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Tēnā koe

The New Zealand Food and Grocery Council (**NZFGC**) has supported, in previous communications and submissions, the Commission's view that well-informed and confident consumers are a key part of competition. We were pleased to see the *Consumer Information Standards (Unit Pricing for Grocery Products) Regulations 2023 (the Regulations)* and now extend our support to the *Guideline on Unit Pricing Regulations (the Guideline)* for retailers.

The past practices of major grocery retailers' in unit pricing were inconsistent and patchy. For example, retailers were not using the same units of measurement and products sometimes did not show unit pricing. The inconsistency created a barrier to consumer comparisons of offerings which the Regulations have endeavored to address.

We are supportive of Guideline repeating the 10 categories for on-line sellers and the same categories together with the sq metre size of the retailer for unit pricing as is included in the Regulations. We also note the Regulations contain helpful explanations in a couple of areas that are replicated in the Guideline for completeness. This means the Guideline is a 'one stop shop' for Unit Pricing which are very supportive of.

In the Guideline, we note the tip for meat, fish, fruit and vegetables (that it includes fresh, frozen, canned, packaged or vacuum-packed products). We suggest another tip for bread could be helpful. This would make it clear that bread includes pre-cooked loaves and buns, leavened and unleavened breads (this distinction is made only for fortification of breads), artisan breads but not packaged bread crumbs or cakes or biscuits.

The units of measure for unit pricing in the Guideline is as is set out in the Regulations. However, we do not agree with the teabag example in the Guideline following paragraph 31 which reads:

"For example, an online grocery store sells tea bags by the number of bags in a box (box of 100 tea bags) or by weight (500 grams of tea bags). If tea bags are most commonly sold by the number of bags in a box, the seller should display the unit price for the tea per bag."

Tea is never sold by the bag and the Guideline is proposing a consumer has to multiply 1.5 gms by 500 to arrive at 'most commonly sold unit (a 20 or 100 or 500 package of tea bags). This is a barrier for the consumer. We think the more helpful approach is to price by 100 tea bags.

Finally, a note on the permission to voluntarily provide unit prices for products that do not have to carry unit pricing could avoid future enquiries about this.

Ngā mihi nui



Raewyn Bleakley
Chief Executive