

National Federation of Retail Newsagents (NFRN) Submission to the Competition and Markets Authority guidance: part 1 consultation

Introduction

The National Federation of Retail Newsagents (NFRN) would like to thank the Competition and Markets Authority and the Department for Business, Innovation and Skills for the invitation to make a written submission on behalf of our members to the Competition and Markets Authority guidance: part 1 consultation.

The NFRN is one of Europe's largest trade associations, representing over 16,000 fee paying members from approximately 18,000 independent newsagents and convenience stores across the UK, Channel Islands and the Republic of Ireland. We are a membership led organisation that is democratically structured; policy is made by annual conference and its implementation is overseen by National Council.

The NFRN assists the independent retailer to compete more effectively in today's highly competitive market through the provision of practical help and assistance, commercial support, deals and buying opportunities, training, expertise and services, it also represents its members' interests at governmental and parliamentary level, as well as within the news and magazine industry.

We would be happy for our responses to this consultation to be made available on the CMA website.

Guidance document: Market Studies and Market Investigations: Supplemental guidance on the CMA's approach

1. Do you consider that the Draft Guidance covers the main changes that are introduced by the ERA13 to the CMA's conduct of market studies and market investigations? If not, what aspects do you think are missing?

The NFRN does not consider that there are any missing aspects from the draft guidance and believes that it does cover the main changes that are introduced by the ERA13, for example, the introduction of a statutory time limit within which market studies must be completed and the changes to the market investigation reference process.

Overall, the Draft Guidance was found to be very comprehensive.

2. Do you consider that the Draft Guidance will facilitate your understanding of the markets regime when read in conjunction with the existing guidance documents?

The NFRN considers that the Draft Guidance will facilitate our understanding of the markets regime as it builds on the information in those documents but also includes the changes which have taken place.

However it might be useful to amalgamate any information that is contained in the existing guidance but not the new Draft Guidance, into one document for reasons of clarity, accessibility and understanding.

3. Do you agree with the list in Annexe B of the Draft Guidance of existing markets-related OFT and CC guidance documents proposed to be put to the CMA Board for adoption by the CMA?

The NFRN agrees with the list in Annexe B of existing guidance to be put to the CMA Board.

4. Do you consider that the Draft Guidance is user friendly in terms of its content and language?

The Draft Guidance was user-friendly in terms of both its content and language – the NFRN found both the document’s structure and explanations of the market studies and markets investigation process very informative and accessible.

The table in Annexe A was particularly useful in highlighting the key changes to existing markets guidance.

5. Do you have any other comments on the Draft Guidance?

The NFRN does not have any further comment to make on the Draft Guidance.