

Formerly Small Retailers Association

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The General Manager
Adjudication Branch
Australian Competition & Consumer Commission
PO Box 1199
DICKSON ACT 2602

Friday 6th October 2006

Contact Officer
Kelvin Binning

Dear Sir

Submission concerning Authorisation A6058

While the justification for not reviewing the authorisation seems to be based on a variety of views (not fact), that there are changes of circumstances; there seems to be little relevance between those supposed changes and the operation of the subject in the real world.

The reason and justification for producing the Price Guide hasn't changed. In fact, life is now much harder for small retailers in this country, where only big business is growing, thanks to de-regulation.

The fact that SRA Members still want it and are prepared to pay the SRA to prepare the Guide, is proof enough that it is still relevant and useful. Have they been asked? They are annoyed that the Price Guide is under threat.

All retailers using our Price Guide are, we argue, members of the public and the Price Guide benefits them by providing the only list of products they can access, unless they are (for instance) an IGA store, following the prices of the IGA in the IGA recommended price list.

We would also argue that the Price Guide could keep prices fair generally – the two major chains admit that they monitor other retailers' prices, and then undercut them. So, the Price Guide may well help to keep prices fair and reasonable overall – in the public interest.

We know that the major chains hope that small business costs (and prices) rise, so that they will, in turn, have to lift their prices.

Many of our member's either don't have computers or, if they do, keep them at home where they do their bookwork. In fact, it is far quicker to use the Price Guide to check the (suggested) price of a product than it is to go to a computer, log-on, find the product/ category and then look for the price. No one can keep a computer on the counter, but the Price Guide will fit almost anywhere and be close at hand.

The Price Guide is now being produced by SAMBA, as was originally the case, though the producers' name change was no different to the TPC becoming the ACCC!

It would appear to us that in actuality, providing the information requested of us, we were unwittingly providing the ammunition the ACCC needed to question accreditation. We can see from your comments that the ACCC has little idea as to how small business operates in a market that suffers from the domination of an oligopoly, (Coles and Woolworths); whose constituents are more often in the eye of the ACCC than is any small business operator.

Having discovered some of the "interested parties" contacted by the ACCC regarding this authorisation, we are amazed at the process, especially as the Price Guide is of absolutely no interest to them: - in fact some didn't even know what it was, why it existed and who it helped. Not a good way to bring about fair or considered comment.

In our view, the Price Guide still serves the original purpose that it was intended to fulfil: – it is still in demand and it performs a useful daily service to small (food) retailers who don't have the time or resources to ring about a similar outcome for themselves. For them, circumstances have not changed even though it is 2006. For them, the only thing that has really changed is that they are working longer and harder for less.

Yours sincerely

John Brownsea
Executive Director
State Retailers Association;