

# Wholesale Supply Inquiry

## Preliminary Issues paper

This feedback form has been developed to assist with the making of submissions in response to the “Wholesale Supply Inquiry - Under section 55 of the Grocery Industry Competition Act 2023 - Preliminary Issues Paper” paper released on 24 September 2024.

If you would like to make a submission using this form, please fill in the boxes on the following pages.

You can choose to respond to any or all of the questions.

Alternatively, you can:

- Email a submission to [grocery.regulation@comcom.govt.nz](mailto:grocery.regulation@comcom.govt.nz);
- Submit an anonymous report using the Commission’s Anonymous Reporting Tool at: <https://report.whistleb.com/en/comcom-grocery>; or
- Post to:  
Grocery Regulation  
Commerce Commission  
PO Box 2351  
Wellington 6140  
New Zealand

**Submissions are due by 5pm Friday .**

**Please note:**

- If you wish to provide commercially sensitive information in a submission, we request that you provide, as necessary, confidential and public versions of your submission. Within the confidential version, please remember to provide reasons alongside any confidential information as to why it is confidential or commercially sensitive.
- There is a 4000 character limit per question. If you would like to provide a longer response, then we recommend providing a written response through the other channels listed above.

## General questions

1. Name

[REDACTED]

2. Email

[REDACTED]

3. Is this an individual submission, or is it on behalf of a business or organisation?

Company

4. Business or organisation name, if applicable

[REDACTED]

[REDACTED]

5. Would you like to be added to our distribution list to receive updates on grocery regulation?

[REDACTED]

6. Is this a public or confidential submission?

Confidential

7. Who do you think the wholesale regime should service? For example, what types of customers and what market share?

Business to business wide. Supermarkets badly need competition. Same prices as offered to supermarkets to business to business clients

8. Please describe any experiences you have had regarding different forms of wholesale supply, inside or outside the wholesale regime. We are interested in the experiences of both wholesale customers and suppliers.

Good example –dilmah tea sells less to consumers in supermarkets than trade that buys it by the pallet - how does that work and no supermarkets do not loss lead on that ...

9. Do you have any additional comments about the wholesale supply regime?

Yes - get on with mandating the change ComCom.

### **Wholesale pricing**

10. Please describe your experiences of wholesale pricing in the grocery industry.

Supermarkets clearly undercut wholesale and now offer online delivery with that advantage - how is that fair?....

11. Please describe your views and provide evidence on the costs to wholesale customers of retailing grocery products. For example, what margin between wholesale and retail prices is required to recover the costs of retail activities.

Already provided – Dilmah far cheaper from supermarket than direct bulk to trade/wholesale

12. Please describe your experience and awareness of the types and value of rebates, discounts and payments (RDPs). How does this affect you as a wholesale customer (eg, retail pricing) or supplier? For example, what types of RDP between suppliers and wholesale customers have you used, and what impact did this have on margins? Please provide evidence if available.

[REDACTED]

They are disgusting - greedy foodstuffs and countdown bullying and threatening de-list unless you comply....

- 13. What is your view on the types of RDP that should be passed on to wholesale customers to reflect the RGRs' benefits of scale and efficiency?

It should be straight best price onto consumer and more visibility of margin, other than line a pak n save owners pockets - what do RGR's offer consumers?

- 14. Do you have any additional comments about wholesale pricing?

Get on with it and mandate - a lot of talk from you and no action

**Range of products**

- 15. Please describe your experience of accessing popular retail grocery products (or appropriate substitutes), including via Regulated Grocery Retailers (RGRs) and through direct supply.

Limited access to many lines only sold direct to supermarket

- 16. Please describe your experience of using alternative channels of supply - eg, wholesalers, direct supply and/or "off the retail shelf"

Expensive!

- 17. Please describe your experience of supplying wholesale groceries to retailers.

Terrible - we now try and avoid it if possible as only volume and no profit

- 18. Please describe your experiences/relationships with suppliers and/or retailers.

Terrible - bully and arrogant

- 19. Do you have any additional comments about range of products?

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**Systems and processes**

- 20. Please describe your experience regarding the effectiveness of systems and processes for wholesale grocery supply.

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- 21. Please describe whether you have experienced differences between the RGRs' and alternative channels' systems and processes? If yes, please comment on the effect of these differences.



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22. Do you have any additional comments about systems and processes?

No

**Terms and Conditions**

23. Please describe your experience of terms and conditions for wholesale grocery supply.

Crippling and unfair - only one party gets rich in that mod and it's not the manufacturer

24. Please describe whether you have experienced differences between the RGRs' and alternative channels' terms and conditions. If yes, please comment on the impact of these differences.

Other channels try and copy but you can reject and still be listed unlike the bully boys in supermarkets

25. What is your opinion on the findings of this progress assessment? Is there anything we have not mentioned in this paper that you consider is relevant? Please explain

All talk, no enforcement or actions

26. Do you have any additional comments about terms and conditions?

No

**RGRs' wholesale offers**

27. Do you consider we have identified the most important issues affecting the RGRs' wholesale offers? Is there anything we have not mentioned in this paper? If yes, please identify and explain.

No

28. Is there any information or analysis that we have not mentioned in this paper that you consider relevant? If yes, please identify and explain.

No

29. Do you have any additional comments about RGRs wholesale offers?

Yes they are not commercially realistic anymore and need to be overhauled and open book visibility by com com



**Direct supply**

30. Do you consider we have identified the most important issues affecting the direct supply of wholesale groceries? Is there anything we have not mentioned in this paper? If yes, please identify and explain.

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31. Is there any information or analysis that we have not mentioned in this paper that you consider relevant? If yes, please identify and explain.

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32. Do you have any additional comments about direct supply?

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**Potential solutions to the issues**

33. Please describe your views on the additional regulatory options.

Get them in place.

34. Are there other actions not described in this paper that you think would help? If yes, please identify and explain.

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35. Do you have any additional comments about potential solutions to the issues?

Yes - overhaul regulations regarding rebates and other terms to reduce the impact to manufacturers

