



Statement of Issues

28 April 2022

THL – proposed acquisition of Apollo

Purpose

1. Tourism Holdings Limited (**THL**) proposes to acquire Apollo Tourism & Leisure Ltd (**Apollo**) (**the proposed acquisition**).
2. This Statement of Issues:
 - gives the Australian Competition and Consumer Commission's (**ACCC**) preliminary views on competition issues arising from the proposed acquisition
 - identifies areas of further inquiry, and
 - invites interested parties to submit comments and information to assist our assessment of the issues.
3. Statements of Issues do not refer to confidential information provided by the parties or other market participants and therefore may not fully articulate the ACCC's preliminary position.

Overview of ACCC's preliminary views

4. In considering the proposed acquisition, the ACCC applies the legal test set out in section 50 of the *Competition and Consumer Act 2010* (the **CCA**). In general terms, section 50 prohibits acquisitions that would have the effect, or be likely to have the effect, of substantially lessening competition in any market.
5. The ACCC divides its preliminary views into three categories, 'issues of concern', 'issues that may raise concerns' and 'issues unlikely to raise concerns'.

Issue of concern – Consolidation of the two largest suppliers of rental RVs

6. The ACCC's preliminary view is that the proposed acquisition is likely to substantially lessen competition in the supply of motorised recreational vehicles (**RV**) for rent in Australia, and that the acquisition would give THL the ability to profitably increase prices and/or decrease quality or service.

7. The proposed acquisition would remove THL's closest and largest competitor. The ACCC's preliminary view is that other sources of competitive tension would not be sufficient to replicate the competitive tension lost by the removal of Apollo. In particular, our investigation to date indicates that:
- other RV rental suppliers lack the scale to replace the competition lost by the proposed acquisition of Apollo by THL
 - peer-to-peer platforms do not provide a strong source of competitive constraint on traditional RV rental suppliers, and it does not appear that they are likely to in the foreseeable future. Additionally, the merged entity's shareholding in Camplify, the largest Australian peer-to-peer platform, may dampen its incentive and ability to competitively constrain the merged entity in future, and
 - the threat of new entry or expansion by other traditional RV rental suppliers is not sufficient to provide a strong competitive constraint on a combined THL/Apollo.

Issues unlikely to raise concerns

Manufacturing of RVs

8. The ACCC's preliminary view is that the proposed acquisition is unlikely to substantially lessen competition in the manufacture of RVs due to the small scale of THL's Australian manufacturing operations.

Sale of RVs

9. The ACCC's preliminary view is that the proposed acquisition is unlikely to substantially lessen competition in the sale of RVs due to the small scale of THL's Australian retail presence, and the presence of numerous other brands of RVs for sale in the Australian market.

Making a submission

10. The ACCC invites submissions from interested parties, particularly on the following key issues:
- The extent to which alternative RV rental suppliers would be able to materially constrain and compete with a combined THL/Apollo
 - The degree of constraint that peer-to-peer platforms would exert in future on a combined THL/Apollo, and
 - Whether new entry or expansion is likely in the next three to five years.
11. Interested parties should provide submissions by 5pm on 19 May 2022. Responses may be emailed to mergers@acc.gov.au with the title: Submission re: THL/Apollo - attention Ninad Kulkarni/Nicholas Welfare. If you would like to discuss the matter with ACCC staff or have any questions about this Statement of Issues, please contact Ninad Kulkarni on (03) 9910 9531 or Nicholas Welfare on (02) 9230 3813.

12. The ACCC anticipates making a final decision on 21 July 2022, however, this timeline can change. To keep up with possible timing changes and to find relevant documents, interested parties should visit the Mergers Register on the ACCC's website at www.accc.gov.au/publicregisters/mergers-registers/public-informal-merger-reviews.

Confidentiality of submissions

13. The ACCC will not publish submissions regarding the proposed acquisition. 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 CCA. Where the ACCC is required to disclose confidential information, the ACCC will notify you in advance where possible so that you may have an opportunity to be heard. Therefore, please identify any confidential information that is provided to the ACCC. Our [Informal Merger Review Process Guidelines](#) contain more information on confidentiality.

About ACCC 'Statements of Issues'

14. A Statement of Issues is not a final decision about a proposed acquisition. A Statement of Issues outlines the ACCC's preliminary views and identifies further lines of inquiry.
15. A Statement of Issues provides an opportunity for all interested parties (including customers, competitors, shareholders and other stakeholders) to ascertain and consider the primary issues identified by the ACCC. It is also intended to provide the merger parties and other interested parties with the basis for making further submissions should they consider it necessary.

Recreational vehicles

16. RVs offer flexible transport and accommodation options for travellers. There are two categories of RVs:
 - Motorised RVs (this includes motorhomes, campervans and 4WD campers) which combine transport and accommodation in a single vehicle, and
 - Towables (this includes caravans, camper trailers and other pop-up or slide on campers) which must be towed by another vehicle such as a car or 4WD.
17. As neither THL nor Apollo offer 'towables' and traditional RV suppliers either do not offer them or offer only limited numbers, these are of limited relevance to the ACCC's competition assessment.
18. Within the category of motorised RVs, there are a range of vehicles of different sizes with different features and amenities. The terms 'motorhome' and 'campervan' are sometimes used interchangeably, however, for the purposes of this document:
 - A 'motorhome' describes a more expensive vehicle, usually built on a truck or bus chassis with facilities that include a kitchen, toilet and shower. They tend

to be targeted at older couples or family groups that are seeking a more comfortable and mobile travel accommodation experience.

- A ‘campervan’ is generally a modified van that is unlikely to include a flushable toilet or a shower, with cooking facilities limited to a gas cooktop. 4WD campers are 4WDs that include expandable roof top tents. Campervans and 4WD campers are targeted at younger travellers (such as backpackers) who prioritise experience and price over comfort. For simplicity, we refer to both campervans and 4WD campers as ‘campervans’.

The parties

19. THL is a New Zealand based global tourism company operating a range of tourism related businesses in Australia, New Zealand, the USA and the UK. In Australia, its operations include RV rental, sales, and manufacturing. THL’s Australian rental brands are Maui, Britz and Mighty Camper.
20. Apollo is an Australian based tourism leisure company with operations in Australia, New Zealand, Canada, Germany, the UK and Ireland. In Australia its principal activities include the manufacture, rental, sale, and distribution of RVs. Apollo’s Australian rental brands are Star RV, Apollo, Cheapa Campa and Hippie Camper.
21. Both parties operate under a build/buy – lease – resell model, where rental vehicles cycle through their respective rental brands before being sold through their individual sales distribution channels and selected dealers.
22. THL and Apollo also overlap through their manufacturing operations in Australia. Apollo manufactures the Coromal, Windsor and Talvor brands at its Brisbane manufacturing facilities. It also exclusively manufactures, imports, and distributes Winnebago branded motorhomes. THL’s manufacturing operations in Australia are mainly limited to the assembly, conversion and fit outs of RV components into existing motorhomes.

Other industry participants

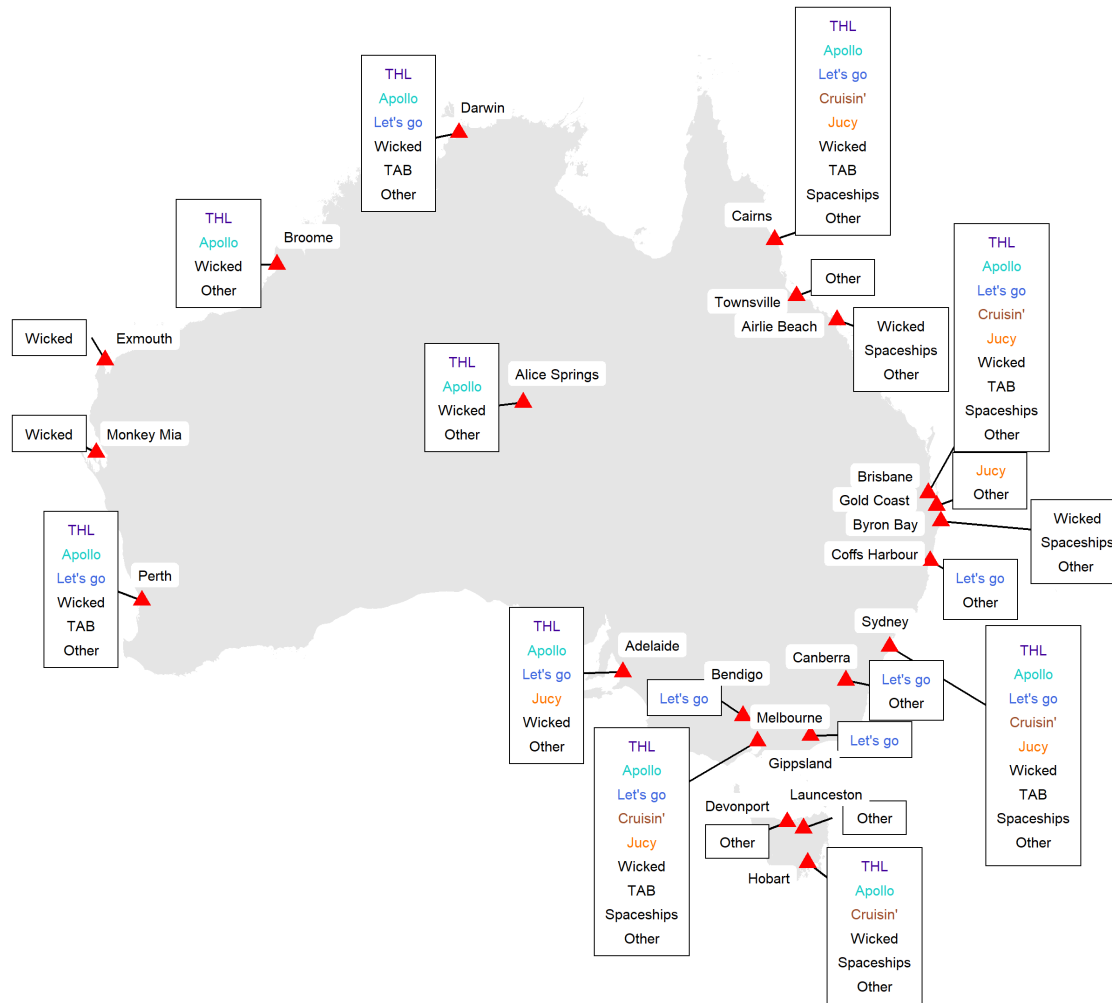
23. THL and Apollo are the largest traditional RV rental suppliers in Australia by a substantial margin. Other suppliers have smaller fleets that are typically weighted much more heavily towards only one of motorhomes or campervans, and some are only present in the eastern states.
24. Table 1 below lists the types of vehicles that each RV rental supplier offers.

Table 1: Vehicles types offered

Vehicles offered	Rental supplier
Motorhomes and campervans	THL, Apollo, Cruisin’ Motorhomes, Let’s Go Motorhomes
Campervans only	Jucy, Wicked, Spaceships Rentals, Travellers Autobarn

25. **Figure 1** below presents these suppliers’ depot locations.

Figure 1: RV rental industry participants



Peer-to-peer networks

26. Peer-to-peer networks provide platforms for private RV owners to offer their RVs for rent. Like Airbnb, private RV owners may be individuals renting out vehicles when they are not used, or professional owners with small fleets. Examples of peer-to-peer networks include Camplify, SHAREaCAMPER, Camptoo and Outdoorsy.
27. In the past few years Camplify has emerged as the leading peer-to-peer platform in Australia. Camplify is ASX listed, reporting \$8.4 million in revenue for FY21¹ and half year results for FY22 of \$6.8 million.² In February 2022, Camplify reported a total of 7,338 vehicles on its platform, of which we understand the majority are towables.
28. Apollo has a 17.8% shareholding in Camplify, and a Non-Executive Director seat on the Camplify board. Camplify has entered into an agreement with THL to purchase SHAREaCAMPER in return for an approximately 7% shareholding in Camplify which was cleared by the New Zealand Commerce Commission on 25 March 2022.
29. If the THL-Apollo acquisition is completed, THL would hold approximately 23% of Camplify's shares and retain Apollo's Non-Executive Director seat.

Industry background

Consumer demographics

30. The RV rental industry caters to a range of consumer demographics, from young backpackers to families to retirees. Market feedback is that people decide to rent RVs for the lifestyle and flexibility they provide.
31. Prior to the Covid pandemic, international tourists, particularly from Europe and the United States, were a key customer base for the industry.
32. Market feedback indicates that travelling by RV, particularly in a motorhome, is at times more expensive than by car and roofed accommodation. It is often a desire for the experience that drives the choice of this type of holiday, rather than cost.

Sales channels and modes of competition

33. The ACCC understands that RV rental suppliers compete based on price (including one-way trip fees, early bird and other discounts), inclusions such as free fuel or cleaning, vehicle quality, vehicle age, vehicle availability and depot locations.
34. Rentals may be booked by consumers through:
 - Rental suppliers, directly

¹ <https://www.camplify.com/investor/wp-content/uploads/2021/11/CHL-Annual-Report-2021.pdf>

² Camplify 1H22 half year results - <https://www.marketscreener.com/quote/stock/CAMPLIFY-HOLDINGS-LIMITED-124598232/news/Camplify-1H22-Half-Year-Results-and-Presentation-39559500/>

- Travel agents (who typically in turn book the vehicle via a travel wholesaler)
- Web consolidators / online travel agents
- Affiliate partners such as the NRMA, RACQ, RACV and airlines
- Peer-to-peer platforms.

35. Information obtained to date suggests that in Australia, domestic customers tend to utilise direct bookings with rental suppliers, web consolidators, or peer-to-peer platforms, particularly throughout the Covid-19 pandemic.
36. We understand that overseas travel agents are an important sales channel for traditional RV rental suppliers. In particular, European travel wholesalers account for significant sales volumes. As a consequence of Covid-19, there have been very few international tourists so bookings by travel agents have decreased significantly. As international and domestic borders continue to reopen, bookings made through travel agents are likely to increase.
37. The ACCC's preliminary view is that the current level of consumer demand is not representative of the long-term state of the market. With international borders reopening, we expect international demand to increase in coming years. The ACCC is therefore focused on competition in the medium term as the effects of the Covid-19 pandemic subside.

The proposed transaction

38. On 10 December 2021, the parties signed a Scheme Implementation Deed under which THL will acquire 100% of the share of Apollo by way of a Scheme of Arrangement under the *Corporations Act 2001* (Cth). The acquisition is subject to obtaining merger clearance from the ACCC and NZCC, as well as approval from the Foreign Investment Review Board.

Future with and without the acquisition

39. In assessing a proposed acquisition under section 50 of the CCA, the ACCC considers the effects of the acquisition by comparing the likely future state of competition if the acquisition proceeds (the 'with' position) to the likely future state of competition if the acquisition does not proceed (the 'without' position) to determine whether the proposed acquisition is likely to substantially lessen competition in any relevant market.
40. On the basis of the information currently available, the ACCC has no reason to believe that Apollo would not continue to operate as a competitor to THL, absent the proposed acquisition.

Market definition

41. The ACCC's starting point for considering which markets will be affected by the proposed acquisition is to identify areas of overlap between the products and services actually or potentially supplied by the merger parties. The ACCC then considers actual or potential suppliers of those products and services, as well as

what other products and services constitute sufficiently close substitutes to provide a significant source of constraint on the combined THL/Apollo.

42. The areas of overlap between THL and Apollo are the rental, manufacture and sale of motorised RVs. However, the ACCC understands that there is only minor overlap in the manufacture and sale of RVs as THL's Australian operations in this regard are small. The focus of the ACCC's review is on the rental of RVs.

Product dimension

43. The ACCC considers the relevant product market to be the supply of motorised RV rentals, including motorhomes, campervans and 4WD campers.
44. The ACCC has reached this preliminary view on the basis of the broad similarities between motorhomes and campervans for consumers, as well as broad similarities in infrastructure, commercial relationships and other inputs required for a rental supplier offering both types of vehicles for rent. In addition, THL and Apollo supply both vehicle types for rent.
45. The ACCC does not consider towables or other forms of travel and accommodation to be part of the relevant market, for the reasons set out in the next section.
46. The ACCC is still considering whether motorhomes and campervans are segments of a combined market or whether there may be narrower, separate markets for motorhomes and campervans. We are considering this from both a supply and demand side perspective.
47. On the supply side, information available to the ACCC suggests there are some differences in the business models for renting motorhomes as opposed to campervans. Campervans are typically rented until they reach the end of their useful life. As motorhomes age, they will be resold or moved through the supplier's brands. Motorhome suppliers tend to manufacture and fit out the entire vehicle and have established dealer sale channels to maximise overall returns from the business, which campervan rental suppliers generally do not. Therefore, campervan suppliers who do not establish such channels may be at a competitive disadvantage if supplying motorhomes for rent.
48. On the demand side, market feedback has suggested that there are some consumers who will switch between motorhomes and campervans based on cost if the consumer has flexibility on the amenities they require. However, most consumers will choose a motorhome for the additional amenities such as a toilet, shower, and full kitchen that are typically not offered in a campervan. This is reflected in a significant gap in pricing between motorhomes and campervans. Market perception is that most campervan renters are younger travellers who wish to spend less on accommodation and transport, and more on other aspects of their holiday, while motorhome renters tend to be more willing to spend extra on a comfortable travelling experience.

Alternative accommodation and transport options

49. The ACCC's preliminary view is that alternative forms of mobile accommodation and transport such as towables, car and roofed accommodation holidays, and cruises are not close substitutes to RV rentals.

50. Market feedback indicates that RV rental customers are attracted to RVs due to the distinct features of combining transport and accommodation. For example, we understand from travel wholesalers that the vast majority of RV rental customers have decided that they are taking an RV trip in Australia before visiting a travel agent. Market feedback suggests tourists do not consider the price of alternative forms of accommodation and transport when deciding on an RV holiday and that RV prices would need to increase by 10%-20% before tourists would consider switching to other types of accommodation or transport.
51. Although there are some tourists that may switch to other forms of accommodation and transport if RV rentals are too expensive, the ACCC considers that alternative accommodation and transport options are unlikely to be in the same market.

Geographic dimension

52. The ACCC's preliminary view is that it is appropriate to consider the effects on the proposed acquisition on a national market for RV rentals.
53. Both THL and Apollo operate from all states of Australia and the Northern Territory. This geographic coverage is important to the success of rental suppliers because it allows them to re-deploy fleets around Australia to meet annual shifts in seasonal demand. Further, customers are able to make one-way trips, dropping off a vehicle at a different location to where they picked it up.
54. However, the ACCC is also actively considering whether it is relevant to consider the effect of the acquisition on smaller regional markets. Competitive dynamics may differ in areas such as Western Australia, South Australia and Northern Territory where there are fewer competitors, and geographically isolated areas such as Tasmania. In particular, information available to the ACCC suggests that a higher share of rentals in Western Australia and Tasmania are return-to-base compared to the east coast.

The ACCC invites comments from market participants on its preliminary views about the definition of the relevant market/s. In particular, market participants may wish to comment on:

- What factors do consumers take into account when deciding to rent either of a campervan or motorhome? Is one vehicle type more popular than the other? Are they interchangeable for some or all customers?
- When setting commercial strategies, to what extent do traditional RV rental suppliers monitor pricing and offerings for other forms of transport, accommodation or holiday, for example car rental and motels?
- Do RV rental suppliers' terms and conditions place restrictions on consumers crossing certain borders or going more than a certain distance from the depot?

Questions specifically for RV rental suppliers:

- How do motorised RV rental suppliers determine their prices? How dynamic are prices, and what are the relevant variables (e.g. vehicle type, location, season, competitor pricing, presence and size of competitor fleets, etc.)?

- What would be involved in a campervan-focused rental supplier commencing supply of motorhomes for rent?
- What would be involved in a motorhomes-focused rental supplier commencing or increasing supply of campervans for rent?
- Is a dealer network to sell ex-rental vehicles necessary to maximise resale value, and does the answer differ between campervans and motorhomes?
- Are manufacturing capabilities or strong relationships with manufacturers necessary to compete effectively, and does the answer differ between campervans and motorhomes?
- What would be involved in an east coast RV rental supplier expanding to Perth, Darwin or other western or central locations?

Issue of concern: Consolidation of the two largest suppliers of rental RVs

55. The proposed acquisition would remove THL's closest and largest competitor. The ACCC's preliminary view is that other sources of competitive tension would not be sufficient to replicate the competitive tension lost by the removal of Apollo. In particular, our investigation to date indicates that:

- other RV rental suppliers lack the scale to replace the competition lost by the proposed acquisition of Apollo by THL
- peer-to-peer platforms do not provide a strong source of competitive constraint on traditional RV rental suppliers, and it does not appear that they are likely to in the foreseeable future. Additionally, the merged entity's shareholding in Camplify, the largest Australian peer-to-peer platform, may dampen its incentive and ability to competitively constrain the merged entity in future, and
- the threat of new entry or expansion by other traditional RV rental suppliers is not sufficient to provide a strong competitive constraint on a combined THL/Apollo.

Closeness of competition between THL and Apollo

56. The ACCC is concerned that the proposed acquisition would remove the strongest competitive constraint on THL.

57. Market participants consistently perceive THL and Apollo to be each other's closest competitors for the supply of motorised RV rentals. Market participants estimate that THL and Apollo have between 50% and 70% combined market share (exclusive of rentals on peer-to-peer websites), measured by booking volume.

58. Market feedback has indicated that THL and Apollo have similar brand structures that are positioned directly against one another. THL and Apollo also compete head on for customers, using the same sales channels including direct bookings, web aggregators and international wholesalers. Their depots are in the same

cities and their fleets are similar in both size and composition. Market participants perceive that THL and Apollo also price in similar ways through their respective sales channels.

Constraint from traditional competitors

59. The ACCC's preliminary view is that alternative suppliers are unlikely to impose a sufficient degree of constraint on THL and Apollo to replace the competition lost by the proposed acquisition.
60. Market feedback indicates that Cruisin' and Let's Go are the next closest competitors to THL and Apollo, and the only other traditional RV rental suppliers offering motorhomes. However, market participants consider that these competitors have significantly smaller fleets, and Cruisin' is only present on the east coast.
61. While Cruisin', Let's Go and other smaller competitors compete for direct bookings and via web aggregators, market feedback indicates that these competitors, even when considered together, are not a sufficient alternative for international wholesalers due to their smaller fleet sizes, more limited range of vehicles and fewer depot locations.
62. There are a larger number of campervan-only rental suppliers in Australia, including Jucy and Wicked. However, these companies do not offer motorhomes, generally target younger, more cost focused travellers, and market feedback indicates that they are likely to provide a constraint on the merged entity only in relation to a subset of consumers.

Constraint from peer-to-peer platforms

63. The ACCC's preliminary view is that motorised RVs listed on peer-to-peer platforms do not provide a strong constraint on traditional RV rental suppliers, and only compete for a subset of consumers.
64. Peer-to-peer platforms have been in Australia for a number of years now, with Camplify and SHAREaCAMPER entering in 2015. Market feedback is that the only peer-to-peer platform that has achieved significant success in Australia is Camplify.
65. Australian peer-to-peer platforms appear to have a greater focus on direct bookings from domestic tourists, as they do not compete for customers via wholesalers or web aggregators which are key sales channels for traditional RV rental suppliers.
66. There are a number of factors that mean that peer-to-peer rentals are less likely to be suitable for international tourists, including:
 - Many international tourists rent RVs as part of overall travel packages that include flights.
 - One-way rentals are popular with international tourists. However, owners on peer-to-peer platforms may be unwilling to accept one-way rentals, or if they do, charge a higher fee to relocate the vehicle back to the pick-up location as they lack a network of depot locations that traditional RV rental companies have.

- Traditional RV rental suppliers provide greater certainty around vehicle availability due to their fleet sizes in the event a vehicle breaks down or requires maintenance. This may be critical for international tourists booking expensive, multi-week holidays planned months in advance. Owners on peer-to-peer platforms are unlikely to have backup listings, and availability is likely to be limited during peak seasons.

67. The ACCC is also considering the following factors relevant to the degree of constraint that peer-to-peer sites are likely to exert:

- Peer-to-peer platforms are a means to connect vehicle owners with customers, and the platform has a limited ability to influence prices set by the vehicle owners.
- A collection of individuals/small businesses on peer-to-peer platforms is unable to act cohesively in response to market conditions. For example, a peer-to-peer platform cannot readily adjust the number of vehicle listings or redeploy vehicles to other locations.
- Market feedback is that owners on peer-to-peer networks are far less active in adjusting pricing, whereas traditional RV rental suppliers change their pricing based on supply and demand at least weekly.
- Peer-to-peer platforms may be capacity constrained at peak holiday periods when individual owners may be personally using their vehicles.
- One factor that traditional RV operators compete on is vehicle quality, replacing vehicles as they age. Peer-to-peer platforms require new listings to replace aging vehicles listed on their platforms.

68. The ACCC is aware that peer-to-peer platforms are growing and adding new features, such as a managed service model. The ACCC will continue to consider the likely future state of peer-to-peer platforms and any competitive constraint they may exert, in particular the likelihood that these platforms will provide greater competition for international tourists in future.

69. The ACCC is continuing to consider whether the 23% ownership interest that the parties would ultimately hold in Camplify would also dampen Camplify's ability and incentive to innovate and compete with the merged entity in the future.

Likelihood of sufficient new entry and expansion

70. The ACCC's preliminary view is that there is unlikely to be entry or expansion on a scale required to constrain a combined THL-Apollo in the foreseeable future.

- The capital requirements for entry or expansion at scale are high, and
- Providers need to build key relationships to support operations at scale, including with:
 - a. key distribution channels, and
 - b. manufacturing and dealer networks.

71. Although small scale entry may be achievable, the ACCC considers that large scale entry or expansion is less likely. The ACCC's view is that small scale entry is unlikely to constrain the combined THL/Apollo due to the very limited capacity available from a small competitor, and the inability of small competitors to contest the large travel wholesaler and aggregator channels due to their small fleets and backend automated booking systems.
72. The ACCC considers the capital requirements to fund the purchase of new vehicles is likely to limit new entry or expansion at scale, particularly for a fleet with a sizeable number of the more expensive motorhomes. Market feedback is that this is a capital-intensive industry, as significant costs are involved in purchasing even a medium-sized fleet. It is questionable whether anyone would invest these sums while international demand remains uncertain.
73. Market participants have also identified the need to have established distribution channels, in particular with aggregators and travel wholesalers, as the majority of pre-Covid RV rental supplier sales were coming through these channels. Suppliers that do not currently have relationships with aggregators and travel wholesalers need to break into the long-established commercial relationships that larger RV rental suppliers currently have with large wholesalers.
74. Market feedback indicates that it is also important for RV rental suppliers to either own or have partnerships with manufacturers and dealer networks in order to be able to procure and dispose of vehicles at scale and to maximise profits from the turnover of older fleets.
75. The combined effect of the barriers mentioned above are likely to create a material impediment for anyone seeking to compete with the combined entity, and reduce the constraint that threat of new entry would exert on the combined entity.
76. At this stage, the ACCC is unaware of any plans by existing RV rental suppliers to expand, or of new competitors entering at a scale sufficient to constrain the parties. The ACCC is aware of failed attempts at new entry or expansion in recent years, including years prior to the pandemic, which highlights the difficulties involved in entry and expansion.
77. Market feedback is that in the short term, ongoing supply constraints including difficulties and wait times associated with sourcing new vehicles and parts also makes significant new entry or expansion very unlikely for approximately the next year.

The ACCC invites comments from market participants on any concerns in relation to THL's proposed acquisition of Apollo. In particular, market participants may wish to comment on the following:

- Can you cite any examples where THL and Apollo reacted to each other or another supplier's commercial strategy or offer? For example, matching pricing or introducing a similar new feature or service?
- When setting commercial strategies, to what extent do traditional RV rental suppliers monitor pricing and offerings on peer-to-peer platforms?
- Are any subsets of customers more likely to be affected by the proposed acquisition than others?

- Is the proposed acquisition likely to reduce consumer choice, level of quality or service, or innovation in the sector?
- Are there any competitive disadvantages faced by an RV rental supplier who is only present on the east coast or in a small number of locations?
- What is the likely future of peer-to-peer RV rental platforms in Australia, including the extent to which they are likely to compete for international tourists and the speed at which the platforms will continue to grow and innovate?
- Is Camplify likely to face significant competition from other peer-to-peer RV rental platforms in Australia in future?
- How have peer-to-peer RV rental websites grown overseas, and are those experiences relevant in Australia?
- Do you have any concerns about the combined entity holding a 23% shareholding in Camplify, and what specific effects are you concerned about?
- To what extent is financing available to establish a new RV rental business at scale, or to help with significant fleet expansion, and how attractive are the terms on which this financing can be obtained?
- What is the scale that an RV rental supplier would require in order to access wholesaler and aggregator sales channels, and is there anything other than scale (such as reputation, track record, etc.) required before being accepted by aggregators and wholesalers?
- Are there any impediments a new credible entrant at scale or an existing supplier seeking to expand may face in securing relationships with manufacturers and dealer networks?
- Has RV rental interest from international tourists increased since the Australian border reopened, and how long it is likely to take for a return to pre-Covid levels of international consumers?
- Do you expect domestic demand for RV rentals to decrease as international borders reopen?

ACCC's future steps

78. As noted above, the ACCC invites submissions from market participants on each of the issues identified in this Statement of Issues and on any other issue that may be relevant to the ACCC's assessment of this matter. Submissions should be emailed to mergers@acc.gov.au by no later than 5pm on 19 May 2022.
79. The ACCC will finalise its view on this matter after it considers submissions invited by this Statement of Issues.
80. The ACCC intends to publicly announce its final view by 21 July 2022. However, the anticipated timeline may change in line with the *Informal Merger Review Process Guidelines*. A Public Competition Assessment explaining the ACCC's final view may be published following the ACCC's public announcement.