

Submission on: Safer Online Services and Media Platforms

To: The Department of Internal Affairs

31 July 2023

Introduction

This submission is by the Cancer Society of New Zealand. We are a registered charity with a mission to reduce the incidence and impact of cancer in New Zealand.

Thank you for the opportunity to provide feedback on these proposals to regulate online services and media platforms in New Zealand.

If you have any questions on our submission, please contact:

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We wish to make the following comments

Harmful commodities like tobacco, alcohol and unhealthy food cause cancer in Aotearoa and increase inequities for Māori

Harmful commodities such as tobacco, alcohol and unhealthy foods are significant causes of cancer in Aotearoa¹. Research demonstrates that exposure to the marketing of harmful commodities in the online environment impacts on purchase and consumption behaviours, especially for young people². Furthermore, Māori experience higher rates of harm, including cancer, from these harmful commodities^{1,3}

The definition of unsafe and harmful content should be wider

We think the definition of unsafe and harmful content should be wider to encapsulate the full range of online activities that impact on the wellbeing of New Zealanders. We think that the digital marketing of harmful commodities like tobacco, vaping, alcohol and unhealthy foods should be included in the scope of the overarching regulatory system.

All 'paid for' online marketing of harmful commodities should be banned

The most effective approach would be to ban all 'paid for' online marketing of harmful commodities (tobacco, vaping, alcohol, and unhealthy food). Marketing of tobacco and vaping products is already illegal under New Zealand law, yet this still occurs online. Similarly, marketing alcohol products to underage users is also illegal, but underage users are exposed to this on social media platforms. Therefore, the extension of the liability for regulated platforms to ensure illegal content is not posted online is necessary. Programmatic marketing means that there is no way to guarantee who is the end user of marketing content on platforms, and age gating and similar techniques are not fit for purpose in the online space. Therefore, a full online ban is required to ensure that the insidious marketing techniques and sheer volume of harmful commodity marketing is removed.

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¹ Te Aho o Te Kahu. 2022. Pūrongo Ārai Mate Pukupuku, Cancer Prevention Report. Wellington: Te Aho o Te Kahu, Cancer Control Agency

² Buchanan L, Kelly B, Yeatman H, Kariippanon K. The Effects of Digital Marketing of Unhealthy Commodities on Young People: A Systematic Review. *Nutrients* [Internet]. 2018;10(2). Available from: <https://pubmed.ncbi.nlm.nih.gov/29382140/>

³ Te Aho o Te Kahu. 2021. He Pūrongo Mate Pukupuku o Aotearoa 2020, The State of Cancer in New Zealand 2020. Wellington: Te Aho o Te Kahu, Cancer Control Agency.