

The following submission on the Wholesale Supply Inquiry: Preliminary Findings Paper, was received through the Commission's Anonymous Reporting Tool (ART) and has been summarised by the Commission to further protect their identity.

Wholesale regime - Impact of Pharmacy channel and Medsafe and CHPNZ controls

1. Customer Trust and Responsible Access:

Moving to a wholesale model could reduce visibility over where and how medicated products are made available to consumers. Today, distribution through Regulated Grocery Retailers (RGRs) ensures that customers receive these products in environments that support responsible use and align with both brand values and consumer expectations. A shift away from this model may impact the ability to maintain that same level of trust and assurance.

2. Maintaining Standards in a Broader Market:

Expanding into wholesale channels introduces new complexities in ensuring that all promotional and safety standards are upheld. While this model may offer broader reach, it also increases the risk of inconsistent messaging or misuse if products are not handled or marketed in line with Medsafe and CHPNZ guidelines. Protecting consumer safety and brand reputation requires careful oversight, even as we explore new ways to meet customer demand

3. Compliance, Safety, and Regulatory Oversight:

A wholesale model introduces complexities that could compromise the safe promotion and sale of medicated products. Without direct oversight, there is an increased risk of non-compliance with Medsafe and CHPNZ guidelines, potentially leading to unsafe handling, misuse, or inappropriate marketing. These risks not only pose regulatory challenges but could also damage the brand's reputation and consumer trust

4. Entrenched Market duopoly,

making both changes, Code and wholesale at the same time, why not complete the code changes, given the entrenched market duopoly powers, this could then by nature of the changes allow for more competition without the wholesale act

5. Alternate supply methods, i.e. going direct,

'many requests' / 'lack of availability; we have given any direct supply requests options for supply currently. Why would lack of availability for one category mean ALL suppliers are then forced into wholesale supply conditions