

Let's talk shop.

Improving price transparency in the supermarkets industry

February 2026

The Australian Retail Council (ARC) welcomes the opportunity to contribute to Treasury's consultation on *Improving Price Transparency in the Supermarkets Industry*.

ARC represents a \$444 billion sector and employs 1.4 million Australians, one in ten workers, making retail the nation's largest private sector employer and a cornerstone of the Australian economy.

Our membership spans the full breadth of Australian retail: from family-owned small and independent businesses, which comprise 95 per cent of our membership, to the largest national and international retailers that support thousands of jobs and sustain communities across both metropolitan and regional Australia. Our industry operates more than 155,000 retail outlets nationwide, with the majority of those also represented by an online or e-commerce presence.

A strong retail sector delivers widespread benefits to all Australians, with a significant portion of every dollar spent in retail flowing back to employees, suppliers, superannuation funds, and local communities. We are united in advocating for the policy settings, reforms and collaboration that will drive growth, resilience, and long-term prosperity for Australian retail and the millions who rely on it.

Executive Summary

ARC supports efforts to improve transparency for consumers in supermarket pricing, promotions and loyalty programs, consistent with the objectives arising from the ACCC Supermarkets Inquiry.

Greater transparency can support informed consumer decision-making and reinforce competitive outcomes. However, reforms must be proportionate, carefully calibrated and aligned with existing regulatory frameworks to avoid unintended costs, duplication or operational complexity.

ARC's key positions are:

- **In-store pricing:** Support requiring all supermarkets to display prices in-store, noting this is already common practice; implementation should be carefully calibrated for remote community stores.
- **Online pricing:** Note that large supermarkets already publish prices online; do not support introducing new duplicative regulation or extending any obligation to smaller or mid-sized operators.
- **Third-party access:** Support enabling third-party use of price data via web-scraping, as a proportionate alternative to mandatory APIs.
- **Promotions:** Support minimum information requirements for discount promotions, but only where requirements are tightly scoped and designed to avoid consumer overload and operational impracticality.
- **Loyalty:** Do not support mandatory loyalty program disclosure summaries.

In-store pricing

Let's talk shop.

ARC supports the principle that consumers should be able to see clear pricing information in-store at the point of purchase. Most supermarkets, including independent grocers and major chains, already display prices as standard practice.

Where concerns have been identified in remote settings, implementation should be proportionate and carefully aligned with existing frameworks, including the Unit Pricing Code and other government initiatives aimed at supporting remote community stores. ARC considers implementation should prioritise support and capability-building, particularly in remote settings, with compliance action focused on systemic or deliberate non-compliance.

Alignment with existing government frameworks already operating in remote settings will be important to avoid duplicative reporting, inconsistent enforcement approaches, or layered compliance obligations. ARC does not expect this proposal to impose material additional compliance costs on its members.

Online Pricing

ARC supports efforts to improve consumer access to pricing information, but does not support introducing duplicative new regulation where existing market practice already delivers the intended outcome. We note that large supermarkets already publish prices online via their websites.

ARC does not support extending any online price publication requirements to smaller or mid-sized operators. Smaller retailers face disproportionate technology, systems integration and ongoing maintenance costs, and additional obligations risk diverting resources from price competitiveness and service delivery.

Treasury should clearly articulate the incremental policy problem being addressed, given current market practice.

Enabling web-scraping technologies

ARC supports enabling third-party access to publicly available pricing data through web-scraping technologies. Web-scraping already operates effectively and is widely used by comparison tools, researchers and retailers themselves. Requiring website terms not to prohibit scraping and ensuring functional access to machine-readable pricing data is a proportionate and efficient approach.

ARC does not support mandating application programming interfaces (APIs). Mandatory APIs would introduce significant build, governance, security and ongoing maintenance costs at scale. Given the volume of products and potential for location-based price variation, these costs could be material and ultimately passed through to consumers.

A web-scraping requirement achieves the policy objective at materially lower regulatory cost. Treasury should ensure any technical requirements are clearly defined and proportionate, with adequate implementation timeframes to minimise disruption.

Let's talk shop.

Minimum information requirements for discount price promotions

ARC supports efforts to improve clarity for consumers in relation to discount promotions, but cautions against overly prescriptive disclosure requirements that risk consumer overload, operational complexity, or unintended cost impacts.

Any minimum information requirements should:

- Be principles-based rather than highly prescriptive;
- Focus on a limited set of high-value information for consumers;
- Be designed with practical shelf label constraints in mind, including electronic shelf labels; and
- Align with, and not cut across, the Unit Pricing Code review process.

ARC considers implementation should be coordinated with broader reforms affecting in-store disclosure, including unit pricing and unfair trading practices reforms, to ensure consistency of information presented to consumers and avoid layered obligations.

ARC supports limiting any such requirements to large supermarkets and excluding categories such as markdowns, clearances and member-only pricing, where commercial and operational circumstances differ.

Record-keeping requirements should also be proportionate and consistent with existing obligations under consumer law and the Food and Grocery Code of Conduct.

Loyalty program disclosure summaries

ARC does not support mandatory loyalty program disclosure summaries.

Loyalty program members already have access to key information through existing program channels and communications, including information about how points are earned and redeemed. We further note that loyalty programs are opt-in. Customers make a proactive choice to join (or not join) and participation is entirely optional.

Mandating six-monthly disclosure summaries also raises practical issues. In particular, assigning a consistent or meaningful “monetary value” to points is not feasible, given points can be redeemed across a wide range of products and partner offers and are not treated as having a cash value under program terms and conditions. A mandated summary risks oversimplifying how benefits are realised and may create consumer confusion rather than clarity.

ARC considers existing Australian Consumer Law protections, together with proposed unfair trading practices reforms, provide an appropriate framework to address any genuine consumer harm. On this basis, ARC does not consider a mandatory disclosure regime to be proportionate or workable.

Let's talk shop.

Conclusion

ARC supports reforms that enhance consumer confidence and strengthen transparency in supermarket pricing and promotions. However, reforms must remain targeted, proportionate and aligned with existing regulatory frameworks to avoid unnecessary compliance costs and unintended consequences.

ARC welcomes continued engagement with Treasury as these reforms progress. Any queries in relation to this submission can be directed to our policy team at policy@retail.org.au.

About us: Australian Retail Council (ARC) represent a \$444 billion sector that employs 1.4 million Australians across metropolitan, regional, and remote communities – making retail the largest private sector employer in the country and a significant contributor to the Australian economy. Our membership spans the full spectrum of Australian retail, from family-owned small and independent retailers that make up 95% of our membership, through to our largest national and international retailers that employ thousands of Australians and support both metropolitan and regional communities every day.