

AUST. COMPETITION &
CONSUMER COMMISSION
MELBOURNE
2 - JUL 2008



**A non-profit, volunteer
organisation, advocating to
advance the interests of
consumers in Queensland**

Secretary:
Max Howard
PO Box 261
Corinda Q 4075

Telephone: 0419 678 395

Graeme Samuel
Chair
Australian Competition and Consumer Commission
GPO Box 520
MELBOURNE V3001

27 June 2008

Dear Mr Samuel

ACCC Grocery Inquiry - Melbourne Hearing 19 May 2008

I refer to my letter on the above matter dated 27 May 2008 in which I congratulated you for raising with Woolworths the critically important issue of the size of the font used to show the unit prices of prepacked grocery items in supermarkets.

Recently, a member of the Association visited the supermarket in Sydney where Woolworths is conducting a trial of unit pricing referred to in the transcript of the hearing in Melbourne on 19 May.

The following extract from the transcript suggested that at the trial Woolworths might be using a large font to show the unit price on shelf labels:

MR SAMUEL: Out of deference to the more maturing members of the community, have you got any idea what sort of minimum font you'll be looking at?

MR LUSCOMBE: Well, if - - -

MR SAMUEL: Given that I do remember the Safeway fonts and they were fairly small.

MR AYLEN: In fairness, Michael, with the test, I believe we're currently at nine.

MR SAMUEL: Yes.

MR AYLEN: Now, it could be 8, it could be 10, a bit like my eyesight, but I think we're bout 9 mill with the test at the moment.

MR LUSCOMBE: I'll be applying my own test, chairman.

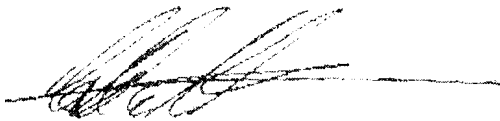
MR SAMUEL: Well, if I could also be consulted in that, that would be helpful, thank you. All right.

FILE No:
DO8/63074
MARS/PRISM.

I am advised that on the day of the visit, the font being used to show the unit price on the shelf labels was only 2mm high and that consequently the unit price information was not easy to read even at eye level and impossible on the lower shelves.

The Association reiterates that unit pricing systems will be used fully by consumers only if the information is presented prominently. Accordingly, it is essential that any supermarket providing unit price information, compulsorily or voluntarily, be required to meet minimum standards for prominence of presentation. Minimum standards are required also for many other aspects of unit pricing, including the units of measurement used to indicate the unit price. At the Woolworths' trial the unit of measurement for weight is 100g and for volume is 100mL. The standard should be kg and litre.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Cherie Dalley', with a long horizontal line extending to the right.

Cherie Dalley
President