

ACS Submission: Core fuel sector resilience: provision of information at specified intervals

ACS (the Association of Convenience Stores) welcomes the opportunity to respond to the consultation on core fuel sector resilience: provision of information at specified intervals. ACS represents over 8,354 petrol forecourts in the UK. The forecourt sector is an important element of the UK's economy and strategic road network, providing over 89,000 jobs and £4.9bn in total sales.¹

We support the aims of this consultation in improving the UK's resilience to crises in the fuel sector. We have seen the impact on supply chains and domestic infrastructure when fuel supply is significantly limited or incurs issues. For instance, as seen during the autumn 2021 supply crisis and the impact of the Russian Invasion of Ukraine in 2022. We have engaged with DESNZ officials in developing the Energy Act and want to ensure that the sector is resilient to any future disruptions to the fuel sector. However, regulations must be workable for all affected and undue burden must not be placed on smaller or independent retailers who currently lack the necessary infrastructure.

6. What are the reasons that forecourts do or do not subscribe to wetstock management companies?

A small minority of small and independent fuel retailers do not work with wet stock management companies due to legacy equipment and limited ability to invest in upgrading. They are often hyper localised business and do not need to report on stock levels centrally. These sites will manually dip their tanks on a weekly basis to check stock levels against their sales for the purposes of ordering fuel, ensuring there are no leaks, or that their pumps are not over or under metering. Predominantly, these businesses are not in ACS' direct membership.

They are likely to use a paper recording systems to inform the ordering of fuel stocks for the following week. They will retain records for the purposes of a compliance check if an enforcement officer requests this, which would typically occur annually. Therefore, the systems they use to record stock levels will not be easily transferable to national monitoring systems in the event of a fuel supply chain incident.

In the event of a fuel supply chain incident, the government would have to make available an online reporting system for businesses that manually dip tanks to upload their stock levels. This would have to be backed up by both national communications by fuel suppliers and local communications by enforcement teams or local resilience units to ensure that reports are uploaded. Given the limited stock levels held by these sites, the government may wish to request more frequent reporting of stock levels, as stock levels diminish quickly during an incident.

7. For independent forecourts over the 1,000 tonne threshold in s276, which lack wetstock management facilities, what feasible reporting alternatives can be developed that provide relevant insights without imposing excessive costs and administrative burdens?

Government should work with industry to develop a system that is workable for all retailers. It is important that any reporting system taken forward by government can be implemented by all retailers regardless of their resources or business models.

We would welcome the opportunity for further engagement on this issue. If you would like to arrange a meeting with ACS or discuss the future of transport, please contact willem.vandeven@acs.org.uk.

¹ [ACS Forecourt Report 2023](#).