



## **Public Health Association of Australia submission on Supermarket Prices**

**2 February 2022**

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**Public Health Association**  
AUSTRALIA

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The **Public Health Association of Australia** (PHAA) is Australia's peak body on public health. We advocate for the health and well-being of all individuals in Australia.

**We believe** that health is a human right, a vital resource for everyday life, and a key factor in sustainability. The health status of all people is impacted by the social, commercial, cultural, political, environmental and economic determinants of health. Specific focus on these determinants is necessary to reduce the root causes of poor health and disease. These determinants underpin the strategic direction of PHAA. Our focus is not just on Australian residents and citizens, but extends to our regional neighbours. We see our well-being as connected to the global community, including those people fleeing violence and poverty, and seeking refuge and asylum in Australia.

**Our mission** is to promote better health outcomes through increased knowledge, better access and equity, evidence informed policy and effective population-based practice in public health.

**Our vision** is for a healthy population, a healthy nation and a healthy world, with all people living in an equitable society, underpinned by a well-functioning ecosystem and a healthy environment.

**Traditional custodians** - we acknowledge the traditional custodians of the lands on which we live and work. We pay respect to Aboriginal and Torres Strait Islander elders past, present and emerging and extend that respect to all other Aboriginal and Torres Strait Islander people.

## Introduction

PHAA appreciates the opportunity to provide feedback to the Senate Select Committee on Supermarket Prices consultation. Competitive markets should encourage better combinations of price and quality for consumers,<sup>(1)</sup> however the majority of Australia's retail food supply is derived from 2-3 large companies.<sup>(2)</sup> This results in an oligopoly that limits competition and has the ability to artificially raise prices.<sup>(3)</sup> The Government has a responsibility to prevent these unjust practices and protect the right to access nutritious food for all.

Appropriate Government regulations and enforcement of guidelines are missing in the Australian supermarket landscape. Industry self-regulation of pricing and discounts affects access to nutritious options for all Australians, although higher prices at the supermarket most impact Australians who live on low incomes. Vulnerable Australians are already at an increased risk of adverse health outcomes; when supermarkets raise food prices, they contribute to the widening of existing health disparities, both directly (by influencing what and how much people buy and consume) and indirectly (by reducing the available budget for other living costs).

PHAA believes that all people living in Australia should be able to access, afford and consume healthy and nutritious foods. PHAA presents research summaries that address the following TOR:

- **TOR A) The effect of market concentration and the exercise of corporate power on the price of food and groceries**
- **TOR D) The prevalence of opportunistic pricing, price mark-ups and discounts that are not discounts**
- **TOR E) The contribution of home brand products to the concentration of corporate power**
- **TOR G) Improvements to the regulatory framework to deliver lower prices for food and groceries**

# PHAA Response to the Supermarket Prices Inquiry

## Terms of Reference

### Background

#### *The price of foods and drinks – a public health crisis*

Access to affordable, healthy foods and drinks for all is undermined by the power of major supermarkets, which set prices that are typically out-of-reach for many segments of the Australian population. Research has indicated that the price of foods and drinks is one of the most influential determinants of what people choose to eat and therefore their health and wellbeing across the life course.<sup>(4)</sup> The price of foods and drinks can also influence health and well-being indirectly by increasing the overall price of a food shop, meaning shoppers buy less or have less budget available for other living costs. Specifically, research by Deakin University (Institute for Health Transformation) and the University of Queensland has shown that the cost of healthy foods and drinks:

1. Are perceived by consumers to be more expensive than unhealthy food and drink options – therefore encouraging excessive consumption of these foods.<sup>(5)</sup>
2. In major Australian cities, can cost a family of four more than \$600 per fortnight.<sup>(6,7)</sup> This is equivalent to approximately one-fifth of the median family income and one-third of the incomes of families on low-incomes.<sup>(6,7)</sup>
3. In remote areas can cost a family of four more than \$800 per fortnight.<sup>(6)</sup>
4. In regional Aboriginal communities can cost 40-50% of family incomes.<sup>(8)</sup>
5. Can be reduced by price promotions (i.e., specials) and generic brands,<sup>(9)</sup> but this happens less frequently (half as much) and less discounted than unhealthy alternatives.<sup>(10–12)</sup>

Additionally, data since the COVID-19 pandemic and cost-of-living crises tell us that:

1. Food and drink prices steadily rose after 2020 – with the Consumer Price Index (CPI) for grocery products peaking at 9.4% in December 2022 compared to the previous year (Figure 1.0).<sup>(13)</sup>
2. The supermarket prices of healthy foods have increased more than unhealthy foods since the COVID-19 pandemic and associated economic downturn.<sup>(14)</sup>
3. Years of progress made against food insecurity rates has been lost during this period.<sup>(15)</sup> This was felt most by people in rural areas, people on low incomes, people with disabilities, women, youth and children, and older persons.<sup>(16)</sup>
4. Approximately 2 in 5 Australians report that their grocery bills are the most stressful expense.<sup>(17)</sup>

### **TOR A) The effect of market concentration and the exercise of corporate power on the price of food and groceries**

Commonly publicised reasons for increased food and beverage prices in recent years have included: COVID-19 food system disruptions and economic demands,<sup>(18)</sup> climate and extreme weather events affecting crops,<sup>(19)</sup> and conflicts such as Russia's war in Ukraine disrupting fuel and other commodity prices.<sup>(20)</sup> However, the role of supermarkets in determining food and beverage prices has been unclear, with their powerful position remaining largely unscrutinised by the public until recently.

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Nevertheless, a systematic review of the available evidence on the power of Australian supermarkets by Pulker et al.,<sup>(21)</sup> found that supermarkets have multiple forms of power that are likely to ensure their dominance in price setting. This evidence-base includes:

1. **Instrumental power** – the power to influence decisions of other actors. This includes using lobbying, sponsorship, financial incentives, relationships with policymakers, public-private partnerships, legal action, technology and their ability to set trading terms with suppliers and consumers.
2. **Structural power** – the power to limit the range of choices of actors via agenda and rule-setting. Examples include: using market position (market share, market concentration, monopsony, etc.), market restructuring (i.e., own brands, vertical integration, international sourcing, consolidation, etc.), promoting deregulation and the burden of regulation, private governance of food standards, and voluntary codes of conduct and self-regulation, and financialisation.
3. **Discursive power** – the power to communicate in a way that influences norms and values across society. This includes framing issues to draw attention away from health and wellbeing, promoting value and convenience, or describing regulation as nanny-state interference. Moreover, supermarkets can use their discursive power to showcase their community involvement, build relationships with media and celebrities, promote their corporate social responsibility, and criticise public health actors.
4. **Political legitimacy** – supermarkets are known to use their authority to appeal to policymakers and processes, advocating for their need to be democratically included in any attempt to hold them accountable. This power overshadows the voices and experiences of other actors who do not hold the same power. This legitimacy is unchallenged by consumers and governments.<sup>(21)</sup>

#### **TOR D) The prevalence of opportunistic pricing, price mark-ups and discounts that are not discounts**

Many Australians make purchasing decisions based on what items are on special (or discounted).<sup>(22)</sup> Research from Deakin University (Institute for Health Transformation) shows that in the two major Australian supermarkets, unhealthy foods are discounted twice as often and with a larger discount compared to healthier foods and beverages.<sup>(10,11)</sup> Sugary drinks for instance, make up approximately two thirds of all price-promoted beverages in any given week.<sup>(11)</sup> As a result, food and drink items that are higher in sugar are more likely to be purchased on price promotion than other food and drink items.<sup>(23)</sup>

In addition, unpublished evidence from Pulker's PhD analysis suggests that supermarkets are taking advantage of their customers' preference for discounted items.<sup>(24)</sup> Results showed that of all (n=3940) supermarket own brand foods (SOBF)/home brands present in Coles, Woolworths, and IGA in Perth during 2017, only 7.8% were discounted. Yet over half (54.8%) carried price promoting messages on packaging or shelf edge labels.<sup>(24)</sup>

Current trading practices prohibit misleading messages.<sup>(25)</sup> This prohibition however is circumvented by price promoting not always promoting a price reduction, for instance, the label's fine print may just be promoting the store's low prices.<sup>(24)</sup> This method takes advantage of the consumer's notice of sales labels and the likelihood that a consumer won't read fine print.

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## **TOR E) The contribution of home brand products to the concentration of corporate power**

With the growth of SOBF/home brands, supermarkets such as Woolworths and Coles have extended their operations to also include food manufacturing, often at the expense of small and medium sized brands.<sup>(21)</sup>

This ultimately means that large supermarkets can exert more control across the entirety of the food production, transport, manufacturing and point of sale supply chain.<sup>(21)</sup> This also provides supermarkets with power over suppliers by strengthening their bargaining position, and provides valuable information about food production which strengthens their knowledge about the supply base.<sup>(21)</sup> The cost of competing with SOBF impacts on investment into product innovation by branded manufacturers, and their financial viability.<sup>(21)</sup> SOBF also impact on competition within the market, placing pressure on wholesale prices, which can be positive or negative for consumers.<sup>(21)</sup> Although SOBF/home brands tend to be lower in price (positive), they are also more likely to be ultra-processed foods or discretionary foods rather than healthy choices (negative).<sup>(26)</sup> Thus, Australians on low incomes that may rely on purchasing cheaper options end up purchasing more unhealthy choices.<sup>(26)</sup>

## **TOR G) Improvements to the regulatory framework to deliver lower prices for food and groceries**

### *Supermarket power remains ineffectively unregulated*

In 2022, Coles and Woolworths [ranked #23 and #35](#) of 250 global powers in retailing, boasted consistent profits in the 100s of millions of dollars. It is well established in the academic literature that supermarkets and other food industry actors use their ‘unprecedented political and economic power’ to influence efforts to regulate their practices and therefore minimise public health benefits.<sup>(21)</sup> The grocery retail sector has an obvious conflict of interest when it comes to regulating practices that will affect their profitability (such as prices). Clear evidence across the world shows that when these conflicts exist, self-regulation is almost always ineffective.<sup>(27)</sup>

Other work by Pulker and colleagues demonstrating supermarkets’ inability to self-regulate their practices at the risk of public health and wellbeing includes:

1. Not setting meaningful nutrition and affordability targets for their own brands and supermarket policies.<sup>(28)</sup>
2. Placing unhealthy food such as confectionary, snacks and sugary drinks on special and in prominent locations to promote their sale and consumption.<sup>(29) (1)</sup>
3. Inconsistent use of Health Star Ratings and Front-Of-Pack Nutrition labelling systems.<sup>(27) (2)</sup>
4. Not transparently reporting on food waste.<sup>(29) (1)</sup>

Other issues with inadequate supermarket regulation within the Australian context include Coles and Woolworths obtaining produce from [only a few major producers](#), thereby pushing out smaller growers from the market; [supermarkets setting new definitions and standards](#) for ‘free-range’ eggs to suit their profitability; and [supermarket own brands being sourced overseas and pushing out local brands](#).

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### ***Regulating supermarket power to address rising food prices – the need for policy action***

Australian families think that supermarkets should assist them to purchase and consume healthy, affordable foods and drinks.<sup>(30)</sup> There is a clear need to set better regulatory standards to ensure supermarkets are not jeopardising the health of our nation.

A 2022 study by Deakin University that interviewed supermarket representatives found that supermarket price promotions were most likely to be supportive of public health if: (i) mandatory regulation was enforced; (ii) compliance was extensively monitored; (iii) additional emphasis was placed on discounting the price of healthier food and beverage options; and (iv) sufficient lead time and retailer support was given to enable implementation.<sup>(31)</sup> However, the interviewees also reported several barriers that hindered implementation of policies to regulate supermarket specials, including: (i) fear of losing competitive advantage; (ii) perceived financial losses to retailers and consumers; and (iii) a perceived lack of impact on public health – none of which are supported by a robust evidence-base.<sup>(32)</sup>

Research from Deakin University shows that grocery settings can shift towards healthy and affordable retailing by prioritising their efforts to disrupt the supply-side status quo by (i) sourcing healthier and sustainable products from a more diverse range of suppliers and (ii) demonstrating leadership through corporate social responsibility actions that genuinely respond to the concerns of consumers and stakeholders (e.g., small-scale producers) who have been most marginalised by their profit-making practices.<sup>(32,33)</sup> For example, this can include investing in initiatives that improve the availability and affordability of healthy options for all and reporting on the sale of affordable healthy foods using evidence-based definitions and metrics.<sup>(29)</sup>

### **Policy recommendations for the Select Committee**

In consideration of the summary of evidence presented in this submission, PHAA urges that the Committee recommends:

- Fully funding and implementing the National Preventive Health Strategy 2021-2023, which includes ongoing access to adequate and affordable healthy food options and restricted promotion of unhealthy foods and drinks at point of sale and at the end-of-aisle in prominent food retail environments.
- Fully funding and implementing the National Obesity Strategy 2022-2023.
- Creating and implementing a National Nutrition Policy that is integrated across sectors (see PHAA policy position statements: [National Nutrition Strategy Background Paper](#) [2021] and [National Nutrition Strategy](#) [2021]).
- Creating enhanced regulatory frameworks (for instore and online supermarket formats) that:
  - Are Mandatory
  - Are Government-led
  - Ensure all Australians have access to healthy and affordable foods now and into the future
  - Include clear monitoring and enforcement processes for compliance, such as ongoing monitoring and benchmarking of food retail environments (e.g., the frequency and magnitude of price promotions, and monitoring how price promotions support or undermine other policy measures)<sup>(34,35)</sup> See [example in Belo Horizonte, Brazil](#).<sup>(36)</sup>
- The Goods and Services Tax exemption on basic healthy foods be retained in Australia.



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- Australian Bureau of Statistics regularly monitor and survey the CPI (healthy foods) as well as CPI (foods),(14) to better focus on the increasing costs of healthy foods.

## Conclusion

PHAA appreciates the opportunity to make this submission and the opportunity to ensure that more Australians can live healthy lives. Please do not hesitate to contact me should you require additional information or have any queries in relation to this submission.

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02/02/2024

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Figure 1.0 Cumulative increase in the costs of Healthy and Unhealthy diets and CPI increases, Brisbane, 2019 to 2022<sup>(14)</sup>

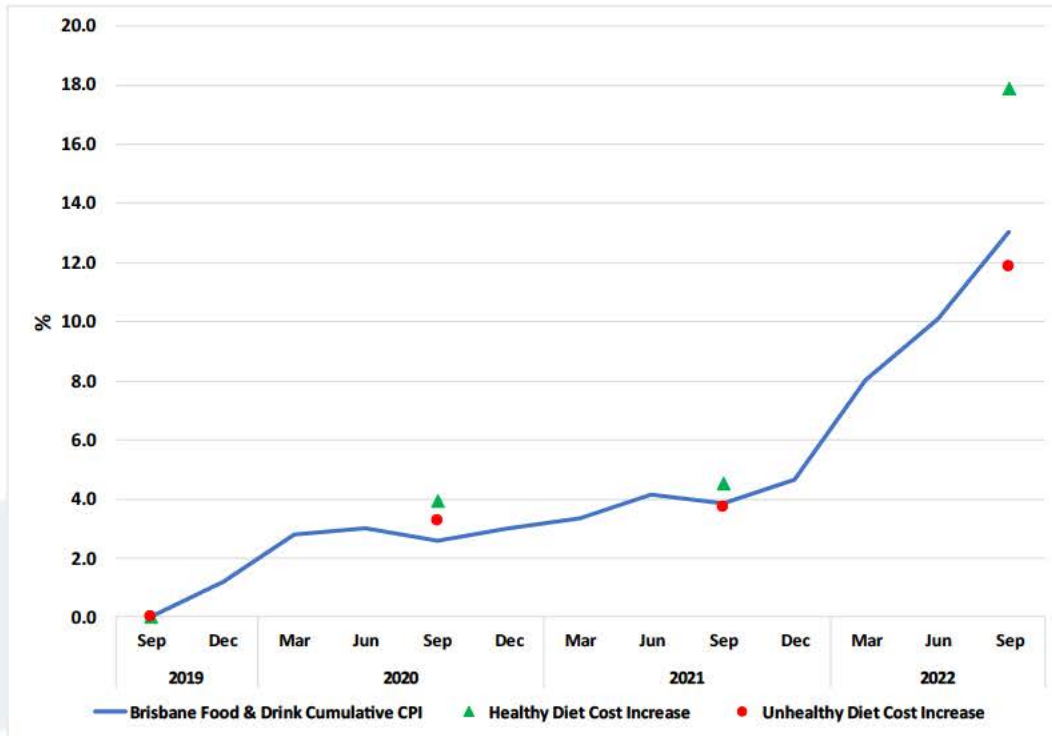


Table 2.0 Summary of information that describes supermarket own brands as a source of supermarket power in Australia. To view the references for Table 2.0, see Appendix 1.

1. Supermarket own brands are a source of instrumental power	
<i>Public-private-partnerships</i>	<ul style="list-style-type: none"> <li>Produced own brands in all food categories included in the food and health dialogue which aimed to reformulate commonly consumed products.<sup>1</sup></li> </ul>
<i>Access to knowledge</i>	<ul style="list-style-type: none"> <li>Access to consumer information via shopper data, which is not available to suppliers.<sup>2</sup></li> <li>Access to information about competitors.<sup>3</sup></li> <li>Access to information about manufacturing costs, which can be used to screen cost price requests made by branded manufacturers.<sup>4</sup></li> </ul>
2. Supermarket own brands are a source of structural power	
<i>Relationship with suppliers of branded products</i>	<ul style="list-style-type: none"> <li>Shift in power relations between supermarkets and manufacturers.<sup>5-6</sup></li> <li>The dual role of supermarkets as customer and direct competitor means there is a risk that abusive practices may be imposed on competitor branded manufacturers.<sup>7</sup></li> <li>Own brands increase leverage in negotiations with manufacturers of branded products.<sup>4,8</sup></li> <li>Branded suppliers face loss of brand status, reduced profit margins, or reduced shelf space.<sup>9</sup></li> </ul>

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	<ul style="list-style-type: none"> <li>• Own brands allow supermarkets to demand more from suppliers and remove branded products.<sup>10</sup></li> <li>• Dependence on individual branded products is reduced giving supermarkets greater flexibility to: reduce branded products' shelf space or stock a more limited range; and increase threats to delist branded products.<sup>4</sup></li> <li>• Given that shelf space is finite, branded goods are inevitably being removed to make space for supermarket own brands.<sup>7</sup></li> <li>• Own brand products are allocated more prominent shelf space than branded product suppliers have to compete directly for space.<sup>11</sup></li> <li>• Allows supermarkets to translate instrumental power to set terms of trade for suppliers, into structural power to set and enforce private standards, and effectively become regulators of the food system.<sup>12</sup></li> <li>• Supermarket power allows them to manoeuvre suppliers into supporting own brands.<sup>11</sup></li> </ul>
<i>Competition with other food retailers</i>	<ul style="list-style-type: none"> <li>• Aldi's market entry in 2001 fundamentally altered the role of supermarket own brands<sup>6</sup>; there was a significant increase in direct response,<sup>13</sup></li> <li>• Advantages of own brands include potentially improved consumer loyalty which offsets own brand competition from other chains.<sup>13</sup></li> </ul>
<i>Consumer loyalty</i>	<ul style="list-style-type: none"> <li>• Own brands form a strategy to develop consumer trust and loyalty.<sup>2,8,11</sup></li> <li>• Own brands strengthen reputation for quality products at low prices with consumers.<sup>14,15</sup></li> <li>• Own brands place pressure on food processors that directly benefits consumers by lowering prices and effectively raising household disposable income.<sup>16</sup></li> <li>• Advantages of own brands include more control over product design and marketing, and potentially improved consumer loyalty.<sup>13</sup></li> <li>• Over 80% of shoppers buy supermarket own brand products.<sup>6</sup></li> </ul>
<i>Market competition</i>	<ul style="list-style-type: none"> <li>• Leads to a more fragmented and competitive market environment, and provides an additional obstacle for food manufacturers to gain market access.<sup>17</sup></li> <li>• Potential to distort competition because supermarkets may promote their own brands in preference to branded products, or retain additional promotional benefits obtained by suppliers of branded products instead of passing them onto consumers.<sup>6</sup></li> <li>• Reduce double marginalisation (i.e. both the manufacturer and the retailer adding a profit margin) meaning consumers will pay less provided they are happy to buy the own brand product.<sup>18</sup></li> <li>• New food companies have emerged that only manufacture own brand products.<sup>19</sup></li> </ul>
<i>Market share</i>	<ul style="list-style-type: none"> <li>• Own brands increase market share.<sup>7</sup></li> <li>• Own brand products account for 25% of supermarket sales.<sup>20</sup></li> <li>• Own brands are now available across all product segments from basic household goods to high-end and organic product ranges.<sup>21</sup></li> </ul>

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	<ul style="list-style-type: none"> <li>• The extent of share of sales varies by category, influenced by the relative strength of branded products and the nature of product differentiation that exists within categories.<sup>20</sup></li> <li>• Woolworths report that 15% of their sales are from own brands, compared to 20% for Walmart, 50% for Sainsbury's and 90% for Aldi.<sup>22</sup></li> <li>• Globally, market share of own brands is increasing, and are predicted to continue to grow until they dominate the food supply led by the largest supermarket chains.<sup>23</sup></li> </ul>
<i>Market domination</i>	<ul style="list-style-type: none"> <li>• Development of own brands contributes to the process of domination called 'supermarketisation'.<sup>24</sup></li> <li>• One of the most important consequences of growth in own brand products, is greater control over the supply chain and greater returns.<sup>2</sup></li> <li>• By 2020-21, it is unlikely there will be a branded product range completely safe from own brand competition.<sup>21</sup></li> </ul>
<i>Financial benefits to supermarkets</i>	<ul style="list-style-type: none"> <li>• Contribute to the profitability of supermarkets at the expense of second-tier brands.<sup>8</sup></li> <li>• Coles own brand products account for 25% of the supermarket's revenue, and deliver higher margins for the company.<sup>15</sup></li> <li>• Profit margins on own brand products are higher than for branded products (10, 14, 17, 28), estimated at about 2% higher.<sup>13</sup></li> </ul>
<i>Risk management</i>	<ul style="list-style-type: none"> <li>• Private standards help to reduce risk for the supermarket by imposing rigid conditions for products, processes, and movement through the supply chain.<sup>26</sup></li> </ul>
<i>Vertical integration</i>	<ul style="list-style-type: none"> <li>• Development has led to vertical integration of supermarkets into manufacture.<sup>4</sup></li> <li>• Coles initiated the development of supermarket own brands that led to vertical integration of retailing and distribution with manufacturing.<sup>27</sup></li> <li>• By entering long-term contracts for own brand milk with processors supermarkets have increased vertical integration.<sup>27</sup></li> <li>• Growth in own brands has the potential to decrease the competitiveness within vertical supply chains.<sup>6</sup></li> </ul>
<i>International sourcing</i>	<ul style="list-style-type: none"> <li>• Can be sourced globally so there is less dependence on local suppliers.<sup>17,28</sup></li> <li>• Enables flexible product sourcing from anywhere in the world,<sup>25</sup> particularly for processed foods.<sup>20</sup></li> <li>• Woolworths report that, by sales, 74% of own brand products are made in Australia including: 95% of Macro, 67% of Select, and 72% of Homebrand (2014).<sup>22</sup></li> </ul>
<b>3. Supermarket own brands are a source of discursive power</b>	
<i>Framing actor identities</i>	<ul style="list-style-type: none"> <li>• A common perception of own brands is that they are detrimental to supplier welfare because they allow supermarkets to consolidate market power and monopolise the entire supply chain, yet supermarkets may not produce the product but instead relies on food manufacturers.<sup>29</sup></li> </ul>

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	<ul style="list-style-type: none"><li>• Supermarkets are accused of deliberately locating own brand products in more visible locations, so that consumers are more likely to choose own brands, yet argue that own brand products are treated the same as branded products, based on consumer demand.<sup>29</sup></li><li>• Although private standards for supermarket own brands are not communicated to consumers, including via packaging, supermarkets communicate through their own brand products to create a loyal and stable customer base.<sup>30</sup></li><li>• Supermarkets claim product decisions are based on sophisticated customer preference modelling and volume of sales; there is no strategy to replace branded products with own brand.<sup>16</sup></li></ul>
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