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12 May 2023

Submitted via: consumer@mbie.govt.nz

Consumer Policy Building, Resources and Markets Ministry of Business, Innovation & Employment Wellington

RE: Letter of support for Consumer NZ submission responding to the exposure draft of the Consumer Information Standards (Unit Pricing for Grocery Products) Regulations 2023

FinCap welcomes the opportunity to comment on the exposure draft of the Consumer Information Standards (Unit Pricing for Grocery Products) Regulations 2023. We submit this letter of support for the Consumer NZ submission, as we strongly support their comments and recommendations.

About FinCap

FinCap (the National Building Financial Capability Charitable Trust) is a registered charity and the umbrella organisation that in supporting 190 local, free financial mentoring services across Aotearoa. In 2022 these services supported almost 50,000 whānau. We lead the sector in the training and development of financial mentors, the collection and analysis of client data and encourage collaboration between services. We advocate on issues affecting whānau to influence system-level change to reduce the causes of financial hardship.

General comments

Often people who financial mentors assist are facing difficulty paying for essential items like groceries. Whānau in Aotearoa should have clear and consistent information while shopping to ensure that they are able to purchase the items that most suit them and their budget.

We strongly agree with the responses that Consumer NZ have given to the consultation paper questions. In particular, we highlight our support of Consumer NZ's comment that a 12-month transition period is too long and that given the current cost of living pressures, supermarkets should be complying with the regulations sooner.

We also highlight the Consumer NZ concern that Regulation 5(1)(a) and 5(1)(b)(i) could result in avoidance by stores from being captured by the regulations. We support their recommendation that regulations should apply to stores selling eight or more products from the list.

Please contact Janeka Rutherford-Busck, policy advisor at FinCap on 027 261 3690 or at janeka@fincap.org.nz to clarify any aspect of this letter of support.

Ruth Smithers

Chief Executive

FinCap