25 November 2021

Attn: Keston Ruxton Commerce Commission Level 9 44 The Terrace Wellington 6011

Tēnā koe e Keston,

Submission on Commerce Commissions Competition Study

This submission relates to the Commerce Commission's competition study and factors that may affect competition for the supply or acquisition of groceries by retailers in Aotearoa New Zealand pursuant to section 51(1) in Part 3A of the Commerce Act 1986.

OpinioNative was created as an independent research, policy and project design company that places Indigenous worldviews at the centre of all its work. Whilst Māori at its foundations, its goal is global with a focus on advancing the development of enduring relationships that will enhance international economic and trade cooperation within and between the worlds Indigenous & Tribal peoples and to support the visioning and creation of direct pathways for them to new, emerging, and existing global markets.

Māori SMEs are only 6-8% of all SMEs, pointing to significant accumulated inequity over time. Māori ownership in supermarkets would stimulate Māori SME growth and innovation in the food supply chain - suppliers to this new entity, would be Māori owned primary producers, processers, and brand owners. A radically inclusive supply chain and merchandising environment would provide a valuable testing ground for Māori F&B SMEs to build capability and balance sheet strength to get export ready.

It could also enhance business growth for non-direct suppliers such as in the design and creative sector across disciplines such as brand development, marketing, advertising, labelling and developers of sustainable packaging. It is in these areas where we are seeing significant interest from the next generation of Māori business owners who are reclaiming their space as the worlds storytellers across many industries and sectors. Other business enhancements include the capacity and capability building of Māori businesses in the financial and professional services industries who SMEs rely on in their contracting, auditing and other formal processes. Moreover, Māori SMEs employ 3x more Māori than non-Māori SMEs meaning that this initiative is likely to lift employment and move more Māori into higher value career pathways

protecting them from the disruption that the automation will have across different industries, but especially in the manufacturing, logistics and distribution industries where Māori are currently overrepresented.

If the Commerce Commission's Market Study's final report advocates that a forced divestment of existing supermarkets will help Competition, then OpinioNative urges the Commission to consider Māori investors and businesses who are interested in this industry and making a contribution to its development for all of NZ.

Māori are interested in the Supermarket / Grocery industry because:

- It provides an opportunity to improve healthy eating and nutrition outcomes for Māori and therefore, all New Zealander's
- It provides opportunities to address the carbon footprint and the negative impact of environmental packaging of supermarkets, in particular, to address the Commerce Commission's submission to the Climate Change Commission (Sue Begg Letter 21 March 2021)
- Much of the market study has been focused on the negative impact the supermarket duopoly has had on suppliers, many of whom are exporters and need local access to test products. Therefore, Māori participation in supermarkets would drive outcomes for Māori owned suppliers.
- If Māori were given an opportunity to be a nationwide scalable Supermarket operator, not only would it create benefits in pricing, quality, service, health, and environment for all of New Zealand, it would also deliver innovative services to differentiate its business value proposition from the incumbents through, for example, internet delivery, nutrition, data management, health monitoring, store lay out, and reusables which would all be central to how it would operate.

An industry led and developed by Māori with embedded cultural frameworks will not only be good for Māori, but good for New Zealand as a whole and could inform global approaches to greater inclusivity of the worlds Indigenous & Tribal peoples in the food and food retail industries

Ngā manaakitanga, nā

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