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Director of the Supermarkets Taskforce,
The Treasury
Langton Crescent
PARKES ACT 2600
AUSTRALIA

Strengthening the Unit Pricing Code

Thank you for the opportunity to make a submission in response to the strengthening the Unit Pricing Code consultation paper.

National Seniors Australia (NSA) is the leading advocacy organisation for older Australians. Through our research and advocacy activities, NSA works to improve the wellbeing of all older Australians, including pensioners, part-pensioners, self-funded retirees, veterans, and carers.

At a time of cost-of-living pressure, effective unit pricing is an important tool for people to manage their budgets, particularly for people on fixed incomes such as those receiving the Age Pension. We wish to express our support for the detailed submission made by the Queensland Consumers Association (QCA), including the recommendations to:

- Expand the number of retailers to which the Code would apply by lowering the minimum floor area threshold and expanding the number of grocery categories.
- Make it easier for a person to read the unit price and adding specific requirements.
- Reduce inconsistency in the units of measure and a requirement that unit prices be accurate.
- The expansion of the code to grocery comparison websites and television advertisements.
- Improved monitoring and enforcement of the Code, including financial penalties.
- Expansion of the Code to other types of retailers.
- In-store and online notification of 'shrinkflation'.

We make some further comments particularly relevant to seniors below.

Yours Sincerely



Chris Grice
Chief Executive Officer

Pensioners spend a larger proportion of their budget on food

At a time of cost-of-living pressure, the price of staples is of particular importance, including those on fixed incomes such as people receiving the Age Pension. A survey we conducted of 6,500 older people showed that the price of groceries was the second-highest cost-of-living concern, behind insurance.¹

This may be driven by the fact that food makes up a larger proportion of their budgets. This is reflected in Australian Bureau of Statistics' (ABS) Pensioner and Beneficiary Living Cost Index (PBLCI) which estimates change in the cost of a basket of goods specific to pension and benefit recipients. The PBLCI has a higher weighting to 'food and non-alcoholic beverages' for pensioners, reflecting the fact that a higher proportion income is spent on these items are compared to the other consumers.

Usefulness of unit pricing to consumers undermined by other changes

Given an ageing population, minimum standards for unit pricing legibility are critical. They should be set such that they can be comfortably and confidently read from a short distance by a person either standing or in a seated position (such as using a mobility aid) without having to crouch or bend or otherwise and not be significantly smaller proportionately than the per item purchase price.

We are concerned that the increasing use of e-ink-style electronic shelf labels can reduce legibility, including through a limited brightness, glare, low-resolution, limited viewing angles, and small fonts.

On a similar note, while this is not within scope of the Unit Pricing Code, we do wish to raise the issue of hinderances to mobility in stores. Especially given an ageing population, we would hope that supermarkets and other retailers make their stores accessible to people with mobility issues. We are concerned by large end-of-aisle displays which extend into and beyond the aisle, which also has been a concern of the Australian Human Rights Commission², and the increasing use of large click-and-collect trolleys within aisles.

In terms of online shopping, with the expansion of click-and-collect or delivery grocery shopping, some retailers have switched to displaying online unit prices per item of fruit or vegetables. We recommend that retailers choosing to show per-unit pricing to also show price per weight of the item. This is important to maintain price comparability between retailers.

¹ [Submission to Senate Select Committee on Supermarket Prices | NSA](#)

² [Access for all: Improving accessibility for consumers with disability | Australian Human Rights Commission](#)