

PUBLIC VERSION

30 October 2019

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Mr Daniel McCracken-Hewson
Acting General Manager, Adjudication
Australian Competition and Consumer Commission
23 Marcus Clarke Street
CANBERRA ACT 2601

Dear Mr McCracken-Hewson

**BP, BP Resellers and Qantas – application for authorisation
AA1000452-1 – response to ACCC information request and
interested party submissions**

1 Introduction

As you know, we act for BP Australia Pty Ltd (**BP**) in respect of the above application for authorisation dated 4 September 2019 (the **Application**) made on behalf of BP, resellers of fuel under the BP brand (**BP Resellers**), Qantas Airways Limited and Qantas Frequent Flyer Limited (together **Qantas**) (together, the **Applicants**).

We refer to the Australian Competition and Consumer Commission's (**ACCC**) letter to BP and Qantas dated 17 October 2019 seeking further information in relation to the Application, and to the interested party submissions received by the ACCC from the Office of the Australian Information Commissioner (**OAIC**) on 15 October 2019 (**OAIC Submission**) and Endeavour Petroleum Pty Ltd (**Endeavour**) on 30 September 2019 (**Endeavour Submission**).

This letter responds to the ACCC's information request, the OAIC Submission and the Endeavour Submission.

Capitalised terms in this letter have the same meanings as in the Application.

2 Confidentiality

Subject to the below, material marked as confidential in this letter is confidential and commercially sensitive and must not be disclosed to any third party without the express written consent of BP and/or Qantas (as applicable). BP and Qantas:

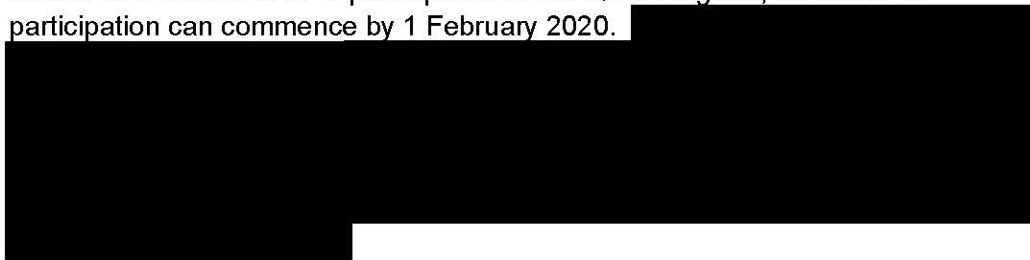
- acknowledge that there is no restriction on the internal use, including future use, use, that the ACCC may make of confidential information consistent with the ACCC's statutory functions;

- consent to the disclosure of confidential information to the ACCC's external advisors and consultants on the condition that each such advisor or consultant will be informed of the obligation to treat the information as confidential; and
- acknowledge that the ACCC may disclose confidential information to third parties (in addition to its external advisors and consultants) without BP's or Qantas' consent if compelled by law or in accordance with section 155AAA of the *Competition and Consumer Act 2010* (Cth).

3 Response to ACCC information request

3.1 *Why is interim authorisation urgent and who will suffer harm if interim authorisation is not granted?*

As the ACCC is aware, interim authorisation is sought for the proposed conduct insofar as it relates to BP's participation in the QBR Program, so that BP's participation can commence by 1 February 2020.



As discussed with the ACCC at our meeting on 11 September 2019, the Applicants are content for the ACCC's decision on interim authorisation to be issued at the same time as its draft determination, which is currently scheduled for November 2019. If interim authorisation is granted, then that timing will allow BP and Qantas to undertake various pre-launch activities including IT integration work, signage preparation, and marketing and promotional activities (such as the production of television commercials and promotional t-shirts) in December 2019, so that a 1 February 2020 commencement can be achieved.

If, however, interim authorisation is not granted, then in circumstances where the ACCC's draft determination acknowledges net public benefits arising from the proposed conduct (including in respect of the QBR Program), those net public benefits would not be realised in the period (if any) between the proposed commencement of BP's participation in the QBR Program and the ACCC's final determination.

Finally, the Applicants reiterate that no detriment will result from the granting of interim authorisation. BP's participation in the QBR Program would involve an immediate and direct benefit to BP Plus fuel card businesses (in that it would facilitate the earning of Qantas points), and has no potential for significant anti-competitive effects or other public detriment. Further, the granting of interim authorisation is highly unlikely to permanently alter competitive dynamics in any relevant market – the conduct for which interim authorisation is sought could

immediately cease if the ACCC subsequently issues a final determination refusing authorisation.

3.2 *To be competitive in Australia, how important is it to an airline to have a loyalty scheme and must that loyalty scheme include an arrangement with a major fuel retailer? Does it make a difference to airlines' competitiveness if the arrangements with fuel retailers are exclusive?*

For clarity, we have addressed the three aspects of the question separately.

To be competitive in Australia, how important is it to an airline to have a loyalty scheme?

To be competitive in Australia it is not essential for an airline to have a loyalty program.

As the ACCC is aware, Australian airlines currently offer different types of loyalty programs. While Qantas and Virgin Australia offer coalition points-based schemes (a model described in more detail below), other airlines offer schemes that do not have a variety of different partners participating in the program and cover only aspects of the airline's services, for example Rex Business Flyer¹. Although Jetstar is a redemption option in the QFF Program, it does not have its own loyalty program. However, Jetstar does have Club Jetstar²; a subscription based service providing access to discounts. While Tigerair Australia offers customers the opportunity to redeem Velocity Points for flight bookings and holiday packages, it too does not have its own stand-alone earn proposition.

Moreover, internationally a number of highly successful low-cost airlines have entered routes and expanded effectively while not offering customers a loyalty program at all.

This diversity of approach is consistent with a conclusion that a loyalty program – let alone a coalition loyalty program – is not essential for an airline to be competitive in Australia. It is also aligned with the view expressed by the ACCC in relation to airline coalition programs that:³

"It is not clear that ... customer lock-in effects and switching costs associated with frequent flyer schemes have resulted in major barriers to entry."

Must an airline loyalty scheme include an arrangement with a major fuel retailer?

The different airline loyalty schemes outlined above, several of which do not involve different partners participating in the program, make it clear that such schemes do not need to include an arrangement with a major fuel retailer.

¹ See <http://www.rex.com.au/ff/flyerbenefit.aspx>.

² See <https://www.jetstar.com/au/en/club-jetstar>.

³ ACCC, Customer Loyalty Schemes Review, *Draft report for consultation*, 5 September 2019, p. 77.

If attention is focused on coalition loyalty programs, such as the QFF Program, the same conclusion can be reached.

Coalition loyalty programs provide members with opportunities to earn and redeem points across a coalition of partners. In this way, such loyalty programs – whether operated by an airline or otherwise – offer members numerous opportunities to earn points on their regular, everyday spend across a range of program partners encompassing a variety of products and services (including e.g., financial services, groceries, fashion, accommodation and transportation services). Fuel retailing is just one of many such products or services. There are numerous competitive loyalty programs operating in Australia more generally that have no relationship with a fuel retailer. Such programs include the Priceline Sister Club, IGA Rewards, David Jones Rewards and numerous other programs run by Australian financial services providers (e.g., ANZ Rewards, Commbank Rewards and NAB Rewards).

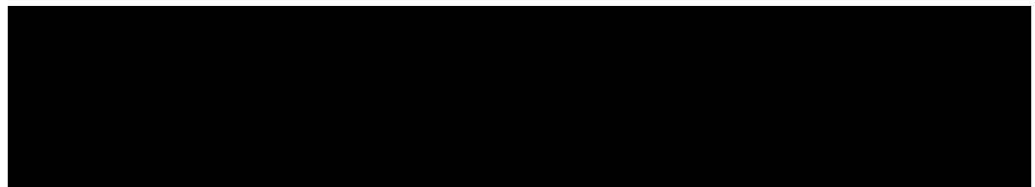
In this context, it is not essential for an airline coalition loyalty program to have an arrangement with a major fuel retailer in order to be competitive.

Does it make a difference to airlines' competitiveness if the arrangements with fuel retailers are exclusive?

For those airlines offering non-coalition loyalty programs or indeed, no specific loyalty program, there can be no impact on competitiveness if an exclusive arrangement is entered into by one airline coalition loyalty program and one fuel retailer.

For airlines with coalition loyalty programs, their competitiveness in terms of supplying airline services will remain unaffected. To the extent a fuel retailer is an attractive program partner, as set out in the Application, there are many fuel retailers and a wide range of other attractive everyday spend partners that will remain available to existing or new coalition loyalty programs. Further specific details are provided in section 3.4 below.

3.3 *What amount of the Qantas Frequent Flyer revenue from Woolworths is derived from purchases at retail fuel and convenience sites?*



3.4 To what extent would the arrangements between BP and Qantas (when combined with other existing arrangements) limit other airlines ability to enter into loyalty scheme partnerships with large fuel retailers?

The proposed arrangements between BP and Qantas will not limit other airlines' ability to enter into coalition loyalty scheme partnerships with other large fuel retailers such as Caltex, Mobil, 7-Eleven, United, Metro and Puma.

To illustrate, following the announcement of the proposed arrangements between BP and Qantas, Virgin Australia CEO Paul Scurrah commented that the business is currently in discussions with alternative fuel retailers to replace BP as a partner of the Velocity Program, and he has expressed optimism that it will be able to do so.⁴ As noted in the Application, BP also considers it highly likely that Velocity will be able to enter into a partnership with a competing fuel retailer upon the termination of its partnership with BP.

(a) Does Qantas have exclusive arrangements with other fuel retailers which, either directly or indirectly prevent those fuel retailers from entering into arrangements with other loyalty schemes?

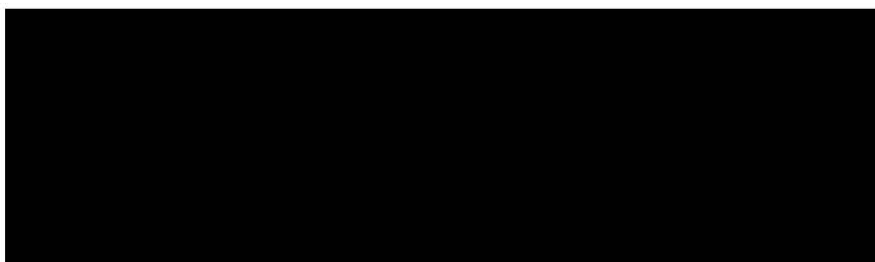


(b) For example, is Caltex prevented from choosing to participate in any other schemes by its arrangements with Woolworths (and/or Woolworths' arrangements with Qantas), whereby customers can effectively earn Qantas Frequent Flyer points on purchases at Caltex by using Woolworths Rewards and exchanging points for Qantas Frequent Flyer points, or its Star Card arrangements with Qantas Business Rewards? Please identify any schemes that Caltex is prevented from participating in.

As the ACCC is aware, Qantas has an indirect earn relationship with Woolworths. The Woolworths Rewards program allows members to earn Woolworths Rewards points by making qualifying purchases at a number

⁴ See e.g., <https://www.news.com.au/travel/travel-advice/money/you-can-now-earn-qantas-frequent-flyer-points-at-bp-servos/news-story/702e8fa3c8bea713ea6d90c8f9f6590e> and <https://www.smh.com.au/business/companies/velocity-to-soar-under-virgin-s-wing-says-frequent-flyer-boss-20191008-p52ymz.html>.

of retail outlets including at participating Caltex fuel outlets.⁵ Woolworths Rewards program members currently have the ability to redeem Woolworths Rewards program points for dollars off at Woolworths or Qantas points, if they have selected Qantas points as their preferred reward redemption option. This redemption opportunity is available at the sole discretion of the member and can be changed at any time.

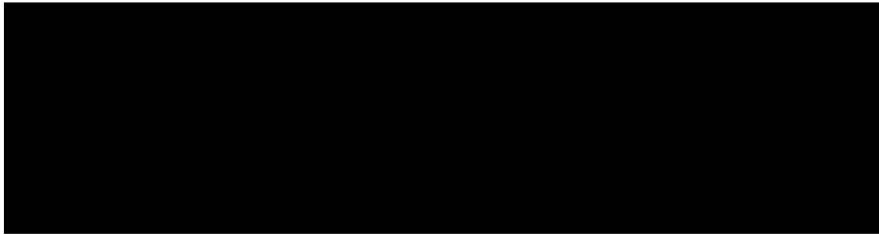


3.5 *Please set out the top ten most valuable partners of the Qantas Frequent Flyer program in the last year, by number of points purchased from Qantas and amount paid to Qantas for those points.*

Table 1 below sets out the top ten partners of the QFF Program by number of points purchased from Qantas in FY19 and the amount paid to Qantas for points purchased in FY19.

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⁵ As set out in the Application, the "Caltex" branded network is comprised of sites that are either owned and operated by Caltex Australia, or by independent retailers who re-sell fuel under the Caltex brand. Caltex Australia also supplies fuel to Caltex-Woolworths co-branded sites, at which consumers are able to participate in the Woolworths shopper docket discount scheme and Woolworths Rewards loyalty program.



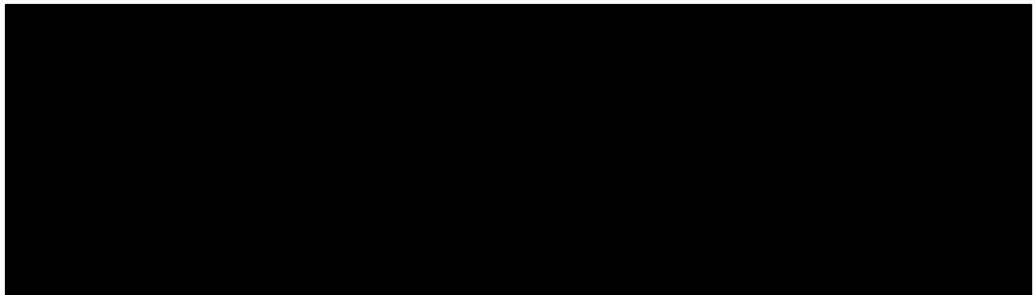
3.6 *What is the expected value to Qantas' Frequent Flyer program of the partnership with BP, in dollars per year?*



These estimates should be considered in the context of Qantas Loyalty's underlying EBIT in FY2019 of \$374 million.⁷

3.7 *To be competitive in Australia, is it important for a fuel retailer to be a participant in a loyalty scheme arrangement with a major airline?*

BP considers that a loyalty scheme partnership with a major airline is not necessary for a fuel retailer to be competitive in retail fuel markets in Australia. Indeed, BP participates in a range of loyalty programs around the world, very few of which involve an airline.



BP considers that airlines are appealing loyalty partners because consumers value the benefits offered by frequent flyer programs. Equally, BP considers it is also important to have a wide variety of loyalty program partners so as to appeal to a large base of consumers.

⁶



⁷ See, e.g., https://investor.qantas.com/FormBuilder/_Resource/_module/doLLG5ufYkCyEPJF1tpgyw/file/annual-reports/2019-Annual-Report-ASX.pdf.

3.8 *What are the advantages and disadvantages of a direct-earn loyalty partnership versus an indirect-earn loyalty partnership?*

A direct earn loyalty partnership offers several different features to an indirect-earn loyalty partnership. The advantages of a direct-earn loyalty partnership for consumers include:

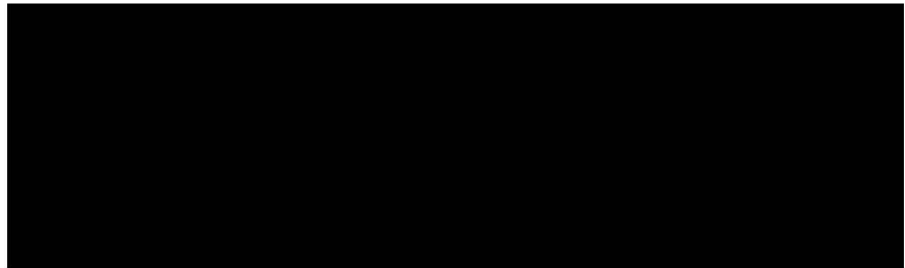
- faster points-earning opportunities (i.e., that are not dependent on reaching a certain threshold before the redemption of points can occur);
- clearer points-earning propositions (e.g., that \$1 spent by the consumer will equal a certain number of points in an alternative loyalty program);
- enhancing consumer choice, both at the initial earn election point and thereafter, with common members of both programs being able to switch between programs at their discretion;
- the ability to more quickly consolidate points earned within one loyalty program, maximizing potential redemption opportunities; and
- a more automated consumer experience (i.e., the consumer selects their earning preference once and earns points in their chosen loyalty program each shop, as opposed to being required to convert their points between loyalty programs periodically).

However, notwithstanding the advantages offered by direct-earn partnerships, BP and Qantas consider that the points earning mechanism used, whether direct-earn or indirect-earn, is unlikely to determine the overall success of the loyalty program (or that of an individual loyalty program partnership). A loyalty program operator may prefer to adopt a direct-earn or an indirect-earn arrangement having regard to a range of factors, including the requirements of the program partner, the proposed scope of the relationship with the program partner, and the nature of the relevant industry sector.

To be competitive in Australia:

(a) *is it important for loyalty schemes to have a direct earn relationship with a fuel retailer, and*

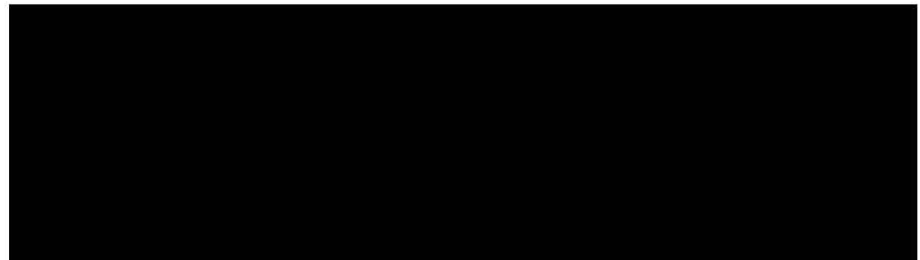
For the reasons set out in section 3.2 above, Qantas considers that it is not essential for an airline coalition loyalty scheme to have a relationship with a fuel retailer in order to be competitive in Australia. While having a fuel retailer as a loyalty program partner may be desirable, because it expands the range of potential opportunities for consumers to earn points, a successful loyalty program will offer its members as many potential opportunities as possible to earn points across a suite of program partners encompassing a variety of products and services – fuel retailing is simply one of many such products and services.



(b) *is it important for fuel retailers to have a direct earn relationship with an airline?*



none of BP's key competitors (such as Caltex, Coles Express and 7-Eleven) offer the direct earn of frequent flyer points at their retail fuel sites (e.g., in the case of Coles Express, consumers may only earn flybuys points for their purchases, which must then be redeemed for Velocity Program points). Various other (non-fuel) loyalty programs do not offer the direct earn of frequent flyer points, and they remain competitive and highly successful.



3.9 *Please provide BP's proposed terms and conditions for loyalty scheme members, including any relevant data protection and privacy policies.*

Membership of the BP Rewards Program will be governed by the BP Rewards and BPme Terms and Conditions (**BP Rewards and BPme T&Cs**). A copy of the current draft of the BP Rewards and BPme T&Cs is set out in **Confidential Attachment 1**. Current draft provisions relating to data and privacy are set out in section 3 of the BP Rewards and BPme T&Cs. The BP Rewards and BPme T&Cs also refer to BP's Privacy Policy, a copy of which is set out in **Attachment 2**.

The current draft of the BP Rewards and BPme T&Cs was prepared in August 2019. BP notes that, as a result, the current draft of the BP Rewards and BPme T&Cs does not yet take into consideration any of the findings or recommendations

in the ACCC's draft report in relation to its Customer Loyalty Schemes Review dated 5 September 2019.

BP is currently in the process of reviewing the draft BP Rewards and BPme T&Cs. BP would be pleased to provide the ACCC with a revised draft once it becomes available.

4 Response to OAIC Submission

At the outset, BP and Qantas note that they are committed to safeguarding the privacy of consumers' personal information and welcome the OAIC's contribution to the authorisation process.

4.1 Privacy impact assessment

The OAIC recommends that the ACCC consider specifying a condition to authorisation requiring BP to undertake a privacy impact assessment (PIA) before the launch of BP Rewards.

It is BP's standard practice to undertake a PIA where appropriate to manage privacy-related risks. This involves completing a template document that captures the relevant privacy-related details in respect of a new or revised initiative, project, process, IT system or website (such as the purpose for collecting the data, data security, and access permissions and controls). BP's privacy team then reviews the PIA template, considers whether any privacy-related risks are associated with the proposed initiative, and advises BP of any steps required to be taken to ensure compliance with BP's Privacy Policy and any applicable privacy laws.

Internal BP work on privacy issues commenced in January 2019, which included the preliminary work required to undertake a PIA. A PIA in respect of the BP Rewards Program is expected to be completed by December 2019.

In these circumstances, it is clearly not necessary for the ACCC to specify any condition to authorisation in relation to a PIA.

4.2 BP Reseller opt-in coverage under the Privacy Act

The OAIC also recommends that the ACCC consider specifying a condition to authorisation requiring BP Resellers to opt-in to coverage under the *Privacy Act 1988* (Cth) (**Privacy Act**).

Such a condition is unnecessary, for three reasons.

First, BP Resellers will not handle any "*personal information*" to which the Privacy Act applies. Rather, the information to be handled by BP Resellers will be limited to de-identified data, such as the date, location and value of the transaction, number of points earned, and card number.

Second, even if BP Resellers were to handle "*personal information*" to which the Privacy Act applies, a large majority of those BP Resellers are already covered by the Privacy Act because they generate annual turnover of more than \$3 million

per year (that is, they are not “*small businesses*” to which the provisions of the Privacy Act do not apply).

Third, to the extent that BP Resellers are not covered by the Privacy Act, that reflects that they are small businesses with turnover of less than \$3 million per year. Imposing obligations under the Privacy Act on those BP Resellers would be disproportionate given their size and relative inability to absorb additional compliance costs.

4.3 Privacy policy

The OAIC notes that the Privacy Act requires covered entities to have a clearly expressed and up-to-date privacy policy explaining how personal information will be managed by the entity, and suggests that BP should ensure that BP Rewards Program members are clearly advised of how their personal information will be collected, used and disclosed.

BP considers that these requirements are met by the draft BP Rewards and BPme T&Cs set out in Confidential Attachment 1, and BP’s Privacy Policy set out in Attachment 2.

4.4 Collection, notification and use of personal information

The OAIC notes that BP must comply with its obligations regarding the collection, notification and use of personal information under the Privacy Act. In particular, the OAIC notes that BP must only collect personal information from BP Rewards Program members where it is reasonably necessary for, or directly relates to, the BP Rewards Program’s functions or activities, and, where information is collected for a particular purpose, BP must not use the information for another purpose without consent or unless an exception applies.

Clearly, BP intends to comply with its obligations under the Privacy Act in these respects.

4.5 Direct marketing

In respect of BP’s intention to collect, use and disclose members’ information for promotional and marketing purposes, BP notes the following.

BP intends to comply with its direct marketing obligations under the Privacy Act.

BP will provide BP Rewards Program members with a range of options to request not to receive direct marketing communications from BP. All direct marketing communications sent to BP Rewards Program members will include an option to unsubscribe from either all electronic marketing communications from BP; the specific category of the communication (e.g., relating to BP products and services); or the specific mode of communication (e.g., email). Members will also be able to proactively control their communication preferences at any time by logging into their accounts via the BP Rewards Program website or BPme app.

In addition to online unsubscribe options, members may contact BP's Privacy Officer via email to request to unsubscribe, and may also call the BP General Business Services call centre (in which case an operator will guide the individual through the online unsubscribe process, or, if that is not possible, escalate the customer's contact details to a blacklist to ensure they receive no further direct marketing communications).

Finally, BP notes that it will not share members' contact details with any other party, including Qantas (other than third party contractors to BP, such as IT system and cloud service providers), and similarly will not receive QFF Program members' contact details from Qantas. BP notes that where a Qantas member presents their QFF Program membership card (i.e., that is not yet linked to the BP Rewards Program) at a BP Rewards Program site with the intention of earning points for their purchase, BP will share only the QFF Program membership number with Qantas (to enable Qantas to contact their member to assist them with linking their QFF Program membership with the BP Rewards Program).

4.6 Registration for BP Rewards via BPme mobile app

The OAIC considers that, in circumstances where consumers download and register an account via the BPme mobile app and are automatically enrolled in the BP Rewards Program, there may be impacts on consumers' ability to provide meaningful consent regarding how their personal information will be handled as part of the BP Rewards Program.

BP is currently working towards expanding the functionality of the BPme mobile app. Consumers will be offered two methods of joining the BP Rewards Program at launch: either by filling out a registration form on the BP Rewards Program website, or by registering for a BPme account using the BPme mobile app. These alternative methods will be offered to cater to different consumers' preferences. At launch, registration of a BPme account will provide consumers with access to the BP Rewards Program, BP's "pay-in-car" functionality, and the BPme app "site locator".

In all cases, consumers who sign up for the BP Rewards Program will be presented with and required to accept the BP Rewards and BPme T&Cs and BP's Privacy Policy. BP considers that section 3 of the draft BP Rewards and BPme T&Cs clearly describes how members' information will be collected and used in the context of the BP Rewards Program (e.g., for the purposes of marketing communications).

4.7 Data analytics

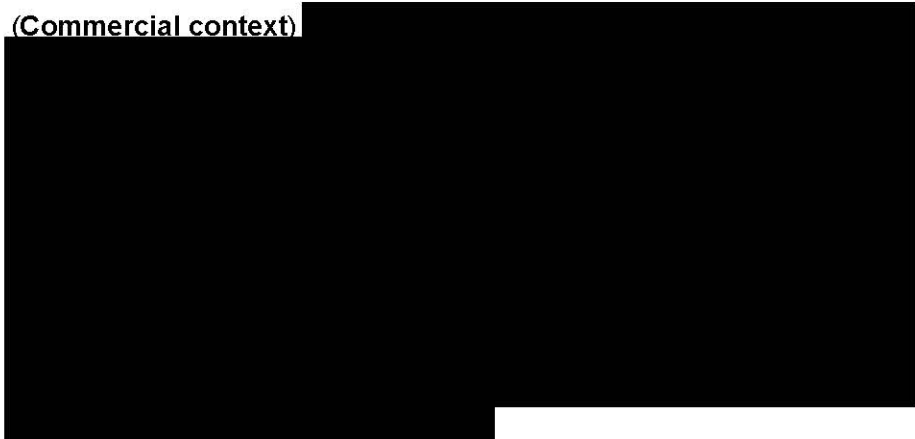
The OAIC submits that the arrangements regarding the sharing of personal information between the BP Rewards Program and the QBR Program are unclear, and that privacy risks associated with data analytics (i.e., techniques that analyse and process data for e.g., direct marketing purposes) increase with the size and complexity of the relevant data set. Accordingly, the OAIC suggests that BP uses de-identified personal information only for data analytic activities, as such de-identified information is not considered “*personal information*” for the purposes of the Privacy Act.

BP confirms that there will be no sharing of “*personal information*” between the BP Rewards Program and the QBR Program.

It is also anticipated that data collected by BP for data analytics purposes will be de-identified (that is, BP’s data analytics system will not contain any “*personal information*”).

5 Response to Endeavour Submission

The Applicants do not propose to respond to every aspect of the Endeavour Submission, much of which is irrelevant to the Application. However, BP’s response in relation to the substantive issues raised in the Endeavour Submission is set out below.

- **(Commercial context)** 
- **(Endeavour as an applicant for authorisation)** Endeavour expressly disclaims that the Application is made on its behalf. It is open to Endeavour to reconsider its position in this respect, and BP considers that it would be preferable for Endeavour to allow the Application to be made on its behalf, so that it may seek to participate in the BP Rewards Program (and, by extension, the QFF Program and QBR Program) at a later stage if it wishes to do so.
- **(Costs of BP Reseller participation)** BP has now communicated to BP Resellers the proposed costs for participating in the BP Rewards

Program.

The aim is for the BP Rewards Program to appeal to a wider number of customers than the current Velocity Program proposition and, therefore, BP is expecting a higher number of loyalty transactions. As a result, the overall costs for a BP Reseller to participate in the BP Rewards Program may go up slightly, however, it is expected that an increase in fuel volumes for BP Resellers will create a total net margin improvement. In this context, no discernible impact on pre-benefit retail fuel prices is anticipated.

- **(BP Rewards program partners)** Endeavour asks what other program partners may be appointed to the BP Rewards Program, and suggests that BP may in future appoint other retail fuel brands.

Beyond that, BP has not determined the further partners to be appointed. However, in keeping with competing loyalty programs, BP expects to explore potential partnerships with businesses in a diverse range of sectors, including the chemist/pharmacy, fast food, home delivery, telecommunications, electronics, health, utilities and leisure sectors.

- **(Release from wholesale fuel supply agreements)** Endeavour asks whether BP Resellers that do not participate in the BP Rewards Program (and, by extension, the QFF Program and QBR Program) will, as a result, be released from their wholesale fuel supply agreements with BP. In circumstances where a BP Reseller does not participate, BP's intention is for the relevant wholesale fuel supply agreement(s) between BP and that BP Reseller to continue on the terms previously agreed.
- **(“Effectively voluntary” participation)** It is currently envisaged that participation in the BP Rewards Program will be voluntary for existing BP Resellers and sites for the remainder of existing POSAs, and will be mandatory only for new BP Resellers and sites. In any event, as discussed with the ACCC at our meeting on 11 September 2019, participation in the BP Rewards Program (and, by extension, the QFF Program and QBR Program) will be “effectively voluntary” in the sense that BP Resellers will always retain their ability to enter into alternative

wholesale fuel supply arrangements with competitors of BP at the conclusion of their existing POSAs. BP expects that the vast majority of BP Resellers will want to participate in the BP Rewards Program (and, by extension, the QFF Program and QBR Program), consistent with the rate at which BP Resellers have voluntarily chosen to participate in the Velocity Program.

- **(Use of data)** Endeavour has raised a concern in relation to the use of data collected under the BP Rewards Program. Specifically, Endeavour suggests that BP will collect data and use it for the purpose of directing customers from BP Reseller sites to BP sites. BP has not used data for this or any similar purpose in the context of the Velocity Program, and has no intention of doing so in the context of the BP Rewards Program.
- **(Pre-existing loyalty arrangements for BP Resellers)** Endeavour has also raised a concern relating to competing loyalty arrangements BP Resellers may currently have in place (specifically in respect of Endeavour's current shopper docket arrangements with certain IGA supermarkets). It is currently proposed that there will be an approval process in respect of other loyalty programs, under which approval would be given for non-competing programs (such as Endeavour's partnership with IGA supermarkets) on condition that the relevant BP Reseller's customers are also offered the opportunity to participate in the BP Rewards Program at the BP Reseller's site(s).
- **(Impact of non-participation on BP Resellers)** Finally, Endeavour suggests that BP Resellers that choose not to participate in the BP Rewards Program will lose customers that are members of the Velocity Program.

30 October 2019

Australian Competition and Consumer Commission

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Should the ACCC have any queries in relation to this letter, please feel free to contact us.

Yours sincerely



Alistair Newton
Partner