Submission on Unit Pricing

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My submission has two parts: an ideal, and a practical one.

Ideal

I wish that NZ supermarkets (and all retailers) be required to act at all times honestly and without attempting to mislead consumers.

It is clear they do not. Unfortunately there is a "communications industry" that is dedicated to influencing consumer perceptions and behaviour to the benefit of retailers.

I acknowledge that such a goal may not be actionable, unfortunately. If you can think of a way in which the small consumer can "call out" dishonest behaviour, perhaps like the Small Claims court, then I would be glad to make use of it.

Practical

An example of misleading behaviour is the display of some unit prices by supermarkets in fonts that I cannot easily read. At my most used supermarket (Countdown) I struggle to read the unit prices where they are shown. I have to get up really close to the shelf labels. For the bottom shelf I have to get down on my knees. For the top shelf there is no easy solution. Though I am 75 years of age I have reading glasses which have been updated in the last year.

Below is an example. The font is about 1.5mm high and its line width is very thin.

As well as failing to provide usable information, I believe this deceives consumers by appearing to help them when it does not.

There are several requirements for usable information which the discussion paper outlines. I support all reasonable requirements to enable convenient unit price comparison. In particular I ask that display requirements suit the average 65-year old standing 1m from the shelf – whether the shelf be at floor level or the top shelf.

I am not an expert in human vision so I cannot specify a font size; and of course there are font types and other factors that influence legibility. It would be an expert task to turn this into a legal requirement. I would rather ask for a functional requirement. I have chosen 65 years as it would be unfair to have to cater for the very worst eyesight in the community; but 15% of the population is 65 years or over – a sizeable proportion.

Thank you and I look forward to the results of your work.

