



17 October 2025

s 9(2)(a)

Official information request

Our ref: R001260

Tēnā koe s 9(2)(a)

Thank you for your Official Information Act 1982 (OIA) request, which the Ministry for Regulation (Ministry) received on 10 September 2025. You requested:

1. *Copies of any submissions, feedback, correspondence received by the Ministry for Regulation regarding the product labelling review.*
2. *Copies of all correspondence (including briefings and advice) sent and received by the Ministry for Regulation with Minister Seymour and any other Government Minister, the Prime Minister's office. Including officials from those offices regarding product labelling, especially in relation to tobacco, vaping, nicotine and alcohol.*
3. *Copies of all correspondence sent and received by the Ministry for Regulation and the Ministry of Health, Te Whatu Ora, Ministry of Justice and Police regarding product labelling, especially in relation to tobacco, vaping, nicotine and alcohol.*
4. *Copies of all correspondence sent and received by the Ministry for Regulation with other Government departments and agencies regarding product labelling.**
5. *Copies of all correspondence sent and received by the Ministry for Regulation and the New Zealand Initiative in relation to tobacco, vaping, nicotine and alcohol, since the establishment of the Ministry.*

Clarification

On 19 September 2025, you agreed to refine the timeframe for the request to cover information starting on 7 August 2025 -- the date when the Product Labelling Regulatory Review (hereinafter referred to in this letter as “the Review”) was announced -- through to 10 September 2025 when the Ministry received your request.

You also agreed to withdraw **item 4** as it would be covered by other parts of the request:

“Copies of all correspondence sent and received by the Ministry for Regulation with other Government departments and agencies regarding product labelling. “

Item 3 partially transferred

On 24 September 2025, we partially transferred item 3 of your request to the Ministry of Health, Health New Zealand-Te Whatu Ora, Ministry of Justice, and New Zealand Police as we do not hold all the information to address this item. We continued to retain item 3 in respect of information that we hold.

Additional context to this response

We have no material specifically about the broader regulatory requirements or product labelling in relation to tobacco, vaping, or nicotine as these fall outside the scope of the Review.

It is also important to note that the Ministry will continue to proactively release further information and documents at appropriate stages of the Review process.

Response to item 1

The Ministry's engagement on the Review involved a process that included an online questionnaire and direct meetings with organisations. This engagement identified key regulatory challenges, sector-specific labelling issues, and suggestions for reducing compliance costs and improving transparency. Insights from this process informed the Terms of Reference and shaped the proposed focus areas for the Review.

The **Terms of Reference** and **Summary of Engagement** report capturing feedback received by the Ministry from regulated parties, industry bodies, consumer groups and agencies we engaged with — which subsequently informed the proposed scope areas and terms of reference for the Review — have been proactively released and are available on the Ministry's website¹.

In addition, we have also proactively released a briefing paper, *MFR2025-243: Product Labelling Regulatory Review Proposed Terms of Reference*, which contains feedback from various agencies we engaged with in the course of developing the terms of reference.

We are withholding copies of submissions, feedback and correspondence from stakeholders and agencies we engaged with on the basis that the Review is still ongoing. We are withholding the information in accordance with section 9(2)(ba)(i) of the OIA to protect information which is subject to an obligation of confidence or which any person has been or could be compelled to provide under the authority of any enactment, where the making available of the information would be likely to prejudice the supply of similar information, or information from the same source, and it is in the public interest that such information should continue to be supplied. Protecting this confidentiality is essential to maintaining trust and ensuring that stakeholders continue to provide valuable input in future engagements, which is in the public interest.

See **Table 4 and Appendix C** for correspondence the Ministry received directly from organisations outside our formal Review engagement process.

Response to item 2

We have grouped our correspondence with the Minister for Regulation and his office into three categories: *weekly reports*, *emails*, and *briefing papers*.

¹ <https://www.regulation.govt.nz/regulatory-reviews/product-labelling-review/>

Weekly reports

The Ministry's weekly reports, containing progress updates to the Minister for Regulation about the Review, have been proactively released on the Ministry's website². I therefore refuse this part of your request under section 18(d) of the OIA as information you have requested is publicly available. **Table 1** lists the weekly reports within scope of your request.

Table 1. Weekly reports

Date	Reference	Title
8/08/2025	MFR2025-217	Ministry Weekly Report 8 August 2025
15/08/2025	MFR2025-226	Ministry Weekly Report 15 August 2025
22/08/2025	MFR2025-232	Ministry Weekly Report 22 August 2025
29/08/2025	MFR2025-236	Ministry Weekly Report 29 August 2025
5/09/2025	MFR2025-248	Ministry Weekly Report 5 September 2025

Emails

Please see **Appendix A** for copies of the Ministry's email correspondence with staff in the Office of the Minister for Regulation. **Table 2** lists these emails in date order.

Table 2. Email correspondence with staff at the Minister's office

Date	Subject line
7/08/2025	<i>Re: Query re product labeling review</i>
13/08/2025	<i>A2025-266: RE: Labelling Laws</i>
14/08/2025	<i>(R001192) and (R001193): WPQs due 14 August³</i>
18/08/2025	<i>Re: A2025-261: RE: Red Tape and Bureaucracy in Food Code.</i>
19/08/2025	<i>Re: Proposed Responses to WPQs 39284 and 39285 due 18 August (R001202)⁴</i>
25/08/2025	<i>Weekly report content Feedback from Ministers Office</i>
2/9/2025	<i>Actions from Advisors Meeting Yesterday</i>

Briefing papers

There are two briefing papers which contain our advice to the Minister for Regulation relating to the Review. Both papers, listed in **Table 3**, have been proactively released and are available on the Ministry website⁵. I therefore refuse this part of your request under section 18(d) of the OIA as information you have requested is publicly available.

² <https://www.regulation.govt.nz/about-us/our-publications/>

³ The response to Written Parliamentary Question **38583** relating to the product labelling regulatory review is available on the Parliamentary website: https://questions.parliament.nz/written-questions/question/WQ_38583_2025?lang=en

⁴ The responses to Written Parliamentary Questions **39284** and **39285** relating to the product labelling regulatory review are available on the Parliamentary website: [39284 \(2025\). Hon Dr Duncan Webb to the Minister for Regulation](https://questions.parliament.nz/written-questions/question/WQ_39284_2025?lang=en) and https://questions.parliament.nz/written-questions/question/WQ_39285_2025?lang=en

⁵ <https://www.regulation.govt.nz/about-us/our-publications/information-release-product-labelling-regulatory-review-key-advice-papers/>

Table 3. Key advice papers

Date	Reference	Title
17/07/2025	MFR2025-191	Forward plan and engagement approach for the Product Labelling Regulatory Review
18/08/2025	MFR2025-243	Product Labelling Regulatory Review Proposed Terms of Reference

Correspondence with other Ministers or their Offices

We have not initiated correspondence with the Prime Minister, other Government Ministers, or their offices regarding product labelling, tobacco, vaping, nicotine or alcohol.

The only occasion when we have sent correspondence to other Ministers is when they have been copied on emails that other organisations have sent to the Ministry. Please see **Appendix C** for details.

Response to item 3

We have grouped the correspondence sent and received by the Ministry relating to product labelling into two categories: *correspondence with agencies*, and *correspondence with organisations*.

Correspondence with agencies

Please see **Appendix B** which contains the email correspondence sent to agencies listed below. Feedback from agencies informed the development of the Terms of Reference for the Review. This feedback is summarised in the briefing paper, MFR2025-243: *Product Labelling Regulatory Review Proposed Terms of Reference*, and in the *Summary of Engagement* report, both of which have been proactively released.

1. Commerce Commission
2. Department of Internal Affairs
3. Environmental Protection Agency
4. Food Standards Australia New Zealand
5. Medsafe
6. Ministry for Primary Industries
7. Ministry for the Environment
8. Ministry of Business, Innovation and Employment
9. Ministry of Foreign Affairs and Trade
10. Ministry of Health
11. Ministry of Justice
12. New Zealand Trade and Enterprise
13. WorkSafe NZ

Correspondence with Organisations

Please see **Appendix C**, which contains correspondence sent to us proactively, outside of the formal engagement process. The correspondence touches on tobacco, vaping, nicotine or alcohol only when these have been mentioned by the organisations that have written to us, to raise these matters. **Table 4** lists the emails in date order.

Table 4. Emails with organisations

Date	Subject line	Organisation
25/08/2025	<i>RE: Letter regarding including tobacco and nicotine in labelling review</i>	<i>Vape-Free Kids NZ</i>
25/08/2025	<i>RE Tobacco and Nicotine Labelling – Exclusion from the Review of Product Labelling</i>	<i>Smokefree Expert Advisory Group-Health Coalition Aotearoa</i>
25/08/2025	<i>RE: Product Labelling Regulatory Review</i>	<i>ASPIRE Aotearoa University of Otago</i>
28/08/2025	<i>RE: Product Labelling Regulatory Review Letter</i>	<i>Cancer Society</i>

Item 4 – withdrawn**Response to item 5**

We understand this part of your request is for copies of any correspondence between the Ministry and the New Zealand Initiative concerning tobacco, vaping, nicotine or alcohol. We do not hold any material relevant to this part of your request. Accordingly, I am refusing this part of your request under section 18(e) of the OIA as the information does not exist.

Information withheld

Some information in the proactively released documents (listed in **Table 1** and **Table 3**) have been redacted consistent with the provisions for withholding information under the OIA. Where this is the case, the relevant sections of the OIA that would apply have been identified and where information was withheld, no public interest considerations were identified that would outweigh the reasons for withholding the information.

I have considered the grounds under which information has been redacted in the proactively released documents which you have requested, and I consider they continue to apply in the same ways under this request. I therefore withhold the same parts of these documents, under the same grounds as listed in the published versions.

In addition, some information in **Appendices A-C** have been withheld in accordance with the grounds for withholding information under the OIA. Information not relevant to your request has been marked as “out of scope”.

Key to sections of the OIA under which information has been withheld

- 9(2)(a) - to protect the privacy of natural persons, including that of deceased natural persons
- 9(2)(ba)(i) - to protect information subject to an obligation of confidence
- 9(2)(f)(iv) - to maintain the current constitutional conventions protecting the confidentiality of advice tendered by ministers and officials
- 9(2)(g)(i) - to maintain the effective conduct of public affairs through the free and frank expression of opinions

Where information has been withheld, the applicable section of the OIA has been noted in the documents.

As required by section 9(1) of the OIA, I do not believe any public interest reasons for releasing the information outweigh the reasons for withholding the information.

Right of review


If you wish to discuss this decision with us, please contact hello@regulation.govt.nz.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

Please note that we may publish this response (with your details removed) on the Ministry for Regulation website.

Ngā mihi

s 9(2)(a)



Aisling Risdon

Head of Ministerial Services
Ministry for Regulation

Out of scope

From: Colm Williams <Colm.Williams@parliament.govt.nz>
Sent: Thursday, 7 August 2025 3:32 pm
To: Joe Stockman; Hello
Subject: RE: Query re product labeling review

Flag Status: Completed

Thanks Joe



Colm Williams

Private Secretary (Regulation) | Office of Hon David Seymour MP
 Deputy Prime Minister
 Minister for Regulation
 Associate Minister of Education
 Associate Minister of Justice
 Associate Minister of Finance
 Associate Minister of Health

Email: colm.williams@parliament.govt.nz Website: www.Beehive.govt.nz
 Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand
 Phone: s 9(2)(a)

From: Joe Stockman <Joe.Stockman@regulation.govt.nz>
Sent: Thursday, 7 August 2025 3:17 PM
To: Colm Williams <Colm.Williams@parliament.govt.nz>; Hello <Hello@regulation.govt.nz>
Subject: Re: Query re product labeling review

Thanks team,

Calvin has also contacted us directly on the media line. We will pass him over to reviews and make sure they go back to him. Simon can tell him we'll be in touch.

The 30 is not an exhaustive list, s 9(2)(g)(i)

Joe

From: Colm Williams <Colm.Williams@parliament.govt.nz>
Sent: Thursday, August 7, 2025 3:06 PM
To: Hello <Hello@regulation.govt.nz>; Joe Stockman <Joe.Stockman@regulation.govt.nz>
Subject: RE: Query re product labeling review

Hi team,

I have made sure Simon has the content on:

- What you mean by “product labelling”
- Why we are doing this review
- What will it cover
- What is in it for new Zealanders
- Examples of the benefits of the review
- Next steps

Clearly we don't know the full extent of these, which is why we will be engaging with regulated parties.

Thanks,

Colm



Colm Williams

Private Secretary (Regulation) | Office of Hon David Seymour MP

Deputy Prime Minister
Minister for Regulation
Associate Minister of Education
Associate Minister of Justice
Associate Minister of Finance
Associate Minister of Health

Email: colm.williams@parliament.govt.nz Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand
Phone s 9(2)(a)

From: Simon Clarke <Simon.Clarke@parliament.govt.nz>

Sent: Thursday, 7 August 2025 2:32 PM

To: Colm Williams <Colm.Williams@parliament.govt.nz>

Subject: FW: Query re product labeling review

Hi Colm,

Is someone at MfR able to get in touch with Calvin re his questions below?

Cheers,

Simon



Simon Clarke

Director of Communications | Office of Hon David Seymour

Deputy Prime Minister | Minister for Regulation | Associate Minister of Education | Associate Minister of Finance | Associate Minister of Health | Associate Minister of Justice

M: s 9(2)(a)

Email: simon.clarke@parliament.govt.nz Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

From: Vape-Free Kids <vapefreekidsnz@gmail.com>

Sent: Thursday, 7 August 2025 2:16 PM

To: Simon Clarke <Simon.Clarke@parliament.govt.nz>

Subject: Query re product labeling review

Kia ora Simon,

Just a quick query on the new product labelling regulatory review. Will the scope of this review investigate plain packaging labeling of cigarettes, tobacco?

Did you have a list of the 30 different codes, standards, and regulations mentioned you could please share.

Best, Calvin

.....
Confidentiality notice: This email may be confidential or legally privileged. If you have received it by mistake, please tell the sender immediately by reply, remove this email and the reply from your system, and don't act on it in any other way. Ngā mihi.

From: Colm Williams <Colm.Williams@parliament.govt.nz>
Sent: Wednesday, 13 August 2025 9:00 am
To: Hello
Subject: A2025-266: RE: Labelling Laws
Attachments: doc - 10082025.pdf

Flag Status: Completed

All good, I have tracked it down. Please see attached.

Thanks,

Colm



Colm Williams

Private Secretary (Regulation) | Office of Hon David Seymour MP
Deputy Prime Minister
Minister for Regulation
Associate Minister of Education
Associate Minister of Justice
Associate Minister of Finance
Associate Minister of Health

Email: colm.williams@parliament.govt.nz Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand
Phone: s 9(2)(a)

From: Hello <Hello@regulation.govt.nz>
Sent: Tuesday, 12 August 2025 3:12 PM
To: Colm Williams <Colm.Williams@parliament.govt.nz>
Cc: Hello <Hello@regulation.govt.nz>
Subject: FW: Labelling Laws

Hi Colm,

The person who wrote to the Minister (s 9(2)(a)) regarding product labelling mentioned attachments in his original correspondence to the Minister.

I have shaded those references in yellow in the original email.

The team has asked me to request please if you could send us those attachments?

Many thanks,
Patricia

From: Colm Williams <Colm.Williams@parliament.govt.nz>
Sent: Tuesday, 12 August 2025 12:14 pm
To: Hello <Hello@regulation.govt.nz>
Subject: RE: Labelling Laws

Hi team,

FAO Product Labelling reg review team

To be aware the Minister has had direct correspondence with the below correspondent on the Product Labelling Regulatory Review.

Can I suggest the Product Labelling team or Mins team send him a polite email noting we are aware of his contact with the Minister and provide an update on where we are up to on the product labelling review and when he will be able to feed in.

Thanks,

Colm



Colm Williams

Private Secretary (Regulation) | Office of Hon David Seymour MP

Deputy Prime Minister

Minister for Regulation

Associate Minister of Education

Associate Minister of Justice

Associate Minister of Finance

Associate Minister of Health


Email: colm.williams@parliament.govt.nz Website: www.Beehive.govt.nz

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand


Phone: s 9(2)(a)

Out of scope

Out of scope



Out of scope



.....
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Label 1

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Label 3

Label 4

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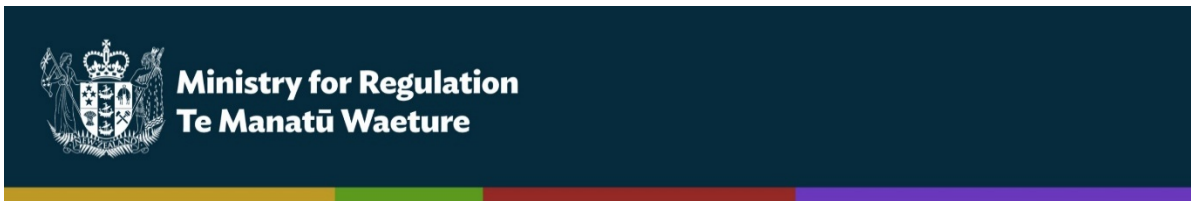
From: Niall Delahunt
Sent: Thursday, 14 August 2025 3:20 pm
To: Colm Williams
Cc: Hello
Subject: (R001192) and (R001193): WPQs due 14 August
Attachments: R001193- (Lan Pham) - WPQ.docx; R001192- (Francisco Hernandez) - WPQ.docx

Hi Colm,

Please see the attached WPQ responses to the below questions.

Many thanks,

Niall Delahunt
Ministerial Services Advisor
Ministry for Regulation
īmēra: niall.delahunt@regulation.govt.nz



www.regulation.govt.nz

From: Colm Williams
Sent: Friday, 8 August 2025 1:17 PM
To: Hello <hello@regulation.govt.nz>
Subject: WPQs due 14 August

Kia ora

Please can the office receive draft replies to the below WPQs by **COP Thursday 14 August**?

Number	Member	Question
38583 (2025)	Hernandez, Francisco	What work, if any, has the Ministry for Regulation done to estimate the portion of labelling costs that 'ultimately get passed on to consumers at the checkout,' and what is the estimated portion of labelling costs that get passed onto consumers, if any?
38700 (2025)	Pham, Lan	What is the total number, if any, of Regulatory Impact Statements held on the Ministry for Regulation website since December 1, 2023, that had "limited evidence available to assess policy problem and its impact" and "limited consultation" noted as part of the limitations and constraints on analysis?
38475 (2025)	Pham, Lan	How many, if any, of the Regulatory Impact Statements held on the Ministry for Regulation website did not meet, partially met, or did meet the quality assurance criteria since December 1, 2023?

Thank you,

Colm

Colm Williams

Private Secretary (Regulation) | Office of Hon David Seymour MP

Deputy Prime Minister

Minister for Regulation

Associate Minister of Education

Associate Minister of Justice

Associate Minister of Finance

Associate Minister of Health



Email: colm.williams@parliament.govt.nz Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand
Phone: s 9(2)(a)

From: Claire Whelen
Sent: Monday, 18 August 2025 5:07 pm
To: Justine Fitzmaurice; Hello; Darryn Kouoi
Cc: Patricia Canlas; Mariam Ramiah
Subject: Re: A2025-261: RE: Red Tape and Bureaucracy in Food Code.

Sure - will do.

From: Justine Fitzmaurice <Justine.Fitzmaurice@regulation.govt.nz>
Sent: Monday, 18 August 2025 5:02 pm
To: Hello <Hello@regulation.govt.nz>; Claire Whelen <Claire.Whelen@regulation.govt.nz>; Darryn Kouoi <Darryn.Kouoi@regulation.govt.nz>
Cc: Patricia Canlas <Patricia.Canlas@regulation.govt.nz>; Mariam Ramiah <Mariam.Ramiah@regulation.govt.nz>
Subject: Re: A2025-261: RE: Red Tape and Bureaucracy in Food Code.

Hi Athena and Patricia,

Thank you for passing this along, we will get in touch with the submitter.

[@Claire Whelen](#) and [@Darryn Kouoi](#) can you please get in touch with the submitter to arrange a call?

Thanks,
Justine.

From: Hello <Hello@regulation.govt.nz>
Sent: Monday, 18 August 2025 3:33 pm
To: Justine Fitzmaurice <Justine.Fitzmaurice@regulation.govt.nz>
Cc: Patricia Canlas <Patricia.Canlas@regulation.govt.nz>
Subject: FW: A2025-261: RE: Red Tape and Bureaucracy in Food Code.

Hi Justine,

Please see Colm's email below. 😊

Thanks,
Athena

From: Colm Williams <Colm.Williams@parliament.govt.nz>
Sent: Thursday, 14 August 2025 1:55 pm
To: Hello <Hello@regulation.govt.nz>
Subject: A2025-261: RE: Red Tape and Bureaucracy in Food Code.

Hi team,

FAO Product Labelling team

Would it be possible for the Product Labelling team to make contact with the below correspondent?

Even if this is an update on where we are in the process, where they can feed in and when MfR can engage directly with her.

Thank you,

Colm



Colm Williams

Private Secretary (Regulation) | Office of Hon David Seymour MP

Deputy Prime Minister
Minister for Regulation
Associate Minister of Education
Associate Minister of Justice
Associate Minister of Finance
Associate Minister of Health

Email: colm.williams@parliament.govt.nz Website: www.Beehive.govt.nz

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

Phone: s 9(2)(a)

From: Colm Williams

Sent: Thursday, 14 August 2025 1:53 PM


To: Sam Purchas <Samuel.Purchas@parliament.govt.nz>

Subject: RE: Red Tape and Bureaucracy in Food Code.

Yes, I will pass on.

Summary of the issue:

Out of scope

A large rectangular area of the document is redacted with a solid grey fill, covering the majority of the lower half of the page.

Colm

Colm Williams

Private Secretary (Regulation) | Office of Hon David Seymour MP

Deputy Prime Minister
Minister for Regulation



Associate Minister of Education
Associate Minister of Justice
Associate Minister of Finance
Associate Minister of Health

Email: colm.williams@parliament.govt.nz Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand
Phone: s 9(2)(a)

From: Sam Purchas <Samuel.Purchas@parliament.govt.nz>
Sent: Thursday, 14 August 2025 1:49 PM
To: Colm Williams <Colm.Williams@parliament.govt.nz>
Subject: FW: Red Tape and Bureaucracy in Food Code.

Hi Colm,

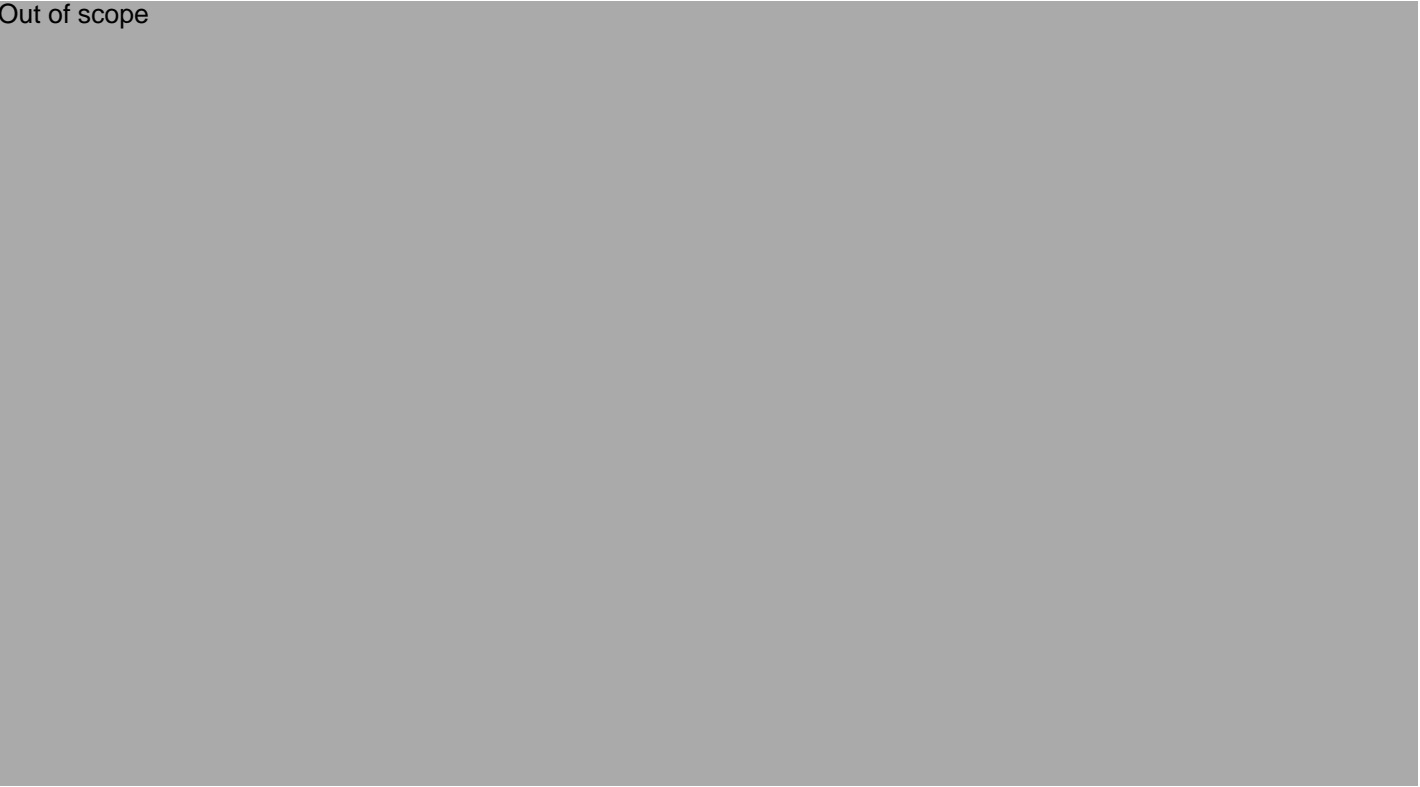
Can we please pass this on to the good people of the labelling review and suggest they get in touch with s 9(2)(a)

Or is there a contact to whom I can refer her?


Thanks
Sam

From: s 9(2)(a)
Sent: Wednesday, 13 August 2025 1:14 PM
To: Hon David Seymour <David.Seymour@parliament.govt.nz>
Cc: s 9(2)(a)
Subject: Red Tape and Bureaucracy in Food Code.


Out of scope



Out of scope



Out of scope



Out of scope

From: Colm Williams <Colm.Williams@parliament.govt.nz>
Sent: Tuesday, 19 August 2025 8:46 am
To: Hello
Cc: Hello; Patricia Canlas; Niall Delahunt; Claire Whelen
Subject: Re: Proposed Responses to WPQs 39284 and 39285 due 18 August (R001202)

Thank you!

From: Hello <Hello@regulation.govt.nz>
Sent: Monday, August 18, 2025 6:56:19 PM
To: Colm Williams <Colm.Williams@parliament.govt.nz>
Cc: Hello <Hello@regulation.govt.nz>; Patricia Canlas <Patricia.Canlas@regulation.govt.nz>; Niall Delahunt <Niall.Delahunt@regulation.govt.nz>; Claire Whelen <Claire.Whelen@regulation.govt.nz>
Subject: Proposed Responses to WPQs 39284 and 39285 due 18 August (R001202)

Kia ora Colm,

Please see the responses to WPQs 39284 and 39285.
These have been approved by Ash, Justine and Paul.

Ngā mihi
Patricia

From: Colm Williams <Colm.Williams@parliament.govt.nz>
Sent: Tuesday, 12 August 2025 11:16 am
To: Hello <Hello@regulation.govt.nz>
Subject: R001202: WPQs due 18 August

Kia ora
Please can the office receive draft replies to the below WPQs by COP 18 August?

Number	Member	Question
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39284 (2025)	Webb, Hon Dr Duncan	Will the labelling review proposed by the Ministry for Regulation relate to food products only or will it include other items such as clothing and electrical goods?
39285 (2025)	Webb, Hon Dr Duncan	What are the "30 different codes, standards, and regulations that dictate what information must be shown on a label, and how it must be shown" referred to by the Ministry for Regulation in its announcement of a review of labelling?

Thank you,
Colm



Colm Williams

Private Secretary (Regulation) | Office of Hon David Seymour MP

Deputy Prime Minister

Minister for Regulation

Associate Minister of Education

Associate Minister of Justice

Associate Minister of Finance

Associate Minister of Health

Email: colm.williams@parliament.govt.nz Website: www.Beehive.govt.nz

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

Phone: s 9(2)(a)

Confidentiality notice: This email may be confidential or legally privileged. If you have received it by mistake, please tell the sender immediately by reply, remove this email and the reply from your system, and don't act on it in any other way. Ngā mihi.

Out of scope

From: Hello <Hello@regulation.govt.nz>
Sent: Monday, 25 August 2025 11:15 am
To: Peter Clark; Justine Fitzmaurice
Cc: Aisling Risdon
Subject: Weekly report content Feedback from Ministers Office

Hi there,

Please see below feedback from John on the Weekly Report:

Out of scope

Product labelling: The Minister would be interested in any early insights from the Ministry's engagement with the sectors to date (where possible). Given the number of sectors involved, he may be keen to understand whether there are significant differences in the issues being raised, or whether there is a greater degree of consistency or commonality across sectors.

Ngā mihi,
Athena

Athena Alba (she/her)

Ministerial Services Coordinator

Ministry for Regulation

Īmēra: athena.alba@regulations.govt.nz



Ministry for Regulation
Te Manatū Waeture

Out of scope

From: Charlie Hulley <Charlie.Hulley@parliament.govt.nz>
Sent: Tuesday, 2 September 2025 12:43 pm
To: Hello
Subject: Actions from Advisors Meeting Yesterday

Flag Status: Flagged

Hi team

Thanks for your patience on the delay on this – see actions from advisors meeting yesterday.

Thanks
Charlie



Charlie Hulley

Cover Private Secretary (Regulation) | Office of Hon David Seymour MP
Deputy Prime Minister
Minister for Regulation
Associate Minister of Education
Associate Minister of Justice
Associate Minister of Finance
Associate Minister of Health

Email: charlie.hulley@parliament.govt.nz Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand
Phone: s 9(2)(a)

Attendees: Ash, Joe, Pip, Elisa, Paul, Hannah

Date: Monday, 2 September 2025

Time: 1:30pm - 2:30pm (*went till 2:45pm*)

Location: Parliament, EW 7.6

Time	Item	Lead	Action sought	Notes	Decisions	Actions
Out of scope						
2:00pm-2:20pm	Out of scope	Paul, Hannah	Overview/update	Out of scope		MfR to: Out of scope 2) provide a check in forward plan with the Minister on Product labeling Out of scope

R001260 – APPENDIX B

Copies of correspondence sent by the Ministry for Regulation to agencies regarding the Product Labelling Regulatory Review

Date sent to agencies: **21 August 2025**

Subject: RE: Product Labelling Regulatory Review - next steps for ToR

Message:

The Ministry for Regulation is undertaking a Regulatory Review into Product Labelling [Product labelling regulatory review](#) | [Ministry for Regulation](#)

I wanted to provide you with an update of where we are in the process and our next steps.

Our online engagement questionnaire closes today (20 August) and direct engagement meetings will finish by the end of this week. We are analysing key themes around issues raised and will be seeking to engage with you to further discuss these topics and the potential scope areas in the coming weeks.

Below is a timeline of when we would like to engage with you, as we develop our draft Terms of Reference. We acknowledge some of these timelines are quite tight, so wanted to give you advance notification of when we'll be seeking to meet and receive your feedback.

Actions	Dates	Responsibility
Early insights to agencies	21/08- 27/08	Ministry for Regulation
Draft Terms of Reference to agencies	1/09	Ministry for Regulation
Meetings with agencies to discuss ToR	02/09 - 04/09	Ministry for Regulation & relevant Agency
Written feedback due from agencies	04/09	Relevant Agency
Review Team to discuss and agree changes	05/09	Ministry for Regulation
Circulate final draft ToR +cover briefing to agencies for feedback	08/09	Ministry for Regulation
Feedback from agencies due	11/09	Relevant Agency
Manager & DCE sign-out of ToR & briefing	17/09	Ministry for Regulation
Briefing & ToR to Minister and other relevant Ministers for agreement	18/09	Ministry for Regulation

As you can see above, we would like to meet with you between 02 Sep - 04 Sep, please let us know some possible times for a meeting during this period.

We look forward to engaging with you.

Date sent to agencies: **31 August 2025**

Subject: First draft Product Labelling Regulatory Review Terms of Reference

Message:

Please find attached a first draft of the Product Labelling Regulatory Review Terms of Reference (ToR).

We are looking forward to discussing the ToR with you later this week. We would also like written feedback by COB on Thursday 4 September.

As a reminder, below is the timeline of agency engagement on the ToR.

Actions	Dates	Responsibility
Early insights to agencies	21/08 - 27/08	Ministry for Regulation
Draft Terms of Reference to agencies	1/09	Ministry for Regulation
Meetings with agencies to discuss ToR	02/09 - 04/09	Ministry for Regulation & relevant Agency
Written feedback due from agencies	04/09	Relevant Agency
Review Team to discuss and agree changes	05/09	Ministry for Regulation
Circulate final draft ToR +cover briefing to agencies for feedback	08/09	Ministry for Regulation
Feedback from agencies due	11/09	Relevant Agency
Manager & DCE sign-out of ToR & briefing	17/09	Ministry for Regulation
Briefing & ToR to Minister and other relevant Ministers for agreement	18/09	Ministry for Regulation

Date sent to agencies: **8 September 2025**

Subject: Second draft Product Labelling Regulatory Review Terms of Reference

Message:

Thank you for your feedback you provided on our first draft of the Product Labelling Terms of Reference (ToR). Our approach to considering feedback has been:

- Where changes have been suggested we've endeavoured to reflect them, whether in directly adopting agencies' suggested wording or by incorporating the broader suggestion into the drafting.*
- Some agencies provided helpful contextual or clarifying information – some of this was not directly related to the terms of reference themselves, but we have noted and will factor these into our planning for the review.*
- In a small number of areas, we have not made changes that were suggested – if you have questions about why we haven't adopted a particular change, please let me know and we'd be happy to discuss this with you.*

Attached are two documents:

- 1. Second version of the ToR** - *this is the final version for agency feedback before we provided them to the Minister for approval next week.*
- 2. Draft cover briefing** - *this will accompany the ToR for the Minister. Please note this is an early draft so may contain typos or rough drafting. We are circulating this to provide agencies an opportunity to comment on how we have characterised your feedback on the first draft of the ToR in the briefing. If you would like to further clarify your agency's views, please feel free either to track changes in the document, or provide your own suggested wording if you would prefer.*

*We would like written feedback by **COB on Thursday 11 September**. As a reminder, below is the timeline of agency engagement on the ToR.*

Actions	Dates	Responsibility
Early insights to agencies	21/08- 27/08	Ministry for Regulation
Draft Terms of Reference to agencies	1/09	Ministry for Regulation
Meetings with agencies to discuss ToR	02/09 - 04/09	Ministry for Regulation & relevant Agency

Actions	Dates	Responsibility
<i>Written feedback due from agencies</i>	<i>04/09</i>	<i>Relevant Agency</i>
<i>Review Team to discuss and agree changes</i>	<i>05/09</i>	<i>Ministry for Regulation</i>
<i>Circulate final draft ToR + cover briefing to agencies for feedback</i>	<i>08/09</i>	<i>Ministry for Regulation</i>
Feedback from agencies due	11/09	Relevant Agency
<i>Manager & DCE sign-out of ToR & briefing</i>	<i>17/09</i>	<i>Ministry for Regulation</i>
<i>Briefing & ToR to Minister and other relevant Ministers for agreement</i>	<i>18/09</i>	<i>Ministry for Regulation</i>

Out of scope

From: Grainne Moss
Sent: Monday, 25 August 2025 11:32 am
To: Vape-Free Kids
Cc: Christopher Luxon (MIN); S.Brown@ministers.govt.nz; d.seymour@ministers.govt.nz; Casey Costello (MIN); cameron.burrows@parliament.govt.nz; Product Labelling Review
Subject: RE: Letter regarding including tobacco and nicotine in labelling review

Tēnā koutou,

Thank you for your letter, we appreciate hearing your views on the Product Labelling Review.

The Terms of Reference have not been developed yet and therefore we don't have a confirmed scope for the Product Labelling Review. We have recently engaged with businesses, industry bodies, consumer groups and government agencies to hear views on how well product labelling regulation is working for New Zealanders and New Zealand businesses. Based on what we heard, we will develop a Terms of Reference to be agreed by joint Ministers.

We value the feedback you have provided and will take this into account as the Review progresses.

We do not consider that the engagement survey for the Review is in breach of Article 5.3 of the Framework Convention on Tobacco Control (FCTC). This is because the FCTC and associated guidelines are focussed on protecting the development of tobacco policy from the influence of the tobacco industry. However, the Review team have not engaged directly with tobacco companies and therefore will not have been influenced by such companies' commercial interests through this engagement. The Review's questionnaire includes a category for "Cigarettes, Tobacco & Products that contain nicotine" as we anticipate that some retailers sell these products and wanted to ensure the information we collect about product categories is accurate.

Before we finalise the Terms of Reference for the Product Labelling Review, we will be in touch to share the draft content and seek your views.

I can assure you that I have registered your views and thank you for taking the time to write to me.

Ngā mihi
 Gráinne

Gráinne Moss *(she/her)*
Chief Executive | Te Tumu Whakahaere mō Te Manatū Waeture
waea pūkoro: s 9(2)(a) | **īmēra:** grainne.moss@regulation.govt.nz



Ministry for Regulation
Te Manatū Waeture

[Ministry for Regulation](#)

From: Vape-Free Kids <vapefreekidsnz@gmail.com>
Sent: Wednesday, 13 August 2025 9:28 am
To: Grainne Moss <grainne.moss@regulation.govt.nz>

Cc: Christopher Luxon (MIN) <C.Luxon@ministers.govt.nz>; S.Brown@ministers.govt.nz;
d.seymour@ministers.govt.nz; Casey Costello (MIN) <C.Costello@ministers.govt.nz>;
cameron.burrows@parliament.govt.nz; Product Labelling Review <productlabellingreview@regulation.govt.nz>
Subject: Letter regarding including tobacco and nicotine in labelling review

You don't often get email from vapefreekidsnz@gmail.com. [Learn why this is important](#)

Mōrena Gráinne,

Please see attached a letter from Vape-Free Kids NZ regarding the consideration of tobacco, and nicotine products in the Government review of product labelling.

Ngā mihi nui,
Vape-Free Kids NZ



For the attention of:

Gráinne Moss
Ministry of Regulation
Te Iho, 1 Bowen Street,
Thorndon, Wellington

CC: Christopher Luxon, Prime Minister
Simeon Brown, Minister of Health
David Seymour, Minister of Regulation
Casey Costello, Associate Minister of Health

Tobacco and nicotine labelling must be excluded from review

Tēnā koe Gráinne,

We are writing to you requesting that you exclude tobacco and nicotine products from the Government's review of product labelling.

The harm caused by these products is undisputed and far reaching, they cause numerous cancers and other severe health harms and result in considerable morbidity and mortality.

For these reasons, Vape-Free Kids NZ is concerned that labelling policies that have increased knowledge of these products' harms and reduced youth uptake is at risk of removal.

Not to mention the fact that costs to the economy as a result of tobacco far outweighs any expense tobacco companies face including appropriate labels on products.

As part of its online consultation form the Ministry for Regulation includes specific categories for cigarettes, tobacco & other products that contain nicotine. The form goes on to provide a range of questions asking how labeling requirements negatively impact doing business.

We are concerned about the questions for two reasons. First, the process appears biased towards industry interests. Second, the process appears to breach Article 5.3 of the WHO Framework Convention on Tobacco Control.

This Article requires the New Zealand Government to recognise that tobacco companies' interests do not align with public health interests and to exclude tobacco companies from policy making except where explicitly required (e.g., to address implementation questions).

No Government that values public health should provide an opportunity for influencing policy to industries built on death and addiction.



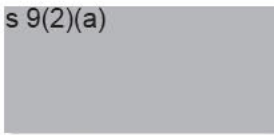
We note that warning labels play a vital, lifesaving role in keeping people aware of the deadly consequences of consuming nicotine products, and can also encourage attempts to quit a deadly addiction.

Including tobacco and nicotine products in this review risks undermining not only public health protections but also risks giving undue favour to the tobacco industry.

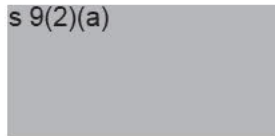
We call on the Government to unequivocally confirm that tobacco and nicotine products will be explicitly excluded from any consideration in this review.

Ngā mihi nui,

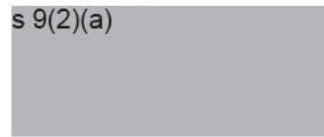
s 9(2)(a)



s 9(2)(a)



s 9(2)(a)



s 9(2)(a)

*Co-founder of Vape-Free
Kids NZ*

s 9(2)(a)

*Co-founder of Vape-Free
Kids NZ*

s 9(2)(a)

*Co-founder of Vape-Free
Kids NZ*

From: Grainne Moss
Sent: Monday, 25 August 2025 11:32 am
To: HCA Chair
Cc: Makona.Pokoati@parliament.govt.nz; christopher.luxon@parliament.govt.nz; Simeon Brown (MIN); Casey Costello
Subject: RE: Tobacco and Nicotine Labelling – Exclusion from the Review of Product Labelling

Tēnā koutou,

Thank you for your letter, we appreciate hearing your views on the Product Labelling Review.

The Terms of Reference have not been developed yet and therefore we don't have a confirmed scope for the Product Labelling Review. We have recently engaged with businesses, industry bodies, consumer groups and government agencies to hear views on how well product labelling regulation is working for New Zealanders and New Zealand businesses. Based on what we heard, we will develop a Terms of Reference to be agreed by joint Ministers.

We value the feedback you have provided and will take this into account as the Review progresses.

We do not consider that the engagement survey for the Review is in breach of Article 5.3 of the Framework Convention on Tobacco Control (FCTC). This is because the FCTC and associated guidelines are focussed on protecting the development of tobacco policy from the influence of the tobacco industry. However, the Review team have not engaged directly with tobacco companies and therefore will not have been influenced by such companies' commercial interests through this engagement. The Review's questionnaire includes a category for "Cigarettes, Tobacco & Products that contain nicotine" as we anticipate that some retailers sell these products and wanted to ensure the information we collect about product categories is accurate.

Before we finalise the Terms of Reference for the Product Labelling Review, we will be in touch to share the draft content and seek your views.

I can assure you that I have registered your views and thank you for taking the time to write to me.

Ngā mihi
Gráinne

Gráinne Moss *(she/her)*
Chief Executive | Te Tumu Whakahaere mō Te Manatū Waeture
waea pūkoro: s 9(2)(a) | **īmēra:** grainne.moss@regulation.govt.nz



Ministry for Regulation
Te Manatū Waeture

[Ministry for Regulation](#)

From: HCA Chair <chair@healthcoalition.org.nz>
Sent: Thursday, 14 August 2025 4:42 pm
To: Grainne Moss <grainne.moss@regulation.govt.nz>

Cc: Makona.Pokoati@parliament.govt.nz; christopher.luxon@parliament.govt.nz; Simeon Brown (MIN) <s.brown@ministers.govt.nz>; Casey Costello <casey.costello@parliament.govt.nz>
Subject: Tobacco and Nicotine Labelling – Exclusion from the Review of Product Labelling
Importance: High

You don't often get email from chair@healthcoalition.org.nz. [Learn why this is important](#)

Tēnā koe Gráinne,

Please find attached a letter from Health Coalition Aotearoa's Smokefree Expert Advisory Group. We are deeply concerned that tobacco and nicotine products are included in the Government's review of product labelling.

We are available to talk to you about why we strongly urge the Government to exclude cigarettes, tobacco, and other products containing nicotine from any consideration in this review.

Ngā mihi

s 9(2)(a)

s 9(2)(a)

Health Coalition Aotearoa www.healthcoalition.org.nz

chair@healthcoalition.org.nz



Health



14 August 2025

Gráinne Moss
Chief Executive
Ministry of Regulation
Te Iho, 1 Bowen Street
Thorndon, Wellington

CC:

- Rt Hon Christopher Luxon, Prime Minister
- Hon Simeon Brown, Minister of Health
- Hon David Seymour, Minister of Regulation
- Hon Casey Costello, Associate Minister of Health

Tena koe Gráinne

Tobacco and Nicotine Labelling – Exclusion from the Review of Product Labelling

We write as members of the Smokefree Expert Advisory Group of Health Coalition Aotearoa, representing community, research, and advocacy organisations that have worked for many years to end the harms caused by tobacco smoking, addiction, and nicotine dependence in Aotearoa New Zealand.

We are deeply concerned that tobacco and nicotine products are included in the Government's review of product labelling.

The Ministry for Regulation's online consultation form lists categories for cigarettes, tobacco, and other products containing nicotine, and asks questions regarding the negative impact labelling requirements may have on doing business.

No Government that values the health of its people should contemplate trading off death and disability against the convenience of 'doing business'. Considering the well-documented and severe health consequences of smoking, such questions are, frankly, irresponsible.

This consultation process also breaches Article 5.3 of the WHO Framework Convention on Tobacco Control (FCTC), which requires the New Zealand Government to recognise that tobacco companies' interests are fundamentally incompatible with public health interests, and to exclude tobacco companies from policy making except where explicitly required (for example, to address implementation questions).

Product labelling policies have played a critical role in reducing smoking rates in Aotearoa. Labelling warns the public of the harms caused by these products, encourages people who smoke to quit, connects them with quitting support, and deters young people from starting to smoke.

Given the extensive and indisputable harms caused by smoking, New Zealand's commitment to a Smokefree future, and our obligations as a signatory to the FCTC, we strongly urge the Government to **exclude cigarettes, tobacco, and other products containing nicotine from any consideration in this review.**

Nga mihi

s 9(2)(a)

s 9(2)(a)

From: Product Labelling Review
Sent: Monday, 25 August 2025 1:41 pm
To: s 9(2)(a) otago.ac.nz
Subject: RE: Product Labelling Regulatory Review

Kia ora s 9(2)(a),

Thank you for your email, we appreciate hearing your views on the Product Labelling Review.

The Terms of Reference have not been developed yet and therefore we don't have a confirmed scope for the Product Labelling Review. We have recently engaged with businesses, industry bodies, consumer groups and government agencies to hear views on how well product labelling regulation is working for New Zealanders and New Zealand businesses. Based on what we heard, we will develop a Terms of Reference to be agreed by joint Ministers.

We value the feedback you have provided and will take this into account as the Review progresses.

We do not consider that the engagement survey for the Review is in breach of Article 5.3 of the Framework Convention on Tobacco Control (FCTC). This is because the FCTC and associated guidelines are focussed on protecting the development of tobacco policy from the influence of the tobacco industry. However, the Review team have not engaged directly with tobacco companies and therefore will not have been influenced by such companies' commercial interests through this engagement. The Review's questionnaire includes a category for "Cigarettes, Tobacco & Products that contain nicotine" as we anticipate that some retailers sell these products and wanted to ensure the information we collect about product categories is accurate.

Before we finalise the Terms of Reference for the Product Labelling Review, we will be in touch to share the draft content and seek your views.

We can assure you that we have registered your views and thank you for taking the time to write to us.

Ministry for regulation



**Ministry for Regulation
Te Manatū Waeture**

From: s 9(2)(a) @otago.ac.nz
Sent: Wednesday, 13 August 2025 8:56 am
To: Product Labelling Review <productlabellingreview@regulation.govt.nz>; Grainne Moss <grainne.moss@regulation.govt.nz>
Subject: Fw: Product Labelling Regulatory Review

Some people who received this message don't often get email from s 9(2)(a) @otago.ac.nz. [Learn why this is important](#)

Tēnā koe,

Please see our email below, sent to Minister Seymour this morning. I am forwarding to ensure Ministry staff are aware of our concerns.

Ngā mihi,

s 9(2)(a)
ASPIRE Aotearoa
University of Otago

From: s 9(2)(a) @otago.ac.nz
Sent: Wednesday, August 13, 2025 8:09 AM
To: David.Seymour@parliament.govt.nz <david.seymour@parliament.govt.nz>
Cc: Casey.Costello@parliament.govt.nz <casey.costello@parliament.govt.nz>; Simeon.Brown@parliament.govt.nz <simeon.brown@parliament.govt.nz>; s 9(2)(a) @otago.ac.nz; s 9(2)(a) @otago.ac.nz
Subject: Product Labelling Regulatory Review

Tēnā koe Minister Seymour,

We are writing with concerns about the Product Labelling Regulatory Review, announced last week. We call on you and your officials to:

- Remove tobacco and nicotine product labelling from the consultation survey and the scope of the review; and

- Explain how diverse views will be considered in decision making.

Our concerns are outlined below.

1. NZ's obligations under the Framework Convention for Tobacco Control

New Zealand is a Party to the WHO Framework Convention for Tobacco Control, and is legally obliged to comply with the Treaty Articles including:

Article 5.3: "In setting and implementing their public health policies with respect to tobacco control [including tobacco labelling and packaging regulations], Parties shall act to protect these policies from commercial and other vested interests of the tobacco industry in accordance with national law."

New Zealand adopted the guidelines for implementation of Article 5.3 developed by the Conference of the Parties in 2008. These guidelines state:

"Parties should interact with the tobacco industry only when and to the extent strictly necessary to enable them to effectively regulate the tobacco industry and tobacco products."

"The measures recommended in these guidelines aim at protecting against interference not only by the tobacco industry but also, as appropriate, by organizations and individuals that work to further the interests of the tobacco industry."

Engaging with the tobacco industry and its allies by inviting input on tobacco labelling (as the review's online engagement survey does) is contrary to New Zealand's FCTC obligations. Given the obligations Article 5.3 places on the Government and its officials, we request that the consultation survey is amended to exclude tobacco and nicotine products. Further, tobacco and nicotine products should be excluded from the scope of the review.

2. Unbalanced review that does not consider the purpose of labelling

Based on the information available on the Ministry for Regulation website, it appears that the review aims to further business interests, for example by cutting compliance costs, but without considering the primary purpose of product labels, namely to inform and protect consumers.

The review appears to engage only with businesses and industry groups; the consultation does not appear to include regulators, consumers, consumer advocacy groups or independent experts.

Please clarify how the review will incorporate important health, safety and consumer protection considerations and stakeholders.

We look forward to your response.

Ngā mihi,

s 9(2)(a)

s 9(2)(a) ASPIRE Aotearoa



s 9(2)(a)

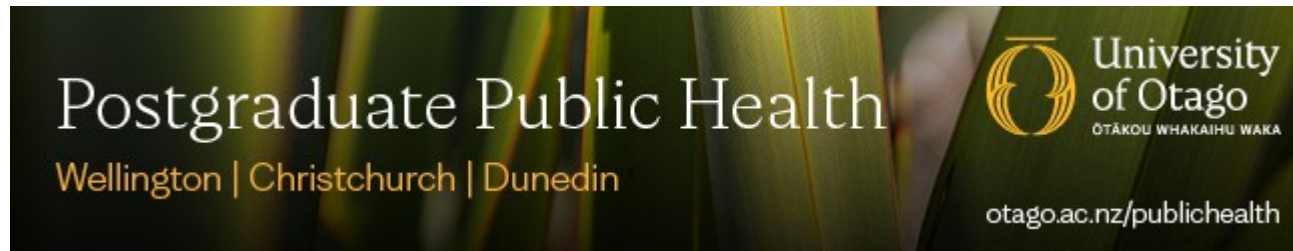
ASPIRE Aotearoa s 9(2)(a)

University of Otago – Ōtākou Whakaihu Waka

Department of Public Health

Wellington | Pōneke

s 9(2)(a)



From: Grainne Moss
Sent: Friday, 29 August 2025 8:29 am
To: Nicola Coom
Cc: Rt Hon Christopher Luxon, Prime Minister; Hon Simeon Brown, Minister of Health; Hon David Seymour, Minister of Regulation; Hon Casey Costello, Associate Minister of Health; Hon Andrew Hoggard, Minister for Food Safety; Product Labelling Review
Subject: RE: Product Labelling Regulatory Review Letter

Tēnā koutou,

Thank you for your letter, we appreciate hearing your views on the Product Labelling Review.

The Terms of Reference have not been developed yet and therefore we don't have a confirmed scope for the Product Labelling Review. We have recently engaged with businesses, industry bodies, consumer groups and government agencies to hear views on how well product labelling regulation is working for New Zealanders and New Zealand businesses. Based on what we heard, we will develop a Terms of Reference to be agreed by joint Ministers.

We value the feedback you have provided and will take this into account as the Review progresses.

In relation to tobacco products, we do not consider that the engagement survey for the Review is in breach of Article 5.3 of the Framework Convention on Tobacco Control (FCTC). This is because the FCTC and associated guidelines are focussed on protecting the development of tobacco policy from the influence of the tobacco industry. However, the Review team have not engaged directly with tobacco companies and therefore will not have been influenced by such companies' commercial interests through this engagement. The Review's questionnaire includes a category for "Cigarettes, Tobacco & Products that contain nicotine" as we anticipate that some retailers sell these products and wanted to ensure the information we collect about product categories is accurate.

In relation to food and alcohol labelling, I note the points you have made. We are engaging with Food Standards Australia and New Zealand and Ministry for Primary Industries as we develop the Terms of Reference for the Review.

Before we finalise the Terms of Reference for the Product Labelling Review, we will be in touch to share the draft content and seek your views.

I can assure you that I have registered your views and thank you for taking the time to write to me.

Ngā mihi nui,
Gráinne

Gráinne Moss (she/her)
Chief Executive | Te Tumu Whakahaere mō Te Manatū Waeture
waea pūkoro: s 9(2)(a) | imēra: grainne.moss@regulation.govt.nz



Ministry for Regulation
Te Manatū Waeture

From: s 9(2)(a) @southerncancer.org.nz> On Behalf Of s 9(2)(a)
Sent: Thursday, 28 August 2025 10:56 am
To: Grainne Moss <grainne.moss@regulation.govt.nz>
Cc: Rt Hon Christopher Luxon, Prime Minister <C.Luxon@ministers.govt.nz>; Hon Simeon Brown, Minister of Health <S.Brown@ministers.govt.nz>; Hon David Seymour, Minister of Regulation <D.Seymour@ministers.govt.nz>; Hon Casey Costello, Associate Minister of Health <C.Costello@ministers.govt.nz>; Hon Andrew Hoggard, Minister for Food Safety <A.Hoggard@ministers.govt.nz>; Product Labelling Review <productlabellingreview@regulation.govt.nz>
Subject: Product Labelling Regulatory Review Letter

You don't often get email from s 9(2)(a) @southerncancer.org.nz. [Learn why this is important](#)

Good Morning,

Please find attached letter from s 9(2)(a) Cancer Society.

Ngā mihi | Kind regards

He waka eke noa | We're all in this together



s 9(2)(a)
Executive Assistant
s 9(2)(a)
s 9(2)(a) @southerncancer.org.nz



This email and its attachments are confidential and intended only for the recipient. If you received this email in error, please notify the sender and delete it. Unauthorised use, disclosure, or distribution is prohibited. The views expressed are those of the author and not necessarily those of Cancer Society.

20 August 2025

Gráinne Moss
Chief Executive
Ministry of Regulation
Te Iho, 1 Bowen Street
Thorndon, Wellington
Grainne.Moss@regulation.govt.nz

CC:

- Rt Hon Christopher Luxon, Prime Minister
- Hon Simeon Brown, Minister of Health
- Hon David Seymour, Minister of Regulation
- Hon Casey Costello, Associate Minister of Health
- Hon Andrew Hoggard, Minister for Food Safety
- productlabellingreview@regulation.govt.nz

Dear Gráinne,

Re: Concerns regarding the scope of the Product Labelling Regulatory Review

Product labels play a vital role in enabling New Zealanders to make informed decisions about the products they purchase and consume. This is especially important when it comes to products that are harmful, carcinogenic, and potentially fatal—such as alcohol and tobacco. All New Zealanders deserve the right to clear, accurate, and evidence-based information to support their health and wellbeing.

The Cancer Society of New Zealand is writing to express our concern regarding the current scope and direction of the Product Labelling Regulatory Review. We respectfully call on the Ministry to take the following actions:

The Cancer Society of New Zealand
Level 13, Ranchod Tower, 39 The Terrace, Wellington 6011 | PO Box 651, Wellington 6140
04 494 7270 | Cancer Information Helpline 0800 CANCER (226 237)

1. Remove harmful tobacco, food, and alcohol products from the scope of the review

We strongly recommend that the following product categories be excluded from the consultation survey and the scope of the review:

- Cigarettes, tobacco, and products containing nicotine
- Food and beverages
- Wine and other alcohol products

Tobacco products

Inviting the tobacco industry to participate in the current online survey is in direct contradiction to New Zealand's obligations under Article 5.3 of the WHO Framework Convention on Tobacco Control (FCTC), to which we are a Party and legally bound.

New Zealand adopted the implementation guidelines for Article 5.3 in 2008, which clearly state that interaction with the tobacco industry should occur only when strictly necessary for regulation, and that protections against interference should extend to individuals and organisations that further the interests of the tobacco industry. In light of these obligations, we recommend that tobacco and nicotine products be excluded from the scope of the review.

Food and alcohol products

Food Standards Australia New Zealand (FSANZ) has regulated food and alcohol labelling for over 25 years through the bi-national Food Standards Code. This system ensures that consumers receive vital information such as use-by dates, ingredients and allergens, storage and preparation instructions, and advisory and warning statements. These standards are enforced by the Ministry for Primary Industries (MPI) in New Zealand and by state and territory governments in Australia.

Reviewing food and alcohol labelling outside of this established system risks undermining public health protections and New Zealand's reputation for safe food. We therefore recommend that food and alcohol products also be excluded from the scope of the review.

2. Ensure the review reflects the purpose of labelling and includes diverse voices

Product labelling is important to all New Zealanders. Everyone has the right to make informed decisions about the products they consume and should have the opportunity to contribute to government policy that affects them.

Based on the information currently available on the Ministry for Regulation website, the review appears to primarily engage with business and industry groups and to prioritise business interests, such as reducing compliance costs. There is little evidence that the review considers a core purpose of product labelling—to inform and protect consumers. This approach risks overlooking critical health, safety, and consumer protection considerations.

The Cancer Society of New Zealand

Level 13, Ranchod Tower, 39 The Terrace, Wellington 6011 | PO Box 651, Wellington 6140

04 494 7270 | Cancer Information Helpline 0800 CANCER (226 237)

We recommend that the Terms of Reference for the Product Labelling Regulatory Review, currently in development, clearly outline how the review will incorporate the views of consumers, regulators, clinicians, public health experts, iwi, advocacy groups, and other relevant stakeholders.

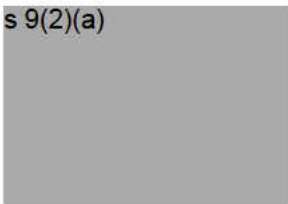
3. Request for a meeting

The Cancer Society of New Zealand would welcome the opportunity to meet with you to discuss our concerns in more detail and to contribute to the early phases of this important review.

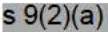

We appreciate the opportunity to raise these issues and look forward to your response.

Yours sincerely

s 9(2)(a)



s 9(2)(a)

Cancer Society of New Zealand

The Cancer Society of New Zealand
Level 13, Ranchod Tower, 39 The Terrace, Wellington 6011 | PO Box 651, Wellington 6140
04 494 7270 | Cancer Information Helpline 0800 CANCER (226 237)