

**From:** Simon [REDACTED]  
**Sent:** Saturday, 13 April 2024 5:41 pm  
**To:** Registrar  
**Subject:** Foodstuffs merger

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I wish to submit on the proposed merger between Foodstuffs South and North Islands.

Foodstuffs has a dominant market position within New Zealand, that has remained unchallenged for years. The company has been subject to various news articles regarding screwing down prices paid by its suppliers, in order to maximise its profit margins.

Foodstuffs have made some claims that the merger would benefit NZ consumers by their providing reduced prices to them, as under its combined buying powers, it would be able to spend less buying food, and allegedly pass savings to consumers.

There is no proof that Foodstuffs would honour these claims, they could only be shown following approval of a merger, and only if Foodstuffs elected to reduce its vast profit margins at its sole discretion. Foodstuffs are under no obligation to release its margins or markup percentage to the public in any event, so there is no way to show they have (or will) comply with this statement.

The merger should not be permitted. NZ is in a dire situation regarding cost of living, something the current government campaigned on. It would not be politically palatable to approve this merger, including for that reason.

The Commerce Commission seriously erred in allowing the Woolworths and Progressive merger over 20 years ago. It is arguable that had this been not permitted at the time, NZ would now have more competition in the food market.

This proposed merger, if approved, would not be for the public benefit. Even if the Foodstuffs claims of some food prices being reduced as a result of the merger being true, then public detriment would result by their pressuring producers even more than currently, to reduce their produce prices. It would substantially lessen competition in the market as Foodstuffs would become an even larger buyer (as one entity, rather than the current two), giving suppliers less choice to sell their goods to.

Simon [REDACTED]