



# Questionnaire: Ampol- EG Australia

MN-01019

## Deadline to respond: 5.00pm (AEDT) on 20 October 2025

The Australian Competition and Consumer Commission (**ACCC**) is currently assessing Ampol Limited's (**Ampol**) proposal to acquire 100% of the shares in EG Group Australia Pty Ltd and EG AsiaPac Holdings Pty Ltd (**EG**) (the **Acquisition**).

For further information about the ACCC's assessment of the Acquisition, see the ACCC's [Acquisitions Register](#).

The ACCC is assessing the impact of the Acquisition on competition and is seeking information and views from stakeholders on a range of issues. The questions below request views in respect of the Acquisition and the proposed divestiture, as well as information from retail fuel suppliers and wholesalers in Australia. Please only respond to the questions that are relevant to you or your business.

The ACCC invites you to provide submissions or information in response to the questions below by **5.00pm (AEDT) on 20 October 2025** via email to [mergers@acc.gov.au](mailto:mergers@acc.gov.au) with the title *Submission re: Ampol - EG Australia*.

If you would prefer to speak to a member of the ACCC case team, please email [mergers@acc.gov.au](mailto:mergers@acc.gov.au) with the title *Request for call re: Ampol - EG Australia*. Someone from the case team will contact you to find a suitable time for a call.

Please note that:

- This request is made in accordance with section 51ABZZD(2)(a) and (c) of the *Competition and Consumer Act 2010* (Cth) (the **Act**). This means that while the ACCC may take into account submissions or information received after the due date, it is not required to do so.
- In responding to the questions below or when providing a submission, please highlight and/or mark any confidential information. The standard terms on which the ACCC accepts confidential information are outlined at the end of this document.

## Questions

### **General questions**

1. Provide a brief description of your business or organisation, including any commercial relationships with Ampol and/or EG.

2. Outline any concerns you have regarding the impact of the Acquisition on competition in the fuel industry. Please specify whether your concerns relate mainly to fuel retailing or other segments of the industry.

3. Provide any additional information or comments that you consider relevant to the ACCC's assessment of the Acquisition.

***Questions for retail suppliers of fuel***

4. Explain how far end customers are willing to travel to choose between retail fuel suppliers, and what impacts their decision (e.g. price, quality, service, location, site amenities such as convenience store or car wash). If you have Australian consumer reports or surveys that indicate how retail consumers choose between fuel stations, and how far they are willing to travel, please identify them or provide copies with your response.

5. Explain how closely Ampol and EG compete in the retail supply of fuel to consumers and how they compete (e.g. price, quality, service, site amenities such as convenience store or car wash). As a part of your response, explain if this differs by specific products (e.g. different types of fuel) or by region, and if so, how.

6. Describe the nature and level of competition in the local areas, city/region or state in which you operate (for example, the strength or number of competitors). As a part of your response, describe whether there are certain areas in which the removal of EG as a competitor will have more of an impact on competition than others.

7. Identify barriers to entry and expansion in the retail supply of fuel in Australia (e.g. obtaining wholesale supply of fuel, regulatory approvals, large capital expenditure etc) and describe how significant they are or are not. As a part of your response, explain the estimated timeframes for any entry or expansion.

8. List your sources of wholesale fuel supply for financial years 23/24 and 24/25 (alternatively annualised for most recent calendar years), for each of the fuel products indicated below. Please indicate whether those volumes are subject to contract volumes or on the spot sales.

Types of fuel	FY 2023/2024	FY 2024/2025	Contract (and key terms, including volume requirements, length of contract and expiry and pricing) or spot sale
RULP			
E10			
PULP with RON 95			
PULP with RON 98			
Diesel			
Premium Diesel			

9. If you purchase fuel from a wholesaler, explain whether there are alternative wholesale suppliers you can acquire fuel volumes from, including whether there are any impediments to you switching suppliers. As a part of your response, describe whether - and if so why - the Acquisition will change your ability to acquire fuel volumes from wholesalers at a competitive price.

10. Outline how, in your experience, Ampol prices at a retail level, compared to other players, and describe any specific behaviour or role Ampol has in relation to price cycles (e.g. does Ampol tend to follow others when prices go up, or down, or does Ampol lead prices up or down; are Ampol's prices generally lower or higher than other major players). Please do the same for EG.

### **Questions for wholesale suppliers of fuel**

11. Using the table below, list all retail suppliers of fuel you supplied volumes to in financial years 23/24 and 24/25 (alternatively annualised for most recent calendar years), and estimate the volumes of each fuel type supplied to each customer, broken down by state (if available).

Customers (list)	Type of fuel and volumes (L)	
	FY 2023/2024	FY 2024/2025
<i>[add as many rows as needed]</i>		

12. Provide an indication of your ability to increase the volume of fuel you supply at the wholesale level, including any excess or spare capacity currently available to supply additional volumes from your upstream facilities (including refineries and import terminals).

13. Identify barriers to entry or expansion in the wholesale supply of fuel in Australia (e.g. regulatory approvals, economies of scale, large capital expenditure etc) and describe how significant they are or are not. As a part of your response, explain the estimated timeframes for any entry or expansion.

### **Questions about the proposed divestiture**

14. Describe the extent to which Ampol's proposed divestiture would address any concerns you have in relation to the Acquisition.

15. Provide your view on whether the sites that Ampol is proposing to divest are likely to attract a suitable purchaser, and the qualities a suitable purchaser would possess.

16. Provide your view on any factors that may impact effective implementation of the divestiture proposal e.g., undertaking drafting, the inclusion of both Ampol and EG sites in the divestiture package, and any third-party consents (including regulatory) required.

17. Provide any additional information or comments you consider relevant to the ACCC's consideration of the proposed divestiture.

### **Confidentiality of responses**

During the ACCC's assessment of a notified acquisition, the ACCC may receive information that is properly regarded as being confidential, and which is provided to the ACCC in confidence. The ACCC is committed to treating this information responsibly and in accordance with the law. The ACCC understands the importance of confidentiality to parties involved in a notified acquisition, as well as to third parties that provide information to the ACCC.

The standard terms on which the ACCC accepts confidential information are:

- there is no restriction on the internal use, including future use, that the ACCC may make of the confidential information consistent with the ACCC's statutory functions
- confidential information may be disclosed to the ACCC's external advisors and consultants on condition that each such advisor or consultant will be informed of the obligation to treat the information as confidential, and
- the ACCC may disclose the confidential information to other third parties if compelled by law or in accordance with section 155AAA of the Act. This includes disclosures made in the performance of official duties or functions, which include transparency requirements which are part of the merger control regime.

**For further information on confidentiality, see the ACCC's [interim merger process guidelines](#)**