

ACS Submission: Road fuel monitoring – consultation on draft guidance for information gathering powers

ACS (the Association of Convenience Stores) welcomes the opportunity to respond to the Competition and Markets Authority (CMA) consultation on guidance for information gathering powers. ACS represents 8,347 convenience stores operating on forecourts in the UK including Rontec, Motor Fuel Group and thousands of independent retailers. The forecourt sector is an important element of the UK's economy, providing over 89,000 jobs and £4.9bn in total sales.¹

- 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 should be requesting information from?**

Yes, we agree with the respondent thresholds outlined in the consultation document. If the CMA intends to review these thresholds and request information from a broader range of fuel retailers with fewer sites, further consultation will be needed. This consultation should seek views on an appropriate notice period for any changes to respondent thresholds.

We welcome the CMA's commitment to continued engagement with trade associations, motoring groups and consumer organisations. It would be helpful to formalise these engagement structures to support evidence collection for future topics the CMA may explore using its new information gathering powers.

- 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.**

Yes, we agree that quarterly reporting strikes the right balance, considering the burden that reporting places on fuel retailers.

- 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, we support the proposed 6-week period for reporting. It is essential that the CMA clearly communicates the data requests it makes of the industry to ensure fairness and consistency in the data being shared.

- 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?**

We welcome the planned update to the CMA's policies on transparency and disclosure, particularly as fuel retailers will be sharing commercially sensitive information. It is crucial that such data is held securely and managed appropriately.

- 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?**

We welcome the development of an online portal. During its initial rollout, the CMA must allow businesses sufficient time to familiarise themselves with the portal and its data upload functionalities. This consideration is especially important during the first year of implementation to account for potential technical or integration errors.

For more information on this submission please contact the ACS Public Affairs Team.

¹ [ACS Forecourt Report 2024](#)