

# **MARKET STUDY INTO THE RETAIL GROCERY SECTOR**

## **DRAFT REPORT BY THE COMMERCE COMMISSION**

### **SUBMISSION BY ERNIE NEWMAN**

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#### **1 WHY I AM MAKING THIS SUBMISSION**

I am a semi-retired consultant, based in Cambridge, with 58 years of continuous experience in the workforce.

Former colleagues and others have persuaded me to participate in this process because I have in-depth policy experience in two industries both of which have experienced major competition issues – grocery, and telecommunications. As changes in technology, commercial behaviour, government policy, and regulatory intervention have evolved in both sectors over several decades I have been an active participant and/or keen observer with a “view from both mountaintops.”

The Commission has done a remarkable job on the Market Study. By any standards it is a comprehensive, complete and compelling analysis, delivered in a challenging time frame. I urge the Commission to maintain the pace, and the government to take the necessary action at the appropriate time. New Zealander grocery consumers have already paid far too much for far too long.

This Submission does not attempt to canvass every issue but instead ranges across the points of comparison and my learnings from the telecommunications experience which may be relevant here.

#### **2 MY CREDENTIALS**

My experience in the grocery industry dates back to 1981-85 when I was Executive Director of the then NZ Grocery Manufacturers’ Association, precursor to the Food and Grocery Council of today. At that time membership comprised about 80 major suppliers to the supermarket sector including many multinationals. Key issues I was involved with leading included fending off pressure from wholesalers to dissuade manufacturers from dealing with individual stores, negotiating the introduction of the CER trade treaty with Australia, defending the industry from negative publicity during the Muldoon price freeze, and successfully campaigning to remove legal compulsion to use expensive rail freight in favour of cheaper trucking.

More recently in telecommunications, I served as CEO of TUANZ, the Telecommunications Users Association, 1999-2010. TUANZ then had over 400 member organisations. The overwhelming mission through those years was to lobby for and actively support the decade-long chain of actions

by Parliament and the Commerce Commission to successfully remove the dominance of Telecom in the fixed line market, and the Telecom/Vodafone duopoly in mobile.

During that period I was deeply involved in the international development of telecommunications policy, participating in an APEC telecommunications group internationally and working closely with the Fletcher enquiry into telecommunications and the Commerce Commission domestically. I was also on the Board of, and for 3 years Chaired INTUG, an international Brussels-based group comprising CEOs of telecommunications users associations from 25 countries, which involved participation in several international conferences and Board meetings each year. That gave me an invaluable overview of how other jurisdictions were resolving market failure in telecommunications.

More recently, 2017-21, I have helped form and managed WISPA.NZ, an industry association of 37 regional WISPs (Wireless Internet Service Providers). These dynamic businesses were enabled to enter the retail telecommunications market as a direct result of the reforms of the 2000s and now provide world class broadband to 70,000 customers including more than half New Zealand's farms.

A summary CV is attached as Appendix 1.

### **3 THE GROCERY AND TELECOMMUNICATIONS STORIES – SIMILARITIES AND DIFFERENCES**

I see some very pertinent comparisons between the Commission's earlier role in bringing competition into telecommunications and the similar task now is being addressing in grocery. Every New Zealander has been a big winner from the former, and likewise the current project if successful will pay enormous dividends for our economy.

Both telecommunications, and grocery distribution, are strategically important essential services. Telecommunications is fundamental to our existence as a modern society, having become the foundation of our work, social connection, education and health services. Similarly, food and related household necessities represent the highest weekly expenditure item after housing for most people.

Both industries are crucial to society, yet both have shown a propensity to restrict competition. The outcomes have been similar, but the reasons are different.

#### Telecommunications:

Telecom dominant position began with the privatisation of a state-owned monopoly in a network industry. Subsequently competition issues arose due to a naïve view that if the government sold off its telecommunications assets and then did nothing, competition would emerge through some magical, though undefined process. In reality Telecom did what any rational business does when finding itself presented with such an opportunity – it shored up its natural monopoly position by using a wide range of techniques which although legal, were of dubious ethical merit, maximised its pricing, and passed the spoils back to its shareholders. Consumers paid dearly - NZ had the most expensive telecommunications in the OECD. Budding market entrants hoping to provide consumer choice burned their capital and walked away.

Attempts by the Commerce Commission at the time to intervene were frustrated by the legal system to the point where the Commission noted in its Annual Report that in the absence of industry-specific regulation Telecom had become the de facto regulator of its potential competitors. Still the government of the day failed to act, and it was not until the 2000s that a lengthy series of steps were implemented, some consecutively and others concurrently – see Appendix 2. The first of these steps

alone, number portability, took more than a decade from the time the Minister demanded it until it finally became available to consumers. Meanwhile consumers paid monopoly prices.

However, the outcome was well worth the effort. It lifted New Zealand from the worst performing telecommunications market in the OECD, to the middle of the range. Not only did massive innovation follow in telecommunications, but adjacent industries such as software which had been held back by an outdated telecommunications service went on to shine.

### Grocery:

In the 1980s the grocery distribution sector was more diverse than today and thus more competitive. Major participants included three Foodstuffs businesses (Auckland, Wellington and South Island), Foodtown, Woolworths, Shoprite, and Three Guys.

At that time many major manufacturers sold their products into the distribution sector through dual channels - not only the wholesalers such as the three Foodstuffs companies, but also through direct sales relationships with individual stores within their groups. This was done by travelling sales representatives, often working from trucks which would sell at promotional prices and deliver on the spot. Stores would often buy straight off the back of the truck at a discounted price negotiated at the time and pass the savings on to their customers as specials. This practice was not always welcomed by the wholesalers, who saw it as competing with their role in the supply chain and put pressure on individual stores and suppliers not to deal directly with one another. The wholesalers aggressively promoted the development of "central warehousing" where most goods would be distributed via a wholesale warehouse. Grocery manufacturers resisted this for fear it would result in excessive power residing in the distribution sector.

In other ways too, the distributors at that time were extremely defensive of their patch. For example, service stations, which in those days sold only motoring supplies, were starting to move into selling confectionery. Confectionery manufacturers came under heavy commercial pressure from grocery wholesalers and retailers not to supply them.

What I have observed from outside the industry over the ensuing decades is that the manufacturers were right in their fear that over time the distribution sector would gain excessive dominance over its suppliers. No doubt centralised distribution has resulted in savings in logistic costs throughout the system. However, it has also led to an extreme concentration of market power so that the benefit of the cost savings has been retained within the distribution system instead of being passed down to the consumer.

### The Commission, and the Privy Council

The roles of the Commerce Commission, and the Privy Council, have interesting similarities and contrasts in the two industries.

During the 1990s the telecommunications company Clear Communications was one of several businesses trying to gain a foothold in New Zealand. This necessitated having cost-related interconnection with the Telecom network so that customers could call between the two. Clear, along with its competitors, was frustrated by a dominant Telecom at every step. When negotiations finally broke down Clear took legal action against Telecom in a complex case invoking the Baumol-Willig rule. Although the Court of Appeal ruled in favour of Clear this was over-ruled by the Privy Council, which condemned Clear to pay excessive prices and delayed by many years the arrival of competitive telecommunications in New Zealand.

More recently around 2001 Progressive Enterprises, the parent company of Foodtown, applied to the Commission for approval to purchase Woolworths. The Commission approved the merger as they had little option; in process was an amendment to the Commerce Act changing the test from “dominance” to “substantial lessening of competition”. Following a chain of litigation, the matter ended with the Privy Council, for legal reasons rather than any analysis of the market, ruling to approve the merger. It can fairly be argued that consumers have overpaid for grocery items for the past 20 years because the new “substantial lessening of competition” legislation protecting their interests came into effect just a few days too late to save them.

While the legal issues in the 2 cases are very different it is ironic that the Privy Council intervention in both cases has cost consumers dearly.

#### **4 SOME GENERAL OBSERVATIONS**

##### New Zealand’s Small Size is No Justification for Limited Competition

A view is occasionally voiced by some business and political leaders that the small size and geographic shape of the New Zealand market means that consumers should resign themselves to limited competition. The terms used have sometimes been that we only have room for “one and a half of everything.” That language served to lower public expectations.

I submit that the view was totally disproven by the telecommunications experience. We now know that with quality regulation, constructed with an in-depth understanding of the New Zealand market, we can migrate from an uncompetitive monopoly to one of the world’s most diverse markets with excellent outcomes for both supply and demand sides. I predict the same will be found true in grocery.

##### Uneven Distribution of Retail Choice

The Commission’s Report highlights the regional variations in grocery store competition. Its chart (Para 2.4 of the Market Study) showing store locations is enlightening. The Commission correctly identifies highly significant regional disparities. For example, Foodstuffs dominates the Wellington market while Woolworths dominates in Auckland.

There is similarity with the early experience in the cellphone sector. Before regulatory action, the market share between Vodafone and Telecom was approximately level nationwide, but widely disparate in various segments. There were ‘Vodafone’ towns (eg Auckland) and ‘Telecom’ towns (eg Wellington), and Vodafone and Telecom schools, universities, workplaces and so on.

The primary reason for that was “mobile termination rates” – extremely high surcharges, vastly in excess of any underlying cost, were placed on calls in which the calling and called parties subscribed to different networks. These rates had no economic justification other than to frustrate competition. Their effect was to incentivise users to subscribe to the same network as the parties they most often called, thus exacerbating the disparity in regional market share. This became the predominant determinant of customer choice, far ahead of the competitiveness of the different plans. Thankfully these reprehensible surcharges were eventually outlawed after a decade-long Commerce Commission and government process.

Grocery too has a regional disparity but the reason appears quite different. I suspect it arises from the fact that time of the Woolworths takeover Foodtown was largely an Auckland chain, and that in the subsequent 20 years each operator has chosen to make the most of the greater margins

available in a comfortable duopoly, rather than build capacity in one another's strongholds and suffer from inevitable retaliation.

Whatever the reason, the geographic price disparity has a profound impact on consumer choice. In Appendix 3 I provide spreadsheets showing the choices available to typical consumers in Auckland and Wellington, using the wealthiest street in each city (Cremorne Road in Herne Bay and Bayview Terrace in Oriental Bay) as their hypothetical homes. These show the choice of supermarkets available to a shopper setting out to do the shopping from each of these addresses willing to travel a finite distance:

- The Aucklander willing to travel up to 5km out and 5km back, could choose from 9 supermarkets - 7 of these (78%) being part of Woolworths and 2 (22%) Foodstuffs.
- The Aucklander willing to travel up to 10km out and 10km back could choose from 23 supermarkets – 16 (70%) Woolworths and 7 (30%) Foodstuffs.
- The Wellingtonian willing to travel up to 5km out and 5km back, could choose from 8 supermarkets – 5 (62%) Foodstuffs and 3 (38%) Woolworths.
- The Wellingtonian willing to travel up to 10km out and 10km back could choose from 15 supermarkets – 10 (67%) Foodstuffs and 5 (33%) Woolworths.

Based on that small sample, it appears Woolworths enjoy around three quarters of the Auckland market and Foodstuffs two thirds of Wellington. That is an extraordinary skewing of market share.

### Consumer Confusion

In an infamous admission widely available on the Internet, Telecom's former CEO Theresa Gattung declared:

*"Think about pricing. What has every telco in the world done in the past? It's used confusion as its chief marketing tool. And that's fine. You could argue that that's how all of us keep calling prices up and get those revenues, high-margin businesses, keep them going for a lot longer than would have been the case."*

Despite the Commission's best efforts that same confusion still reigns in telecommunications. It's hard to overcome in that sector due to the inherent complexity of the service involving choice of technologies, speeds, data caps, and fixed/mobile substitution.

However, the current grocery Market Study has exposed the same principle at work in the grocery market. Different forms of "special" are overlaid on one another alongside multi purchase deals, loyalty schemes with dubious benefits, and "promotions" that are almost year-round.

Unlike telecommunications there is nothing especially technical about pricing groceries. Pricing should be transparent and simple. Groceries are staples of life and many New Zealanders are heavily constrained in what they can afford.

Consumers deserve better than a grocery sector that has become a playground for creative marketers bent on bringing maximum confusion to what should be the simplest of choices. Only regulation can make that happen.

### The Adverse Effect of Excessive Market Power on Adjacent Markets

Kiwis understand that New Zealand is a highly competent and creative developer of premium, bespoke foods. To grow their businesses our innovators require a vibrant and competitive domestic distribution structure, so they have a next step when they outgrow their local farmers market but remain too small to export. That steppingstone role of supermarkets is crucial.

During the deregulation of Telecom there was considerable reference to the “ladder of investment.” In the telecommunications context this concept required that during a new entrant’s phasing-in of services it would need to rent services from the incumbent - its competitor – in order to lift itself to the next phase of competition.

Conceptually this has some similarity to the challenge facing our small food producers. If the “nationwide distribution” rung is missing from the ladder how will our suppliers of tomorrow grow to international capability? How can they counter supermarkets’ ability to take their intellectual property for use with their own house brands? Or supermarkets’ radical reductions in range, presented as great news for consumers but in reality a cynical means to increase retailers’ profit at the cost of suppliers?

The Commission successfully solved that similar issue in telecommunications. It must accept the same challenge here. Far more hangs on this market study than “just” consumer prices.

#### Voluntary Agreements/Codes of Conduct

In Chapter 9 the Commission discusses a potential Code of Conduct as a means to protect suppliers from downstream market dominance.

Such Codes have some merit. Without the constraints of a legal overlay they can be implemented quickly and managed simply. The fact that the parties are participants in their design may give a greater commitment to making them work.

However, the telecommunications experience shows their limitations. Urged on by the government and the Commission under threat of more intrusive regulation, that industry established the Telecommunications Carriers Forum to develop voluntary Codes of Practice across a wide range of industry practices. The Forum was accepted by the industry with varying degrees of enthusiasm but once operational enjoyed wide support.

Key to the success and independence of the Forum were two independent positions on its Board - an independent chair and a consumer representative.

However, some years later, devoid of direct regulatory oversight, members disestablished these two independent roles. The independent chair was replaced by the CEO of one of the large telcos. This removed external oversight and entrenched the power in the hands of the 3 or 4 largest service providers, in an industry which by then had more than 100 participants. In short, the Forum morphed from an inclusive and transparent standards-setting body working alongside the regulator, to something of a “closed shop” focused increasingly on industry self-promotion skewed in favour of the large members and their products.

Some form of Code and/or forum for the grocery sector has obvious benefits, both for suppliers and consumers. However, if such a Code were established in the grocery sector I submit it should have active, ongoing independent oversight, an assurance of longevity, an effective and rapid disputes resolution process, and meaningful sanctions for transgressions.

## 5 WAYS TO ENHANCE COMPETITION

### Options to promote entry or expansion into the retail grocery sector (Market Study Para 9.25-9.31)

The Commission's observations that "for most consumers, competition for their regular main shop will continue to be focused on the rivalry between the two major grocery retailers" (Para 9.27), and that "competition...tends to focus more on differentiation of the non-price dimensions of competition than on price" (Para 4.57) paint a depressing picture for consumers. Simply, if nothing is done we are up for more of the same – flashy pseudo-competition and high prices with no end in sight. Therefore the options explored in the Study are of critical importance.

### Improved Supply Through Existing Wholesale Grocery Channels (Market Study Para 9.39-9.56)

Based on the telecommunications history I agree with the Commission's preliminary view (9.41) that it is unlikely the existing retailers would agree voluntarily to open their wholesaling facilities to external retailers. Even if this were achieved under duress, the prospects of this enduring for the long haul would be slim. Such is the complexity of the market with its vast range of products and trading terms, that even regulated access would be inordinately difficult and costly for a regulator to enforce in the long term.

### Vertical Separation (Market Study Para 9.57-9.64)

In my opinion structural separation is by far the best of the available options.

As indicated earlier in this Submission, structural separation in telecommunications was a win for all parties – both the wholesale (Chorus) and retail (Spark) units went on to become successful and profitable businesses in their own right, while consumers and adjacent industries achieved a new level of service and pricing. The only losers were the Telecom shareholders who had (literally) banked on the government shying away from intervention and thus entrenching the shares at their monopoly-inflated price.

An objective of any structural separation should be to have each individual retail group (New World, Countdown, Pak n Save etc) make its pricing and marketing decisions independently of any other without collaboration.

Unless the Commission and government have an extremely high level of confidence that some form of undertaking can survive in the long term, I would strongly recommend moving straight to full vertical structural separation. The telecommunications process took more than a decade to reach its goal. The precedent, and the proof of a successful outcome, are there on our doorstep – let's learn from that and go straight to the optimal outcome without putting all parties through a series of interim steps along the way.

### Facilitation of Entry (Market Study Para 9.65-9.73)

In my opinion direct government entry into the market in the form outlined should be a last resort if structural separation did not deliver the desired result. Instead the focus should be on removing barriers and thus creating a market where commercial entry becomes a viable prospect. Nobody saw the explosion of profitable service providers resulting from the telecommunications reforms. The moral of the story – "Regulate well, and they will come."

### Improving Access to Suitable Sites (Market Study Para 9.74-9.97)

Clearly the RMA is overdue for a major review. I agree the Commission's points should be part of such review.

Exclusivity covenants (in new malls for example) should be subject to a sunset clause based on a reasonable time frame for the retailer to gain some first mover advantage to recoup any development costs. Other forms of covenant, if they can be shown to be predominantly for anticompetitive motives, should be quashed.

### Options to Directly Improve Retail Competition (Market Study Para 9.98-9.106)

I note that mandated divesting of retail stores is a less favoured option in the Commission's preliminary view. (Para 9.106.) However, I submit that it should not be lightly dismissed. Should it occur, it should be used to reduce the unequal geographic distribution of stores referred to earlier under "Uneven Distribution of Retail Choice."

### Potential Arrangements for a Code of Conduct (Market Study Para 9.113-9.119)

My earlier note about telecommunications experience with a somewhat similar concept, sets out some lessons.

In this instance I submit that there is a clear need for a Code or Codes, not least because it could be invoked rapidly to deal with aspects of the imbalance of power and bullying behaviour between wholesalers and suppliers.

However, I caution about any Code being seen as a panacea. It would be part of a solution, implemented rapidly while the more challenging remedies listed in the Market Study are addressed. Any Code should be subject to regulatory oversight, incorporate a disputes resolution process, and independently overseen.

### Price Comparison Web Sites (Market Study Para 9.155-9.159)

I submit that any such Site will only be effective and reliable if independently funded. Comparison Sites operating in sectors other than grocery appear to be heavily compromised by funding from major stakeholders within their industry, through fees, sponsorships, and provision of commercial marketing services to those whose products they compare. That is an unacceptable conflict of interest which must impact the integrity of their recommendations, at least in terms of consumer perceptions and possibly in reality.

## **CONCLUSION**

Thank you for the opportunity to make this Submission and good luck to the Commission in this challenging process.

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**APPENDIX 1****SHORT CV – ERNIE NEWMAN****Consulting Roles 2010-current**

Worked continuously in telecommunications policy, health IT, digital economic development, prison reform, and online education. Clients have included several District Health Boards, the National Health IT Board, local bodies, telecommunications organisations, government agencies and philanthropic trusts.

**Full Time Salaried Roles 1963-2010**

1. Chief Executive, [Telecommunications Users Association of New Zealand Inc](#) (TUANZ) 1999-2010
2. Marketing Manager, [Packaging House Ltd](#)/Carter Holt Harvey Distributors 1994-1999
3. Founder and General Manager, "Buy New Zealand Made Campaign" Ltd 1989-2004
4. General Manager - Trade Groups, New Zealand Manufacturers Federation Inc (now Business NZ) 1987-1989
5. Director, Otago Southland Manufacturers Association 1985-1987
6. Director, Wellington Regional Manufacturers Association 1987-1989 (concurrent)
7. Executive Director, NZ Grocery Manufacturers Association 1981-1985
8. Chief Executive, Otago Chamber of Commerce 1986-1987
9. Executive Officer, NZ Vegetable Growers Federation 1977-1981
10. Senior Training Officer, Ministry of Works & Development
11. Senior Travel Officer, NZ Government Tourist & Publicity Department

**External Roles**

1. Chairman (3 years) and Board Member (11 years) of the [International Telecommunications Users Group](#) (INTUG)
2. Honorary Fellow of the [Institute of IT Professionals](#), NZ (Awarded 2010)
3. Executive Member, HINZ ([Health Informatics New Zealand](#)) 2012-2014
4. Leadership Group Member, NZ Telehealth Forum - 2011-2013
5. Chair of Consumer Panel for [NZ National Health IT Board](#) -2010-2012
6. Expert Advisory Group Member, Health, Quality & Safety Commission Indicators Project 2011-2013
7. Author, E-Health & E-Learning chapters of NZ [Commerce Commission "Broadband Demand-Side Study"](#) 2011-2012
8. Board Member (5 years) [Telecommunications Forum](#), New Zealand
9. Board member, [Telecommunications Disputes Resolution Council](#), 2006-10
10. Council member, NZ Digital Development Council
11. Board member, New Zealand Chambers of Commerce
12. Board member, Grocery Industry Council
13. Board member, NZ Product Number Association

**APPENDIX 2 - Telecommunications Transformation – a Chronology of Major Issues 1999-2010**

**In approximate chronological order**

- Number portability
- Wholesale access regime
- Industry-specific regulation (Telecommunications Act)
- Operational separation of Telecom
- Industry collaboration – the Telecommunications Carriers' Forum
- Code of practice on customer complaints handling
- Telecommunications Disputes Resolution Service
- Local Loop Unbundling
- Updated Telecommunications Act – structural separation
- Celltower colocation
- Mobile termination rates

## Appendix 3 - Retail Choice - Auckland and Wellington compared.

## AUCKLAND

NUMBER	ST	DISTANCE FROM CREMORNE	STORE
1		1.9	Countdown Grey Lynn
2		2.2	<b>New World Victoria Park</b>
3		3.0	Countdown Ponsonby
4		3.2	Countdown Halsey St
5		3.6	Countdown Albert St
6		3.8	<b>New World Queen St</b>
7		4.0	<b>Countdown Victoria St</b>
8		4.6	<b>Countdown Auckland City</b>
9		4.8	Countdown Point Chev
10		6.0	<b>New World Alberton</b>
11		6.0	Countdown Mt Eden
12		6.6	Countdown St Lukes
13		6.6	Countdown Northcote
14		7.0	Countdown Newmarket
15		7.0	Countdown Takapuna
16		7.2	Countdown Birkenhead
17		7.6	Pak n Save Mt Albert
18		7.8	<b>New World Shore City</b>
19		7.9	Countdown Hauraki Corner
20		8.4	<b>New World Birkenhead</b>
21		9.6	Countdown Greenlane
22		9.9	<b>New World Milford</b>
23		9.9	Countdown Lynmall
24		10.3	Countdown Milford
25		10.5	<b>New World Mt Roskill</b>
26		10.7	Pak n Save Wairau Rd
27		11.0	Pak n Save Royal Oak
28		11.1	Countdown Glenfield
29		11.3	Countdown Three Kings
30		11.3	Countdown Blockhouse Bay
31		11.4	<b>New World New Lynn</b>
32		11.4	Countdown Mt Roskill
33		11.7	<b>New World Remuera</b>
34		12.1	Countdown Te Atatu South
35		12.3	Countdown Te Atatu
36		12.4	Countdown Sunnynook
37		12.6	<b>New World Devonport</b>

38	12.9	Countdown Meadowbank
39	13.0	<b>New World Stonefields</b>
40	13.4	<b>New World Green Bay</b>
41	13.6	Countdown Kelston
42	13.9	Countdown Lincoln Rd
43	14.1	Countdown Mairangi Bay
44	14.3	Pak n Save Lincoln Rd
45	14.3	<b>New World Eastridge</b>
46	14.5	Countdown Henderson
47	15.0	Countdown Lindfield
48	15.4	Pak n Save Sylvia Park
49	15.4	Countdown Mt Wellington
50	15.8	Countdown St Johns
51	15.9	Pak n Save Albany
52	16.0	Pak n Save Glen Innes
53	16.0	<b>New World Albany</b>
54	16.5	Countdown Westgate
55	17.4	Pak n Save Westgate
56	17.5	Countdownm Onehunga
57	18.0	Countdown Northwest
58	18.1	<b>New World Browns Bay</b>
59	18.1	Countdown Pakuranga
60	18.5	Countdown Highland Park
61	18.6	Countdown Browns Bay
62	20.4	<b>New World Hobsonville</b>
63	20.6	<b>New World Long Bay</b>
64	21.0	Countdown Hobsonville
65	21.4	Countdown Botany Downs
66	21.4	Countdown Papatoetoe
67	22.3	Countdown Mangere Mall
68	22.4	Pak n Save Mangere
69	22.4	Countdown Aviemore
70	22.5	<b>New World Botany</b>
71	22.5	<b>New World Papatoe</b>
72	23.9	Pak n Save Manukau
73	23.9	<b>New World Howick</b>
74	23.9	Countdown Manukau
75	24.1	Countdown Auckland airport
76	24.2	Countdown Mangere East
77	24.3	<b>New World Kumeu</b>
78	24.6	Countdown Manukau City Mall
79	24.8	Countdown Meadowlands
80	24.9	Countdown Howick
81	27.6	<b>New World Ormiston</b>
82	27.7	Pak n Save Ormiston
83	28.8	<b>New World Southmall</b>

84	29.9	Countdown Manurewa
85	30.2	Pak n Save Silverdale
86	31.0	Pak n Save Botany
87	31.4	Countdown Silverdale
88	31.5	Pak n Save Clendon
89	31.9	Countdown Takanini
90	33.8	Countdown Roselands
91	35.6	<b>New World Orewa</b>
92	35.8	Countdown Orewa
93	36.0	<b>Whangaparaoa</b>
94	36.5	<b>New World Papakura</b>
95	36.7	Countdown Papakura
96	38.1	Countdown Whangaparaoa
97	38.6	Pak n Save Papakura
98	41.9	Countdown Helensville
99	43.2	Countdown Beachlands
100	51.4	<b>New World Pukekohe</b>
101	52.6	Countdown Pukekohe
102	57.1	Countdown Pukekohe South
103	59.4	Pak n Save Pukekohe
104	66.7	<b>New World Waiuku</b>

**WELLINGTON:**

<b>NUMBER</b>	<b>DISTANCE FROM BAYVIEW TERRACE</b>	<b>STORE</b>
1	1.3	<b>New World Wellington City</b>
2	2.3	<b>New World Willis St</b>
3	2.5	Countdown Cable Car Lane
4	2.6	Countdown Newtown
5	3.1	<b>New World Wellington Railway</b>
6	3.6	<b>New World Newtown</b>
7	3.7	<b>New World Thorndon</b>
8	4.6	Countdown Kilbirnie
9	5.2	Pak n Save Kilbirnie
10	5.9	<b>New World Island Bay</b>
11	6.8	<b>New World Miramar</b>
12	7.3	<b>New World Karori</b>
13	7.9	Countdown Karori
14	9.3	Countdown Crofton Downs
15	9.6	<b>New World Khandallah</b>
16	11.3	Countdown Johnsonville Mall
17	12.3	Countdown Johnsonville

18	13.0	New World Newlands
19	15.0	Pak n Save Petone
20	15.8	Countdown Petone
21	16.2	New World Churton Park
22	18.2	Countdown Tawa
23	19.2	Pak n Save Lower Hutt
24	19.2	Countdown Queensgate
25	19.3	New World Hutt City
26	19.9	New World Tawa
27	19.9	Countdown Lower Hutt
28	23.4	New World Porirua
29	24.1	Pak n Save Porirua
30	24.5	Countdown Porirua
31	26.3	Countdown Wainuiomata
32	27.1	Countdown Aotea
33	28.3	New World Paremata
34	28.6	New World Stokes Valley
35	30.0	New World Silverstream
36	32.4	New World Whitby
37	35.4	Pak n Save Upper Hutt
38	36.4	Countdown Maidstone
39	36.8	Countdown Upper Hutt
40	53.3	Pak n Save Kapiti
41	53.5	Countdown Paraparaumu
42	55.3	New World Kapiti
43	64.2	New World Waikanae
44	64.2	Countdown Waikanae