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Competition and Markets Authority
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Via: [REDACTED]

27 March 2026

Dear [REDACTED]

It was a pleasure to see you and colleagues from the Competition and Markets Authority (CMA) at the meeting with Dr Caoimhe Archibald MLA, Minister for the Economy, on 19 March 2026.

The Consumer Council welcomes the CMA's market study into the retail supply of heating oil for domestic use in the UK, and your new powers to tackle unfair pricing and profiteering, including in energy and fuel markets.

I am concerned however that the scope of the market study may be limited, and am writing to highlight the following in relation to the heating oil market:

1. There are potentially relevant consumer issues in the heating oil market across the whole-system supply chain, covering wholesale, intermediary, distribution and retail elements.
2. Retail price and supply chain volatility is driven by wholesale, intermediary and distribution factors, and these factors must be thoroughly investigated.
3. Northern Ireland has:
 - No refinement capability or storage capacity, so heating oil distributors and suppliers (retail supply chain) are predominantly, if not fully, 'price takers' at the oil import terminals in Belfast Port and Foyle Port in the northwest.
 - The most households per capita using heating oil as the main energy source to heat their homes (c60% of all homes or just over 500,000), so price and supply chain volatility is having a relatively greater and more detrimental impact on our population (domestic and business customers) than other parts of the UK.

When it comes to making recommendations, including improved price transparency and potential regulatory protections for consumers, I would encourage the CMA to be cognisant of the following as part of this market study:

4. Price transparency can be achieved in two ways:
 - From a retail supply perspective, price transparency is achieved through access to trusted information. The Consumer Council provides this by monitoring heating oil prices and our online [Home Heating Oil Price Checker](#) tool.
 - From a wholesale, intermediary and distribution perspective, regulatory compliance at a national level supports fair and transparent pricing.

5. Any proposed future regulatory protections for consumers must therefore:
 - Be appropriate, proportionate and considered with the intention of embedding whole-system price transparency, and deliver regional parity.
 - Consider the legislative levers that are already in place and prioritise the gaps in consumer protection at the relevant points of the whole-system supply chain.
 - Consider the value of codes of conduct to augment whole-system price and supply chain transparency and the protections from existing consumer law.
 - Consider fiscal measures, such as the Energy Profits Levy, and examine how these can be used to strengthen security of supply for heating oil consumers.

6. It is important to ensure that the 2026 Heating Oil Market Study is sufficiently different from the Review of Off-Grid Energy by the Office of Fair Trading in 2011, which also looked at prices and supply issues from a retail perspective.

Our teams are already collaborating in relation to our heating oil price data. Alongside this, we are conducting research in the first quarter of 2026-2027 into consumer experiences of the heating oil sector in Northern Ireland, and this may be a timely opportunity for the Consumer Council and the CMA to undertake this as a joint project.

If you or your colleagues would like a follow-up discussion, I would be happy to arrange this at your convenience.

Yours sincerely

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