



Questionnaire: Symal Group - Davison Earthmovers

MN-55003

Deadline to respond: Wednesday 11 February 2026

The Australian Competition and Consumer Commission (**ACCC**) is currently assessing Symal Group Limited's (**Symal Group**) proposed acquisition of 80% of the entity which will own the business, assets and related entities of J. Davison Nominees Pty Ltd t/a Davison Earthmovers in its capacity as trustee for J M Davison Family Trust, P&A Equipment Pty Ltd and Davison Contractors Pty Ltd (collectively referred to as **Davison Earthmovers**). The final transaction will be subject to the completion of a restructure of Davison Earthmovers.

Symal Group will then acquire 80% of the shares in P&A Equipment, with the balance of the 20% (**Option Shares**) owned by one or more entities owned and controlled by Paul and Anna Davison.

The Parties will agree to a put and call option arrangement in respect of Symal Group acquiring the Option Shares following completion of the initial acquisition.

Symal Group is an Australian based self-performing contractor providing construction and engineering services, specialising in the roads, rail, defence, justice, ports and energy sectors. The services provided by Symal Group include various forms of construction, project management, plant and equipment hire, material sales and recycling and repurposing.

Davison Earthmovers is a South Australian based civil contractor specialising in civil construction and infrastructure. Their capabilities span bulk earthworks, excavation and material movement, and roadwork and pavement construction, alongside project management and design-and-construct offerings.

Symal Group provides its services across Australia, particularly Victoria and Queensland, while Davison Earthmovers' supply of services is limited to South Australia.

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 your views. The ACCC invites you to provide submissions or information in response to the questions below by 11 February 2026 via email to mergers@acc.gov.au with the title *Submission re: Symal Group - Davison Earthmovers*. The ACCC must complete its assessment within strict statutory timelines which also impacts the time available for consultation.

If you would prefer to speak to a member of the ACCC case team, please email mergers@acc.gov.au with the title *Request for call re: Symal Group - Davison Earthmovers*. 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 and indicate why the information is confidential (as brief reasons in footnotes in your response or submission, or in a separate document such as the ACCC's [confidentiality claims template](#)). The standard terms on which the ACCC accepts confidential information are outlined at the end of this document.

Questions

1. Outline any concerns regarding the impact of the Acquisition on competition, including if Symal Group and Davison Earthmovers are close competitors and there are not many alternatives or if one is a major supplier to competitors of the other.

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

3. Provide a brief description of your business or organisation, including any commercial relationships with Symal Group and/or Davison Earthmovers.

4. For suppliers in the construction industry:
 - a. describe the goods or services you supply in the construction industry and the geographic areas you operate in; and
 - b. provide, for the 2025 financial year:
 - i. total revenue from operations in the construction industry;
 - ii. revenue from operations in the South Australian construction industry (if applicable); and
 - iii. to the extent possible, provide a breakdown of your revenue in each of the items i. and ii. above by the different categories of goods or services you supply in the construction industry (for example, civil contracting, civil construction, earthmoving).

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](#).