & Smoking
Christchurch Prime Enterprise Ltd
College of Respiratory Nurses
Conspiracy E juice Ltd
Consumer
Cosmic
Council of Medical Colleges in New Zealand
Counties Manukau Health
Crown Vape Ltd
Cumulonimbus Eliquids Ltd (T/A Jock's Vapes)
Dunedin City Council

East Coast Cancer Society
Eastern Bay Primary Health Alliance
Elate Vape Ltd
Electric Vape Ltd
End Smoking New Zealand
epuffz Ltd
Foodstuffs (NZ) Ltd
Gisborne Girls High School
Hāpai Te Hauora
Hauora Tairāwhiti
Havelock North High School
Hawke's Bay Vapour
Hawkes Bay Collective for Hauora Promotion of Tamakariki and Rangatahi
Hawke's Bay District Health Board
Hawke's Bay Secondary Schools' Principals' Association
Hawkes Bay Smokefree Coalition
Health Coalition Aotearoa Smokefree Expert Advisory Group
Healthy Families Hutt Valley
Heart Foundation
HEL Vape Ltd
High Group Ltd
Hollywood Vape Ltd
Hoopers Vapour Ltd
Hoopers Wholesale Ltd
Hospitality New Zealand
Imperial Brands Australasia
Infused Vape Shop
Institute of Environmental Science & Research (ESR)
Juul Labs Inc
Lakes District Health Board
Lawless Ltd
Lion Projects Ltd (T/A Lion Labs)
Liquid Lab NZ Ltd
Māori Women's Welfare League
Mason Corporation Ltd (T/A Shosha)
Miasma
MidCentral District Health Board
MidCentral District Health Board Public Health Service
Ministry of Social Development
Mission Brands Ltd
Mixem Ltd T/A Vape Hub
Napier City Council
National Poisons Centre
Nelson Marlborough District Health Board

New Zealand Association of Convenience Stores
New Zealand Drug Foundation
New Zealand Food & Grocery Council
New Zealand Medical Association
New Zealand Nurses Organisation
New Zealand Taxpayers' Union Inc
Newman Medical Services Ltd
Ngā Taura Tūhono
Ngāti Porou Hauora
Nice with Spice Ltd
Northland District Health Board
NZ Smokefree Tomorrow Ltd
NZ Vapor Trade
NZ Vase Ltd (T/A Shisha Glass)
Oceania Liquid Labs
Office of the Children's Commissioner
Pacific Island Community Trust
Paediatric Society of New Zealand
Party Vape Ltd
Pharmaceutical Society of New Zealand
Pharmacy Council
Pharmacy Guild of New Zealand
Philip Morris Ltd
Population Health
Premium Vape
Public Health South
Puff Mart Trading Ltd
Rangitoto College
Regional Public Health
RELX International
Retail NZ
Royal Australian and New Zealand College of Ophthalmologists
Royal Australian and New Zealand College of Psychiatrists
Royal Australasian College of Physicians
Royal New Zealand College of General Practitioners
Ruapehu Health Ltd
SHS VAPES
SkyCity Entertainment Group Ltd
Smoka Vape Ltd
Smokefree Murihiku
Smokefree Otago
South Canterbury District Health Board
Southern District Health Board
Stroke Foundation of New Zealand

SuperGrans Tairāwhiti
Switch
T&T Consulting Ltd
Taki Tahī Toa Mano (Tairāwhiti Smokefree Coalition)
Takiri Mai te Ata Regional Stop Smoking Service
Taranaki District Health Board
Te Aitanga ā Hauiti
Te Haa Mātea
Te Kupenga Hauora Ahuriri
Te Puna Waiora
Te Rūnanga o Ngāti Whātua
Te Wairua Ltd
TFN Vape Ltd
The Mushroom Cloud
The New Zealand Initiative
The University of Queensland
The Vape Shed
The Vaping Kiwi
The Vapor Box
Thoracic Society of Australia and New Zealand
Toi Te Ora Public Health
Turanga Health
Vape Canyon Ltd
Vape Direct (T/A Xvape NZ)
Vape Legends New Zealand
Vape Merchant Ltd
Vapebox
Vapeology Ltd
Vaping Gadget Ltd
Vapor World Ltd
Vendetta Vape Lounge Ltd
Victoria University of Wellington
Viva La Vape Ltd
Waikato District Health Board
Waitemata District Health Board
WellSouth
West Coast Tobacco Free Coalition
Whanganui District Health Board
Whanganui Regional Health Network
Whitehall Ltd (T/A Podlyfe New Zealand)
Woolworths New Zealand

General retailers

1 Stop Discounter
36 Nine Convenience
77 Convenience Store
A1 Groceries
Abaj Superette
Acacia Bay Store
Achilles Store
Ahuriri Corner Store
Airport Oaks Foodmart
Albany Highway Superette & Lotto
Albert Street Dairy
Alfriston Dairy
Allied Flaxmere
Alpine Superette
Amber Dairy
Arkwrights Corner Store
Ashhurst Dairy and Takeaway
Ashley Ave Superette
Ashs Superette
Ashton Dairy
Astley Superette
Avenue Dairy
Avondale Discount Mall
Avondale Road Superette
Awanui Superette
Awapuni Four Square
Aytos Dairy
Baba Superette
Bairds Road Pricecutter
Balclutha Discounter and Cafe
Barrack Road Superette
Barrels & Bottles Willowbank
Barriball Street Dairy
Bayview Store
Bayview Superette
Beach Grocers
Beach Haven Liquor Store
Beach Haven Superette
Beach Rd Superette
Beachlands Superette
Beachside Convenience Store
Bell Bird Dairy

Bell Block Motors
Bellbird Dairy
Bells Dairy and Takeaway
Bellvue Dairy
Best Choice Mini Mart
Better Life Dairy
Betty's Beach Street
Betty's Cow Lane
Bewdley Minimart
BGS Dairy
Big Barrel Nelson
Big Basket Foodmarket
Big Basket Supermarket
Birkdale Superette
Black Bull Liquor
Blagdon Dairy
Blue Bell Minimart
Blue Dairy
Bluff Bottle Store
Bollywood Spices
Bolton Street Dairy
Boomerang Superette
BP Bader Drive
BP Connect Haven Road
BP Connect Richmond
BP Elles Road
BP Motueka
BP Mt Roskill
Breaktime MIT Campus
Breaktime SH7
Bream Bay Gas
Bream Bay Superette
Brews Mt Roskill
Brews Pacific Square
Bridge Mini Mart
Brockville Supermarket
Broderick Dairy
Brook Street Store
Brown Derby Dairy
Brown Street Dairy
Browns Road Superette
Bruces Dairy
Bryant Park Mini Supermarket
Buns Bakery and Cafe

Burbank Food Mart
Bus Stop Dairy
C Junction Convenience
C R Dairy
Caltex Bridge Street
Caltex Dinsdale
Caltex Glenbrook Rd
Caltex Kaiwaka Rd
Caltex Taradale
Candy Corner Superette
Carlyle Street Store
Carnation Superette
Cedar Superette
Cee Jaes Superette
Central Park Superette
Central Superette
Central Superette
Centre Superette
Challenge Fitzroy
Challenge Manunui
Challenge Massey
Challenge Opawa
Challenge Swanson
Challenge Tauranga Taupo Rd
Challenge Tokoroa
Challenge Waimak
Chartwell Food Centre
Chartwell Liquor Spot
Cherry Grove Dairy
Chivalry Foodmart
Choice Convenience Store
Choice Dairy
Choice Liquor
Churton Park Store
City Express Discounter
City Mart Hamilton
City Square
Claudelands Foodcentre
Clendon Dairyshop
Clendons Foodmarket
Clevedon Superette
Cloverlea Four Square
Clyde St Dairy
College Superette

Conifer Grove Dairy
Cornwall Park Store
Cornwall Park Superette
Coromandel Garage
Coromandel Service Station
Coronation Dairy
Coronation Foodcentre
Coronation Superette
Cosy Nook Dairy
Counties Inn Liquor
Cranford Street Dairy
Creagh Street Store
Criterion Dairy
Crofton Road Dairy
Crystal Mini Mart
Daffodil Dairy Whangarei
Davies Corner Food Market
Deco City Store
Del Rio Superette
Deluxe Superette
Devon Lotto & Treats
Diorella Superette
Discount Food Mart
Discount Here
Discount Specialist Strandon
Discount Supermarket & Takeaways
Discount Tobacconist
DJs Dairy
Dorchester Superette
Dowse Drive Foodmarket
Drury Lotto & Superette
Drury Mini Foodmarket
East Tamaki Supermarket
Eastbourne Dairy
Eastside Dairy
Eden Foods
Eden Superette and Lotto
Edgware Dairy
Edinburgh Foodmarket
Elgin Food Market
Elles Rd Mini Market
Ellis Avenue Superette
Empire Liquor Centre Wines and Spirits
Express Supersave Supermarket

Fair & Square Superette
Family Mart
Farmcove Superette
Felix Superette
Fifth Avenue Mini Mart
Finlayson Superette
Fitzroy Dairy
Five Star Dairy
Flatbush Superette
Flaxmere Liquor
Flaxmere Village Dairy
Food For Thought Cafe & Takeaways
Four Square Atawhai
Fresh Choice
Fresh For Less
Fresh Vege Mart
Gadsby Supermarket
Gas Avalon Drive
Gas Brick Street
Gas Cascades Rd
Gas Coopers Beach
Gas Eketahuna
Gas Hawera
Gas Linton
Gas Maraetai
Gas Maungatapere Dairy
Gas Ngaio
Gas Omapere
Gas Pakowhai
Gas Pakuranga Rd
Gas Papanui
Gas Picton
Gas Station Rd
Gas Swanson
Gas Tikipunga
Gas Vogeltown
Gemini Dairy
George Street Dairy
Gilbert Road Superette
Glass Road Superette
Glenavon Superette
Glendene Superette
Glenfield Dairy
Glenn Invested Pricecutters

Gloriana Dairy
Gloucester Discounter
Gonville Service Station
Goodvalue
Gordonton Superette
Gossamer Mini Mart & Lotto
Got'a Light Mate
Graeme Superette
Grand Superette
Grange Superette
Grassmere Dairy
Grays Road Store
Green Dairy
Green Haven Dairy
Green Meadows Superette
Greenbay Minimarket
Greenhithe Store
Grey Street Dairy
Grey Street Maxi Mart
Gull Snells Beach
Halsey Road Foodmart
Halswell Convenience Store
Halswell Dairy
Handy Store
Hari Superette
Harrington Dairy
Harris Road Superette & Lotto
Hastings Central Discount Specialist
Hastings Hospital Babalas
Hautapu Country Store
Havelock Mini Mart
Hepburn Superette
Herbert Street Store
Hibiscus Dairy
High Street Dairy
Highbury Superette
Highway Supermart
Hill Superette
Hillcrest Dairy
Hillpark Superette
Hilltop Dairy
Hi-Way Dairy
Hokianga Dairy
Homai Superette

Hospital Dairy
Huapai Dairy
Huxley Road Dairy
Idlewild Superette
Imperial Mini Supermarket
Inglewood Dairy
Iona Dairy
Irwin Motors
J Young Motors
Jaks Kwik Mart
Jalaram Dairy
Jay Store
Jayna Superette
JB's Discounter
JD Dairy
Jervois Foodcentre
JJ Liquor
Johnsonville Dairy
Jubilee Dairy
Juliet Superette
K Been Putaruru
Kaiti Dairy
Kaiwaka Food Mart
Kaiwaka Liquor Centre
Kandy Korner
Kaikohe Discounter
Karori Park Store
Katikati Superette
Kauri Park Superette
Kauriland Superette
Kawaha Point Superette
Kelso Dairy
Kelston Superette
Kemps Dairy
Kendal Food Centre
Kennedy Rd Dairy
Kepa Road Superette
Keri Hill Superette
Kerikeri Dairy
Kerwyn Liquor Store
Kesgrove Dairy
Keymans Lunch Bar
Khandallah Dairy
Kimpton Superette

Kingfisher Super Seven
Kingsford Superette
Kirwee Auto Services
KK Liquor
Kohi Dairy
Kolmer Super Seven
Kowhai Wines And Spirits
Kwikimart Kelston
Laingholm Beach Store
Langley Mini Market
Lantern Light Dairy
Larnoch Superette
Latham Street Superette
Lavengro Dairy
League Park Superette
Limbrick Street Maxi Market
Lincoln Heights Superette
Linden Foodmarket
Lipcombe Dairy
Liquor Centre Royal Oak
Liquor Hut Otahuhu
Liquor Hut Tokoroa
Liquor Spot Target Road
Liquorland Centrepont
Liquorland Gore
Logan Park Foodmart
London Dairy
London Street Dairy
Lookout Point Foodcentre
Lotz of Pots Express Shop
Lower Don Buck Road Superette
Macs Dairy
Maheno Foodtsores
Mahora Superette
Mangere Fresh Supermarket
Mangawhai Service Station
Manhattan Superette
Manuka Dairy
Manuroa Superette
Maori Hill Dairy
Marfell Superette
Mascot Dairy
Massey Rd Superette
Matakana Dairy

Matakana Liquor Centre
Matakana Motors Limited (Gull)
Matapouri Bay Store
Maungakaramea Service Station
Maunu Superette
Max Wholesale Foodmarket
Mayfair Superette
Mayfair Supermarket
Mayur Foodmarket
Mcdivitt Superette
Mckenzie Superette
Mclean Park Superette
Meadow Park Store
Meadowbank Dairy
Meeanee Store
Melton Road Foodmarket
Melville Price Cutter
Mercury Bay Foodmarket
Merivale Superette
Metromart Armagh
Metromart Madras
Metromart Riccarton
Michael Discounter
Michaels Milk Bar
Midhirst Dairy Rd
Millwater Superette
Milton St Dairy
Mirrabooka Superette
Mobil Clendon
Mobil Dannevirke
Mobil Dayman Motors
Mobil Karapiro
Mobil Madras
Mobil Morrisville
Mobil Murchison
Mobil St. Martins
Mobil Star Garage
Mobil Tahunanui
Mobil Te Rapa
Mobil Thames
Mobil Whitianga
Mockett Motors
Moerewa Foodmart
Mokia General Store

Monument Dairy
Moshim Discount House
Mount Smart Superette
Mountain Pricecutter
Mundra Foodmart
My Mates Dairy Shop
Navya Superette
Naya Supermarket
Nayland Dairy
Neelam Superette
Nelson Street Dairy
New Inverell
New Windsor Dairy And Lotto
New World Blenheim
New World Motueka
New World Nelson
New Zeal Superette
Ngaio Supermarket
Ngamotu Dairy
Nickys
Night Owl Store
Nikisha Foodmarket
No 1 Supavalue
Nolantown Store
Normanby Dairy
Norwest Liquor
NPD Waimea
NZ Convenience Store
Oasis Store
Odessas Minimart
Oms Star Convenience
One Shop Convenience
One Stop Super Shop
One Tree Point Store
Onekawa Store
Onerahi Dairy
Onerahi Foodmart
Opua General Store
Oranga Foodmarket
Oratia Superette
Orere Point Store
Orly Ave Superette
Otaika Dairy
Otane General Store

Otara Liquor Spot
Othello Superette
Oto Mini Mart
P & P Dairy
Pacific Superette
Pakuranga Liquor Centre
Pakuranga Liquor Spot
Panorama Dairy
Paparoa Store
Park Avenue Foodmarket
Park Road Dairy
Patel Superette
Patels Foodmarket
Pegasus General Store
Peninsula Foodmarket
Peninsula Price Cutter
Pepes Dairy
Pink Spot Dairy
Pioneer Minimart
Pirimai Foodmarket
Pirimai Plaza Dairy
Pirongia Food Mart
Pohutakawa Superette
Ponderosa Foodmart
Ponderosa Superette
Poonam Superette
Pop Inn Dairy
Portage Rd Superette
Pricecutter Mangere
Priestley Dr Superette
Prince Albert Road Dairy
Princes Superette
Puhinui Mini Mart
Puketapu Store
Putaruru Mini Mart
Quarry Food Market
Quickstop Dairy
Racecourse Dairy
Railway Rd Mini Market
Rainbow Tearooms
Raleigh Street Dairy
Ranfurly Road Superette
Rangatira Superette
Rangiora Mini Market

Rathgar Super Seven Dairy
Rawene Foodmart
Rays Dairy
Redcliffs Convenience Store
Redhill Superette
Regent Street Dairy
Rendezvous Dairy
Rewa Dairy
Richmond Superette
Rimu St Superette
Riverdale Store
Riverside Dairy
Rockfield Superette
Rosebank Dairy
Rosedale Food Centre
Rosella Superette
Royal Heights Dairy & Lotto
Ruakaka Liquor Centre
Ruawai Motors
Rural Fuel Egmont Village
Sai Baba Foodmarket
Salisbury Store
Salisbury Superette
Seaview Service Station
Seddin Supermarket
Seddon Street Food Market
Selwyn Dairy
Selwyn Superette
Shakespeare Mini Market
Sharland Avenue Liquor Centre
Sharland Avenue Superette
Shirley Road Superette
Shoprite
Siddhi Superette
Sky Blue Superette
Sky Mart
Slipper Superette
Smile Dairy
Smokos Tobacconist
Snack Smart
Snells Beach Dairy
South Road Dairy
Southern Dairy
Southern Service Station

Southland Road Superette
Spa Rd Foodmarket
Spice Plus
Spirit Stratford
Starwood Superette
Station Mart
Stop N Save
Stratford Dairy
Styx Family Dairy
Summerhays Corner Superette
Sunnybrae Dairy
Sunnybrae Superette
Sunnyside Foodmarket
Sunnyvale Superette
Sunset Superette
Sunvue Dairy
Supa Supavalue Supermarket
Super Liquor Burswood
Super Liquor Colombo
Super Liquor Hawera
Super Liquor Lincoln
Super Liquor Mangere
Super Liquor Okara
Super Liquor Shotover St
Super Liquor Waipawa
Super Liquor Warkworth
Super Mart
Super Mart Petone
Super Service Station
Superhero Superette
Superliquor New Plymouth
Superliquor Target Road
Supervalue Waiuku
Swaffield Superette
Swanson Road Dairy
Swanson Superette & Post Centre
Sweets Dairy
Sylvan Superette
Taikata Superette
Taipa Superette
Tairua Superette
Takanini Superette
Taonui Street Foodmarket
Taradale Foodmart

Tavistock Dairy
Tawa Foodmarket
Te Atatu Discount Superette
Te Awa Store
Te Kawa Service Station
Te Marua
Te Puke Superette
Te Puru Store and Take Aways
Telstar Dairy
Tennyson Dairy
Terrace End Discount Tobacconist
The Bottle-O Botany
The Bottle-O Hastings
The Bottle-O Huapai
The Bottle-O Leamington
The Bottle-O Mangatera
The Bottle-O Mangere East
The Bottle-O Manukau
The Bottle-O Picton
The Bottle-O Puhinui
The Bottle-O Royal Oak
The Bottle-O Te Anau
The Broughton St Discounter
The Clinton Express
The Corner Shop
The Longburn Store
The Plough Hotel
The Shed Liquor Centre
The Village Shop
Thirsty Liquor Havelock
Thirsty Liquor Airport Oaks
Thirsty Liquor Darfield
Thirsty Liquor Hall Ave
Thirsty Liquor Onehunga
Thirsty Liquor Otahuhu
Thirsty Liquor Ranfurly Road
Thorndon General Store
Thorrington Dairy
Three Brothers Superette
Tiraumea Superette
Tiritea Dairy
Titirangi Super Seven
Toko Dairy
Top Cook Dairy and Takeaway

Top Dairy
Top Dairy (Price Cutter)
Top Dairy Inglewood
Tuakau Food Market
Tuakau Gas
Tudor Dairy
Tuhikaramea Superette
Tui Crescent Foodmarket
Tukapa Dairy
Tutukaka General Store
Two Ten Dairy
Uptown Mini Mart
Valley Wine Merchants
Vape 71
Vege Oasis
Velmar Dairy
Victoria Dairy
Victoria Mini Supermart
Victoria Superette
Victory Discounter
Victory on the Spot
View Road Dairy
Vigor Brown Store
Vincent Street Superette
VIP Superette
Viva Foodmarket
Waimauku Mini Mart
Waipapa Superette
Waipu Tyres & Automotive
Waipukurau Store
Waitakere Superette
Wakefield Dairy And Bakery
Wallace Rd Superette
Waterview Superette
Wellsford Superette
West End Dairy
West End Store
West Harbour Superette
Westend Superette
Westtown Dairy
Westpark Superette
Westshore Corner Store
Westside Dairy
Westside Superette

Westview Superette
Weymouth Superette
Whangamata Foodmarket
Whangapoa Beach Store
Whangarei Liquor Centre
Whau Valley Dairy
White Heron Dairy
Whiteacres Superette
Whitford Liquor Store
Whitford Store
Whnuapai Mini Mart
Wickman Way Pricecutters
Wigram Minimart
Willowbank Superette
Winchester Store
Windmill Dairy
Windsor Park Store
Wine Plus Spirits
Winsford Superette
Woodlands Park Superette
Wordsworth Superette
Wycliffe Superette
Wyllie Road Super Seven
XI Dairy
Xpress Mart
Young Food Service
Yug Super Store
Z Grove Road
Z Kingsway
Z Richmond
Z Stoke
Zesto