

## Road fuel monitoring – consultation on draft guidance for information gathering powers Petrol Retailers' Association submission

### Questions for consideration

- 1. Do respondents agree with our proposed approach that ongoing information requests should cover (i) supermarkets (ii) motorway 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 the information from?**

The PRA agrees with the proposed approach to ongoing information requests, which focuses on (i) supermarkets and (ii) motorway retailers with five or more sites. However, we disagree with the last proposal (iii), which stipulates that other retailers with 80 or more petrol filling stations (PFS) sites across their group as by doing this it would widen the scope of those companies who are currently included in the scheme. For clarification, (iii) should comprise companies who are already submitting information to the voluntary scheme, which includes the major oil companies and large dealer groups.

Expanding the scope beyond those currently participating in the voluntary scheme is unnecessary and could introduce complexity that undermines the initiative's practicality. The current composition of participants should already cover a significant enough proportion of the market to provide the required market insights. This will ensure robust data collection while removing the administrative burden on medium size independent retailers who often operate with limited resources.

We do however suggest that the scope should be continually reviewed to ensure that any significant market movements for example a group acquiring more sites is accounted for. We also recommend assessing whether there are regional or market-specific gaps in coverage under the current setup.

- 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.**

The PRA supports the CMA's proposal for retailers to submit monitoring information on a quarterly basis. This frequency strikes an appropriate balance between collecting timely data and avoiding undue administrative burdens on retailers.

More frequent submissions, such as monthly reporting, would require significant resources from retailers, thus incurring additional costs. Quarterly reporting ensures that data is collected regularly enough to provide meaningful market insights while allowing retailers adequate time to compile and verify their submissions.

Furthermore, this frequency aligns with standard business reporting cycles, making it easier for retailers to integrate this requirement into their existing processes without significant disruption.

**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.**

Yes, the PRA agrees with the proposed timing for submissions—requiring data for a specific month or quarter to be provided by the 15th day of the second month following that period. This timeline is practical, allowing sufficient time for retailers to collect, process, and verify their data while ensuring that the CMA receives information promptly enough to maintain effective monitoring.

This timing also accommodates for unforeseen delays, such as those caused by staffing shortages or technical challenges. By setting a clear and achievable deadline, the CMA can ensure high levels of compliance without imposing any unnecessary pressure on retailers.

**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?**

To enhance the practicality and consistency of submissions, the CMA should develop and publish a standardised reporting template. This template would provide clear guidance on the format, metrics, and level of detail required, reducing ambiguity and ensuring consistency across submissions from different retailers.

Furthermore, the CMA should explicitly recognise the unique business models of motorway service areas (MSAs) in its guidance. MSAs operate under different market conditions compared to regular forecourts, where approximately 80% of their fuel volume attributed to fuel card transactions compared to a typical forecourt, where approximately 20% of their fuel card volume is attributed to fuel card transactions.

This distinction significantly distorts average margins and could lead to misleading conclusions if not accounted for. The CMA should consider a tailored reporting framework for MSAs to ensure their data accurately reflects their market dynamics. The PRA can explain this in detail and provide further assistance if required.

Finally, the guidance should address confidentiality and data protection concerns, given the commercial sensitivity of the information being requested. Retailers need assurance that their data will be handled securely and used solely for its intended purpose.

**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?**

Yes, the PRA strongly supports the development of an online portal for data submission. Such a platform would streamline the reporting process, making it more efficient and accessible for retailers. However, to ensure its success, the CMA should prioritise the following features:

- 1. User-friendly interface:** The portal should be intuitive and straightforward, accommodating for users with varying levels of technical expertise.

2. **Cybersecurity:** Robust measures must be implemented to safeguard against data breaches, ensuring that sensitive business information remains secure.
3. **Data validation tools:** Built-in tools for verifying the accuracy of submissions would help reduce errors and enhance the quality of the data collected.
4. **Technical support:** A dedicated support team or helpdesk should be available to assist users with technical issues or queries about the submission process. Retailers should be given the option to speak to a real person.
5. **Mobile accessibility:** Given the increasing reliance on mobile technology, the portal should be optimised for use on smartphones and tablets, enabling retailers to submit data conveniently.
6. **Submission acknowledgment:** Automatic confirmation of receipt for submitted data would provide retailers with assurance that their obligations have been fulfilled.

By incorporating these features, the CMA can create a system that not only facilitates compliance but also fosters trust and cooperation among retailers.