

Submission to
The Review of Tobacco Displays in New Zealand
Consultation Document 2007

Submission Addressed to Ministry of Health:

Courtenay Mackie
Tobacco Policy and Implementation
Sector Capability and Innovation
Ministry of Health
PO Box 5013
Wellington

Dear Courtenay Mackie

Please find attached the New Zealand Association of Convenience Store's Submission on the Future of Tobacco Displays in Zealand – Consultation Document 2007.

Yours sincerely



Bryce Taylor
Chairman, NZACS

Submission on the Future of Tobacco Displays in New Zealand

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1. Opening Comments:

2. The New Zealand Association of Convenience Stores (NZACS) welcomes the opportunity to comment on the Consultation Document. We will also be seeking to appear before the Health Select Committee to express our members' views on this issue.
3. NZACS believes that the tobacco category within convenience organised retail premises is well managed and importantly provides a customer focused service.
4. Our organisation's members include a large number of smaller independent retail businesses, franchisees as well as Caltex, Shell, Mobil and BP and have a significant retail presence with approximately 769 stores across New Zealand with average weekly sales of over \$31 million. In terms of the tobacco category, 37.3 per cent of total sales are generated from consumer demand for cigarettes and tobacco products in our member's retail premises¹.

¹ NZACS 'State of the Industry –Survey of New Zealand', Year Ended December 2006. Conducted by Coalface Consulting and Nielsen

5. In terms of opening hours, 89 per cent of NZACS members are open 24 hours a day with an average number of employees per store being around 13, who see, on average, over 900 customers per day.
6. NZACS recognises public health views about cigarettes and other tobacco products, and strongly supports both an ongoing educative and tough enforcement approach to keep tobacco out of the hands of young people.
7. As businesses our members recognise the commercial importance of consumer demand and value of tobacco products.
8. NZACS believes the current requirements of the Smoke-free Environments Act in terms of retail visibility are sufficient and we do not support a complete ban on the visibility of a key consumer category.

9. NZACS Supports

- i. Active engagement with the Ministry of Health on reducing the opportunity for young people under 18 years to have access to tobacco products.
- ii. Prosecution of and fines to retailers who sell tobacco to those under the age of 18 years.
- iii. The ability to with the Ministry of Health and Regional Public Health Units to assist them with their enforcement efforts across our members' retail premises.

10. NZACS believes that the key issue is enforcement not bans.

11. NZACS would be pleased to assist the Ministry of Health in the development of an education programme designed to further educate our members' customers about the age requirement for the purchase of tobacco products.

12. NZACS is also strongly supportive of training programmes for retailers and their staff who serve customers and who are at the front-line for the prevention of tobacco sales to under 18 year olds. Members of NZACS already have their own training programmes for customer service staff.
13. However in order to learn more about the degree of education or enforcement that the Ministry has undertaken, NZACS wishes to learn more about the level of retailer checks undertaken by the Ministry of Health or its Regional Public Health Unit Smoke-free Officers. This would include the number of prosecutions against retailers for selling tobacco to young people under the age of 18 years; or for a lack of compliance with the Smoke-free Environments Act, alongside what educational materials the Ministry has developed for retailers to assist with compliance.
14. Public answers to these types of questions would enable various stakeholders, including those in the public health community to see exactly where the problems or concerns are in terms of tobacco being sold within the retail sector. If these questions are unanswered then it raises serious questions about the motivation in regards to introducing new bans or restrictions.

Comments on proposed options:

Option 1: Current restrictions with enhanced education and enforcement

Would you support this option? If yes, why? If no, why not?

What possible advantages or disadvantages do you see with this particular option?

1. **Yes: Our members support Option 1 principally because:**
2. NZACS believes that banning the display of tobacco products from public visibility is a simplistic answer to the more complex issue of youth smoking; or to the issue of assisting smokers with quitting.
3. Enhanced education and enforcement by the Ministry of Health and Regional Public Health Unit's Smoke-free Officers provides a valuable service to the retail sector by ensuring compliance with regulations.
4. NZACS believes that retail environment in New Zealand is changing and that consumers are tending to favour purchasing a multitude of consumer items from convenience organised premises over smaller corner dairies.
5. Our members' retail premises are in all cases part of centrally managed programmes and each retail business is required to follow a set of requirements established by the respective head office. As the vast majority of NZACS members also sell fuel, the level of management and regulatory compliance within these business units is understandably very high, alongside the ongoing training and supervision of employees.
6. Each NZACS member is aware of the Act's requirements and rigorously endeavours to enforce the proof of age requirement for the purchase of tobacco products.
7. We note that the Consultation Document comments on the 2006 Wellington School of Medicine's Department of Health study 'Cigarettes and Candy'² and the issue of retailer compliance with the display provisions of the Act. This

² Department of Public Health. 2006. Cigarettes and Candy; A Study of retailer compliance with the point of sale tobacco display regulations in the 2003 Smoke-free Environments Amendment Act. Wellington; Wellington School of Medicine and Health Sciences.

study raises concern over the '*...almost total absence of enforcement of the law. At present enforcement is based on a passive system whereby enforcement officers are restricted to responding to complaints from the general public*'³.

8. Additionally this study reports that '*Enforcement officers...have little regular contact with retailers, which could be an opportunity to educate them about the POS regulations*'⁴.
9. The Consultation Document also demonstrates that when compliance checks were undertaken by Ministry officials the level of non-compliance was reduced to almost no reported instances of non-compliance⁵.
10. This strongly indicates that should the Ministry wish to see compliance with regulations pertaining to the display and sale of tobacco products then they need to ensure checks are regularly undertaken.
11. NZACS is surprised that there is no information available in the Consultation Document to inform stakeholders on the current level or regularity of the Ministry's enforcement of the Act; or how many retailers were prosecuted as a result of non compliance with the Act's provisions. We ask the question why not?
12. If there is an issue of retailer misunderstanding of the provisions relating to the display of tobacco products then NZACS understands it is the Ministry of Health's statutory duty to provide education to those stakeholders affected by legislation it is responsible for.

³ *ibid*; page 31/32

⁴ *ibid*; page 40

⁵ Ministry of Health: Consultation Document 2007 'Review of Tobacco Displays in New Zealand', page 11

13. NZACS also wishes to place on record our concern that the suggestion or theme throughout the Consultation Document that retail displays are ‘inconsistent with the “don’t start” and “stop smoking” messages and therefore necessitates the ban of tobacco displays is a simplistic and to our knowledge there is no link shown between a reduced level of smoking as a result of a ban on tobacco displays.

14. Advantages of Option 1

15. It is possible that gains can be made to the Government’s stated tobacco control goals, if the Ministry was willing to work with retailer organisations - including NZACS. For example, issues of retailer misunderstanding of the Act’s provisions may well be avoided. This approach would also have the benefit of ensuring retailers do not inadvertently sell tobacco products to those under the age of 18 years. Disappointedly, to date there has been no such approach from the Ministry of Health.

16. NZACS would be willing to share its retail address database with the Ministry and work with officials on developing an education programme designed specifically for retailers. This would in part support the Wellington School of Medicine’s study that ‘*recommends the development and implementation of an active education programme for retailers*’⁶.

17. While it is recognised that the development of an education programme for retailers would result in some costs, NZACS would be willing to contribute to, or fund this programme.

⁶ Department of Public Health. 2006. Cigarettes and Candy; A Study of retailer compliance with the point of sale tobacco display regulations in the 2003 Smoke-free Environments Amendment Act. Wellington; Wellington School of Medicine and Health Sciences; page 42.

18. This approach seems more sensible and proactive than advocating a total ban on tobacco displays in our member's retail premises. It would also ensure the Ministry of Health or its Regional Public Health Unit Smoke-free Officers have up-to-date database of retail addresses and contacts, alongside giving the Ministry the ability to work constructively with the retail sector on tobacco control efforts.

19. NZACS Additional Comments – Issues with tobacco displays

20. NZACS Comment - Protecting children and young people

21. The vast majority of our members' retail premises follow a set format, which has been carefully developed over many years of consumer and customer research. In respect to the placement of tobacco behind the service counter there are a number of key reasons for this placement. The first is the importance of the security of tobacco due to its value and frequency of purchase for our customers. Secondly, and by no means of any lesser importance, is the need to ask for proof of age of customers who seek to buy tobacco products. Thirdly, with about 23 per cent of the adult population in New Zealand still smoking there is a consumer demand for the product and the corresponding ability to see and choose what brands they want to purchase. We are a customer driven business and our customers want to be able to see the products before they purchase them.

22. NZACS members regularly undertake training of their employees on issues such as asking for proof of age and we have signage (as required by legislation) showing that you must be over the age of 18 before being able to purchase tobacco products.

23. NZACS Comment – Providing an environment that supports smokers who are trying to quit.

24. NZACS notes that the research being cited to justify this general argument is from Canada and other overseas sources and asks the Ministry of Health what research or evidence is available in the New Zealand retail context that supports the notion that smokers who enter our members' retail premises somehow are 'tempted to try or continue to purchase tobacco products'?

25. There is no comment available on whether those overseas jurisdictions have similar tobacco control laws as experienced in New Zealand; whether they have similar point of sale restrictions on the sale of tobacco; or limits on the amount of tobacco products being permitted for sale. Our concern is that those retail environments are likely to be completely different to those experienced in New Zealand and cannot be or should not be utilised as evidence justifying a ban in New Zealand.

26. NZACS Comment – Avoiding undermining the health message

27. NZACS believes that the Ministry is 'drawing a long bow' in terms of stating that as a result of tobacco displays in our members' retail premises, they are in some way making 'tobacco socially prominent'. Since the introduction of the Smoke-free Environments Act in 1990, New Zealand has experienced a significant reduction in size of tobacco displays, together with a reduction in the number of tobacco products being available for sale. The current tobacco displays are compliant with the legislation as supported by the Ministry of Health.

28. New Zealand is recognised globally for being a leader in tobacco control and the Government spends annually over \$40 million from the Vote Health budget on tobacco control efforts. Social marketing efforts on tobacco control

include extensive television and other multi-media advertising with the Smoke-free brand. Following the nearly two decades years since the passing of the Smoke-free Environments Act, together with its corresponding bans and restrictions, New Zealanders are well aware of the risk of smoking and tobacco use.

29. To suddenly claim that tobacco displays undermine nearly two decades of extensive tobacco control or the health message(s) about smoking belies credibility.

Option 2: Further restrictions

- Further limit the maximum size of tobacco displays.
- Limit the number of tobacco displays to one display per retail outlet.
- Require graphic health-warning posters to be displayed.

Do you support any of these options? If yes, why? If no, why not?

Would you like to see some of the above options combined? For example, only one tobacco display per retail outlet *and* this display to include a graphic health-warning poster.

What possible advantages or disadvantages do you see with these options?

1. **NZACS cannot and does not support Option 2 for the following reasons:**
2. This Submission supports comments by public health stakeholders that education and enforcement are two key determinants in reducing youth access to tobacco products and in general supports the Government's overarching tobacco control policy.
3. However, NZACS is concerned and notes that the Consultation Document fails to discuss, highlight or project the significant costs that would be incurred as a direct result of (a) limiting the maximum size of tobacco displays; (b) limiting the number of tobacco displays to one display per retail outlet, and (c) requiring graphic health warning posters to be displayed.
4. NZACS understands the need for effective tobacco control regulations but is alarmed that the Consultation Document seems to fail to understand the basic realities of the commercial world and the retail environment across New Zealand. For example, the role of convenience stores within the local community; the local employment and training opportunities these stores provide; even serious business issues such as theft and security concerns for retailers.

5. In terms of any costs of compliance when developing any new regulations (reducing the current size of built in tobacco unit in our member's retail premises) we would have thought the Ministry of Health would have sought the advice from retailers or retailer associations', including NZACS in order to identify the potential costs to retailers of their proposed options. To our knowledge this has not occurred.
- 6. Further limit the maximum size of tobacco displays**
7. Our members operate and manage well run businesses serving customers across New Zealand on effectively a 24 hour basis. With tobacco products generating over 37 per cent of our members' overall annual sales, this is a key customer category. We would have hoped that in light of the possible ramifications of the Review of tobacco displays, the retail sector would have been consulted prior to the Ministry of Health releasing a Consultation Document effectively calling for a simplistic ban on these displays.
8. The retail outlets of our members are carefully designed to maximise space and create a welcoming ambiance for customers. Customers expect a fast and efficient level of service that our members all aspire to provide. This particular point concerning the physical size of the tobacco display, lacks any specific information on how this limit would work or how it would be implemented. The Consultation Document displays a lack of understanding about the physical dimensions of the multitude of tobacco units within the retail sector in New Zealand. In NZACS members' case, the unit holding tobacco products have been specifically and specially designed for each of our various members' specific store layouts.
9. Simply introducing a limit on the size of these tobacco units would no doubt necessitate a large-scale refit and remodelling effort behind the busiest area of the retail premises – that of the point of sale area. To undertake such an activity,

businesses would be required to organise and supervise builders and shop-fitters, while trying to still operate a friendly customer-focused business.

10. Additionally these changes would result in potentially significant cost outlays for many retail businesses, including members of NZACS, all for reasons that are not specifically backed-up by research or evidence conducted with the New Zealand retail context.

11. Limit the number of tobacco displays to one display per retail outlet

12. NZACS finds that it cannot support this option for the reasons outlined above.

13. The Consultation Document makes ongoing comment about '*children and young people who would continue to be exposed to tobacco product displays*'. However NZACS wishes to point out that over 87 per cent of our members' customers are over the age of 20 years of age⁷.

14. A limit on the number of tobacco displays would also lead to customers being frustrated at not being able to see the product of their choice and / or see what alternative products are available. A limit would also stop our customers from being able to make comparisons about the pricing of tobacco products or what brands are available.

15. Any limit could potentially have Commerce Commission ramifications in terms of the availability of one company's tobacco products displayed over that of another manufacturer. NZACS is concerned that our members may be drawn into costly and long drawn-out legal battles between manufacturers. NZACS notes that this commercial element has not been considered by the Ministry of Health during the development of the Consultation Document.

⁷ NZACS 'State of the Industry –Survey of New Zealand', Year Ended December 2006. Conducted by Coalface Consulting and Nielsen

16. Require graphic health-warning posters to be displayed.

17. NZACS is concerned that the effort to maximise the attractiveness of our members' retail premises will be diminished and harmed by the requirement to place grotesque images of the health effects of smoking. We question why non-smokers (and the majority of our customers) should be forced to be confronted by these images. This concept completely goes against our ethos of offering visually compelling retail locations and is strongly resisted by NZACS.

18. The Consultation Document again places great emphasis concern about youth exposure to tobacco products. However the document fails to mention or outline the prevailing view of the evidence or research that demonstrates the determinants of youth smoking – not one of these determinants mentions that tobacco displays in retail is a key determinant in youth smoking.

19. For example, extensive smoke-free educational efforts have been conducted in New Zealand over the last few decades including the substantial support of the 'Smoke-free' brand. These efforts include discussion over why children and young people smoke. For example the Smoke-free Schools website states that:

- a. 'The problem is complex: Smoking among youth is largely to do with emotional – not rational – decision-making. Like piercing an ear or dyeing hair, smoking is used as a tool of self-expression and control, independence and rebellion. Youth often smoke to show that they have made a decision for themselves, that they are conforming with their peer group. Sometimes, what makes smoking so alluring to teenagers is that it is forbidden'⁸.

⁸ <http://www.smokefreeschools.co.nz/default.asp?sectionID=37>

20.And

a. **Youth are More Likely to Smoke if:**

- their parents smoke
- their peers smoke, or if it is considered acceptable by their peers
- other people of influence smoke ie teachers, favourite celebrities etc
- they have access to cigarettes
- they have a disposable income
- they do not feel a strong sense of connection to their parents
- they do not feel a strong sense of connection with their school and community
- they do not engage in extra-curricular activity
- they are not high academic achievers
- they think smoking is more prevalent than it is ie they think it is a 'normal' behaviour because it seems to be a normal part of their environment
- they have a risk-taking personality'⁹.

21.And

- a. 'Restricting access to tobacco products is a relatively controversial preventive measure. High levels of retailer compliance have been associated with decreased youth prevalence. Restricting the sale of tobacco to those less than 18 years of age may reinforce the perception of smoking as an 'adult' behaviour, thereby making it more desirable among youth who aspire to adult status'¹⁰.

22.And from the New Zealand Medical Journal:

⁹ <http://www.smokefreeschools.co.nz/default.asp?sectionID=37>

¹⁰ Helen Darling, Notes from a PowerPoint presentation at the 'Moving forward for a Smoke-free Auckland Symposium'. 14 July 2004.

- a. 'Parental behaviour is a key determinant of smoking by New Zealand adolescents. Efforts that target the role of parents should be pursued, such as health promotion strategies that advise parents about the possible benefits of banning smoking in the home, limiting pocket money, and not providing cigarettes to their children'¹¹.

23. NZACS members are already required to place the bold black and white health warning messages "Smoking Kills" at their point of sale. Replacing these with graphic images is not supported, particularly when referencing reasons why young people smoke. No comment is made in the Consultation Document about who would pay for or distribute these images, or ensure compliance with this new requirement(s).

24. In addition, NZACS is concerned that any forced placement of these graphic images in our members' retail premises will subject employees to disparaging and negative comments and criticism from their customers.

25. NZACS would have hoped that this is not the intention of the Ministry of Health whereby to see employees who are going about their normal duties of employment suddenly subjected to verbal abuse and ongoing criticism as a result of being forced to put up a graphic health warning – particularly when there is universal awareness of the health risks of tobacco use.

¹¹ Journal of the New Zealand Medical Association, 12-December-2003, Vol 116 No 1187; 'Parental smoking and related behaviours influence adolescent tobacco smoking: results from the 2001 New Zealand National Survey of 4th form students'. Robert Scragg, Murray Laugesen, Elizabeth Robinson.

Option 3: Ban on tobacco displays

- Ban tobacco displays in areas accessible to under- 18s.
- Completely ban all tobacco displays.

Do you support either of these options? If yes, why? If no, why not?

What possible advantages or disadvantages do you see with these options?

- 1. NZACS cannot and does not support Option 3.**
2. Our members believe that the introduction of a complete ban on the visibility of tobacco products at retail will have the opposite effect to that intended by the Ministry of Health and the Government.
3. NZACS believes that tobacco displays in our members' retail premises are static and do not encourage smoking. The product is offered to customers over the age of 18 years old because there is a demand for that product; the vast majority of our customers are over the age of 18 years old and they want to see the product before they buy it. Additionally there is existing proof of age requirements for the sale of tobacco products that our members comply with. Any introduction of a ban on the visibility of tobacco would have detrimental impact on our members' businesses.
4. Again NZACS notes that the Consultation Document makes little or no comment about the potential financial ramifications on the retail sector. These are likely to be significant for a large number of small retailers. It may also directly result in some smaller independent retailers going out of business, with implications for their immediate families and communities that they serve.
5. Another concern to NZACS is the lack of comment in the Consultation Document about the possible unintended consequences of introducing a visibility ban in retail of tobacco products. By 'covering up' or placing tobacco 'behind screens'

- actually dramatically increases the attention to the tobacco category. The Ministry of Health would have effectively negated any attempts to ‘denormalise’ the tobacco products by inadvertently highlighting a product that it wishes to limit.
6. Children and young people who come into our members’ retail premises will be intrigued and interested to see what is ‘behind the screens’. They will end up paying more attention to the tobacco product category as it is for ‘adults only’ when presently they are focused and interested in confectionary and ice-creams.
 7. The statement in the Consultation Document *‘protecting ex-smokers, recent quitters and those trying to quit smoking’*¹² in our view trivialises the concept of adults being able to make informed choices.
 8. NZACS agrees with the Ministry of Health in that *‘it [a ban] would make it difficult for consumers to know where to go to buy cigarettes and to know what products are available’*. But our members are concerned that the Ministry is not acknowledging the importance of a business whose principle objective is to actually assist customers when they enter into our retail premises. In a highly competitive retail environment like that experienced in New Zealand, particularly within the convenience organised channel, our members make every effort to make our premises ‘convenient’ for our customers and offer them products that they wish to purchase, and which they are legally entitled to do so.
 9. As discussed in Option 1 and Option 2 above, NZACS is concerned that the Consultation Document negates to mention the degree of cost or ramifications of a complete ban on tobacco displays in our members’ retail businesses. Simply saying that *‘simply covering existing displays or moving tobacco products to*

¹² Consultation Document page 21

*drawers or cupboards*¹³ demonstrates a lack of understanding of how the convenience organised retail channel operates in New Zealand.

10. For example, if tobacco products were 'removed to drawers or cupboards' then employees would be forced to constantly bend down out of sight of their customer(s) creating issues around OSH requirements about the health and safety of employees. The Consultation Document makes no comment on this important health and safety business issue. With over 769 retail store across New Zealand employing approximately 10,000 people, this is a significant concern for our members.
11. The same argument is applicable to the notion of constantly 'lifting' and 'pulling down' heavy screens on the tobacco display units.
12. Despite the significant health risks associated with smoking, tobacco products are still in high demand by our members' customers – and they want to be able to see and choose from a range of products – including tobacco.
13. Trying to pretend that tobacco is not available creates unintended consequences and potentially increases the risk and allure of tobacco products and actually increase the incidence of youth smoking.

¹³ Consultation Document page 21

Which is your preferred option? Why?

1. It is the considered view of NZACS members that Option 1, with greater education and enforcement, is the key to addressing concerns about youth smoking and assisting smokers who want to quit.
2. NZACS is concerned that the Consultation Document fails to draw on New Zealand specific research and instead relies on overseas studies that may be based on an entirely different set of retail and environmental factors.
3. NZACS agrees with the Ministry of Health in that Option 1 would 'cause no cost to retailers' but recognises that resources are needed to provide enhanced education and enforcement to retailers and other stakeholders. That is the principle reason for NZACS's offer to work with the Ministry of Health and Regional Public Health Unit Smoke-free Officers on an education programme for retailers.
4. Our members are strongly of the belief that if there are retailers who sell tobacco products to children and young people under the age of 18 years, then they should be prosecuted and have fines imposed upon them.
5. We are concerned with the lack of information about current levels of enforcement. However we note that the Consultation Document demonstrates that compliance issues drop significantly when Ministry officials enforce the legislation that they have introduced. NZACS is willing to share, in good faith, its knowledge and awareness of the convenience organised trade channel with the Ministry of Health to assist in ensuring compliance.
6. NZACS believes that Option 1 is part of a credible and effective solution to the management of tobacco across the New Zealand retail sector. Options 2 and 3 introduce additional issues of compliance, costs and complexity to an otherwise well managed tobacco category.

7. NZACS recognises the concerns of the public health community about tobacco products, but in turn recognises that there is a demand for tobacco products and that those adult customers also want to have the ability to see and choose their tobacco products by either brand, flavour or price.

Is there anything else you would like to comment on?

1. NZACS is the main representative organisation for over 769 retail outlets, operated across New Zealand. We would like to have positive engagement with the Ministry of Health over their concerns about tobacco in the retail sector.
2. Linked to this, is the concern about the use of an edited photograph of a tobacco display unit on the cover of the Ministry's youth friendly version of the Consultation Document.
3. This photo has been copied and subsequently edited from page 35 of the Cancer Society sponsored study conducted by the Department of Health, Wellington School of Medicine and Health Sciences 'Cigarettes and Candy: A Study of Retailer Compliance with Point of Sale Tobacco Display Regulations in the 2003 Smoke-free Environments Amendment Act'.
4. Further to this, when looked at more closely we note that this photo has a blue 'header card' which features an '18+' sticker in the middle of the tobacco display unit and directly above that is a small yellow British American Tobacco New Zealand logo. I am led to believe that a number of years ago that following a complaint from ASH New Zealand, the Ministry of Health wrote to that company asking that they remove those header cards or face prosecution. The Company duly complied.
5. The concern that the New Zealand Association of Convenience Stores (NZACS) has is that this photo may be well out of date and not reflective of the current

retail environment. It also therefore potentially misleads and gives a biased view to those people who may submit on the Consultation Document.

6. We are concerned that the impression both the photo and media comments by Ministry officials in support of a ban on tobacco display gives is one of trying to engineer a total ban on the display of tobacco at retail –one that will affect all our members who have multiple retail premises.

Conclusion

1. NZACS welcomes the opportunity to lodge this Submission on the Consultation Document.
2. NZACS will also be seeking to appear before the Health Select Committee to comment on the petition of Dalton Leo Kelly and provide the Committee with information about the retail environment across New Zealand.

Thank you



Bryce Taylor
Chairman
New Zealand Association of Convenience Stores