

Tena koe e te Tiamana, Ms Rawlings,

My name is Hoki-mai Chong, and I am writing to contribute to the Commerce Commission's competition study (pursuant to section 51(1), Part 3A of the Commerce Act 1986) into any factors that may affect competition for the supply or acquisition of groceries by retailers in Aotearoa New Zealand .

I understand that the Commerce Commission expects to finalise its Market Study in March of next year, 2022.

I would like provide feedback along the following lines. Should the Commerce Commission's report advocate a strategy of forced divestments of existing supermarkets in order to facilitate competition, then I strongly urge the Commission to consider Māori stakeholders as investors to take up the slack. Maori, or more accurately, iwi have incredibly strong balance sheets, and are increasing looking to diversify their investment portfolios in Aotearoa NZ. Of course, they are not likely to take flight anytime soon, and they share a partnership relationship with the Crown vis-à-vis Te Tiriti obligations. These ought to be factored in here ala the Treaty principle of active protection, and consideration given to the advancement of Māori economic participation in the NZ supermarket sector.

I also understand that the Iwi Chairs Forum has indicated an interest on a pan-Maori basis. However, I also believe the Commission has an obligation to consider discrete iwi interests such as individual post settlement governance entities like the Waikato Raupatu Settlement Trust, and Te Runanga o Ngai Tahu.

Needless to say, Maori and iwi are interested in the supermarket industry, and in making a contribution to its development for all of NZ. I say this because having a Maori or iwi stake in the NZ supermarket industry will in my opinion:

- a. enable Māori and iwi the opportunity to improve the health outcomes for not only Māori, but the rest of the NZ population. Having multiple bottom lines including social as well as commercial, it is beholden of iwi entities to have regard to not only the commercial proposition but also the social outcomes, such as health;
- b. enable Māori and iwi to take the opportunity to help remedy the carbon footprint issue, and the negative environmental impacts associated with packaging of supermarket goods, which has the potential to support the Commission's submission to the Climate Change Commission;
- c. improve outcomes for all suppliers (in line with Maori values such as manaakitanga and kaitiakitanga). Much of the market study has been focused on the negative impact the NZ supermarket duopoly has had on suppliers. Many of these suppliers are exporters and need local access to test their products. I believe that Māori participation in the supermarket industry will deliver improved outcomes for Māori, as well as non-Maori owned suppliers;
- d. drive innovation - if Māori and iwi were given an opportunity to be a nationwide scalable supermarket operator, not only would Maori or iwi create benefits in pricing, quality, service, health outcomes, and the environment for all of NZ, but we would also see the delivery of innovative services to differentiate a Maori or iwi chain from the incumbents, such as greater focus on online sales, nutrition, data management, health monitoring, store lay out, reusables as well as a focus on the locales of stores - all these considerations would be central to how Maori or iwi would choose to operate their business.

As such, I strongly urge you to engage fully with Maori and iwi to explore the potential for Maori to have a stake in the NZ supermarket industry, as the Commission looks to formulate its recommendations in respect of this study.

Naku iti noa, na

Hoki-mai Chong