

29/05/2026

The Treasury  
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## Reforms to the Unit Pricing Code, targeted consultation – May 2026

Thank you for the opportunity to make a submission in response to the further consultation on the reforms to the Unit Pricing Code.

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 self-funded retirees, pensioners, part-pensioners, veterans, and carers.


Seniors are deeply concerned with the cost of groceries at this time of cost-of-living pressure, and unit pricing is an important tool to manage budgets.

We wish to express our support to the recommendations contained in the related submission from the Queensland Consumers Association, attached, which we summarise below:

- Unit pricing **obligations should be expanded** to include a greater number of retailers, by:
  - **reducing the product category threshold** (from 11 to 4, for both physical and online retailers)
  - **reducing the minimum floor area** (from 1000m<sup>2</sup> to 300m<sup>2</sup>) and
  - **the inclusion of non-grocery retailers.**
- **Unit price** and **unit of measurement** should be legible when viewed from normal viewing positions and distances via **minimum font sizes** using standard font types and with **minimum contrast requirements.**
- Retailers should be required to **display information for a minimum period of time** explaining when the size of a product is reduced to alert people to possible **shrinkflation.**
- Effective **monitoring and compliance** regimes are required to enforce the Code, including the use of a penalty regime for serious breaches.
- The effectiveness of the amended **Code should be reviewed** no later than **two years after commencement** of any new provisions.

Soon to be published research we have conducted into the concerns older Australians have about affordability reveals that 39% of people receiving the full age pension are concerned about the cost of groceries. This is the fifth highest affordability concern for this cohort out of the twelve categories, ranking behind healthcare.

Yours Sincerely



**Chris Grice**  
Chief Executive Officer