

Submission on Draft of the Consumer Information Standards (Unit Pricing for Grocery Products) Regulations 2023.

Your name and organisation

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| Name | David Stevens |
| Organisation (if applicable) | n/a |

Responses

| Statistical Information | |
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| 1 | Do you consider 12 months to be an appropriate transitional period before compliance is mandatory? |
| | No. |
| 2 | Please explain why you think a 12-month transition period is sufficient or not? |
| | I think 6 months should be a sufficient transitional period. All retailers know that this is coming and should already be well-advanced in preparations for implementation. |
| 3 | Do you have any comments on the key definitions in regulation 3? |
| | No |
| 4 | Do you have any comments on regulation 5? |
| | Reg 5 (1) (b) (i) and 5(2) – my interpretation of the Consultation Paper para 14 is that a store could deliberately not sell one line of products mentioned (e.g. medicines, or fish for example) and thereby be exempt from the regulations for the rest of its products? This is |

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| | unlikely for our major supermarkets, but shouldn't the Unit Pricing apply to all the other product categories a store sells if it otherwise qualifies under the other provisions of 5(1)? |
| 5 | Do you have any comments on the "exempt products" set out in regulation 5(3)? Is there anything that you think is missing, or anything that you think should not be exempt? Please provide your reasoning. |
| | I don't think NZ needs to have an extensive list of exempt products as in Australia – the draft regulations in 5(3) should be sufficient. However, who is the arbitrator if a retailer argues that a product should be exempt? |
| 6 | Do you have any comments on the on the requirements for where unit pricing must be displayed, as set out in regulation 6? |
| | No |
| 7 | Do you have any comments on the advertising exemption set out in regulation 9? |
| | No |
| 8 | Do you have any comments on regulation 7? |
| | No |
| 9 | Do you have any comments on the display requirements provided in regulation 8? |
| | 8 (3) (b) I think the unit price font size should be bigger – at least 40% of the purchase price. In many supermarkets and other grocery stores, the pricing labels on shelves are not very big anyway, and a unit price at only 25% size could be difficult to read, especially on very low or high shelves. The boldness of the font of the unit price should also be the same as that of the purchase price, not in a fainter script. |
| 10 | Do you have any general comments regarding the regulations? |
| | I think they are a good step forward for consumers and should be brought in as soon as possible! |