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Draft Suicide Prevention Action Plan for 2025-2029 Submission from Health Coalition Aotearoa

Health Coalition Aotearoa

Health Coalition Aotearoa (HCA) is a collective organisation of public health NGOs, health professional associations, and academics with a shared goal of promoting equitable health outcomes in Aotearoa New Zealand. We advocate for healthier public policy in the areas of unhealthy food, tobacco and other nicotine products, and alcohol. Guided by Te Tiriti o Waitangi, HCA is committed to upholding its principles, embedding tikanga Māori and kaupapa Māori values into all aspects of our work. We have four expert advisory panels that provide guidance to our efforts, to ensure that our advice is both evidence-based and culturally responsive.

The narrow, individual focus of the current Suicide Prevention strategy and plans

The Government has developed a draft suicide prevention action plan for 2025-2029¹ and is now considering the submissions on this plan. This HCA submission recognises that a Suicide Prevention plan needs to have actions which target both the high-risk populations and the underlying societal determinants of the problem. Actions for high-risk populations are well covered in the draft plan but a determinants approach is virtually absent. Therefore, this HCA submission will focus on the missing societal determinants aspects, especially those related to the accentuating factors of harmful and addictive substances.

HCA considers suicide to be the tragic tip of the tip of the mental health iceberg. Much of the focus in this draft plan, as well as the previous one, has been on individuals already at risk of suicide and their whānau in pre- and post-suicide situations. For example, the Suicide Prevention Strategy 2019-2029 and the first Action Plan 2019-2024 contained only one reference to alcohol and none to addiction to smoking or vaping, or to ultraprocessed foods². The interventions have been primarily centred on individual and whānau-targeted programmes and services. There is a lack of policies or structural interventions addressing the primary prevention of mental health issues, particularly among rangatahi.

¹ Ministry of Health. (2019). Every Life Matters - He Tapu te Oranga o ia Tangata: Suicide Prevention Strategy 2019–2029 and Suicide Prevention Action Plan 2019–2024 for Aotearoa New Zealand. Wellington: Ministry of Health.

² Ministry of Health. (2019).

The “Wellbeing” component of the Action Plan 2019-2024 is vague and focuses mainly on education-based activities, while policy actions on addressing contributing factors such as alcohol, were absent.

The draft Action Plan for 2025-2029³ references the societal determinants of poor mental health and suicide more than the previous plan, however, the new draft plan does not include actions which are truly primary prevention.

The societal determinants of suicide and poor mental health

The underlying determinants contributing to the rise in people reporting high or very high psychological distress, along with related inequities, are societal, complex and layered^{4 5}. These need to be recognized within the new plan to emphasize that actions addressing the underlying determinants are essential contributions to suicide prevention. Even if the majority of the actions within the plan are not directed at improving these deeper underlying determinants, they still need to be acknowledged. The Pae Ora Act (2022) obliges health agencies to take a societal determinants view of health, so the draft plan needs to fulfil this statutory requirement.

- Structural determinants, such as socioeconomic policies and institutional racism and privilege, drive negative health outcomes and their related ethnic and economic inequities. These deep determinants need to be named and support given to policy actions to address them.
- Other societal determinants of suicide include poverty, family and sexual violence, unemployment, and inadequate housing and these must also be addressed.
- Policy actions to reduce the impact of harmful and addictive substances on mental health need to be specifically named in the Action Plan 2025-2029.

Harmful and addictive products

HCA’s particular focus is on the need to change the current policy settings which enable harmful and addictive products to further exacerbate mental health problems. Causality from any complex, adaptive system should be thought of as predominantly circular (ie driven by feedback loops) rather than simple linear relationships. This raises a critical question: **‘What are the policy-sensitive exacerbating cycles (ie positive feedback loops) driving up severe psychological distress in Aotearoa New Zealand?’**

The placement, promotion and pricing of legal but harmful and addictive products, such as alcohol, ultra-processed foods, tobacco, vapes, and gambling, are highly policy-sensitive and fuel vicious cycles in the lives of many people struggling with poor mental health. While commercial practices can be positive or negative for health, the practices employed for alcohol and other harmful and addictive products are

³ Ministry of Health. (2019). Every Life Matters - He Tapu te Oranga o ia Tangata: Suicide Prevention Strategy 2019–2029 and Suicide Prevention Action Plan 2019–2024 for Aotearoa New Zealand. Wellington: Ministry of Health.

⁴ Compton, M. T. and Shim, R. S. (2015) ‘The Social Determinants of Mental Health’, Focus. American Psychiatric Publishing (FOC), 13(4), pp. 419–425. doi: 10.1176/appi.focus.20150017.

⁵ Ministry of Health (2023). New Zealand Health Survey 2022/23. Topic: Mental Health, Psychological distress - high or very high

overwhelmingly negative for health, including mental health. They are characterised by pervasive predatory practices that exploit people’s vulnerabilities for profit - usually large profits⁶. The Suicide Prevention Action Plan 2025-2029 must acknowledge that these predatory behaviours of harm industries, through saturation of outlets in poorer neighbourhoods and targeted marketing, are powerful accelerants of poor mental health. The Action Points in the plan need to strongly signal the need for policy action on these products as a form of true primary prevention of suicide. Vague statements in the plan about improving wellbeing, without addressing these harmful accelerants, are meaningless and ultimately ineffective.

Alcohol

The links between alcohol, poor mental health, and suicide are well-evidenced^{7 8 9}. The 2018 Inquiry into Mental Health and Addictions recommended a strong regulatory approach to alcohol addressing availability, promotion and pricing, factors which not only promote consumption but make it harder to cut down or remain sober^{10 11}. However, these recommendations, along with those from the 2010 Law Commission review on Alcohol in our Lives: Curbing the Harm¹², the 2014 Ministerial Forum on Alcohol Advertising and Sponsorship¹³, and the 2014 Ministry of Justice report on alcohol pricing¹⁴, have been ignored by the governments of the day. In addition, the rapid expansion of alcohol product marketing online, employing increasingly sophisticated targeting techniques, has no regulatory oversight¹⁵.

In 2023, HCA identified key priority policies needed to reduce the harm from alcohol¹⁶:

⁶ Williams, D. M. (2024). Ultra-processed foods and the strategic manipulation of our evolved motivational tendencies. *Preventive Medicine Reports*, 102902. <https://doi.org/10.1016/j.pmedr.2024.102902>

⁷ Paterson, R., Durie, M., Disley, B., Rangihuna, D., Tiatia-Seath, J., & Tualamali’ I, J. (2018). *He Ara Oranga. Report of the Government Inquiry into Mental Health and Addiction*. Wellington: Ministry of Health.

⁸ Lange, S., Jiang, H., Stelemekas, M., Tran, A., Cherpitel, C., Giesbrecht, N., Gostautaitė Midttun, N., Jasilionis, D., Kaplan, M. S., Manthey, J., Xuan, Z., & Rehm, J. (2021). Evaluating the Impact of Alcohol Policy on Suicide Mortality: A Sex-Specific Time-Series Analysis for Lithuania. *Arch Suicide Res*, 1-14. <https://doi.org/10.1080/13811118.2021.1999873>

⁹ Boden, J., Hetrick, S., Bowden, N., Fortune, S., Marek, L., Theodore, R., Ruhe, T., Kokaua, J., & Hobbs, M. (2022). Empowering community control over alcohol availability as a suicide and self-harm prevention measure: Policy opportunity in Aotearoa New Zealand. *The Lancet Regional Health - Western Pacific*, 29. <https://doi.org/10.1016/j.lanwpc.2022.100631>

¹⁰ Paterson et al., (2018)

¹¹ Casswell S, Huckle T, Wall M, Parker K, Chaiyasong S, Parry CDH, Viet Cuong P, Gray-Phillip G, Piazza M. Policy-relevant behaviours predict heavier drinking and mediate the relationship with age, gender and education status: Analysis from the International Alcohol Control Study. *Drug and Alcohol Review* 2018;37:S86-S95.

¹² Law Commission Te Aka Matua o te Ture New Zealand. (2010) Law Commission Report no. 114 ALCOHOL IN OUR LIVES: CURBING THE HARM: A report on the review of the regulatory framework for the sale and supply of liquor

¹³ Ministry of Health. (2014). *Ministerial Forum on Alcohol Advertising and Sponsorship: Recommendations on alcohol advertising and sponsorship*. Wellington: Ministry of Health.

¹⁴ Ministry of Justice (2014). *The Effectiveness of Alcohol Pricing Policies Reducing harmful alcohol consumption and alcohol-related harm*. Wellington: Ministry of Justice.

¹⁵ Carah N, Brodmerkel S. Alcohol marketing in the era of digital media platforms. *Journal of Studies on Alcohol and Drugs* 2020, in press.

¹⁶ Ministry of Health. (2019). *Every Life Matters - He Tapu te Oranga o ia Tangata: Suicide Prevention Strategy 2019–2029 and Suicide Prevention Action Plan 2019–2024 for Aotearoa New Zealand*. Wellington: Ministry of Health.

1. Amend the Sale and Supply of Alcohol Act 2012 to embed Te Tiriti o Waitangi, remove the Local Alcohol Policy appeals process, strengthen community control in licensing, and regulate online alcohol sales and delivery
2. Increase alcohol taxes to reduce products affordability
3. Ban all alcohol promotion (marketing), including in digital and print media, billboards, front facing retail outlets, branding of sports and cultural events, educational initiatives and charitable works.

Now that the appeals process against local alcohol policies (LAPs) has been removed, these LAPs need to be scaled up and implemented in each local government area, and supported by shorter national maximum trading hours. The remaining priorities above are the most effective strategies for reducing the harm from alcohol, including breaking the vicious cycle between alcohol misuse and poor mental health. For this Suicide Prevention Plan 2025-2029 to take a determinants approach to health seriously (as specified in the Pae Ora Act 2022), these evidence-based recommendations on alcohol need to be included.

Ultra-processed foods

Ultra-processed foods (UPFs) is a more precise categorisation of the group of industrially produced packaged foods which have previously been labelled as processed, high in fat/sugar/salt, non-core, discretionary, or unhealthy. Although the link between dietary patterns high in UPFs and poor mental health is not widely appreciated, the existing and emerging evidence is compelling. It highlights the likely role of UPFs in worsening mental health, with higher UPF intake linked to higher risks of anxiety and common mental health disorders¹⁷. Changing dietary patterns towards healthier, whole food diets is one of the potentially powerful ways of improving the mental well-being of the entire population, thus reducing the incidence of mental health events like suicide.

A strong and consistent link exists between dietary patterns and mental health, particularly regarding the impact of certain dietary patterns on depression¹⁸. Diets characterised as “healthy”, which are rich in fruits, vegetables, whole grains, fish, and low-fat dairy have been shown to significantly reduce the risk of depression, while a “Western” diet- high in red and processed meats, refined grains, and sweets increases that risk^{19 20}. The Royal Australian and New Zealand College of Psychiatrists acknowledges that

¹⁷ Lane, M. M.; Lotfaliany, M.; Machado, P.; Jacka, F. N.; Mohebbi, M.; O’Neil, A.; Werneck, A. O.; Monteiro, C.; Loughman, A.; Rocks, T.; Travica, N.; Berk, M.; Opie, R. S.; Marx, W. (2023) Change in Ultra-Processed Food Consumption Moderates Clinical Trial Outcomes in Depression: A Secondary Analysis of the SMILES Randomised Controlled Trial. Preprints 2023, 2023081110. <https://doi.org/10.20944/preprints202308.1110.v1>

¹⁸ Li, Y., Lv, M. R., Wei, Y. J., Sun, L., Zhang, J. X., Zhang, H. G., & Li, B. (2017). Dietary patterns and depression risk: A meta-analysis. *Psychiatry research*, 253, 373–382. <https://doi.org/10.1016/j.psychres.2017.04.020>

¹⁹ Li et al. (2017)

²⁰ Bizzozero-Peroni, B., Martínez-Vizcaíno, V., Fernández-Rodríguez, R., Jiménez-López, E., Núñez de Arenas-Arroyo, S., Saz-Lara, A., Díaz-Goñi, V., & Mesas, A. E. (2024). The impact of the Mediterranean diet on alleviating depressive symptoms in adults: a

addressing lifestyle factors, particularly the promotion of a healthy diet is foundational in the maintenance of mood disorders, as outlined in their clinical practice guidelines²¹.

The inequitable distribution of food insecurity in the country significantly affects the hauora of Māori whānau²². Research indicates that food insecurity is strongly linked to psychological distress, and serves as a substantial barrier to accessing healthier foods²³.

HCA's priority policies for improving the healthiness of population diets are:

1. Develop and implement a package of fiscal levers by 2025 as part of a wider strategy to reduce the absolute and relative cost of healthy food
2. Expand Ka Ora, Ka Ako to reach at least 50% of school children by 2025 and introduce a duty on schools and kura to provide only healthy food and drinks
3. Legislate to protect children from exposure to all forms of unhealthy food marketing in the places they learn, live and play.

Tobacco smoking and vaping

Addictions to harmful products such as tobacco and vapes are also problematic for mental health. Dependency creates its own negative effects on physical, emotional, and economic wellbeing which can accelerate deteriorations in mental health. Higher cigarette consumption is associated with an increased risk of suicidal behaviour²⁴. Reducing smoking rates could therefore play another important role in lowering suicide rates and improving mental health overall^{25 26}. While research on vaping is still developing, recent studies suggest that people with mental health diagnoses who vape face increased

systematic review and meta-analysis of randomised controlled trials. *Nutrition reviews*, nuad176. Advance online publication. <https://doi.org/10.1093/nutrit/nuad176>

²¹ Malhi, G. S., Bell, E., Bassett, D., Boyce, P., Bryant, R., Hazell, P., Hopwood, M., Lyndon, B., Mulder, R., Porter, R., Singh, A. B., & Murray, G. (2021). The 2020 Royal Australian and New Zealand College of Psychiatrists clinical practice guidelines for mood disorders. *The Australian and New Zealand journal of psychiatry*, 55(1), 7–117. <https://doi.org/10.1177/0004867420979353>

²² Beavis, B. S., McKerchar, C., Maaka, J., & Mainvil, L. A. (2019). Exploration of Māori household experiences of food insecurity. *Nutrition & dietetics : the journal of the Dietitians Association of Australia*, 76(3), 344–352. <https://doi.org/10.1111/1747-0080.12477>

²³ Carter, K. N., Kruse, K., Blakely, T., & Collings, S. (2011). The association of food security with psychological distress in New Zealand and any gender differences. *Social science & medicine* (1982), 72(9), 1463–1471. <https://doi.org/10.1016/j.socscimed.2011.03.009>

²⁴ Miller, M., Borges, G., Orozco, R., Mukamal, K., Rimm, E. B., Benjet, C., & Medina-Mora, M. E. (2011). Exposure to alcohol, drugs and tobacco and the risk of subsequent suicidality: findings from the Mexican Adolescent Mental Health Survey. *Drug and alcohol dependence*, 113(2-3), 110–117. <https://doi.org/10.1016/j.drugalcdep.2010.07.016>

²⁵ Wilcox H. C. (2004). Epidemiological evidence on the link between drug use and suicidal behaviors among adolescents. *The Canadian child and adolescent psychiatry review = La revue canadienne de psychiatrie de l'enfant et de l'adolescent*, 13(2), 27–30.

²⁶ Evins, A. E., Korhonen, T., Kinnunen, T. H., & Kaprio, J. (2017). Prospective association between tobacco smoking and death by suicide: a competing risks hazard analysis in a large twin cohort with 35-year follow-up. *Psychological Medicine*, 47(12), 2143–2154. <https://doi.org/10.1017/S0033291717000587>

risks of mental health issues and substance use²⁷. Recent studies also link vaping among individuals with mental health diagnoses to greater odds of mental ill-health and further substance use²⁸.

Illicit drug use and mental illness often go hand in hand also, but commentary on this relationship is outside the scope of HCA.

Summary

Health Coalition Aotearoa is strongly urging the Ministry of Health to expand its individual-oriented 'rescue' actions in its draft Suicide Prevention plan 2025-2029 and to take a true prevention and determinants of health approach. The Plan must refer to the deeper determinants of poverty, housing, unemployment and so on, but it must also deal with the manifestly harmful accelerant cycles driven by harmful and addictive substances. As legislated for in the Pae Ora Act 2022, a determinants of health approach must be included in government actions on health and Suicide Prevention is a classic case where the links are clear, the policy recommendations are clear, and the Plan needs to be equally clear.

²⁷ Ministry of Health, (2019). "Suicide Facts: Data tables 1996–2016" (28 November 2019)

²⁸ Grant, J. E., Lust, K., Fridberg, D. J., King, A. C., & Chamberlain, S. R. (2019). E-cigarette use (vaping) is associated with illicit drug use, mental health problems, and impulsivity in university students. *Annals of clinical psychiatry : official journal of the American Academy of Clinical Psychiatrists*, 31(1), 27–35.