



Jamie Baker

Director of External Relations

Fuels Industry UK

1 Castle Lane

London

SW1E 6DR

roadfuel.remedies@cma.gov.uk

Via email

5th December 2024

To whom it may concern,

Re: Road fuel monitoring – consultation on draft guidance for information gathering powers

Fuels Industry UK is the country's largest trade association for fuel producers and suppliers, whose members help supply over 93% of the UK's road fuel and are committed to delivering a competitive fuel supply to the UK, day in, day out.

The consultation on the draft guidance is welcome to give a greater understanding of expectations of future information gathering by CMA and its intents on road fuel monitoring publications. Our response to the consultation questions can be found in the annex to this letter and we would welcome further discussion to clarify any points of our response.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'JB', is positioned below the text 'Yours sincerely,'.

Jamie Baker

Director of External Relations

- 1) Do respondents agree with our proposed approach that ongoing information requests should cover: i) supermarkets; ii) motorways retailers with five or more sites; and iii) other retailers with 80 or more PFS sites across their group? If not, who do you believe we should be requesting information from?

Agree. The approach seems proportionate, although will not include very small PFS owners – it may be worth sampling them even if only for the annual report as noted in the guidance was previously done with the Petrol Retailers Association, however, there would be large enough coverage of filling stations that it is not essential.

Agree. The approach seems proportionate, although will not include very small PFS owners – it may be worth sampling them even if only for the annual report as noted in the guidance was previously done with the Petrol Retailers Association, however, there would be large enough coverage of filling stations that it is not essential.

- 2) Do respondents agree with our proposal for retailers to submit monitoring information to us on a quarterly basis rather than more frequently? If not, please detail your preferred reporting frequency and why.

Agree. Should be no more than quarterly, in keeping with the expected reports. The quarterly timetable should also even out any market volatility as long as all participants are reporting the same performance quarter – see response to Q4 but it is important that there is confidence that there is consistency of reporting.

- 3) Do respondents agree that data required for a specific month or quarter should be provided by the 15th day of the second month following that period? If not, please explain your preferred timing of submissions and why.

Agree. 6 weeks seems appropriate, as does the accommodation for bank holidays.

- 4) Are there any other issues or information the CMA should include in the guidance we will publish on exercising our information gathering powers for our motor fuel monitoring function?

It is important to ensure that all reporting is the same so far as possible. In order to deliver this we would suggest a template be developed with industry (including discussion to ensure common interpretation) with clear definitions and expectations of the data to be reported e.g. ensuring that calculations of gross margin are the same across respondents.

- 5) Do respondents agree that an online portal should be set up and used as a way for retailers to submit data for the road fuel monitoring function? If so, are there any particular features you would like the CMA to consider, if it is developed?

Ensuring best use of the reporting they will be receiving as part of fuels finder is essential, however, do not have a strong view on whether this is best delivered with a portal.

The use of a portal for uploading of the additional information for these reports should only be taken forward if it will not add to training / cost requirements, and does not increase the risk of delays in sharing information or data security over and above the email route.