



Australian Government



Australian  
**Small Business and  
Family Enterprise**  
Ombudsman

27 February 2019

[REDACTED]  
Manager  
Consumer Policy Unit  
Consumer and Corporations Policy Division  
The Treasury  
Langton Crescent  
CANBERRA ACT 2904

By email: [UnitPricingReview@treasury.gov.au](mailto:UnitPricingReview@treasury.gov.au)

Dear [REDACTED]

### REVIEW OF THE RETAIL GROCERY INDUSTRY (UNIT PRICING) CODE OF CONDUCT

As noted in the discussion paper the Retail Grocery Industry (Unit Pricing) Code of Conduct has proven effective in meeting its objectives. However, we would not support an expansion to small retailers or changes to the minimum grocery items.

As the review in 2012 found, the majority of costs to a retailer incur at implementation, such as new computer software and ticketing systems. Few small retailers, with less than 1000 square metres of retail floor space, have the capacity to absorb such costs. We support continuation of the option for those smaller retailers to voluntarily adopt the Code.

We would also not support the broadening of the minimum range of grocery items. As the review found and the discussion paper indicates, the current range has been adequate to encompass changes in the market such as new entrants and the growth in online sales.

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact [REDACTED] on 02 [REDACTED] or [REDACTED].

Yours sincerely

[REDACTED]

**Kate Carnell AO**  
Australian Small Business and Family Enterprise Ombudsman

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