

Online alcohol sales and delivery:

before and after implementation of Auckland's Local Alcohol Policy



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Glossary of terms

Term (abbreviation)	Definition
City Centre	Defined in Auckland Council's Local Alcohol Policy as the area between State Highways 1 and 16, the City Centre has special restrictions on the number and density of alcohol outlets
Local Alcohol Policy (LAP)	A set of decisions made by a local or regional council in consultation with its community about the sale and supply of alcohol in its area, including the number and location of licences, conditions on licences, and trading hours
On-demand delivery	Delivery within two hours of ordering
'Priority overlay' suburb	Auckland Council's Local Alcohol Policy defines a 'priority overlay' of 23 suburbs with special restrictions on the number and density of alcohol outlets
Same-day delivery	Delivery beyond two hours but within the same calendar day of ordering

Executive summary

Background

Under Auckland's new Local Alcohol Policy (LAP), off-licences or retailers selling takeaway alcohol must close by 9pm instead of the national default trading hour of 11pm. The LAP also places a two-year freeze on new offlicences in areas with the most alcohol-related harm, including the City Centre and 23 other 'priority overlay' suburbs. The impacts of the LAP on the availability of alcohol online had not been evaluated before. There is currently limited regulation of on-demand alcohol sales and deliveries in New Zealand. Evidence shows online alcohol sales may be contributing to increased levels of alcohol harm, and this method of purchasing alcohol has grown rapidly since COVID-19.

Methods

We assessed the adherence of on-demand alcohol delivery services (that delivered alcohol within two hours of ordering) to the new permitted trading hours in Auckland, at 9pm and 10pm before and after the LAP came into full effect in December 2024. We compared availability within the City Centre and 'priority overlay' suburbs against other areas of the city. We also documented the availability of same-day deliveries (that delivered beyond two hours but on the same day of ordering) through other online retailers. Finally, we described the range of marketing methods used by on-demand alcohol delivery services and compared their pricing of common alcohol products.

Findings

- Adherence by on-demand delivery services to the LAP's closing time of 9pm appeared to be high. Before the LAP was implemented, there was high availability of these services across Auckland at 9pm, offering delivery times as short as 10 minutes and no delivery fees.
- On-demand alcohol availability may be greater in the City Centre and 'priority overlay' suburbs.
- Price promotions and targeted marketing were commonly used by on-demand delivery services, including 'buy now, pay later' schemes. Other online retailers, including supermarkets, also offered same-day delivery and pick up.
- · While on-demand services may offer higher prices for beer and wine compared to supermarkets, these price differences were offset by lower delivery fees and shorter delivery times.

Implications

Our findings show that in Auckland online alcohol sales and delivery appeared largely adherent to the LAP's trading hour restrictions.

However, we identified high availability of on-demand delivery in residential neighbourhoods, particularly in areas with the most alcohol harm. This may worsen existing inequities and lessen the impact of the LAP's controls on new off-licences in these areas. We also found evidence of concerning marketing methods that could increase the risk of alcohol harm. These findings demonstrate inconsistencies and gaps in current alcohol law, which was developed before on-demand sales and delivery came into existence.

Background

There has been a rapid growth in online alcohol sales since the start of the COVID-19 pandemic, changing the way alcohol can be accessed outside licensed premises.^{1,2} This trend may be driven by consumer preferences for convenient delivery options, alongside emerging digital platforms and payment methods.³

Evidence shows online alcohol purchasing may be increasing harm. A New Zealand (Aotearoa) study showed that those who purchased alcohol online for delivery were more likely to report heavier drinking.⁴ An Australian study also found that hazardous drinkers were more likely to purchase alcohol online, extend a current drinking session by ordering online, and report receiving alcohol deliveries while intoxicated.⁵ As 33% of heavy drinking occasions occur at home in New Zealand,⁶ alcohol deliveries may be exacerbating harm in domestic settings, including family violence.⁷

Much of New Zealand is now serviced by on-demand services that deliver alcohol within two hours of ordering, which may compound alcohol-related harm.^{2,8} In Auckland (Tāmaki Makaurau), New Zealand's largest city, these services had an average delivery time of 29.5 minutes, providing rapid access to alcohol.⁹ About half of online alcohol deliveries were left unattended and 73% did not request age verification upon delivery, potentially facilitating supply to intoxicated persons and minors.⁹

Similarly, a survey in Australia showed that 28% of on-demand users had been drunk or intoxicated when receiving their orders, and 33% did not have their ID checked upon delivery. Several Australian states have since introduced regulatory measures for online alcohol delivery, such as banning unattended deliveries, forbidding deliveries to intoxicated people, and requiring ID checks. However, while it is an offence under New Zealand law to sell or supply alcohol to anyone under 18 years of age, delivery drivers are not required to undergo training in responsible service of alcohol or age verification upon delivery. 1,9

Alcohol regulatory controls in New Zealand were developed before the growth of online sales and delivery. This has created some gaps and inconsistencies in regulation with regards to the expanding digital environment for alcohol retail.¹² Although the Sale and Supply of Alcohol Act 2012 (the 'Act') requires retailers to have a licence to sell alcohol,¹³ delivery is often contracted out to a third party.² Some on-demand delivery platforms, such as Uber Eats and DoorDash, do not have alcohol licences, serving only as intermediaries or delivery agents for off-licences such as bottle stores.²

The Act allows alcohol to be delivered from 6am to 11pm, potentially allowing customers access to takeaway alcohol outside the national maximum trading hours (7am to 11pm for off-licences). On the other hand, the Act does not clearly state whether pick up of online orders ('click and collect') is permitted outside these trading hours. In addition, online alcohol retailers can bypass the monopoly rights given to licensing trusts, which are community-led initiatives to control alcohol sales in their district.¹⁴

Marketing methods to encourage alcohol purchases, including price promotions, targeted advertisements, and 'buy now, pay later' (BNPL) schemes such as Afterpay and Zip, have been documented in Australia.¹⁵⁻¹⁷ A New Zealand study found that none of the 23 on-demand delivery services for alcohol offered BNPL in 2021, but did not examine other forms of marketing.⁸

Online alcohol sales may also be increasing the availability of alcohol at night, particularly from 8pm to 10pm when most night-time alcohol purchases from off-licence premises are made.¹⁸ This may undermine the effectiveness of current restrictions on late-night alcohol sales, introduced by the Act in 2012, which have reduced the incidence of assaults and violence. 19,20 Under the new Local Alcohol Policy (LAP) in Auckland, off-licences are now required to close by 9pm instead of 11pm.²¹ However, under the Act, alcohol can still be delivered until 11pm if purchased by remote sale. Auckland Council's LAP also places a 'temporary freeze' on new off-licences in the City Centre and a 'priority overlay' of 23 suburbs.²² These areas were prioritised for their high levels of alcohol-related harm and existing alcohol licences.²²

This report examines the impacts of Auckland's LAP on the availability of online alcohol, which had not been done before.



Objectives

The objectives of this report were to:

- 1) Assess the night-time availability of online alcohol sales in Auckland, focusing on services offering on-demand delivery and pick up services (within two hours of ordering).
- 2) Determine any changes in this availability following the earlier closing time for off-licences introduced by the LAP on 9 December 2024.
- 3) Compare availability in the City Centre and 'priority overlay' suburbs with other areas of Auckland.
- 4) Describe the same-day availability of alcohol (delivered or collected beyond two hours but within the same calendar day of ordering) via other online retailers in Auckland.
- 5) Compare the marketing and pricing of alcohol across various platforms for online sales and delivery.

Methods

Data collection

IDENTIFYING ONLINE ALCOHOL DELIVERY SERVICES AND RETAILERS

We included on-demand delivery services that: 1) offered delivery and/or pick up within two hours of ordering; 2) allowed purchases consisting of alcoholic beverages only; and 3) operated within the Auckland region. Seven services that met the above criteria were identified from previous studies^{2,9} and a search of the online Apple App Store. By November 2024 when data collection was commenced, two services were no longer in operation, leaving five services for this project. Three of these services were intermediary platforms for alcohol retailers, one was an online retailer that only serviced Auckland Central, and one was a hybrid of both (which held an offlicence while serving as an intermediary for other retailers) (Appendix Table 1).

We also included online alcohol retailers that: 1) offered delivery and/or pick up within the same day of ordering; 2) allowed purchases consisting of alcoholic beverages only; and 3) operated within the Auckland region. We used a list of current alcohol licences held by the Alcohol Regulatory and Licensing Authority²³ (as of August 2024) to identify remote sellers of alcohol and supermarkets with off-licences and cross-checked against the National Public Health Service (Northern Region) Liquor Licensing Database on Microsoft Access. By November 2024, a total of seven retailers that met the above criteria were included.

SAMPLING OF ADDRESSES

We first obtained a random sample of 150 physical addresses in Auckland from the dataset available on the Land Information New Zealand website.²⁴ We then sampled from this list to ensure that our final sample included: 1) locations within and outside the City Centre and 'priority overlay' suburbs; 2) all 13 Auckland Council wards; 3) addresses that were likely to be residential, as determined using 'street view' on Google Maps. Our final sample included 37 address points for our analysis of on-demand delivery services (Appendix Table 2). Because supermarkets and online retailers delivered to multiple suburbs, we used a random sample of 13 out of the 37 addresses to assess the availability of same-day delivery and pick up ('click and collect') among these services.

Data analysis

AVAILABILITY OF ONLINE DELIVERY AND PICK UP

We assessed the availability of alcohol at each address via on-demand delivery services at two time points: 1) November 2024 (prior to the LAP's new trading hour restrictions); and 2) late January to early February 2025 (post-LAP implementation). Data collection was carried out at around 9pm and 10pm, Wednesday to Friday (Appendix Table 1). We accessed each on-demand delivery service using the relevant app or website, entered each address in our sample, and searched for 'alcohol' or selected the 'alcohol' category of products. We placed alcohol products within the shopping cart to collect relevant data, but did not complete the purchases.

The following information for each on-demand delivery service was recorded using Microsoft Excel: 1) the number of alcohol retailers that delivered to each address; 2) the fastest advertised delivery time to each address; 3) the minimum advertised delivery fee across retailers; 4) the maximum advertised delivery fee across retailers; 5) whether pick up of alcohol was available; and 6) the fastest advertised time to pick up. Where only 'less than' estimates were advertised for delivery time, the highest of the range was recorded, i.e. 'less than 60 minutes' was recorded as 60 minutes. The initial round of data collection was completed by two team members independently, and no discrepancies were identified. We then summarised these measures using the median and range where applicable. Based on the service with the highest alcohol availability (DoorDash), we used the Mann-Whitney U test to compare the median number of alcohol retailers servicing a single address in the City Centre and 'priority overlay' suburbs with other parts of Auckland, at both 9pm and 10pm before the LAP's implementation. P values < 0.05 indicate a statistically significant difference in this measure of alcohol availability between these areas and other areas. All analyses were checked by another team member for accuracy.

Because none of the online retailers that offered same-day delivery and/or pick up appeared to deliver after 9pm prior to the LAP's implementation, we only examined them at a single time point after the LAP's implementation to reflect current alcohol availability. We recorded the addresses with access to same-day delivery and pick up, and the following information as advertised on the retailers' websites: 1) the latest delivery time; 2) the minimum delivery fee; 3) the maximum delivery fee; and 4) the latest pick up time. We also summarised these measures using the median and range where applicable.

PRICING AND MARKETING OF ONLINE DELIVERY SERVICES

We also documented the range of marketing used by each of the above on-demand delivery services after registering as a new customer. We included any promotions and advertisements seen on the website or app, as well as through email and text messages. Notable examples are presented in this report. We then compared the pricing of common alcohol products, including beer, wine and ready-to-drink/pre-mixed products (RTDs), available on these platforms against supermarkets and grocery stores that offered same-day delivery and/or pick up. Data was collected over May 2025 based on an address in Newmarket, Auckland Central.

Results

Availability of on-demand alcohol before and after the LAP's implementation

The availability of on-demand alcohol before and after the earlier closing time for off-licences came into effect in Auckland, is summarised in Tables 1 to 5.

Prior to the LAP's implementation, alcohol availability was high across most on-demand delivery services at 9pm (Tables 1 and 2). Uber Eats offered the shortest median delivery time of 10 minutes (Table 1). DoorDash had the highest number of alcohol retailers (median of 8, range of 0 to 24) servicing a single address point, no delivery fees, and the largest number of addresses (28 out of 37) with access to same-day pick up. There was a notable reduction in alcohol availability by 10pm, with two services having closed and fewer services offering same-day pick up (Table 2). However, there were no substantial differences in delivery fees between 9pm and 10pm for each service. Table 3 shows that on DoorDash, the median number of alcohol retailers delivering to a single address was higher in the City Centre and 'priority overlay' suburbs combined, compared to addresses outside these areas at 9pm (15 versus 3 retailers, P = 0.03). There was less of a difference by 10pm (6 versus 1 retailer, P = 0.10) as many retailers had closed. The City Centre and 'priority overlay' suburbs also had greater access to same-day pick up of alcohol at both 9pm (100% versus 61% of addresses) and 10pm (86% versus 52% of addresses). Delivery times and fees were similar between these areas and other areas.

Following the LAP's implementation, only one on-demand delivery service (Delivereasy) appeared to be selling alcohol products at 9pm (Table 4). By 10pm all services were closed or no longer offering alcohol products for delivery or same-day pick up (Tables 4 and 5). The alcohol retailers that appeared to be trading at 9pm were two off-licences in Henderson and Papakura, respectively. We referred these retailers to Auckland Council's Licensing Inspectorate for further action. Upon the Licensing Inspector's enquiries, the relevant licensees claimed that their trading hours on Delivereasy were erroneous and that their premises were closed by that hour. Subsequent site visits by National Public Health Service Compliance Officers confirmed that the two offlicences were closed by 9pm.

Alcohol availability via other online retailers

Alcohol availability via other online retailers after the LAP's implementation is summarised in Tables 6 and 7. Of the seven retailers, six offered same-day delivery and five offered same-day pick up of alcohol orders. None of these retailers offered delivery or pick up after 9pm. The latest delivery time for orders ranged from 8pm to 9pm, and the latest time to collect orders ranged from 5.30pm to 9pm. Delivery fees varied widely across the retailers, depending on the address, the value of the order and the availability of 'express' deliveries. Across all retailers that offered delivery, the median delivery fee was a minimum of \$14.00 and maximum of \$19.00.

Alcohol marketing and pricing across the on-demand delivery services

Most forms of marketing across the five on-demand delivery services were price promotions. Notable examples of price promotions included discounts on specific products (Image 1), temporary discount codes (Image 2), a 'spin the wheel' game to win discounts, free delivery and loyalty points (Image 3), as well as text messages promoting account credits, giveaways upon referrals, a 'slot machine' game to win rewards, and the BNPL service Afterpay (Image 4). Most of these were promoted by Gimme Beverage Delivery, whose website also offered an interactive chatbot ('Al Concierge') to assist customers in purchasing alcohol (Image 5). Concerningly, this chatbot offered alcohol product recommendations when we responded, 'but I'm drunk'. As of July 2025, the 'AI Concierge' was no longer available on the website.

The five on-demand delivery services appeared to have higher advertised prices for two common beer and wine products, compared to the supermarkets and grocery stores (Appendix Table 3). The supermarkets offered substantially lower prices for these products, although these differences may be offset by higher delivery fees for orders of smaller values. Among the on-demand delivery services, Delivereasy and Drinks Mate had the lowest advertised and total prices across the three beer, wine and RTD products.

TABLE 1. ALCOHOL AVAILABILITY VIA ON-DEMAND DELIVERY SERVICES AT 9PM AND 10PM, BEFORE IMPLEMENTATION OF AUCKLAND'S LAP

On-demand delivery service	alcohol that deli		Deliver (min			n delivery e (\$)	Maximun fee		address	ay pick		pick up ninutes)
	9pm	10pm	9pm	10pm	9pm	10pm	9pm	10pm	9pm	10pm	9pm	10pm
	Median (Range)	Median (Range)	Median (Range)	Median (Range)	Median (Range)	Median (Range)	Median (Range)	Median (Range)	Median	Median	Median (Range)	Median (Range)
DoorDash	8 (0-24)	5 (0-9)	18 (12-31)	17 (12-31)	0.00 (0-0)	0.00 (0-0)	0.00 (0-0)	0.00 (0-0)	28	24	10 (7-26)	9 (7-10)
Uber Eats ^a	2 (0-5)	1 (0-4)	10 (10-15)	10 (10-20)	2.49 (0.99-7.99)	2.99 (0.99-13.99)	5.99 (2.99-13.99)	5.99 (0.99-13.99)	26	23	10 (10-15)	10 (10-20)
Drinks Mate	0 (0-1)	1 (0-1)	60 (60-60)	60 (60-60)	9.99 (9.99-9.99)	9.99 (9.99-9.99)	9.99 (9.99-9.99)	9.99 (9.99-9.99)	NA	NA	NA	NA
Gimme Beverage Delivery	1 (0-1)	0	120 (120-120)	NA	4.99 (4.99-4.99)	NA	4.99 (4.99-4.99)	NA	NA	NA	NA	NA
Delivereasy	0 (0-2)	0	20 (20-35)	NA	7.99 (6.99-8.99)	NA	8.99 (6.99-8.99)	NA	17	NA	10 (5-30)	NA

Abbreviation: NA, not applicable.

TABLE 2. SUMMARY OF ON-DEMAND ALCOHOL DELIVERY SERVICES, BEFORE IMPLEMENTATION OF AUCKLAND'S LAP

Time	Number of on-demand delivery services operating	Median number (range) of alcohol retailers that delivered to address points across all services	Number of services with same-day pick up of alcohol
9pm	5	1 (0-24)	3
10pm	3	0 (0-9)	2

^a Uber Eats offers a paid monthly subscription with benefits such as \$0 delivery fees and reduced service fees on eligible orders, including alcohol.

TABLE 3. COMPARISON OF ALCOHOL AVAILABILITY ON DOORDASH IN THE CITY CENTRE AND 'PRIORITY OVERLAY' SUBURBS AND OTHER AREAS, BEFORE IMPLEMENTATION OF AUCKLAND'S LAP

Area	alcohol that deli	per of retailers vered to s points		ry time utes)	Deliver	y fee (\$)	Numl address same-da			pick up mins)
	9pm	10pm	9pm	10pm	9pm	10pm	9pm	10pm	9pm	10pm
	Median	Median	Median	Median	Median	Median	Median	Median	Median	Median
	(Range)	(Range)	(Range)	(Range)	(Range)	(Range)	(%)	(%)	(Range)	(Range)
City Centre and Priority	15	6	18	17	0	0	14	12	9	9
Overlay suburbs (14 addresses)	(1-19)	(0-7)	(12-31)	(12-31)	(0-0)	(0-0)	(100%)	(86%)	(7-26)	(7-10)
All other areas (23 addresses)	3	1	18	18	0	0	14	12	9	10
	(0-24)	(0 - 9)	(13-30)	(14-21)	(0-0)	(0-0)	(61%)	(52%)	(9-10)	(9-10)

TABLE 4. ALCOHOL AVAILABILITY VIA ON-DEMAND DELIVERY SERVICES AT 9PM AND 10PM, AFTER **IMPLEMENTATION OF AUCKLAND'S LAP**

On-demand delivery service	Number alcohol r that deli address	etailers vered to	Delivery (minutes		Minimum fee (\$)	delivery	Maximum fee (\$)	delivery	Number addresse same-da up	s with	Order pi	
	9pm	10pm	9pm	10pm	9pm	10pm	9pm	10pm	9pm	10pm	9pm	10pm
	Median (Range)	Median (Range)	Median (Range)	Median (Range)	Median (Range)	Median (Range)	Median (Range)	Median (Range)	Median	Median	Median	Median
DoorDash	0 (0 - 0)	0 (0 - 0)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Uber Eats	0 (0 - 0)	0 (0 - 0)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Drinks Mate	0 (0 – 0)	0 (0 – 0)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Gimme Beverage Delivery	0 (0 – 0)	0 (0 – 0)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Delivereasy	0 (0 - 1)	0 (0 – 0)	25 (20 – 35)	NA	7.99 (6.99-9.99)	NA	7.99 (6.99-9.99)	NA	8	NA	13	NA

Abbreviation: NA, not applicable.

TABLE 5. SUMMARY OF ON-DEMAND ALCOHOL DELIVERY SERVICES, AFTER IMPLEMENTATION OF **AUCKLAND'S LAP**

Time	Number of on-demand delivery services operating	Median number (range) of alcohol retailers that delivered to address points across all services	Number of services with same-day pick up of alcohol
9pm	1	0 (0-1)	1
10pm	0	0 (0-0)	0

TABLE 6. ALCOHOL AVAILABILITY AT 13 ADDRESS POINTS VIA OTHER ONLINE RETAILERS, AFTER IMPLEMENTATION OF AUCKLAND'S LAP

Retailer	Address points with same-day delivery	Latest delivery time	Minimum delivery fee (\$)	Maximum delivery fee (\$)	Address points with same-day pick up	Latest collection time
	Number (%)	Time	Median (Range)	Median (Range)	Number (%)	Time
Woolworthsa	13 (100%)	8:30pm	9.00 (9.00 – 14.00)	19.00 (19.00 – 19.00)	11 (85%)	9pm
New World ^b	12 (92%)	8pm	9.00 (9.00 – 9.00)	14.00 (14.00 – 14.00)	12 (92%)	8pm
PAK'nSAVE	0 (0%)	NA	NA	NA	10 (77%)	8pm
Farro	9 (69%)	9pm	15.00 (15.00 – 15.00)	15.00 (15.00 – 15.00)	13 (100%)	6pm
Paddock to Pantry ^c	12 (92%)	9pm	12.00 (11.95 – 172.02)	57.12 (20.24 - 172.02)	0 (0%)	NA
Everyday Wine	9 (64%)	9pm	14.99 (14.99 – 14.99)	29.99 (29.99 – 29.99)	13 (100%)	5:30pm
Vine Online	10 (76%)	NA	40.00 (40.00 – 40.00)	40.00 (40.00 – 40.00)	0 (0%)	NA

Notes:

- a Delivery fee was \$19 for express delivery, \$14 for orders under \$200, and \$9 for orders \$200 and over. A minimum spend of \$50 is also required for delivery.
- b Delivery fee was \$14 for orders under \$200, and \$9 for orders \$200 and over. Collection fee was \$5 for orders under \$50.
- c Additional fees apply for express delivery, which vary by address.

TABLE 7. SUMMARY OF ALCOHOL AVAILABILITY ACROSS ALL OTHER ONLINE RETAILERS, AFTER IMPLEMENTATION OF AUCKLAND'S LAP

Latest delivery time	Retailers delivering after 9pm	Minimum delivery fee (\$)	Maximum delivery fee (\$)	Retailers offering same-day pick up	Latest collection time	Retailers offering pick up after 9pm
Range	Number	Median (Range)	Median (Range)	Number	Range	Number
8pm - 9pm	0	14.00 (9.00 – 172.02)	19.00 (14.00 – 172.02)	5	4pm – 9pm	0

EXAMPLES OF MARKETING ACROSS THE FIVE ON-DEMAND DELIVERY SERVICES

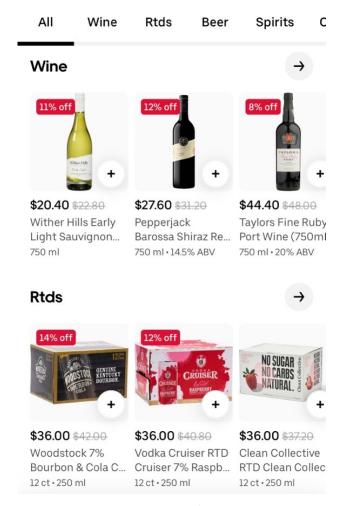


Image 1. Price discounts on specific products



Image 3. 'Spin the wheel' game for price discounts, free delivery and loyalty points



Image 2. Temporary discount code

EXAMPLES OF MARKETING ACROSS THE FIVE ON-DEMAND DELIVERY SERVICES (CONTINUED)

Kia ora, Patron! Welcome to GIMME. Choose from 6K+Spirits, wines & RTD's. \$20 credited in your wallet. Afterpay enabled. Cheers!

Yesterday 11:03 AM

Still craving drinks from GIMME? \$250 giveaway alert. To enter refer friends from your GIMME wallet here -https://onelink.to/gxuq3g. Highest referrer win!

Yesterday 3:11 PM

Hi Line ! Your baby Doll Pinot Noir are just a click away on GIMME - > http://onelink.to/qxuq3g. We 'll deliver it pronto. (use your GIMME points as discounts) Van @ GIMME

Hi Patron, Still craving drinks? Afterpay them on checkout. Get upto 24% price-off by winning on the Slot Machine! Tap here to play now https://shor.by/gimme

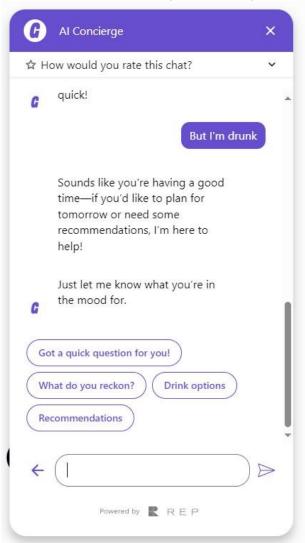


Image 5. Interactive chatbot to answer customer questions and recommend products

Image 4. Text messages promoting account credits, giveaways upon referrals, a 'slot machine' game, and a BNPL service

Discussion

Summary of findings

There was high adherence to the LAP's closing time of 9pm for off-licences, as we found no definitive evidence that any retailers were trading past this time. Before the earlier closing time for off-licences came into effect, there was high alcohol availability via on-demand delivery services at 9pm. These services provided coverage to most areas of Auckland, with advertised delivery times as short as 10 minutes and no or low delivery fees. Meanwhile, other online retailers, such as supermarkets, offered same-day delivery and pick up of alcohol. These findings show that online alcohol sales and delivery are increasing the accessibility to alcohol in residential neighbourhoods. That one of these services offered BNPL was particularly concerning, as it facilitates alcohol purchases for those who would otherwise be unable to afford them.

The above findings are consistent with two previous studies, showing similarly wide coverage and rapid access to on-demand alcohol in Auckland, Wellington and Christchurch.^{2,9} Our analysis of one of these services suggested that on-demand alcohol availability was higher in the City Centre and 'priority overlay' suburbs compared to elsewhere in Auckland. This is not surprising, given these areas had more off-licences that supply alcohol for delivery. The 'priority overlay' suburbs are concentrated in South and West Auckland, which have larger populations of Māori and Pacific peoples.²⁵ A previous study also showed that the number of outlets available on-demand was highest in the areas with the highest density of physical outlets.² The greater availability of ondemand alcohol in areas that already have higher levels of alcohol harm may be worsening existing inequities and reducing the impact of the LAP's controls on new off-licences in these areas.

Price promotions were commonly used by on-demand delivery services to market alcohol products. One service offered BNPL for alcohol and employed highly targeted marketing tactics, including gamification, to promote its products and recruit new customers. Its interactive chatbot, which is no longer available, appeared to be encouraging alcohol use. While on-demand delivery services may offer higher prices for alcohol products compared to supermarkets, these price differences were compensated by lower delivery fees, shorter delivery times, and a larger range of alcohol products, as supermarkets and grocery stores are currently only allowed to sell beer, wine and mead.

Limitations

This analysis examined the availability of online alcohol sales and delivery in New Zealand's largest city. To our knowledge, no other studies have evaluated the impact of earlier closing times for retailers on the availability of on-demand alcohol in New Zealand. However, several limitations should be considered when interpreting our findings:

- Although we assessed the availability of on-demand alcohol before and after the new trading hour restrictions
 came into effect, we were not able to capture longer-term changes in the availability of alcohol delivery
 services or online retailers. For instance, the retailer Vineonline has ceased operations as of July 2025. Our
 analysis of marketing and pricing on the above platforms was also only based on data collected in May 2025.
- While we attempted to include all on-demand delivery services and online retailers at the time of data collection, this sample may not have been exhaustive. Similarly, our sample of addresses did not cover all suburbs in Auckland.
- Through this desktop analysis, we did not assess whether retailers were physically open for trading at the time of data collection. Retailers that were no longer selling alcohol after 9pm could legally still be selling non-alcohol products.
- Our data collection was limited to weeknights, including Fridays. As such, we may have underestimated the availability of on-demand alcohol, which may be higher on weekends.
- We did not complete any online purchases and were thus unable to verify the actual time of delivery, or whether age or intoxication checks were done upon delivery or pick up. A recent study by Alcohol Healthwatch showed that around half of on-demand alcohol deliveries in Auckland were left unattended, increasing the risk of minors or intoxicated individuals illegally accessing alcohol.⁹

Implications

Although the online sales and delivery of alcohol in Auckland appeared largely adherent to the LAP's trading hour restrictions, our findings illustrate several inconsistencies and areas not covered in the current law, showing that more work is needed to close these gaps. Specifically:

- Most on-demand delivery services act only as intermediaries for alcohol retailers and do not hold alcohol licences themselves, as section 59 of the Act only requires 'remote sellers' (those selling alcohol over the Internet, mail order or telephone) to hold a licence.¹³ This means that while delivery services remain accountable to the Act's penal provisions on sales to minors, sales to intoxicated persons and irresponsible promotion of alcohol, they are not bound by conditions specified on individual alcohol licences. Alcohol licences may include a broad range of conditions that licensees must adhere to (section 117 of the Act); for example, restrictions on the types or price of alcohol sold, and bans on the provision of BNPL services. Requiring these services to hold alcohol licences would bring them into the existing regulatory regime. The World Health Organization (WHO) advises that regulations regarding minimum age, selling to intoxicated persons and days and hours of sale should be safeguarded for alcohol remote sales and delivery.²⁶
- Even though delivery services are prohibited from sale and supply to minors or intoxicated persons, this remains challenging to enforce. Currently, section 14 of the Sale and Supply of Alcohol Regulations 2013 outlines the reasonable steps that remote sellers must take to verify that buyers are not under 18 years of age. These include asking prospective buyers to tick an on-screen box declaring they are 18 years of age or over, once when they first enter the website, and again immediately before the sale of alcohol is completed.²⁷ While it is an offence to sell or supply alcohol to a minor or intoxicated person, the existing regulations could explicitly require age or intoxication checks upon delivery.
- · Although we found no retailers that were clearly trading after 9pm, the Act allows deliveries of alcohol until 11pm. This time aligns with the default closing time for off-licences nationally, but not with more stringent trading hour restrictions in LAPs that are intended to minimise alcohol harm at night. In addition, the Act does not clearly state whether pick up of online orders is permitted outside the trading hours. Resolving these discrepancies would improve clarity for alcohol retailers and delivery services.
- The Act has few restrictions on alcohol marketing, except regarding the 'irresponsible promotion of alcohol' under section 237. This section of the Act prohibits anything that is likely to encourage alcohol consumption 'to an excessive extent' and only covers several specific aspects of marketing, including price discounts of 25% or more, the promotion of free alcohol, offers to win a prize on alcohol purchases, and promotions with special appeal to minors.¹³ This means that marketing tactics designed to encourage alcohol purchases, such as giveaways or games that mimic gambling, may be excluded from regulation. The challenges of regulating digital alcohol marketing, which is highly personalised and ephemeral, have been extensively described elsewhere.²⁸ Given the fast-evolving nature of digital marketing, WHO recommends comprehensive restrictions on alcohol marketing that cover all forms of media and promotional channels, both existing and emerging.26

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Appendices

Appendix Table 1. Summary of on-demand delivery services

On-demand service	Type of service	Areas serviced within Auckland	Dates and times of data collection
DoorDash (App)	Intermediary	All	1. Wednesday, 13/11/2024 and Thursday 14/11/2024, 21:01 to 22:32
			2. Tuesday, 28/01/2025, 21:00 to 22:23
Uber Eats (App)	Intermediary	All	1. Wednesday, 13/11/2024 and Thursday, 14/11/2024, 21:01 to 22:32
			2. Tuesday, 28/1/2025, 21:00 to 22:23
Drinks Mate	Vendor	Auckland Central	1. Friday, 15/11/2024, 21:02 to 22:01
(Website)			2. Wednesday, 29/01/2025, 21:00 to 22:02
Gimme Beverage	Intermediary	All	1. Wednesday, 13/11/2024 and Thursday, 14/11/2024, 21:02 to 22:39
Delivery (App)			2. Thursday, 30/01/2025, 21:00 to 22:02
Delivereasy	Hybrid	All	1. Friday, 29/11/2024, 21:00 to 22:07
(App)			2. Friday, 31/01/2025 and Friday 07/02/2025, 21:25 to 22:18

Appendix Table 2. Addresses and suburbs of Auckland included in the analysis

ON-DEMAND DELIVERY SERVICES

Street	Suburb	Street	Suburb
Queen Street	Auckland Central	Scenic Drive	Waiatarua
Margaret Road	Papatoetoe	Scoria Crescent	Stonefields
Kutukutu Street	Takanini	Radcliffe Street	Glen Innes
Rockfield Road	Ellerslie	Nukumea Common	Orewa
Victoria Street	Onehunga	Karaka Street	Takapuna
Ferguson Street	Māngere East	Umbriel Lane	Avondale
Konini Road	Titirangi	Massey Road	Māngere
Armein Road	Panmure	Buisson Glade	West Harbour
Avonbrook Lane	Pukekohe	Havana Place	Glenfield
Druces Road	Wiri	Jessop Street	Wesley
Washington Avenue	Snells Beach	Landscape Road	Mount Eden
Wainui Road	Silverdale	Seneca Court	Golflands

Meiklejohn Way	Omaha	Link Crescent	Stanmore Bay
Kelvin Road	Papakura	Kelvin Road	Remuera
Cornwallis Road	Cornwallis	Hekerua Road	Oneroa (Waiheke Island)
Shelly Beach Road	Saint Marys Bay	Wharetana Crescent	New Lynn
Burundi Avenue	Clendon Park	Anzac Avenue	Auckland Central
Slowater Lane	Puhoi	Cook Street	Auckland Central
Namata Road	One Tree Hill		

SUPERMARKETS / REMOTE SELLERS

Street	Suburb	Street	Suburb		
Nukumea Common	Orewa	Karaka Street	Takapuna		
Jessop Street	Wesley	Scoria Crescent	Stonefields		
Avonbrook Lane	Pukekohe	Washington Avenue	Snells Beach		
Seneca Court	Golflands	Konini Road	Titirangi		
Margaret Road	Papatoetoe	Queen Street	Auckland Central		
Kutukutu Street	Takanini	Umbriel Lane	Avondale		
Rockfield Road	Ellerslie				

Appendix Table 3. Pricing of common alcohol products across on-demand delivery platforms and remote sellers

	DoorDash (Black Bull Liquor)	Uber Eats (Black Bull Liquor)	Delivereasy	Gimme Beverage Delivery	Drinks Mate	Woolworths	New World ^b	PAK'nSAVE ^c		
Beer (Corona Extra, 12-pack, 355ml cans)										
Advertised price (\$)	52.99	52.99	42.99	52.49	39.99	37.99	32.99	36.99		
Delivery fee (\$)	0	1.49	7.99	0	10	19	14	NA		
Service fee (\$)	2.65	5	0	3.99	0	NA	NA	NA		
Total price on delivery (\$)	55.64	59.48	50.98	56.48	49.99	56.99	46.99	NA		
Wine (Oyster Bay Rosé, 750ml bottle)										
Advertised price (\$)	31.99	31.99	22.99	32.99	24.99	17.99	19.99	18.49		
Delivery fee (\$)	0	1.49	7.99	0	10	19	14	NA		
Service fee (\$)	1.6	3.48	0	3.99	0	NA	NA	NA		
Total price on delivery (\$)	33.59	36.96	30.98	36.98	34.99	36.99	33.99	NA		
RTD (Pals Vodka Hawke's Bay, Lime and Soda 5%, 10-pack, 330ml cans)										
Advertised price (\$)	47.99	45.99	35.99	40.49	37.99	NA	NA	NA		
Delivery fee (\$)	0	1.49	7.99	4.99	9.99	NA	NA	NA		
Service fee (\$)	2	5	0	3.99	0	NA	NA	NA		
Total price on delivery (\$)	49.99	52.48	43.98	49.47	47.98	NA	NA	NA		

- a Delivery fee was \$19 for express delivery, \$14 for orders under \$200, and \$9 for orders \$200 and over. A minimum spend of \$50 was required for delivery.
- b Delivery fee was \$14 for orders under \$200, and \$9 for orders \$200 and over.
- c Did not offer deliveries.

Abbreviations: NA, not available; RTD, ready-to-drink products.

