

29 September 2008

Mr James Chisholm
Competition & Consumer Policy Division
The Treasury
Langton Crescent
PARKES ACT 2600

Dear Mr Chisholm

Re: Unit Pricing Issues Paper

With the release of the Treasury Unit Pricing Issues Paper on 12 September 2008, the Australasian Associated Brewers welcomes the opportunity to provide comment on unit pricing, specifically relating to the sale of packaged beer.

Australasian Associated Brewers is an industry association for brewers, representing Australia and New Zealand's largest manufacturing brewers including Foster's Group, Lion Nathan, Coopers Brewery, and DB Breweries. The Associated Brewers is a policy-based organisation that has been representing its members in legislative and regulatory affairs in Australia since 1967 and in New Zealand since 2007. We maintain a presence in both Canberra and Wellington.

Following from the report of the recent Australian Competition and Consumer Commission Inquiry into the Competitiveness of Retail Prices for Standard Groceries, we note that alcohol products were expressly excluded from consideration as standard grocery products, and therefore excluded from consideration *vis-à-vis* unit pricing:

"...the ACCC has not investigated issues relating to alcohol and tobacco products. The ACCC did not consider that such items fell within the scope of standard groceries. Furthermore, to extend the inquiry to include these products would have broadened the inquiry very significantly, particularly given that the competitive dynamic for such products is quite different to other grocery items."

While alcohol products are not within the scope of existing examinations of unit pricing, the Associated Brewers would appreciate the opportunity to comment on any future examination, should your enquiries be widened to include alcohol products.

Yours sincerely



Stephen Swift
Executive Director