[redacted]

From: [redacted]
Sent: Wednesday, 5 August 2026 1:44 pm
To: [redacted]
Cc: [redacted]
Subject: Confidential Submission Regarding J&P Turner / T&G Fresh Proposed Acquisition [CCNZ-IMANAGE.FID497500]

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Dear Commerce Commission Team,

I request that this submission be treated as strictly confidential.

I am a commercial grower supplying fresh produce into the New Zealand market. I would like to request that any public version of my submission be published only after removing / redacting all information that could reasonably identify me, my business, or the products that I grow.

This would include, but not necessarily be limited to:

- My name;
- My business name;
- My email address and contact details;
- Any references that could identify my growing operations;
- Any references to the specific produce category that I grow;
- Any references that could identify my market position, growing region, or commercial relationships.

I am writing to express my concerns regarding the proposed acquisition of T&G Fresh by J&P Turner (Fresh Direct).

My concerns relate primarily to the impact of the transaction on competition within the fresh produce supply chain, particularly for growers and independent retailers, and the longer-term consequences for consumers.

Reduced Competition for Growers

As a grower, I currently have the ability to market my product through both T&G Fresh and Fresh Direct. While both businesses compete in similar markets, they provide independent routes to market and create competitive tension that benefits growers.

If the acquisition proceeds, two of the three major wholesale participants in New Zealand will effectively become one.

The loss of an independent wholesale buyer will reduce the competitive options available to growers and increase dependence on fewer market participants. This is particularly significant for highly perishable crops where growers have limited ability to store product and are reliant on efficient market access during short harvest windows.

In my view, the practical effect of the merger will be a material reduction in bargaining power for growers.

Concerns Regarding Alternative Channels

While it may be argued that growers can switch to alternative wholesalers should the merger proceed, an unintended consequence of the transaction may be increased concentration within certain produce categories. Where a wholesaler already holds a significant market position in a particular category, growers seeking an alternative to the merged entity may have little choice but to direct additional supply through that wholesaler.

This could further entrench existing market positions and, over time, result in a reduced level of competition for grower supply. In such circumstances, the loss of an independent wholesale participant may reduce growers' bargaining power and leave them with fewer genuinely competitive routes to market. From a grower's perspective, the relevant question is not whether another wholesaler exists, but whether sufficient competition remains between wholesalers to provide meaningful choice and competitive tension.

Impact on Independent Retailers

I am equally concerned about the implications for independent fruit and vegetable retailers.

Independent retailers depend on competitive wholesale markets to access product, obtain competitive pricing, and maintain reliable supply.

Over many years, the New Zealand produce industry has experienced ongoing consolidation within wholesale markets and distribution networks. At the same time, the number of independent fruit and vegetable retailers has declined significantly across many regions of New Zealand.

While there are many factors contributing to this trend, I believe there is a clear relationship between the reduction in wholesale competition and the decline of independent retail operators.

Where strong wholesale markets exist, independent retailers are generally better able to compete. Where wholesale competition is reduced, independent retailers become increasingly disadvantaged relative to the major supermarket chains.

Long-Term Consumer Impact

My greatest concern is not necessarily the immediate impact on consumer pricing.

Rather, I am concerned about the long-term structural consequences for competition.

Some may argue that independent retailers have alternative sourcing options through businesses such as Seeka or Primor Produce. However, in my view these businesses should not be considered genuine substitutes for a national wholesale market. Neither operates as a full-service national wholesale network, and their presence is largely confined to the greater Auckland region. As a result, they do not provide a practical alternative for many independent retailers or growers operating throughout New Zealand.

It is also important to recognise that Auckland remains one of the few regions in New Zealand where independent fruit and vegetable retailers continue to hold meaningful market share and are able to compete effectively with the major supermarket chains. In my view, this is not coincidental. Auckland also retains a stronger and more diverse independent wholesale market than many other parts of the country.

Over the past several decades, a significant consolidation of wholesale produce markets has occurred throughout New Zealand. During the same period, the number and market share of independent fruit and vegetable retailers has declined in many regions. While there are undoubtedly a number of factors contributing to this trend, I believe there is a direct correlation between the strength of independent wholesale market competition and the ability of independent retailers to compete successfully against larger supermarket operators.

Where independent wholesalers and wholesale markets remain strong, independent retailers have greater access to competitive pricing, product variety, market information, and reliable supply channels. Where wholesale competition diminishes, independent retailers face increasing challenges in remaining competitive. Over time, this can contribute to further market concentration at the retail level.

If wholesale consolidation continues, independent retailers will face fewer supply options and may become less competitive. Over time, this is likely to contribute to further decline in the independent retail sector and increased concentration of grocery and fresh produce sales within the two dominant supermarket groups, Foodstuffs and Woolworths New Zealand.

A supply chain that becomes increasingly concentrated at both the wholesale and retail levels is unlikely to deliver the best long-term outcomes for consumers. Reduced retailer diversity ultimately means less competition, less choice, and a greater risk of higher prices over time.

Request for Consideration

I respectfully ask the Commission to consider not only the direct effects of the acquisition on wholesale market share, but also:

- The reduction in genuinely independent routes to market available to growers.
- The impact on grower bargaining power.
- The effect on access to supply for independent retailers.
- The long-term viability of wholesale markets in New Zealand.
- The broader implications for retail competition and consumer choice if supply chains continue to consolidate around a small number of dominant participants.

Thank you for considering this submission.

I would again request that my identity and submission be treated in strict confidence due to the commercial sensitivity of my relationships with the parties involved.

Yours sincerely,

[redacted]