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# Industry-led solution commitment examples

**GROCERY WHOLESALERE SUPPLY INQUIRY**

May 2026



# Context

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- As set out previously at our webinar in March, the Commission is inviting suppliers (and RGRs) to make commitments regarding improvements to wholesale grocery supply in April and May 2026.
- These commitments will be summarised in an Industry-Led Roadmap. The Roadmap will not include commercially sensitive information.
- The Roadmap will inform our assessment regarding how an industry-led approach will deliver improvements in key areas of wholesale grocery supply, and whether additional regulations are required as part of the Draft Inquiry Report.



# How these examples should be used

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- We acknowledge that some suppliers may appreciate seeing examples of the types of commitments they could make.
- These examples have been prepared to align with the areas where the Commission has identified that the current wholesale market is not performing at the level we would expect to see in a competitive market. They are provided as a guide only.
- They are intended to assist suppliers to develop commitments that are workable and appropriate for their businesses. As it is an industry-led solution, it is not for the commission to specify how your business can improve. The examples do not represent a prescribed or mandatory set of commitments. You may use, adapt, or remove any elements as you see fit.
- We do not want to add administrative burden by setting prescriptive measures.



# How these examples should be used

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- Suppliers will need to tailor these examples to best suit your businesses and to ensure they have meaningful impact on the wholesale supply market.
- Your commitments should be time-bound and outcomes focused, and reflect commercial realities, such as cost-to-serve.
- The commitments could detail actions your businesses are already taking, where they align with our expectations for the wholesale grocery market. If this is the case, you should also supply supporting evidence about these actions and the associated impacts.
- We do not expect public declaration of commercially-sensitive information. But to assess the likely impact of the commitments and the progress, we need to see the evidence that sits behind the commitments.



# Introductory statement

*You could include an introductory statement to your commitments that signals intent, alignment with the regulatory environment and accountability. For example:*

## **[Supplier Name] – Commitments to improve grocery wholesale supply**

[Supplier] is committed to supporting a competitive and efficient grocery market to enable retail competition, for the benefit of New Zealand consumers.

These commitments are consistent with the Commerce Commission’s expectations for the wholesale market, as set out in the [Wholesale Supply Inquiry Preliminary Findings Paper](#), [Open Letter to participants in New Zealand’s grocery wholesale market](#), and the Wholesale Market Indicators.

Endorsed by:

[Supplier]

[Senior executive name and title]

[Date]



# Theme – visibility for wholesale customers (available products)

*You could include commitments about how you will support wholesale customers to understand what products are available for sale. For example:*

To support wholesale customers' ability to access and compare grocery products we will:

- Provide them with clear information about available grocery products, including prices, contact persons for negotiations, minimum order quantities, order cut-off and lead times, delivery schedules, handling requirements, payment facilities and any other relevant supply criteria and/or service levels; and
- [If relevant] Engage constructively with regulated grocery retailers (RGRs) to support improved visibility of products available in their wholesale offerings.
- [If relevant] We will support RGRs to provide us with sales information by engaging constructively with RGRs about their development of any necessary systems and processes

*To ensure your commitments are specific and meaningful, you should tailor them to reference the specific actions your business takes / will be taking.*

- *For example, demonstrating how your current/future systems/approaches will ensure wholesale information is easy to access, consistent and kept up to date. You should also set out how your engagement approach will enable you to engage constructively with wholesale customers.*



# Theme – cost-effective pricing and access to rebates, discounts and payments (RDPs)

*You could include commitments setting out how you will ensure wholesale pricing is cost-effective. For example:*

We will contribute to cost-effective wholesale pricing by:

- Ensuring products supplied to RGRs are also available for direct supply on comparable terms, reflecting actual costs to serve and that variation only occurs where objectively justifiable; and
- Making available range-, quantity- and frequency-based rebates, discounts, and payments (RDP) funding to non-RGR retailers, either directly or via RGR wholesale offers; and
- Using reasonable endeavours to offer non-RGR retailers lower net prices, if promotional funding is not available; and
- Reviewing wholesale pricing and promotional arrangements at regular intervals to support cost-effective wholesale pricing (including increased proportion of RDPs to non-RGR retailers).

*You should tailor your commitments to set out how your systems and approaches ensure that:*

- Wholesale pricing offered to all retailers is comparable in structure and outcomes, with differences linked only to cost-to-serve, e.g. you could explain your cost-to-serve model (how pricing differences will reflect factors such as order size and frequency, delivery location and/or handling costs);
- RDP settings (including for promotional funding) mean RDPs (or lower net prices) are accessible to all grocery retailers, e.g. by explaining your current/planned RDP opportunities for non-RGR retailers and/or by explaining the circumstances in which promotional funding would not be available and what alternate mechanisms could be used in these circumstances to lower net prices; and
- Pricing and promotional settings are actively reviewed e.g. you could identify frequency and what factors you will consider as part of these reviews, and describe your strategy for increasing the proportion of RDPs to non-RGR retailers.



# Theme – range/choice

*You could include commitments about how you will support competitive range and choices for wholesale customers. For example:*

We will support a competitive product range and choices for wholesale customers by:

- Participating in RGR wholesale offers or supplying wholesale customers directly at terms and conditions that are not worse than those offered to RGRs (unless there is an objectively justifiable reason to do so); and
- Making available in-demand products, at terms and conditions that are not worse than those offered to RGRs (unless there is an objectively justifiable reason to do so), this includes the products wholesale customers request, and where relevant may include choice within categories and at different price points ; and
- Responding to wholesale ranging requests promptly in writing; and
- Providing clear, objectively justifiable reasons in writing where requested products cannot be supplied.

*You should tailor these commitments to set out how your systems/processes ensure that:*

- *Wholesale customers can access products on T&Cs that are comparable to those offered to RGRs, e.g. by confirming all the channels through which wholesale customers can access products, explaining any differences in terms and how these are linked to objectively justifiable factors, and confirming the internal policies/principles you use to assess the comparability of T&Cs;*
- *You can respond promptly to wholesale ranging requests;*
- *Where products cannot be supplied, you have clear, objective criteria; and*
- *Requests are dealt with transparently.*



# Theme – competitive conduct

*Your commitments could include statements about how you will support competitive conduct in the wholesale grocery market. For example:*

We will support a more competitive and efficient grocery wholesale market by:

- Treating non-RGR retailers on terms and conditions that are not worse than those offered to RGRs, except where objectively justified;
- Competing actively to win and retain (non-RGR) wholesale customers; and
- Providing information to non-RGR wholesale customers' that allows them to compare products across alternative channels.

*To support your commitments, you should provide detail about:*

- *How your business applies fair and comparable terms across customer types; and*
- *Your business's strategy for competing for non-RGR wholesale customers; and*
- *The types of information you will make available to wholesale customers to allow them to compare deals effectively.*



# Reviewing and reporting on progress

*Your commitments could include statements about how you will review your performance and report it to the Commission. For example:*

- We will review our performance against these commitments on at least an annual basis. Based on this review, we will report annually to the Commerce Commission about our performance against our commitments.
- We will engage constructively with wholesale customers and the Commerce Commission to support continued improvements to wholesale grocery supply. We will report annually to the Commerce Commission about our future plans for improving wholesale grocery supply.



# Next steps

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- In order for your commitments to be included in the Industry-Led Roadmap and Draft Inquiry Report we need to receive them by late-May 2026.
- The Roadmap will bring together your individual commitments, to capture the industry-led progress already made to date and to present a clear picture of the industry-led approach to improving wholesale supply. Practically this will involve aggregating your individual commitments and actions into common themes, and then aligning these themes with the intended outcomes for a more competitive and efficient wholesale market.
- The Roadmap will also set out key milestones and how the commitments will be implemented over time. It will indicate where responsibility sits, and how and when progress will be monitored, reviewed and reported.
- The Roadmap will identify what suppliers and RGRs have made commitments, but will not include commercially sensitive information, e.g. individual businesses specific commercially-sensitive strategies.
- If you have questions or would like to request a meeting about your commitments, please contact our team at [Grocery.Regulation@comcom.govt.nz](mailto:Grocery.Regulation@comcom.govt.nz)

