

## **Market inquiries email – Tourism Holdings Limited’s proposed acquisition of Apollo Tourism & Leisure Ltd – 28 January 2022**

Dear interested party

Tourism Holdings Limited (**THL**) proposes to acquire Apollo Tourism & Leisure Ltd (**Apollo**). We are seeking your views on this proposal because we understand your business may be affected, or you may have valuable insights into the relevant markets.

The Australian Competition and Consumer Commission (**ACCC**) is an independent statutory authority responsible for investigating whether mergers are likely to substantially lessen competition.

### **The parties**

THL is a New Zealand Exchange listed global tourism company operating a range of tourism related businesses in Australia, New Zealand, the USA and the UK. In Australia, its operations include recreation vehicle (**RV**) rental, sales and manufacturing. THL’s rental brands in Australia are Maui, Britz and Mighty Campers. THL also owns and operates the peer-to-peer RV rental online platform SHAREaCAMPER.

Apollo is an ASX listed tourism leisure company with operations in Australia, New Zealand, Canada, Germany, the UK and Ireland. In Australia, its principal activities are the manufacture, rental, sales and distribution of a range of RVs. Apollo’s rental brands in Australia are Star RV, Apollo, Cheapa Campa and Hippie Camper. Apollo also has a shareholding in the peer-to-peer RV rental online platform Camplify.

### **Information we are seeking**

Please provide a brief description of your business and the reasons for your interest in the proposed acquisition, including an explanation of any commercial relationship you have with THL or Apollo. This will help us to better understand your views.

The topics we are interested in include:

1. How closely do THL’s and Apollo’s RV rental brands compete in relation to price (as well as inclusions and promotions), service, vehicle range, fleet size, locations and target customers?
2. Who are THL’s and Apollo’s main competitors for RV rentals, and how do they compare in relation to price, service, vehicle range, fleet size, locations and target customers?
3. Are there any locations where THL and Apollo are particularly strong or where there are few competitors?
4. Are there any RV types for which THL and Apollo are especially strong in (e.g. luxury motorhomes)?
5. To what extent are private RV rentals through peer-to-peer online platforms in competition with THL and Apollo?
6. To what extent are alternate forms of accommodation such as motels, holiday parks and Airbnb in competition with THL and Apollo?

7. What is involved in expanding or entering into rentals of RVs in order to compete effectively against THL and Apollo? What is the likelihood of new entry or expansion by an existing competitor?
8. Do you have any views on the future of RV rental trends, particularly in light of the Covid-19 pandemic?
9. Do you have any views on how closely THL and Apollo compete in the sale, resale and manufacture of RVs?
10. Do you have any concerns about the likely competition effects of the proposed acquisition? Why/why not?

## How you can engage

Please provide responses to our specific questions above. Please also address any other issues you think are relevant. We would be happy to receive your response by email, or have a discussion with you over the phone or via Microsoft Teams.

This matter is public and you can forward this email to anybody who may be interested. Updates regarding the ACCC's investigation will be available on the ACCC's public mergers register [here](#).

If you would like to comment in writing, please do so by **Friday 18 February** by return email. Alternatively, email or call me on (02) 9230 3813 or Elizabeth Elias on (02) 6243 1104 if you prefer to set up a time to discuss or if you need more time to respond.

The ACCC treats sensitive information it receives during a merger review as confidential, and will not publish your submission. We will not disclose submissions to third parties (except our advisors/consultants) unless compelled by law (for example, under freedom of information legislation or during court proceedings) or in accordance with s155AAA of the Competition and Consumer Act 2010. Where the ACCC is required to disclose confidential information, we will notify you in advance where possible so that you have an opportunity to be heard. Therefore please clearly indicate if any information you provide is confidential. Our [Informal Merger Review Process Guidelines](#) contain more information on confidentiality.

Kind regards,

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The ACCC acknowledges the traditional owners and custodians of Country throughout Australia and recognises their continuing connection to the land, sea and community. We pay our respects to them and their cultures; and to their Elders past, present and future.