

21 July 2025

Commerce Commission

Wellington

By email: [grocery.regulation@comcom.govt.nz](mailto:grocery.regulation@comcom.govt.nz)

## **SUBMISSION on Wholesale Supply Inquiry – Preliminary Findings Paper**

### **1. Introduction**

Thank you for the opportunity to make a submission on the Wholesale Supply Inquiry Preliminary Findings Paper (the Paper). This submission is from Consumer NZ, an independent, non-profit organisation dedicated to championing and empowering consumers in Aotearoa. Consumer NZ has a reputation for being fair, impartial and providing comprehensive consumer information and advice.

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### **2. Comments on the Paper**

We agree with the Commission's analysis that the wholesale access regime is not working to deliver benefits to consumers. Although we support changes to the regime, we consider there are strong and obvious financial incentives for the major supermarkets to ensure the regime fails. Therefore, we do not consider the parties can be relied on to make effective change by themselves and introducing voluntary requirements undermines the purpose of the regime.

We consider regulatory intervention is required to remedy current issues with the regime. However, even if this regulation is introduced, we think it is

unlikely to be sufficient to adequately increase competition in the sector and result in better outcomes for shoppers.

In our view, it is now clear that more substantial interventions are required.

Thank you for the opportunity to provide comment.

*ENDS*