

Mobil Oil Australia Pty Ltd
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An ExxonMobil Brand

31 May 2017

Natalie Morton
Analyst, Merger & Authorisation Review Division
Australian Competition & Consumer Commission
Level 2, 23 Marcus Clarke Street Canberra ACT 2601

Via email: adjudication@accc.gov.au

Dear Natalie

RE: Mobil Oil Australia comments regarding A91580, A91581 & A91582 – BP Australia Pty Ltd & Ors – submission

Mobil Oil Australia Pty Ltd (Mobil) is a refiner-wholesaler of petroleum products in Australia. Mobil is a major supplier of petroleum fuels to resellers, wholesalers and end users around Australia. Mobil's wholly owned subsidiary, Mobil Refining Australia Pty Ltd owns and operates the Altona refinery in Melbourne, which is a key part of Victoria's energy supply chain, providing around 50% of the States petroleum fuel needs.

Mobil also regularly imports petroleum products into Australia, primarily sourced from Singapore. Petroleum fuels are distributed to Mobil customers through a network of fuel distribution terminals across the country. Mobil's wholesale customers include independent distributors, larger industrial users, transport operations (truck, rail and bus), Mobil branded independent dealers and resellers, and other unbranded resellers.

Mobil does not directly operate in the Australia retail fuels market. Accordingly, we cannot comment on the application of authorisation by BP on the likely benefits and effect on competition from the proposed arrangements.

We do note however that this application appears to extend beyond the reach of the current Caltex-Woolworth arrangement which only includes Caltex-Woolworths co-branded sites around Australia. The use of Woolworths fuel discounts and other loyalty programs does not extend to the network covered by single banner Caltex sites as these sites have no alliance with Woolworths.

The proposal by BP appears to include all BP resellers (independent dealers, distributors, or other sites operators) that re-sell fuel under the BP banner. If this extends to all BP branded sites Australia wide, this would result in a significant increase in coverage of the Woolworths fuel discount and rewards loyalty program.

If you would like more information regarding our position or would like to discuss this matter further, please contact Melanie Saliba, Public Affairs Adviser on 0467 801 719 or via email to Melanie.m.saliba@exxonmobil.com.au.

Yours sincerely,

Frank Tudic
Australian Retail Sales Manager
Mobil Oil Australia Pty Ltd

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