



Proactive Release

Submissions on the Child and Youth Wellbeing Strategy

August 2019

The Department of the Prime Minister and Cabinet has released the following submission received during its public consultation on the child and youth wellbeing strategy.

Some of the information contained within this release is considered to not be appropriate to release and, if requested, would be withheld under the Official Information Act 1982 (the Act).

- Where this is the case, the information has been withheld, and the relevant section of the Act that would apply, has been identified.
- Where information has been withheld, no public interest has been identified that would outweigh the reasons for withholding it.

Key to redaction codes and their reference to sections of the Act:

- **9(2)a** – Section 9(2)(a): to protect the privacy of natural persons, including deceased people.

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Child and Youth Wellbeing Strategy – Submission Template

This document is intended for individuals or groups who wish to make a formal submission on the child and youth wellbeing strategy.

Please complete this template and email it to: childandyouthwellbeing@dpmc.govt.nz

A guide to making a submission is available on the DPMC website <https://dpmc.govt.nz/our-programmes/child-and-youth-wellbeing-strategy>

Submissions will close on **Wednesday 5 December**.

Please provide details for a contact person in case we have some follow up questions.

Contact Name:	9(2)□(a)
Email Address:	
Phone Number:	
Organisation Name:	
Organisation description: (tell us about your organisation – i.e. who do you represent? How many members do you have? Are you a local or national organisation?)	<p>I am writing this submission as an individual, but I bring a number of organizational perspectives to the submission. I am:</p> <p>9(2)□(a)</p>

Executive Summary:

(Please provide a short summary of the key points of your Submission - 200 words)

The Child Poverty Reduction Bill and the Child and Youth Wellbeing Strategy are excellent, progressive initiatives from the New Zealand Government. I fully support the principles and content of the Bill and the strategies.

I wish to make two points

- **Freedom from commercial exploitation:** The commercial determinants of health, wealth and wellbeing are not recognised with respect to alcohol, tobacco, unhealthy food, and gambling. There should be an explicit desired outcome that *Children, young people and their families and whanau are protected from commercial exploitation.*
- **Independent monitoring of government actions:** The indicators included in the Bill to report back to Parliament are all outcome indicators. This is excellent and necessary, but not sufficient. There needs to be independent monitoring of the policies and actions the Government needs to take to reduce child poverty and improve wellbeing

Submission Content

Thank you for the opportunity to provide a submission to this important Bill and strategy.

I strongly endorse the principles and desired outcomes in the strategy and the outcomes reporting to Parliament. I strongly support the submissions of the Child Poverty Action Group and the Paediatric Society of New Zealand. I will make only two specific points.

Freedom from commercial exploitation

My particular interest, and that of the Health Coalition Aotearoa ^{9(2)(a)} is the protection of children, young people and adults from the harm from tobacco, alcohol and unhealthy food which contribute about one third of the total health loss (premature death and disability) in New Zealand. We have the third highest prevalence of childhood obesity in the OECD, and the last decade of government inaction on this issue is a disgrace. The commercial drivers of high consumption of cigarettes, alcohol, and unhealthy food (and gambling) are major causes of childhood ill-health, violence, low quality of life, inequity and poverty. This is completely unrecognised in the Wellbeing strategy. The toxic environments created by the commercial forces behind these harmful products are the everyday wallpaper in children's lives – 'wallpaper' because it is hidden by its pervasiveness. The toxic environments that whanau face in their neighbourhoods full of junk food outlets, liquor stores, and pokie machines are just seen as normal. Even the professionals and service organisations at the hui on the Wellbeing strategy at Ko Awatea did not comment on this.

There needs to be an explicit desired outcome that *Children, young people and their families and whanau are protected from commercial exploitation.*

This would include:

- Regulations protecting children from junk food marketing

- Banning and buying out alcohol and junk food sponsorship of sports and events
- Restrictions on the density of junk food outlets and liquor outlets in communities
- Restricting access to unhealthy food in children's settings and restricting opening hours of liquor outlets
- Taxing unhealthy products like sugary drinks and alcohol
- Appropriate labelling of harmful products and including mandatory warning labels where appropriate
- Reducing the numbers of pokie machines and replacing the money gambling uses to support community activities with funding from higher alcohol taxes.

Independent monitoring of government actions

Government-collected outcome data, compiled by a government agency and reported back to government is important and necessary but not sufficient for accountability purposes. Not only is it Government marking its own homework, but the outcome indicators need to be complemented process indicators – ie the implementation of policies, the funding of programs and services, and actions to protect children and whanau from commercial exploitation. There are parallels with another complex, 'wicked' problem – obesity. New Zealand has quite good government outcome monitoring systems which have noted the rising childhood and adult obesity for years, but this has not translated into government being accountable for taking action to reverse these trends. Many WHO-recommended actions which might impinge on the profits of the companies selling unhealthy food have remained sitting in WHO reports – untranslated into action in this country.

The INFORMAS group is an international network of researchers and NGO who monitor and benchmark government progress on creating healthier food environments (www.informas.org). It provides independent, upstream, evidence-based, consensus-driven assessments of government policies and infrastructure support. A similar structure is needed if this Government wants its Wellbeing strategies continued across several future governments. There needs to be parallel reporting to Parliament every year – outcomes reporting by Statistics NZ and process reporting (policies and actions implemented) by an independent body. The Commissioner for Children (for example) could be charged with, and funded for, conducting a review of Government policies and actions towards meeting the outcomes – bringing in the expertise and engagement of community organisations, NGOs, academia and the public. Otherwise, there is no real accountability system, other than general elections. There are many forces contributing to child poverty, child wellbeing, and child health and governments can easily hide inaction behind the multiple other societal forces impinging on these outcomes.

Congratulations again to the Government for this bold, progressive, much-needed initiative. I am happy to be contacted regarding this submission and related discussions, and I would welcome an opportunity to present orally to this submission in person.

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Please note that your submission will become official information. This means that the Department of the Prime Minister and Cabinet may be required to release all or part of the information contained in your submission in response to a request under the Official Information Act 1982.

The Department of the Prime Minister and Cabinet may withhold all or parts of your submission if it is necessary to protect your privacy or if it has been supplied subject to an obligation of confidence.

Please tell us if you don't want all or specific parts of your submission released, and the reasons why. Your views will be taken into account in deciding whether to withhold or release any information requested under the Official Information Act and in deciding if, and how, to refer to your submission in any possible subsequent paper prepared by the Department.