Regulatory Impact Statement for Fuel Reforms

David Graham, Sally Carrick, Dr Richard Tooth

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Contents

Glossary

Abbreviation	**Stands for**
ACAPMA	Australasian Convenience and Petroleum Marketers Association's
The ACLFT Act	*Australian Consumer Law and Fair Trading Act 2012*
ACCC	Australian Competition and Consumer Commission
API	Application Programming Interface
The Department	The Department of Government Services, Victoria
$M	$ Millions
MCA	Multi Criteria Analysis
NPV	Net present value
RIS	Regulatory Impact Statement

Executive summary

Background

In January 2025, the Premier of Victoria announced the introduction of the Fair Fuel Plan. Under Phase 1 of the Fair Fuel Plan, it will be mandatory for all Victorian fuel retailers to provide real time pricing data to be published through a new fuel finder feature on the Service Victoria application (app). The fuel finder feature on the Service Victora app is intended to provide up to date and readily accessible information to enable Victorian consumers to compare prices of fuel before purchasing.

Purpose and scope of this RIS

This purpose of this RIS is to consider different options to improve fuel pricing information for Victorian motorists and analysis of their costs and benefits.

Phase 2 of the Government's Fair Fuel Plan – which involves setting prices the day before and locking prices in for 24 hours – is not within the scope of this RIS. The Victorian Government is separately undertaking policy work and stakeholder consultation for that next phase of the Plan.

Problem being addressed

There are gaps in the information available to help Victorian motorists make informed decisions about where to purchase fuel at the lowest available price. Fuel price apps and websites allow motorists to make more informed decisions about where and when they shop for fuel. While several non-government fuel price apps and websites are available for Victorians to use, there are gaps in the coverage, accuracy and timeliness of information provided. This means consumers may pay for fuel at higher prices than necessary, impacting their cost of living outcomes.

Objectives of proposed change

The objective of the proposed changes is to enable Victorians to save money by providing better information about fuel prices which will enable them to make more informed decisions about when and where to buy fuel.

Options

As part of the RIS process, it is important to consider different options that could achieve the Victorian Government's objectives for addressing the problem. This should include considering a range of approaches, including non-legislative options, approaches in other jurisdictions, and improvements to existing regulatory regimes and regulatory practice.

This RIS has assessed which options could achieve the policy objective, and why other options were considered but not considered feasible.

Options considered in this RIS are:

- **Base case** – No change.
    - Current arrangements continue.
- **Option 1** – Mandatory reporting by fuel retailers of fuel price data with government publication of data.
    - Under Option 1, new Regulations would be made to prescribe a new Code of Practice under the *Australian Consumer Law and Fair Trading Act 2012*.
    - All fuel retailers in Victoria will be required to register their business with Service Victoria and report their normal fuel price, trading hours and the brands and types of fuel offered for retail sale.
    - All fuel retailers will be required to notify the Service Victoria Chief Executive Officer (CEO) of any change in the normal price (increase or decrease) within 30 minutes of changing the normal fuel price on the fuel pump display, for publication on the Service Victoria application
    - Fuel retailers will also be required to report if a fuel offered for sale is temporarily unavailable within 30 minutes of the fuel becoming unavailable.
    - Monitoring, compliance and enforcement of the new Regulations will be undertaken by Consumer Affairs Victoria.
- **Option 2** – Voluntary reporting by fuel retailers of fuel price data with government publication of data (no regulatory change).

Options analysis and preferred option

Relative to the base case the two assessed options have a range of potential costs and benefits. These have been broadly categorised as follows:

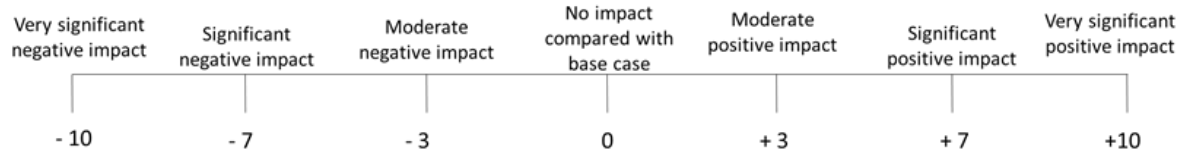
- Costs to Government including:
    - Costs of Service Victoria in providing the digital systems
    - Costs of Consumer Affairs Victoria (CAV) in monitoring and enforcing compliance
- Costs to fuel retailers in complying with the regulation (or voluntarily participating under Option 2)
- Potential benefits to fuel retailers in reduced costs of obtaining competitor prices
- Impacts to providers of fuel information (e.g. Petrol Spy, RACV)
- Benefits to consumers associated with improved price transparency including reduced search costs and improved satisfaction with the price they pay.
- Impacts on market and fuel prices.

Options are assessed using a multi-criteria analysis (MCA). It is not practical to quantitatively estimate all of the impacts of the options due to data constraints and uncertainty. Costs to government and some of the costs to retailers have been quantitatively estimated.

The table below describes the MCA framework that has been used. Cost and benefit criteria are equally weighted at 50 per cent.

Criteria	Description of criteria	Weighting
	Costs	
Costs to industry	• Costs to fuel retailers in complying with the regulation • Impacts to providers of fuel information	25%
Costs to government	• Costs of Service Victoria in providing the digital systems • Costs of CAV in monitoring and enforcing compliance	25%
	Benefits	
Benefits to Victorian consumers	• Victorians have access to better (more accurate, timely and comprehensive) information on fuel prices to enable them to make more informed decisions about when and where to buy fuel • Direct benefits including reduced search costs and improved satisfaction with the price they pay • Distributional benefits as a result of greater savings for consumers who care most about saving money	50%

Options are scored relative to the Base Case as follows:



A summary of the results of the MCA is provided in the table below. Option 1 (mandatory reporting) is assessed as the preferred option and likely to deliver a net benefit over Option 2 (voluntary reporting), due to the significant uncertainty of participation in Option 2 and consequently benefits that might be realised.

	Unweighted score		Weighted score	
	Option 1	**Option 2**	**Option 1**	**Option 2**
Costs to industry (25%)	-3.5	0	-0.9	0
Costs to government (25%)	-4	-3	-1	-0.75
Benefit to consumers (50%)	5	2	2.5	1
Total			**0.6**	**0.25**

We note there is uncertainty as to the benefits and some of the costs for both Options 1 and 2. Nevertheless, on balance, we expect that in the medium to long-term there will be net benefits realised from Option 1 relative to the base case. This is based on the following:

- Benefits to consumers
    - Mandatory reporting will result in greater level of geographic market coverage and accuracy of retail price information to the benefit of consumers
    - The scheme will deliver additional consumer benefits in reducing consumer search costs and will have some distributional benefit in enabling those consumers who are more price sensitive to save more.
- Benefits to industry
    - There are potential costs savings to retailers in relation to the costs of obtaining competitor data

- The additional costs to both government and industry associated with the management of the scheme and provision of information by retailers are not significant.

The following table provides a high level summary of impacts under each option relative to the base case.

	Option 1 - mandatory reporting	Option 2 - voluntary reporting
Government costs	~$1.3m p.a. NPV[1] (excluding sunk costs), including: • System development and app development costs • Ongoing system maintenance costs • Monitoring, compliance and enforcement costs	Slightly lower costs at ~$1.1m p.a. NPV
Retailer impacts		
Costs of providing data and compliance	~$1.1m p.a. NPV, including: • Registration • Reporting prices • Compliance requirements Potential for ongoing additional staff training	Slightly lower as retailers who find the system burdensome would opt out
Cost reduction benefit to retailer in reducing cost of obtaining competitor prices	Potential costs savings to retailers in relation to the costs of obtaining competitor data (assuming reciprocal data provision) – variable across retailers and difficult to quantity	Lower benefit to the extent there is lower participation in the scheme (assuming reciprocal data provision)
Market price impacts	No net benefit, noting uncertainty of market and price impacts	Lower benefit to the extent there is lower participation in the scheme
Consumer benefits	Distributional benefits, e.g. reduced search costs, for most price sensitive consumers	Lower benefit to the extent there is lower participation in the scheme

[1] Net present value

Small business and competition impacts

Seven fuel retailers are estimated to make up 58.5 per cent of total market revenue[2]. Outside of the major players, the industry is highly fragmented.

The cost of implementation for retailers may be proportionately larger for small businesses. For example, it will cost more per service station site to understand the requirements and set up a system for inputting data for a retailer with 4 sites compared to a retailer with a few hundred service station sites. The smallest retailers owning one or two sites are more likely to input data manually rather than establish reporting systems; it is estimated that this could take about 10 minutes a week, equating to a cost of about $1000 per year.[3]

While there may be disproportionate impacts on small retailers, overall there are unlikely to be significant competition impacts as a result of this proposal.

Implementation plan

The key elements of the implementation plan will include the following:

- Finalisation of the proposed Regulations
- Completion of the solution design and testing of the Victoria Fuel Finder App by Service Victoria
- Retailer onboarding and registration process in advance of launch of the Service Victoria Fuel Finder
- Development of a compliance monitoring and enforcement approach by Consumer Affairs Victoria.

The release of the proposed Regulations and this RIS for a 28-day public comment period will provide key stakeholders and members of the public the opportunity to consider the proposed changes to the Regulations and provide feedback. At the conclusion of the public comment period, the department will review and consider each submission and take account of the feedback on both the proposed Regulations and the RIS in finalising the Regulations.

The Department will also develop a communications plan to support the launch of the Service Victoria Fuel Finder. This will include:

- Formal communication to fuel retailers in advance of the launch to communicate the timing for the new Regulations to come into effect, registration process and reporting obligations
- Wider communication strategy to the Victorian consumers to promote awareness of the Fuel Finder feature on the Service Victoria app.

[2] IBISWorld 2024, Retail Trade G4000, *Fuel Retailing in Australia*. The market shares of the major retailers are: Ampol 17.6%, Viva Energy Australia 9.4%, BP Australia 7.6%, 7-Eleven Stores Pty Ltd 6.6%, Chevron Australia Products Pty Ltd 4.3%, EG 10.9%, United Petroleum 2.1%.

[3] indicative estimate and will depend on retailer processes.

The regulations are intended to commence from July 2025 followed by the launch of live fuel pricing on the Service Victoria app in August 2025.

Evaluation strategy

The Regulations will sunset 10 years after the commencement of the Regulations. The Department will actively monitor and evaluate the effectiveness and efficiency of the Regulations throughout the life of the Regulations. Supporting this, the Department will continue to consult and gather feedback from key industry stakeholders on a frequent basis.

Once the regulatory change has been implemented, the Department will conduct a short-term review of retailer compliance with requirements, and petrol consumer usage of the Service Victoria app. This will inform whether an additional education and awareness campaign is needed to support compliance and usage.

Structured evaluation of the Regulations will be undertaken before the sunsetting of the Regulations. To support this evaluation the department will develop an evaluation plan including evaluation questions, available data and data gaps to assess any potential gaps in evidence. Key evaluation questions will be designed to align with the Department of Treasury and Finance Resource Management Framework, such as:

- Problem justification: What is the evidence of continued need for the Regulations and role for government?
- Effectiveness:
    - To what extent has the primary objective of the Regulations been achieved?
    - Have the Regulations been effective in providing more information for petrol consumers?
- Efficiency: Do the Regulations achieve the objectives in the most efficient way?

Data assessment will include consideration of indicators such as:

- Customer usage of the Service Victoria app
- Surveys of customers using the app, either:
    - Direct surveys of consumers using the app
    - Market wide surveys of price apps usage as conducted by ACAPMA (next survey undertaken will be 2026) – this has been undertaken over time and will provide baseline information for comparison
- App ratings and usage
- Data on pricing as collected by the Service Victoria app
- Compliance data from CAV.

Media reporting could also be used as an indicator of retailer and customer satisfaction with the Service Victoria app

1. Background

In January 2025, the Premier of Victoria announced the introduction of the *Fair Fuel Plan*. Under Phase 1 of the *Fair Fuel Plan*, it will be mandatory for all Victorian fuel retailers to provide real time pricing data to be published through a new fuel finder feature on the Service Victoria app.

The fuel finder feature on the Service Victora app is intended to provide up to date and readily accessible information to enable Victorian consumers to compare prices of fuel before purchasing.

This Regulatory Impact Assessment (RIS) considers options to provide improved fuel price data to Victorian motorists.

1.1 Introduction and context

On 20th January 2025 the Victorian Premier announced the Fair Fuel Plan, which is a cost of living measure aiming to give Victorian motorists access to the most up to date prices available at retail sites in Victoria so they do not miss out on pricing information from lower priced retailers. Two distinct phases were identified:

- *Phase 1: Make it compulsory for the more than 1,500 fuel retailers across the state to provide their pricing data in real time. This data will then feed directly into a new fuel finder feature on the Service Victoria app, giving Victorians the opportunity to shop around for the best deal when they're ready to fill up*
- *Phase 2: Cap the number of fuel price rises to once a day, lock in those prices the day before, and freeze them for 24 hours.*[4]

The scope of this RIS includes assessment of options in relation to Phase 1 of the Fair Fuel Plan - Mandatory fuel price reporting.

Fuel price transparency schemes operate in all states and territories except Victoria[5]. They exist to provide transparency of easily accessible retail fuel price information for consumers. Under the schemes, fuel retailers are required to report their retail fuel prices to a centralised database or system. While the operation of schemes vary[6], the objectives and outputs of the schemes are similar to the extent that they aim to:

- Provide comprehensive across retailers and fuel types

[4] *Save At The Servo With Fuel Prices Locked And Price Rises Capped*, January 20th 2025, available at https://www.premier.vic.gov.au/save-servo-fuel-prices-locked-and-price-rises-capped.

[5] All schemes in other states and territories establish mandatory reporting requirements for fuel retailers except for the Australian Capital Territory where reporting is voluntary.

[6] For example, schemes vary in regard to the systems retailers are required to report to and the availability of data to third parties.

- Provide accurate data as the schemes are mandatory and supported by a regulator undertaking monitoring and compliance and supported by enforcement penalties
- Provide near real-time pricing as retailers are required to report prices within a certain time period.

In addition, a range of commercial apps and websites also provide fuel price information (often alongside other commercial promotions, incentives and discounts), although there are gaps in the coverage, accuracy and timeliness of information provided on these apps and websites. More detail on government fuel transparency schemes and commercial apps/websites is provided in Chapter 2.

1.1.1 Scope of this analysis

This RIS considers different options to improve fuel pricing information for Victorian motorists and analysis of their costs and benefits.

While acknowledging that the next phase of the Fair Fuel Plan will be setting prices the day before and locking prices in for 24 hours, that Phase is not within the scope of this RIS. The Victorian Government is separately undertaking policy work and stakeholder consultation for that next phase of the Plan.

1.2 Current regulatory framework for fuel pricing in Victoria

Fuel prices in Victoria, and Australia, are set by the market.

The Australian Competition and Consumer Commission (ACCC) monitors Australian fuel prices. The ACCC reports on fuel prices and the overseas and local factors influencing prices.[7] The ACCC investigates anti-competitive behaviour, including in the fuel industry, and may take action if it thinks a fuel retailer has broken competition or consumer law. [8]

In Victoria, fuel retailers[9] must also comply with the Australian Consumer Law and Fair Trading (Code of Practice for Fuel Price Boards) Regulations 2016 which prescribe a code of practice to regulate the display of fuel prices on price boards at service stations. These Regulations are made under section 232 of the *Australian Consumer Law and Fair Trading Act 2012* (the ACLFT Act).

The Code of Practice for Fuel Price Boards[10], set out in Schedule 1 of Regulations, requires that:

- A fuel retailer must not display a discounted fuel price on any price board

[7] Under a Ministerial Direction - Competition and Consumer (Price Monitoring—Petroleum Fuels) Direction 2022 - the ACCC monitors prices, costs and profits related to the supply of petroleum products in Australia. The following industries are within scope of the Ministerial Direction: (i) the fuel retailing industry; (ii) the petroleum product wholesaling industry; (iii) the petroleum fuel manufacturing industry; (iv) bulk petroleum storage sub-industry.

[8] The ACCC does not set or control Australian fuel prices and does not regulate the fuel industry.

[9] Fuel retailer means a person or body who carries on the business of supplying fuel for retail sale.

[10] Price board means a board, sign or notice at a service station that displays information regarding the price of types of fuel for retail sale at the service station.

- A fuel retailer may display information about discounts and special offers on a price board so long as only normal fuel prices are displayed
- If a fuel retailer increases the normal fuel price for a type of fuel, the retailer must change the price displayed on any price board to reflect the increase in price before, or at the same time as, changing the price displayed on any fuel pump display for that type of fuel
- If a fuel retailer decreases the normal fuel price for a type of fuel, the retailer must change the price displayed on any price board to reflect the decrease in price after, or at the same time as, changing the price displayed on any fuel pump display for that type of fuel.

The Regulations were introduced in 2016 with the aim of:

- Helping motorists trying to compare prices to get the best deal, and guaranteeing that no one pays more for fuel than the price displayed on the board
    - The regulation prevents fuel retailers promoting discounted fuel prices on the price boards that either do not match the price at the pump or were only available for certain consumers (e.g. consumers that had a discount from a shopper docket)
    - Discounts are still allowed to be advertised as long it is alongside the full price for that specific fuel type
- Ensuring the price advertised on the fuel-price board is the same as what is on the pump, with service station operators required to update their boards at the same time or before the price on the pump increases.

Petrol stations are subject to other legislation in Victoria including under the *Environment Protection Act 2017*[11] and the *Occupational Health and Safety Act 2004*[12].

1.2.1 How the current Code of Practice is managed and administered

Responsibility for policy-making in relation to consumer law and fair trading in Victoria sits with the Department of Government Services (the Department).

Under section 109 of the ACLFT Act, the Director of Consumer Affairs Victoria[13] (CAV) has powers and functions to conciliate disputes under the Act and powers to carry out investigations into alleged breaches of the Act. This includes (amongst other things):

- To monitor compliance with the Act and the regulations
- To prepare and publish guidelines in relation to the operation and enforcement of this Act or the regulations or a Consumer Act or the regulations under a Consumer Act
- To investigate breaches of this Act or the regulations or of a Consumer Act or the regulations under a Consumer Act
- To prosecute breaches of this Act or the regulations or of a Consumer Act or the regulations under a Consumer Act

[11] Including meeting the General Environmental Duty under the Act. The EPA conducts inspections of compliance to check compliance with the guidelines for *The design, installation and management requirements for underground petroleum storage systems (publication 888)*.
[12] Including general duties relating to health and safety.
[13] Within the Department of Government Services.

- To encourage the preparation and use of codes of practice for guidance in safeguarding and promoting the interests of purchasers of goods and services
- To prepare codes of practice safeguarding and promoting the interests of purchasers of goods and services and submit those codes of practice to the Minister for inclusion in the regulations under this Act.

1.3 RIS process

A RIS is required under the *Subordinate Legislation Act 1994* for proposals that are 'likely to impose a significant economic or social burden on a sector of the public'. As per the *Victorian Guide to Regulation*, the indicative threshold is that the burden (cost) of a proposal is likely to be greater than $2 million per year, including readily quantifiable impacts (such as licensing or registration requirements) as well as other unquantifiable, intangible or human rights impacts. In addition, an impact assessment may also be required if the overall costs are unlikely to exceed $2 million per year, but there are concentrated effects on particular groups or sectors.[14]

The Department of Government Services engaged Sapere Research Group to prepare this RIS in accordance with the Victorian Guide to Regulation.

Its purpose is to assess the rational for and impact of options for improving fuel transparency. The RIS process includes targeted consultation during its development, as well as an opportunity for public comment on the final RIS and proposed Regulations. Key steps in the process include:

- Preparation of the RIS (this document)
- Public comment on the RIS and proposed Regulations
- Addressing public comments
- Finalising the Regulations.

The approach to preparing the RIS is as follows:

Figure 1 Summary of RIS process

1. Identify the problem	2. Identify options to achieve the objectives	3. Options analysis	4. Assess other impacts	5. Develop Implementation and evaluation plan
Considered the nature and extent of the problem that the proposed Regulations aim to address	Options that could address the defined problem were identified	Costs and benefits of options were assessed, and a preferred option was identified	Considered the likely small business and competition impacts of the preferred option	Arrangements for implementation and evaluation of the preferred option are described

[14] *Victorian Guide to Regulation*, p.3.

Public comment

The proposed Regulations and this RIS will be released for a minimum of 28 days to provide businesses, members of the public and other interested parties the opportunity to provide feedback.

Fuel retailers, other interested parties and members of the public are invited to make submissions responding to the proposed Regulations and/or the RIS.

The proposed Regulations and RIS can be accessed via Engage Victoria's website at https://engage.vic.gov.au/

Addressing public comment and finalising the Regulations

At the conclusion of the public comment period, the Department will review and consider each submission and take account of the feedback on both the proposed Regulations and the RIS in finalising the Regulations.

The Department will prepare a document, which will discuss the comments provided in in response to this RIS and respond to those comments. The Office of Chief Parliamentary Council will review and settle the Regulations, which will then be submitted to the Minister for Consumer Affairs for approval.

2. Problem definition

This chapter outlines the problem being addressed. In summary, there are gaps in the information available to help Victorian motorists make informed decisions about where to purchase fuel at the lowest available price. Fuel price apps and websites allow motorists to make more informed decisions about where and when they shop for fuel. While several non-government fuel price apps and websites are available for Victorians to use, there are gaps in the coverage, accuracy and timeliness of information provided.

This means consumers may pay for fuel at higher prices than necessary, impacting their cost of living outcomes.

This chapter explores the problem by discussing spending on fuel and fuel purchasing decisions by consumers, outlining the current fuel pricing information available, and gaps in information.

2.1 Fuel spending by Victorians

Victorians spend a significant amount of their income on transport including fuel. Victorians (and Australians generally) are spending more of their income on fuel

Across Australia, revenue at petrol stations was about $45 billion per year over the five years to 2023-24 with about half of this revenue derived from petrol sales, a third from diesel sales and the remaining revenue from other products. In Australia it is estimated that there are about 6,954 "establishments" (petrol stations) and 3,752 "enterprises" that own the petrol stations; Ibis World estimates 23% of petrol stations and enterprises are located in Victoria, consistent with population share. This gives an estimate of about 1,600 petrol stations and 862 enterprises in Victoria.[15]

A report on fuel consumer attitudes by the Australasian Convenience and Petroleum Marketers Association (ACAPMA) notes that in 2024 the majority of Australians typically spent $26-$75 per week on fuel, with 29% spending $26-$50 and 28% spending $51-$75. The APACMA report notes a clear trend to higher spending on fuel since 2019:

- 56% of Australian consumers in 2024 spent more than $50 per week on fuel, up from 42% in 2019 and 53% in 2022
- The proportion of consumers spending more than $75 also increased, from 26% to 28% over the last two years, both well above the 15% who spent above $75 in 2019.[16]

According to data published by the Australian Automobile Association's Transport Affordability Index, a "hypothetical" Melbourne household spent $526.33 per week on total transport costs in the

[15] IBISWorld, Fuel Retailing in Australia, 2024.
[16] ACAPMA, *National Monitor of Fuel Consumer Attitudes*, 2024, p. 15. Answering the survey question: "Approximately, how much do you usually spend on fuel per week?"

December 2024 quarter ($27,369.16 per year). People living in regional areas generally spend less, for example in Geelong people spend $437.40 per week.[17] [18] [19]

Of this total transport cost, the AAA reports that the Melbourne household spent $91.66 per week on fuel while the Geelong household spent $108.11 per week.[20] [21] Using ABS household and expenditure data, it is estimated that Victorian households have a total spending of $1,620 on average each week[22]. As a simple indicative benchmark, fuel spend represents 6% of the weekly expenditure for the AAA's "hypothetical" Melbourne household and 7% for the "hypothetical" Geelong household.[23] [24]

Transport affordability has decreased since 2019; in Melbourne from 15.3% of income in 2019 to 16.9% in 2024, and in Geelong from 12.2% to 14.6% of total income (see Figure 2). Basically, household income has not kept pace with increases in transport costs (in Melbourne, from $401.26 in 2019 to $526.33 in 2024). Petrol and other transport costs have all increased over time and maintained a relatively level steady contribution to total transport costs.

Figure 2 Transport affordability (AAA Transport Affordability index reports, 2019-2024)

Quarter	Transport costs as % of income Melbourne and Geelong	Petrol costs as % of transport costs - Melbourne
Dec qtr 2024	Melbourne: 16.9, Geelong: 14.6%	17.4% (=$91.6 petrol cost/$526.33 transport cost)
Dec qtr 2023	17.9%, 14.7%	18.8% ($100.41/$534.17)
Dec qtr 2022	16.7%, 13.7%	20.6% ($96.42/$468.67)
Dec qtr 2021	16.7%, 13.6%	18.0% ($82.14/$457.12)
Dec qtr 2020[25]	14.0%, 10.5%	16.2% ($63.74/$392.78)
Dec qtr 2019	15.3%, 12.2%	18.9% ($75.86/$401.26)

[17] Transport Affordability Index, Australian Automobile Association, March 2025. The Transport Affordability Index is an indicator of movements in the total price of household transport through a longitudinal study design approach. It uses economic modelling to illustrate changes over time to transport costs relative to movements in the CPI and household incomes.

[18] Includes registration, compulsory third party and licensing, servicing and tyres, insurance, roadside assist, public transport, tolls, fuel and car loan payments.

[19] The Transport Affordability Index provides a snapshot of the costs of transport for a hypothetical or "benchmark" 2 person plus children household in each capital city and in a regional location in each state and the Northern Territory by transport cost category over time. See report Appendix for methodology and sample.

[20] This is best available public data, noting different households will have high or lower transport and fuel expenditure.

[21] The AAA reports report data for Geelong and not other regional Victorian locations.

[22] There were 2.6 million Victorian households counted at the 2021 Census. Total household expenditure (Vic) for the 12 months to March 2025 was $219,014 million (ABS 5682.0 Monthly Household Spending Indicator), which equals $4.212 million per week. Dividing this by 2.6m households gives $1,620 per week per household.

[23] Assumes same household expenditure for Melbourne/Geelong which is unlikely to be the case in practice.

[24] There are different data sources citing typical or average spending on fuel by Australians and (Victorians specifically). BudgetDirect undertook a survey of 1,000 Australians in 2022 and found that Victorians pay an average of $68.42 every time they refill their everyday car[24], with 70% of Australians reporting they refilled their car at least once every two weeks.[24] Source: BudgetDirect, Fuel Consumption Survey & Statistics 2022, available at https://www.budgetdirect.com.au/car-insurance/research/average-fuel-consumption-australia/2022.html.

[25] 2020 is considered an outlier due to impacts on income and transport costs of the COVID-19 pandemic.

How have fuel prices changed over time?

The ACCC monitors fuel prices over time. The following graph shows the increase in seven-day rolling average retail petrol prices in the five largest cities from January 2022 to December 2023.[26] The average quarterly price across Australia was 194.9 cents per litre, and 196.9 cents per litre in Melbourne. Over the four 2024 quarters the average price per litre in Melbourne decreased by just under 10%: March 2024 196.0, Sep 2024 185.2, Dec 2024 181.1).[27]

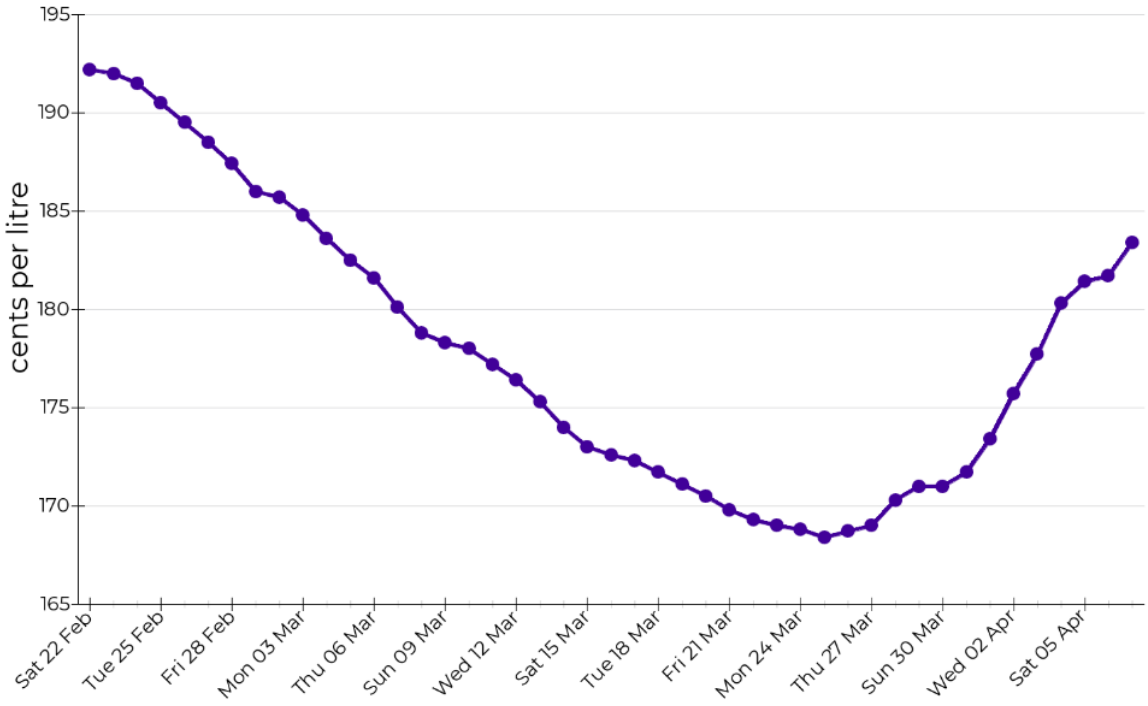
Figure 3 Seven-day rolling average retail petrol prices in the five largest cities, ACCC, Jan 2022-Dec 2023

Source: ACCC calculations based on data from FUELtrac and Informed Sources.
Notes: The shaded area in the chart represents the December quarter 2023.
The 2 vertical dotted lines indicate the cut in fuel excise from 30 March 2022 and the restoration of full excise from 29 September 2022.
A 7-day rolling average price is the average of the current day's price and prices on the 6 previous days.

It is important to note that prices can vary through the petrol cycle. The ACCC provides daily average regular unleaded petrol prices in Melbourne over 45 days, as shown in the figure below for the period to 5th April 2024.[28]

[26] ACCC, *Retail petrol prices remain relatively high despite falling in the December quarter 2023*, 19 March 2024, available at https://www.accc.gov.au/media-release/retail-petrol-prices-remain-relatively-high-despite-falling-in-the-december-quarter-2023.
[27] ACCC, Quarterly Reports on the Australian petroleum market (Appendix A: Petrol price data for monitored locations).
[28] The ACCC uses data provided by Informed Sources. Informed Sources is a private business that collects and provides retail market petrol data worldwide.

Figure 4 Daily average regular unleaded petrol prices in Melbourne over 45 days to 5th April 2024, ACCC



Price is the most significant influence for consumers when deciding where to purchase fuel

ACAPMA's annual report *National Monitor of Fuel Consumer Attitudes National Monitor of Fuel Consumer Attitudes* consistently reports that price is the most important factor for consumers in deciding to purchase fuel.[29] The 2024 report states that the majority of Australians continue to visit service stations weekly or fortnightly, with younger, urban consumers being the most frequent visitors. Price remains the most significant influence for 56% of consumers when deciding where to purchase fuel, with suburban and lower-income groups showing heightened sensitivity. The rising cost of living has intensified this focus, particularly for suburban and regional areas where around three in five consumers emphasise price as their primary consideration. In contrast, inner-city residents are less driven by price, with only 40% prioritising cost, highlighting an inner urban - regional divide in consumer motivations.[30]

[29] ACAPMA, National Monitor of Fuel Consumer Attitudes, 2024, p. 57. The research is commissioned by ACAPMA, the peak body representing the interests of fuel and convenience retail businesses. The 2024 research was conducted in August 2024 via an online survey. A nationally representative sample of 1008 consumers across Australia provided their feedback. The online survey was open to respondents over the age of 18 who hold a driver's license and the sample is representative of the Australian population in terms of age, gender and location.

[30] Ibid, p.3.

Figure 5 Most important factors when deciding where to purchase fuel, 2017-2024 (ACAPMA 2024)

	2017	2019	2022	2024
Sample	**1,042**	**1,059**	**1,005**	**1,008**
Price of fuel	48%	56%	54%	56%
Location of the service station	17%	13%	13%	12%
Quality / type of fuel	11%	10%	11%	10%
Brand	4%	4%	4%	5%
Ability to redeem supermarket fuel discount vouchers or use loyalty card	6%	6%	4%	4%
Ease of entry and / exit	4%	3%	4%	4%
Safety	3%	3%	3%	3%
Opening hours	2%	2%	2%	2%
Customer service	2%	2%	2%	1%
Cleanliness	1%	1%	1%	1%
Availability of rest rooms	1%	0%	0%	1%
Availability of prepared food and coffee	1%	1%	1%	0%
Range of grocery and food offerings in the convenience store	0%	0%	1%	0%

Prices can vary significantly across geographic areas and petrol stations, impacting the cost of fuel for individual motorists

At any time, fuel prices can vary substantially across a geographic area, and consequently fuel price information is valuable to consumers who are seeking to save money on fuel purchases.[31] As an example, on 8th April 2025 reported fuel prices varied by over 30 cents per litre across Melbourne suburbs. Motorists could pay 162.5 centres per litre at service stations in Heatherton and Cheltenham. Heading north-west towards the city however, within 5km, multiple service stations were selling fuel at 205.9 centres per litre. A review of reported pricing across Melbourne on the same day shows numerous examples of this scenario.[32] In such cases where there is a 30 cent difference in prices, filling up at a higher priced service station rather than a lower priced service station could cost a motorist $15 per full tank purchased[33].

While the above provides just a single isolated example, the ACCC notes that in 2023, "a motorist in the 5 largest cities could have made substantial savings over the year from filling up at the lowest point of petrol price cycles and from shopping around for lower priced petrol retail sites at other times". The ACCC reports the motorists in Melbourne could have saved $333 from "shopping around".[34]

For an average Victorian household with one car spending $1,616.79 per week (see footnote 22), a saving of $333 could represent a saving of 0.4% on their household expenditure. If the typical

[31] Petrol prices vary across petrol stations due to a combination of factors including competition, location, and pricing policies.
[32] Based on reported prices on commercial price websites and apps.
[33] Assuming a 50 litre tank.
[34] ACCC, *Making the most of fuel price apps and websites*, 2004, p.2. Annual savings assuming a motorist filled a 50-litre tank weekly, buying when price cycles are at the lowest point before prices increase (among the 5 largest cities) and at other times buying from lower average priced retail sites rather than higher average priced retail sites.

household had two cars being used equally, it could represent a saving of 0.8% on their household expenditure.

However, an important factor in a motorist's ability to find the lowest fuel, and achieve this saving, depends on the information available and their use of that information.

Victorians currently have less information available to inform their price decision than motorists in other States and Territories, as discussed in the following section.

2.2 Information available to compare prices

Commercial fuel monitoring websites and apps are available to help Victorians decide where to purchase fuel, however there are gaps in coverage, accuracy and timeliness. This means that Victorians can lack information about where is the best place to buy fuel and may fill up at more expensive petrol stations, thus worsening their cost of living situation.

Consumers can conduct their own primary research on fuel prices by checking and observing fuel price boards in their local areas and where they are driving[35]; effectiveness of this depends on where and how often they drive and what prices are showing at the time. ACAPMA reports that price boards remain a popular option for 32% of consumers across Australia, especially for those who may not rely heavily on digital tools.[36]

Consumers can also access for free a number of commercially available websites and apps.

2.2.1 Use of commercial apps and websites by consumers

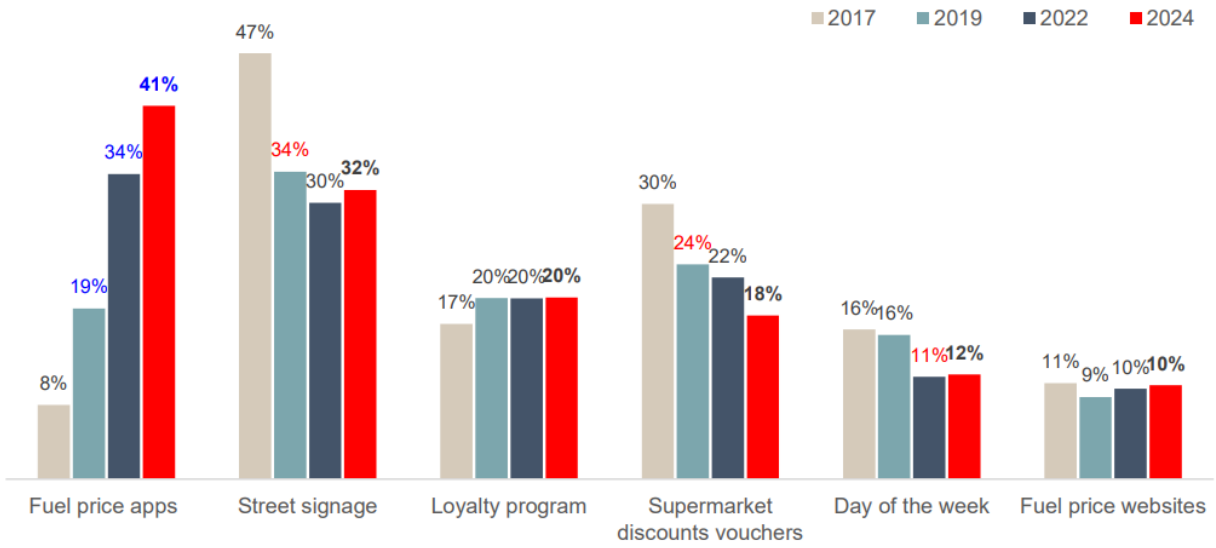
Use of commercial apps and websites is increasing over time and are a key input to decisions on where to buy fuel

The ACCC reports that various consumer surveys have found an increase in the use of fuel price apps and websites. The ACCC noted that its industry consultation found that downloads of fuel price apps and the number of active app users (users who accessed the app within the last 30 days) have increased over time (from 2017 to 2023). [37]

The ACCC cites ACAPMA's 2024 *National Monitor of Fuel Consumer Attitudes* report which states that consumers in Australia predominantly rely on digital tools to shop for fuel, with fuel price apps being the most common way to determine where to buy fuel. 41% of consumers use fuel price apps, an increase from 34% in 2022 and 19% in 2019.[38] The ACAPMA report does not explain what is driving the increase in fuel app usage, but potential factors are increasing use of technology and apps in the community, increasing availability and quality of apps available, and increasing available of price information (including as a result of mandatory price transparency schemes in other states and territories.

[35] As noted in Chapter 1, reporting prices on price boards is mandatory in Victoria.
[36] ACAPMA, National Monitor of Fuel Consumer Attitudes, 2024, p. 17.
[37] ACCC, *Making the most of fuel price apps and websites*, 2004, p.2.
[38] ACAPMA, National Monitor of Fuel Consumer Attitudes, 2024, p. 17.

Figure 6 Methods Consumers Use to Shop for Cheaper Fuel Prices, ACAPMA, 2017-2022[39]



ACAPMA reports notable differences in app use across gender, age, location, and income levels:

- Women (46%) are significantly more likely than men (36%) to use apps
- Younger consumers, particularly those aged 18-24, are the most active app users, with 55% using them to find the best fuel prices
- 31% of people over 60 use apps, which ACAPMA says possibly highlights a generational gap in technology adoption for fuel price shopping
- Those living in NSW (47%) and QLD (51%) are also more likely to use fuel price apps than their Victorian and Western Australian counterparts at 32% and 24% respectively
- Those earning under $70,000 are less likely to use fuel price apps compared to higher-income earners.[40]

2.2.2 Information collected and provided by governments

Victoria is the only state or territory which has not established a fuel price transparency scheme

In other jurisdictions (see Table 2 below), governments have established fuel price transparency schemes to ensure that fuel prices are up-to date and accurate. In these schemes, governments (other than the ACT) have mandated via legislation that fuel retailers publish timely updates to any price changes, which are used by the fuel price apps and websites. In Western Australia fuel retailers must also lock in prices for 24 hours.

In the ACT, there is 95% participation in a scheme facilitated by government that utilises the NSW scheme. It is important to note that the ACT has been designed and implemented as an extension to the NSW Government's mandatory FuelCheck scheme. It is understood that this has supported uptake

[39] ACAPMA, National Monitor of Fuel Consumer Attitudes, 2024, p.17.
[40] Ibid.

of retailers as those who operated in both NSW and the ACT were already part of the NSW scheme so there were lower barriers to extending their participation to the ACT scheme.

Table 1 State and Territory fuel transparency schemes[41]

State / Territory	Legislation	Scheme	Fuel price aggregator	Retailer price notification requirement	Non-compliance penalty
Western Australia (WA)	*Petroleum Products Pricing Act 1983*	FuelWatch	WA Govt	24 hour rule – notify by 2pm for those prices to be fixed for 24 hours from 6am the next day.	Retailers: up to $20,000. Corporations: up to $100,000. [1]
New South Wales (NSW)	Fair Trading (FuelCheck) Order 2016 under the *Fair Trading Act 1987*	FuelCheck NSW	NSW Govt	As soon as practicable. Prices at the board/bowser must be consistent with that shown in FuelCheck.	Individuals: $550; Corporations: $1,100, if the prescribed fuel offered for sale is found not to be at the notified price.
Northern Territory (NT)	*Consumer Affairs and Fair Trading Act 1990* and Consumer Affairs and Fair Trading (Fuel Retailers) Regulations 2017	MyFuel NT	NT Govt	Notify at the date and time the change in price is effective.	Maximum penalty of $16,200 including if fuel retailers do not report fuel prices as required by the scheme.
Queensland (QLD)	Fair Trading (Fuel Price Reporting) Regulation 2018 under the *Fair Trading Act 1989*	Queensland fuel price reporting scheme (no government app or website)	Commercial data aggregator[42], for Queensland Govt	Notify within 30 minutes of a price change.	20 penalty units. The current penalty unit value is $161.30.
Australian Capital Territory (ACT)	Voluntary scheme –	FuelCheck in the ACT (extension by	As per NSW Government	n/a	n/a (due to being a voluntary scheme)

[41] Sapere analysis of publicly available information.
[42] Informed Sources.

State / Territory	Legislation	Scheme	Fuel price aggregator	Retailer price notification requirement	Non-compliance penalty
	not mandatory	ACT Govt of FuelCheck NSW into the ACT)			
South Australia (SA)	Fair Trading (Fuel Pricing Information) Regulations 2021	South Australia Fuel Pricing Information Scheme. Note SA provides open access data but no government app publishing the data.	Commercial data aggregator[42], open access data.	Notify within 30 minutes of a price change.	Maximum penalty of $10,000
Tasmania (TAS)	Code of Practice under the *Australian Consumer Law (Tasmania) Act 2010*	FuelCheck TAS	TAS Government	Notify within 30 minutes of a price change.	Court order for contravention of code of practice under the Act

2.2.3 Overview of information provided by commercial providers

The ACCC conducted a search in the first 6 months of 2024 and found over 40 fuel price apps and websites available, including those provided by five states and territories as outlined above. The ACCC notes about commercially available apps:

- some are state or territory specific, while others show fuel prices Australia-wide (to the extent possible)
- apps and websites draw on a range of data sources, including state and territory fuel price transparency schemes, commercial data providers, point-of-sale information, and crowdsourced pricing information from the public.[43]

The ACCC categorises the commercial apps into:

- Websites and apps provided by motoring organisations, with near real-time fuel prices: National Roads and Motorists' Association My NRMA app[44], Royal Automobile Club of

[43] ACCC, *Making the most of fuel price apps and websites*, August 2024, p.26.
[44] Only available to members by sign in.

Victoria (RACV) arevo app, Royal Automobile Association of South Australia, Royal Automobile Club of Tasmania (RACT) Fuel Saver app, RACQ Fair Fuel Finder app and website

- Other commercial apps: AI4petrol.online, APCO/Fuel Service, Bowser Watch WA, EzySt, Fuel Map Australia, Fuel Price Australia, Fuel Radar, Fuel Snoop, Fuelio, MotorMouth, PetrolSpy, Petty, Pumped Fuel, SA Bowser: Should I Fuel?, ServoTrack, Simples (Compare the Market), Vroom FuelPrice Compare, and WA Fuel Finder.

Sapere reviewed seven major apps for features and functionality. All apps are available on the App Store and Google Play and therefore can be used by both Apple and Android users. PetrolSpy has the highest consumer ratings across both the Apple Store and Android Store, followed closely by My 7-Eleven and RACV Arevo, while MotorMouth has the lowest ratings. Two apps can also be used on a desktop computer (PetrolSpy and MotorMouth). All apps are free to download. Two apps require users to create an account to use them (My 7-Eleven and RACV Arevo). Two different apps require users to create an account to access special features (Petrol Spy and Motor Mouth). All apps are available nationwide except RACV Arevo which is exclusive to Victoria. All apps except the 7-Eleven app include petrol prices for major and independent service stations. This review did not extend to confirming the accuracy of the data however two of the Apps (PetrolSpy and MotorMouth) rely on motorists reporting price data whereas My 7-Eleven and RACV data is provided by retailers. The 7-Eleven and RACV Apps are also part of a broader service offering.

The My 7-Eleven App offers a unique feature that allows users to 'lock in' a low fuel price from their five closest 7-Eleven locations, which can be redeemed within seven days. The Simples App has a special feature that allows users to view fuel prices at retail stores along a route they set. PetrolSpy, MotorMouth and Fuel Map Australia track recent price trends.

Table 3 summarises the features of the apps reviewed in detail by Sapere.[45]

[45] Selected based on a judgement that the apps appear to be amongst the main ones used in Victoria based on research undertaken by Sapere in March-April 2025.

Table 2 Sapere review of commercial apps available to consumers in Victoria[46]

App	Information and Features	Data Source	Incentives
PetrolSpy 	• Free app and desktop-based tool • Australia wide coverage • Displays an interactive map showing prices and brand logos of retail fuel stores • Users can switch to a list view with sorting by distance, price, or both • Direct Google Maps link for navigation to selected retail fuel store • Recent average price graph for unleaded and E10 in each capital city • Reported 50,000 daily users in Victoria[47] • Advertising used • Operated for 10 years	• Data provided directly to PetrolSpy by 7-Eleven and EG Ampol. • All other price data is crowdsourced from users In Melbourne and Victoria	Users are encouraged to report prices through leader boards and fuel voucher rewards
MotorMouth 	• Free app and desktop-based tool • Australia wide coverage • Displays an interactive map with a colour-coded system that marks fuel prices: green for cheapest, yellow for mid-range and red for most expensive • When a user clicks on a location pin, prices for the retail fuel store are displayed in price bands, along with brand logos • Registered users are allocated 30 'price reveals' per week which allow them to view the specific price of a selected retailer • Average price graph for last 60 days for select fuel types in capital cities and regional locations • Owned and operated by Informed Sources • Began operation in 2016 following an undertaking to the ACCC by Informed Sources to make data available to the public	In Melbourne and Victoria, price data is crowdsourced from users, updated electronically from participating major fuel retailers, and input manually from service station site operators	
My 7-Eleven	• Free app available nationwide • 'Fuel Price Lock' feature allows users to 'lock in' the cheapest fuel price from the 5 closest 7-Eleven retail fuel stores, redeemable at any location within 7 days	Price data from 7-Eleven stores	• Special deals offered on other food and drink items • Pay & Go feature allows user to pay

[46] Source: Information in this table has been sourced from Sapere's review of publicly available information on current app offerings in the Victorian Market and the ACCC's report *Making the most of fuel price apps and websites* (2024). The source of data cited on usage and downloads is cited in footnotes.

[47] Australian Broadcasting Corporation, Government to track and freeze petrol prices each day under new cost-of-living fuel plan, news article, 20 January 2025, accessed on 2 April 2025.

App	Information and Features	Data Source	Incentives
	• Users can purchase up to 150 litres of fuel with a maximum discount of 25 cents per litre • Store locator feature displays an interactive map showing 7-Eleven locations along with price data for fuel retail stores		within app and drive away • Can be linked to Velocity Frequent Flier to earn points on fuel purchases
RACV Arevo	• Free app available in Victoria • 'Fuel Finder' tool features an interactive map displaying prices and brand logos for fuel retail stores, prices are colour-coded to indicate value: green for cheapest, yellow for mid-range, and red for most expensive • Users can select a list view with sorting by distance or price • User can choose to be notified when average prices are rising or falling, and where to find the best fuel price through the personalised fuel alert feature • Direct Google Maps link for navigation to chosen fuel store	Price data is reported by participating fuel retail stores, and updated every 15 minutes	Users save 4c per litre at participating EG Ampol stations
Fuel Map Australia	• Free app • Australia wide coverage • Locations for fuel retail stores are shown on an interactive map as a pin with the brand logo and last known fuel price displayed above • Users can choose a list view with sorting by distance or price • Fuel logbook feature allows users to keep track of their fuel purchases • Recent average price graph for select fuel types in each capital city • Advertising used	Price data is crowdsourced by users in Melbourne and Victoria	
Simples: Compare & Save	• Free app and desktop-based tool • Australia wide coverage • Locations for fuel retail stores are shown on an interactive map with the brand logo and last updated fuel price displayed • The cheapest price in an area is shown on a green banner above the location pin • Users have the option to view fuel prices at retail stores along a route they set	• Data in Melbourne and Victoria is sourced from The Pricing Project Pty Ltd • Pricing in Victoria is a guide	

2.2.4 Level of coverage provided by commercial apps and websites

Coverage levels and update frequency varies by app and is commercial in confidence. Anecdotal evidence suggests coverage could be around 60% of petrol stations.

Retailers make commercial decisions about the provision of data to commercial apps and websites based on commercial considerations including pricing strategy and the administrative cost of providing the data. Some retailers noted that they are incentivised to provide data to price aggregators such as Informed Sources because they get access to reciprocal data i.e. price data of their competitors.

Different reports and analyses have considered the question of how much coverage of petrol stations is provided on commercially available apps and websites. The information on levels of coverage is commercial and not publicly available. Only anecdotal evidence from stakeholders is available, supported by primary sampling of the apps and websites.

Sapere consulted with commercial app suppliers as part of this RIS process. One supplier noted that their app covers about 70% of the Victorian market[48], while another supplier reported that its app and website collects and publishes regular updated price data for about 60% of the Victorian market.[49]

We do not have information about levels of coverage across other apps and websites except to note that the 7-Eleven app makes available data across all 7-Eleven stores, which is a commercial decision to support its fuel price locking feature and other exclusive deals.

Anecdotally, one industry stakeholder held the view that data provided on commercially available apps is often outdated i.e. not kept up to date when prices change. The information is not comprehensive. It also may not be accurate in some cases. During consultation we heard anecdotal reports of false crowd-sourced information being posted.

Sapere is unable to verify different claims on coverage, however it seems reasonable to conclude that is coverage in the range 60% to 70% and that there are gaps in the available information.

It is noted that the South Australian Productivity Commission was commissioned to investigate and report on potential models that would increase transparency of fuel prices and enable customers to make informed choices when purchasing fuel. In considering available apps and websites, the report (published in 2020) noted:

> *"The websites and commercially provided mobile applications, including MotorMouth, GasBuddy and Petrolspy, either capture information from Informed Sources, Fleet Fuel Card data or crowdsourced data from customers. While much of this information can be assumed to be accurate, it is not complete (gaps in the coverage of lower price independent retailers), the integrity of some information can be low and crowd-sourced information can be dated. Some stakeholders have suggested this information covers 70 – 90 per cent of service stations and sales volumes. Informed Services advised during this review that as a result of recent changes its coverage is now more than 96 per cent of Adelaide service stations. The Commission has been unable to independently validate any of these various claims."* [50]

To support understanding of level of coverage, Sapere undertook primary research on information provided by the PetrolSpy app, which has been selected based on a quick review and sampling of price information available on different apps across a small sample of suburbs; in Sapere's view, the

[48] With data reported by participating retailers.
[49] Figures were provided anecdotally. Specific details such as frequency or timeliness of updates is not available.
[50] South Australian Productivity Commission, *Commissioner Report on Fuel Pricing*, 2020, p.14.

PetrolSpy app seems to offer the most coverage across petrol stations (sampling undertaken in the last week of March and first week of April 2025).[51] The results are provided in Appendix C. Sapere's quick finding is that there are geographical areas where there are gaps in coverage. This means that a motorist might not have access to the information required to make the best decision about where to buy the cheapest full, hence they may pay more for full than they might have if they had better access to information, negatively impacting their cost of living.

Coverage levels vary significantly across different geographical areas, for example one area might have strong coverage and another has lower coverage.

Extensive further monitoring across a larger number of geographic areas and over a longer timeframe would need to be undertaken to draw stronger conclusions.

[51] Sapere reviewed petrol price information reported on apps versus identifiable service stations in an area to assess the number of petrol stations which had price reported.

3. Objectives of proposed changes

The objective of the proposed changes is to enable Victorians to save money by providing more extensive and up-to-date information about fuel prices which will enable them to make more informed decisions about when and where to buy fuel.

4. Options

This chapter outlines the feasible options considered for analysis in this RIS. It also describes options considered but not progressed.

4.1 Options development

As part of the RIS process, it is important to consider different options that could achieve the Victorian Government's objectives. The SL Act, *Subordinate Legislation Act 1994 Guidelines* (the guidelines), and the *Victorian Guide to Regulation* recommend that this includes considering a range of approaches, including non-legislative options, approaches in other jurisdictions, and improvements to existing regulatory regimes and regulatory practice.

The following process was used to identify a set of feasible options for this RIS:

- Policy review of the problem being addressed and the objectives of the regulatory reform
- Review of approaches in other jurisdictions
- Initial stakeholder consultation to explore stakeholder views on the performance of the current regulations and any proposed amendments they would like to see
- Development of a set of feasible options for consideration in this RIS, drawing on research findings, policy papers, and consultation outcomes.

Feasible options analysed in the RIS as a result of this process are detailed in section 4.2, whilst options considered but not progressed are outlined in section 4.3.

4.2 Feasible options

This section describes the following options considered in detail in this RIS for providing improved fuel price data to Victorian motorists:

- **Base Case** – No change. Current arrangements continue.
- **Option 1** – Mandatory reporting by fuel retailers of fuel price data with government publication of data
- **Option 2** – Voluntary reporting by fuel retailers of fuel price data with government publication of data.

4.2.1 Base Case

The Base Case is a counter-factual scenario used to provide a common point of comparison for all options. Under the Base Case, fuel retailers must adhere to the Code of Practice for Fuel Price Boards under section 232 of the *Australian Consumer Law and Fair Trading Act 2012*, which came into effect in 2016 and sunsets on 31 May 2026 (see description of Chapter 1).

Under the current Regulations, fuel retailers are not required to provide pricing information to any platform. Some fuel retailers voluntarily provide their pricing information to commercial fuel pricing apps through business arrangements with data aggregators (e.g. Informed Sources' Motormouth) and would continue to do so.

4.2.2 Option 1: Mandatory price reporting with government publication

Under Option 1, new Regulations would be made to prescribe a new Code of Practice under the ACLFT Act which mandates that all fuel retailers in Victoria will be required to register their business with Service Victoria including their trading hours, brands and types of fuel offered for retail sale and their normal fuel price.

All fuel retailers will be required to notify the Service Victoria CEO of any change in the normal price (increase or decrease) within 30 minutes of changing the normal fuel price on the fuel pump display, for publication on the Service Victoria application.

They will also be required to report if a fuel offered for sale is temporarily unavailable within 30 minutes of the fuel becoming unavailable.

The 2025 regulations will revoke the 2016 regulations, however the new regulations will continue to require fuel retailers to adhere to the current Code of Practice requirements on the display of fuel prices on price boards and fuel pumps at service stations (as detailed in Chapter 1). This has not been assessed as it does not represent a change from current requirements, and the impacts of these requirements relative to the base case (where the 2016 regulations would sunset in May 2026) are not considered to be significant.

Monitoring, compliance and enforcement of the new Regulations will be undertaken by Consumer Affairs Victoria.

4.2.3 Option 2: Voluntary reporting with government publication

Under Option 2, the fuel retailers volunteer to participate in the Government's fuel pricing scheme. There is no regulatory change. Fuel retailers must continue to adhere to the requirements to display fuel prices on price boards and fuel pumps at service stations as described for Option 1. The Government would establish a process and IT system to collect and publish data. It would undertake an education and awareness campaign to encourage retailers to participate and encourage consumers to access and use the data via the Service Victoria app.

There would be no regulatory requirement to register or provide data under Option 2, although there would be a sign up and reporting process for retailers who choose to participate.

This is similar to the ACT model where the government collects pricing data and publishes it for fuel retail and consumers audiences but there is no regulatory requirement for retailers to register or provide data (see Table 1).

4.3 Options considered but not progressed

As part of the policy process undertaken to develop options, the Department undertook policy work and consultation to explore a range of options for providing improved fuel price data to Victorian motorists.

Options considered but not progressed were:

- **Government education and awareness campaign:** This does not involve regulatory change. It would involve implementing a government funded education and awareness campaign to

make consumers aware of the existing sources of fuel pricing information, such as RACV's Arevo app, PetrolSpy and Motormouth. This would provide consumers with a certain amount of information required to make an informed choice; however, commercial apps have gaps in coverage, accuracy and timeliness, meaning the Department considers that this option would not address the main problem for consumers. This option is also problematic from a market neutrality perspective, as it would mean government would be spending money to promote commercial fuel pricing apps.

- **Industry self-regulation:** This also does not involve regulatory change and would instead involve industry developing, implementing and managing an industry code of conduct. Under the industry self-regulation model, it would a rule of membership of the industry organisation to comply with the code of conduct, but not mandatory under any government regulation. Compliance and enforcement would be managed by industry. This is a zero to low cost option for government and may achieve greater price accuracy, timeliness and comprehensiveness for consumers but this depends on the compliance and enforcement approach adopted and how the industry organisation manages this. It's effectiveness also depends on the extent of coverage of the industry by the industry organisation, for example in relation to smaller businesses. Strategically, it could be considered a precursor to regulation, in order to incentivise increased price transparency from the industry, but the outcomes in terms of information provided are uncertain.

5. Options analysis

This chapter analyses the impacts of the feasible options and identifies the preferred option. The preferred option is Option 1 (mandatory reporting) as it will maximise coverage of fuel pricing information for consumers who most value the information. Option 2 is assessed lower because there will be gaps in coverage with uncertain participation.

5.1 Overview of costs, benefits and other impacts

Relative to the base case, the two assessed options have a range of potential costs and benefits. These have been broadly categorised as follows.

- Costs to Government including:
  - Costs of Service Victoria in providing the digital systems
  - Costs of Consumer Affairs Victoria (CAV) in monitoring and enforcing compliance.
- Costs to fuel retailers in complying with the regulation (or voluntarily participating under Option 2)
- Potential benefits to fuel retailers in reduced costs of obtaining competitor prices
- Impacts to providers of fuel information (e.g. Petrol Spy, RACV)
- Benefits to consumers associated with improved price transparency including reduced search costs and improved satisfaction with the price they pay
- Impacts on market and fuel prices.

Some of these, such as the system build costs for government, can be quantified with a degree of certainty. However, there is significant uncertainty over a range of key impacts.

5.1.1 Method for options analysis

Options are assessed using a multi-criteria analysis (MCA). It is not practical to quantitatively estimate the impacts of the options due to data constraints and uncertainty. An MCA framework provides a robust and transparent way of evaluating the disparate and qualitative data that is available.

Text Box 1: MCA framework explained

MCAs use a selection of criteria for costs and benefits against which options are subjectively scored (relative to the Base Case) using evidence-informed judgement. The criteria are typically broader than that used in traditional financial analysis (e.g., social/environmental impacts) and the MCA framework assigns a weight to each criterion reflecting its relative importance to the policy decision. Evidence used to inform scores may include both quantitative and qualitative evidence. The MCA then uses the scores and criterion weights to determine a weighted score for each option. The option with the highest weighted score is the preferred option.

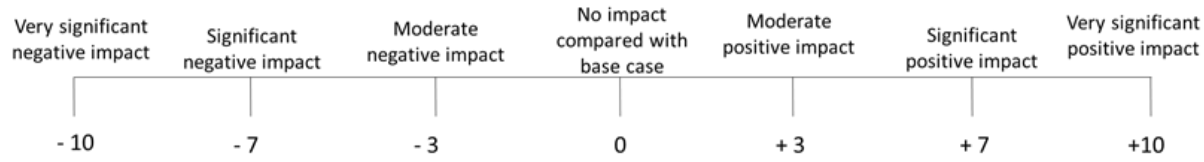
The table below describes the MCA framework that has been used. Cost and benefit criteria are equally weighted at 50 per cent.

Table 3: MCA framework

Criteria	Description of criteria	Weighting
	Costs	
Costs to industry	• Costs to fuel retailers in complying with the regulation • Impacts to providers of fuel information	25%
Costs to government	• Costs of Service Victoria in providing the digital systems • Costs of CAV in monitoring and enforcing compliance.	25%
	Benefits	
Benefits to Victorian consumers	• Victorians have access to better (more accurate, timely and comprehensive) information on fuel prices to enable them to make more informed decisions about when and where to buy fuel. • Direct benefits including reduced search costs and improved satisfaction with the price they pay. • Distributional benefits as a result of greater savings for consumers who care most about saving money	50%

Options are scored relative to the Base Case using the points system below (see Figure 7) where a score of 0 represents no change relative to the Base Case and scores above (or below) zero represent positive (or negative) impacts relative to the Base Case. For example, a score of +10 represents a very significantly positive impact compared to the Base Case.

Figure 7: MCA scoring system



Once scores were assigned, weighted and totalled, each policy option was given an overall weighted score to indicate its impact and the option with the highest positive overall score was the preferred option.

The impact of each option relative to the no-change base case is qualitatively assessed on a scale of zero to ten, then weighted by the allocated weighting. This provides a weighted score for each option.

5.2 Government costs

5.2.1 System development and ongoing system costs[52]

Base case

$1.07 million of the system development costs are sunk (as of 13 May 2025) and thus will be incorporated into the base case. This amount is likely to increase by the time the decision to proceed with the option is complete.

Option 1 (Mandatory Reporting)

Under Option 1, Service Victoria develops and maintains the digital systems to enable registration, capture and manage pricing information, and provide the information to motorists via a digital app.

The Service Victoria system development costs have been estimated as totalling $2.88 million being the sum of developing:

- Registration system: $894k
- Price Portal: $875k
- Fuel Finder app: $633k
- Plus 20% contingency: $480k

As noted above, $1.07 million of the system development costs are sunk and included in the base case, while it is expected that $1.81 million of costs are yet to be incurred prior to the launch of the app.

In addition, Service Victoria have estimated ongoing operating costs. These are reported in the table below.

Table 4: Ongoing system costs under Option 1, real (2024-25) $m

	$m cost
System Maintenance & operations	0.80
Licence Renewals (Case Management)	0.01
System Support - Service Management	0.02
Total	**0.83**

Option 2 (Voluntary reporting)

The total system costs do not vary substantially between Option 1 and Option 2. Under a voluntary scheme, the Government will still need to develop and maintain the digital systems to enable registration; in the case of a voluntary scheme it will be a sign up process instead of a mandatory registration process however the digital systems will still be needed. There will also be a need to capture and manage pricing information, and provide the information to motorists via a digital app.

[52] Costs in this section using information by Service Victoria as at 13 May 2025.

5.2.2 Monitoring, compliance and enforcement costs

Option 1 (Mandatory reporting)

CAV will have responsibility for ongoing monitoring and enforcing compliance with the regulation. While the monitoring, compliance and enforcement approach is still being developed, it is likely that it will include:

- Monitoring compliance with reporting requirements using system generated data
- Monitoring and responding to a compliance incident – where there is a report of a mismatch between the price in the system and at the pump.

There will be a mechanism for consumers to report compliance incidents via the fuel transparency app.

It is expected that compliance and enforcement action would only be undertaken for repeat, serious instances of non-compliance. We understand that from experience in other jurisdictions most incidents are a result of customers mistakenly reporting a site (typically because they have confused the site with another site).

There is likely to be a need for some additional resources to monitor compliance and issue infringement notices. For the purpose of this RIS we have assumed a need for two full time staff[53]. Assuming one VPS4 staff member and one VPS6 staff member, this is an additional cost of just over $450,000 per year[54]. Note: this is an estimate by Sapere and additional resourcing is to be confirmed by CAV during the implementation phase.

Option 2 (Voluntary reporting)

Although participation is optional under Option 2, those participating under Option 2 will need to abide by the rules of participation and some monitoring of the scheme will be required by the Government. For example, a business who signs up to participate but infrequently reports prices could be removed from the system. Some costs will be incurred to support this, but it is expected to be lower than under Option 2 because of the lower compliance threshold required for a voluntary scheme versus a mandatory scheme. For the purpose of this RIS it is assumed costs under Option 2 will be half that of Option 1, or approximately $225,000 per year.

5.2.3 Total Government costs

Total government costs under Option 1 are estimated to be $13.0 million over ten years or $1.3 million per year (NPV). The costs to government under Option 2 are estimated to be slightly lower at $11.2 million over ten years.

[53] The WA Government has two full time staff managing compliance and enforcement.

[54] Based on *Victorian Public Service Enterprise Agreement 2024* (Schedule C – VPS Salaries and Classification and Value Range Descriptors), the cost of VPS4 staff and VPS6 respectively is $182,960 and $283,630 per year assuming mid-point salary and includes 75% on-costs.

Table 5 Estimated costs to Government under Option 1 and 2, $m NPV cost over 10 years to FY35 (discount rate 4%)

	Option 1	Option 2
System implementation	1.8	1.8
Ongoing system costs	7.6	7.6
Monitoring, compliance and enforcement costs	3.6	1.8
Total cost	**13.0**	**11.2**

MCA assessment

The cost to government is assessed as moderate. Option 1 is given a score of -4 and Option 2 is given a score of -3.5.

5.3 Costs to business

There are impacts of each option on fuel retailers and businesses that currently supply fuel price information (i.e. commercial providers).

It is important to note in regard to Option 2 (voluntary reporting) that costs for the purpose of this RIS considered to be zero as participation is voluntary; businesses will only participate up to the point where costs to their business do not outweigh benefits to their business. Discussion in the following sections note what individual costs may be incurred if they do participate, but total costs for Option 2 are assessed as zero.

5.3.1 Fuel retailer costs

The costs of compliance by retailers includes costs of:

- Cost of registering and reporting price information
- Costs of managing compliance incidents.

There may also be some cost reductions for businesses as a result of avoided search costs and demand management efficiencies.

These costs will vary by type of retailer and design decisions.

5.3.1.1 Cost of registering and reporting price information

Option 1 (Mandatory reporting)

All fuel retailers will be required to register and report price information within 30 minutes of changing a price.

Retailers will be required to register their business with the government fuel price transparency app. This will be the same cost for every business[55]. We estimate a time cost of 4 hours per business

[55] i.e. one registration per business regardless of number of sites.

(considered conservative and includes time for business to research and understand the regulatory requirements). A total upfront cost of $0.4 million is estimated for the 862 fuel retailers.[56]

System development costs and ongoing reporting costs are likely to depend on what systems a retailer already has in place for reporting prices in other jurisdictions, and the size and characteristics of the retailer. Cost impacts are highly uncertain; discussions with stakeholders indicated they are uncertain about what costs they will incur, although they consistently indicated they did not expect costs of reporting to be a significant burden.

It is expected that **small to medium size retailers** (i.e. managing 5+ sites) will develop a system to manage the information upload. Estimates of the cost of such a system vary and were not clear in regard to upfront costs versus ongoing costs. We received one estimate of ~$50k annual cost (using an aggregator). Other estimates for developing a bespoke API are in the order of $10k to $15k for development and then ongoing maintenance costs, which we assume to be in the order of $2k to $3k per year. Another retailer estimated $1000 per site per year. We have indicatively estimated the total cost to be $1k per petrol station site per year for such retailers, noting this assumption has a high level of uncertainty.

For **owner-operators of a small number of sites (e.g. one or two sites)** and where price changes are less frequent, manual entry of prices may be a more attractive option. For example this may take a few minutes to input data for one or two sites once or twice a week (or more or less often depending on pricing strategy). In the absence of better data, we assume the same $1000 annual cost per service station site for very small businesses as for small to medium sized businesses.[57]

Large retailers with multiple sites, estimated to cover just under 60% of petrol stations[58], are likely to manage prices centrally, particularly those located in urban areas where prices change frequently. This is due to the cost of compliance and the training costs of the retail staff operating the sites. Under the scheme, there will be additional effort by the pricing management team within retailer groups to manage and confirm the pricing upload.

For large retailers who already provide data to an aggregator and/or provide data via an Application Programming Interface (API) in other jurisdictions, the systems development costs should be small. Nevertheless, there is some uncertainty as the system design has yet to be finalised and data protocols[59] are not expected to match that in other jurisdictions and thereby necessitate additional systems development and testing.

For large retailers with multiple sites, we assume there will be efficiencies from current systems and size, and assume a cost per site of $500 per year (this is uncertain but used in the absence of better data).

The costs of information upload also depend on stringency of requirements relating to incidents and matters such as a fuel outage. The requirement to report on fuel outages may be a material cost. While fuel outages are rare, they may occur at inconvenient times (in early hours of the morning) at

[56] 4 hours at a manager wage rate of $67.20 per hour (for a manager as per ABS Employee Earnings and Hours, May 2023) multiplied by 1.75 times on-costs equalling $117.60 per hour, for 862 retailers.

[57] Putting $1000 per site into perspective for manual entry, at an hourly wage rate of $117.60 for a manager this equates to 9.5 minutes per week spent putting prices into an app for a single service station.[57]

[58] IBISWorld, *Fuel Retailing in Australia*, G4000, January 2024. Based on market share data.

[59] These define the details of how data is transferred between systems.

times when no price changes occur, and none of price management team is available. This is particularly an issue for retailers who run unmanned sites. The details of how such compliance incidents will be determined during implementation of the scheme. We have not estimated a cost for this.

There may also be additional costs associated with establishing operating procedures and staff training to ensure compliance with the regulations. Stakeholders acknowledge this cost but were unable to identify what it would involve or estimated costs.

Option 2 (Voluntary reporting)

For completeness this section discusses costs to a retailer if they participate in the voluntary scheme. These are not considered mandatory costs and a retailer will only choose to participate up to the point where it makes commercial sense.

Costs to businesses will be lower under Option 2 – both in terms of cost of providing information and cost of managing compliance – as those retailers for whom the compliance costs are expected to be high are much less likely to participate.

The level of participation under the scheme is uncertain but it is could be in the range 70% to 95%, noting:

- The lower bound is likely to be at least equal to the current level of coverage by commercial fuel pricing apps which is around 60% to 70%
- The upper bound is unlikely to be higher than the reported level of coverage in the voluntary price reporting scheme in the ACT reportedly of around 95%.

The ACT scheme (the only other voluntary scheme) achieved 95 per cent participation; however, the participation rate may be high because:

- The ACT is primarily a metropolitan area
- The scheme was a replica of the NSW scheme and so the participation costs were minimal for retailers already participating in the NSW scheme.

During stakeholder consultation, most retailers we spoke to were uncertain but expected that they would participate in a voluntary scheme – in part, due to the branding risk and lack of exposure of not participating. Nevertheless, there is a risk that the level of participation is low and the number of retailers providing real-time information is not materially greater than that currently available via the Motormouth and RACV app. It seems reasonable to assume smaller retailers will be less likely to participate in a voluntary scheme because they have less resources and systems in place to support it, and lower commercial incentives (e.g. state-wide branding considerations).

Option 2 costs for registering/joining up and price reporting will be less than for Option 1, although costs are too uncertain to estimate. As noted above, these are not considered mandatory costs and a retailer will only choose to participate up to the point where it makes commercial sense.

5.3.1.2 Costs of managing compliance incidents

Option 1 (Mandatory reporting)

The cost of managing compliance incidents – whereby there is a report of a mismatch between the price in the system and at the pump – is a material factor. We understand from other jurisdictions that most incidents are a result of customer mistakenly reporting a site (typically because they have confused the site with another site). Feedback from retailers that operate in other jurisdictions is that an incident may occur about once per site per year. One retailer estimated investigating and resolving an incident will likely require at least an hour of management resource (plus resources at the site). We have indicatively estimated this cost to be in the order of just under $150 per site per year, which totals $0.24 million across all sites.[60]

The costs of managing compliance incidents will depend on some design matters (i.e., matters that will be determined by policy implementation and not the regulations) including:

- The availability of historical data to retailers. Access to historical data will make it easier for the retailer to verify the source of the incident, for example, to determine whether it was a case of mistaken identity or an issue with their own processes
- The frequency and type of information to be reported. More stringent and inflexible enforcement requirements will increase the cost of compliance. The costs of compliance could be significant if compliance leads to changes in operations and additional training for service station staff.

Option 2 (Voluntary reporting)

The costs for managing compliance incidents under Option 2 should be minimal given it is a voluntary scheme. However, there may be some costs associated with responding to compliance queries in relation to pricing mismatches or other ongoing conditions for participation in the voluntary scheme.

5.3.1.3 Cost reductions for retailers

Option 1 (Mandatory reporting)

Option 1 may reduce the retailers' costs associated with monitoring prices of competitors assuming the pricing information is made public.

While commercial price apps reportedly provide 60% to 70% coverage, there are gaps in coverage and issues with timeliness and accuracy[61] (see discussion in section 2.2.3). Therefore some retailers report that they invest resources in directly observing the price boards of competitors.

With the scheme in place, retailers may reduce that activity and rely on the scheme to obtain competitor price information.

While this cost saving could potentially be significant for some businesses, it has not been quantified due to the level of uncertainty about the extent to which retailers conduct their own spot checking compared to using commercial price apps, and also how they conduct their own spot checks. Practices

[60] One hour of manager rate of $117.6 and one hours of store worker rate of $52.8 (minimum hourly wage for casual retail workers $30.20 per hour).

[61] For example, retailers commonly report incorrect pricing being reported on the commercial pricing apps.

differ across the industry. A small to medium sized multi-site retailer could have a single worker tracking prices for several petrol stations. The costs of tracking may be smaller if conducted by owner operators and by people who are commuting i.e. they may observe prices on their way to work. Some retailers may rely only on pricing from commercial apps which they may currently being paying a fee for access.

Whilst the extent to which the industry currently uses price as a mechanism for managing peak or off peak demand is uncertain, there may also be additional benefits to fuel retailers as a result of improved price transparency in more efficiently communicating to consumers. For example, it may lead to greater use of pricing to shift demand between peak and off-peak times, thereby increasing a retailer's sales when they have excess capacity and reducing the crowding and demand on staff during peak times. This benefit has not been quantified.

Finally, the benefits to retailers will depend on the effectiveness of compliance of the proposed scheme. A concern for retailers in other jurisdictions, is that some retailers discount prices below what they publish to the scheme and that such pricing behaviour is not penalised because it is perceived as being in the consumer interest.[62] We note however, it is unlikely in practice that consumers would report these mismatches, given that they stand to benefit from lower-priced fuel.

Option 2 (Voluntary reporting)

A voluntary scheme is expected to increase price information of competitors available to fuel retailers but less so than under Option 1. The cost saving is expected to be smaller.

5.3.2 Costs to providers of fuel price information

Existing providers of fuel price information (e.g. Petrol Spy, RACV, MotorMouth) will be impacted by the scheme. Whether the impact is positive or negative will largely depend on whether the information collected by the scheme is available to them.

If they can use the pricing information collected by Service Victoria they will likely benefit as the perceived value of the services they provide to consumers could increase[63] and their costs of data acquisition could fall. Regarding the latter, we understand:

- Petrol Spy crowd source their data in Victoria but draw on scheme information in other states. Consequently, their costs of crowd sourcing (e.g. through provision of rewards) could fall if the scheme data was made accessible
- Other aggregators (e.g. Informed Sources) obtain some information from price spotters. Their needs and costs could fall. However, this may depend on the effectiveness of compliance and trust in the data
- RACV currently obtain information via a commercial arrangement with Informed Sources. Potentially RACV's costs of obtaining data may fall if the Service Victoria makes their data accessible.

[62] This is the practice of posting one price to the scheme, but then posting a lower price on the price boards so as to fool competitors into thinking they are charging more but gaining more business through a lower price advertised on the price-board.

[63] Consumers value the information provided on an app. If an can display better information on their app consumers will value and use it more.

If the Service Victoria data is not immediately accessible to them then the perceived value of their services may fall, because they are considered inferior to Service Victoria app. For example, this could lead to reduced traffic and consequential impacts on other service providers. Conceivably, they could lose some users to the Service Victoria app even if they are given access to the information.

This cost has not been quantified for this RIS.

5.3.3 Total costs to businesses

The following table outlines estimated costs to business for Options 1 (mandatory reporting). Across 862 fuel retailers this equates to an estimate of just over $1,300 per retailer per year on average. It is noted that significant assumptions have been used and these costs are indicative only.

This quantified cost in Table 6 below does not include an offset for potential savings for avoided costs associated with monitoring prices of competitors (assuming the pricing information is made public). This could be a significant cost reduction for some retailers but is too uncertain and variable across retailers to quantify but has been considered in the MCA scoring.

Costs for Option 2 (voluntary reporting) are zero as participation is voluntary; businesses will only participate up to the point where costs to their business do not outweigh benefits to their business.

Table 6 Estimated costs to business under Option 1, $m NPV cost over 10 years to FY35 (discount rate 4%)

	Option 1
Registration cost / joining up	0.4
Price reporting cost	11.3
Managing compliance incidents	2.4
Total cost	**11.5**

MCA assessment

Option 1 is given a score of -3.5 and Option 2 is given a score of 0.

5.4 Benefits

5.4.1 Market pricing impacts

Option 1 (Mandatory reporting)

The market impact of introducing price transparency schemes on petrol prices is uncertain. There are two potential main impacts. Greater price transparency may lead to:

- higher fuel prices resulting from increased (or more effective) tacit collusion / strategic pricing by fuel retailers
- lower fuel prices due to improved consumer information that drives greater price competition among retailers.

It is uncertain which of these impacts will be larger in the Victorian market context.

There is a substantial literature on the impact of fuel price transparency schemes from around the world (see Box 1 below). The results are mixed, with some studies finding evidence of price-reducing impacts and some (fewer in number) finding evidence of price-increasing impacts. Some studies also shed some light on the factors that impact the success of the price transparency scheme. Based on the limited evidence it appears that the schemes will have relatively larger benefits for consumers where:

- prior to the scheme, consumers were relatively less informed than retailers
- where there is greater competition (i.e. more sellers)
- the consumers made greater use of the scheme (and where adoption was supported through promotion).

It is important to note that fuel retailing is, in the main, a highly competitive industry in which multiple retailers compete in selling a largely uniform set of products. Fuel retailers may have some – but limited – market power to price above cost due to their brand and location. However, in competitive markets, over the medium to long-term we would expect firms to earn, on average, normal profits.[64] This is the case regardless of whether a fuel price transparency scheme is in place.

Greater price transparency could drive retailers to increase efficiency (e.g. reduce costs or improve services). However, given the existing level of competition, the opportunities for further efficiency may be very small. Consequently, aside from the benefits discussed in the next sections, there does not appear to be a major source of benefit in the short-term[65]. As such, any change in average prices may simply result in a wealth transfer between consumers and suppliers. For example, lower (/higher) average fuel prices would result in higher (/lower) consumer surplus offset by lower (/higher) supplier surplus.

[64] A normal profit is when the total revenue matches the total cost inclusive of the opportunity cost of the investment.

[65] Over a longer time period, it is possible that greater price transparency in market may result in a more efficient market as more efficient retailers gain greater market share.

Box 1: Fuel price transparency literature

There have been multiple studies that have attempted to analyse the impact of fuel price transparency schemes on prices. These studies typically involve tracking how retail prices and margins (differences in wholesale and retail prices) have changed over time before and after the introduction of a scheme using a variety of controls. Commonly comparisons of changes in prices are made with a control group from another jurisdiction (where there has been no change) or location where the scheme has yet to roll-out.

Bernhardt et. al (2025)[66] provide a useful summary of the prior literature analysing the impacts of the price transparency schemes in Germany, Italy, Chile, and Austria and conduct their own analysis of the impact of transparency schemes in France, Germany and Austria. The results from these studies are mixed. While several studies found evidence of a price-reducing impact of a price transparency scheme, some studies found evidence of a price-increasing impact. Of note, different studies found a different direction of impact for the same regulation and jurisdiction, implying that the results can be sensitive to the study method.

There also have been studies on the introduction of price transparency schemes in Australia. These include a study by Griffith University (2020)[67] estimating the impacts of the Queensland Fuel Price Reporting Trial. This study concluded (p. 3) that the trial led to a 'small but statistically significant decline in the average daily retail prices' of key products in Southeast Queensland. Byrne and De Roos (2019)[68] studied fuel prices in Western Australia and found evidence that years after Fuelwatch scheme (which includes the 24-hour price lock-in) had been introduced, 'dominant firms use price leadership and price experiments to create focal points that coordinate market prices, soften price competition, and enhance retail margins.'

Some studies have focussed on under what conditions price transparency reduces prices. Luco (2019)[69], in a study of a price transparency scheme introduced in Chile, found evidence to suggest that the change in prices depended significantly on the extent of usage of the price information by suppliers and consumers, with prices rising where consumers did not search as actively and falling where they did. Similarly, Montag et. al (2024),[70] in a review of the German scheme, found the scheme 'was particularly successful in markets with a lower share of ex-ante informed consumers, in markets with a higher number of sellers, and when accompanied by complementary information campaigns.'

It also worth noting that a several common challenges to all the empirical studies

- Data is available on prices but not volumes. Average prices are typically calculated as the average displayed price rather than average price paid by consumers. This might vary significantly if, for example, prices are higher during times of high demand.
- The impacts can vary over time (as demonstrated 2019 study Byrne and De Roos referenced above).

[66] Bernhardt, L., Breiderhoff, X., & Dewenter, R. (2025). New Evidence on Price Effects of Transparency Regulations in European Fuel Markets. *Journal of Industry, Competition and Trade*, *25*(1), 4.

[67] Griffith University. (2020) *An Assessment of the Queensland Fuel Price Reporting Trial.* For the Department of Natural Resources, Mines and Energy. Second Biannual Update – February 2020. DNRME 03/07/3795

[68] Byrne, D. P., & De Roos, N. (2019). Learning to coordinate: A study in retail gasoline. *American Economic Review*, *109*(2), 591-619.

[69] Luco, F. (2019). Who benefits from information disclosure? the case of retail gasoline. *American Economic Journal: Microeconomics*, *11*(2), 277-305.

[70] Montag, F., Sagimuldina, A., & Winter, C. (2024). When Does Mandatory Price Disclosure Lower Prices? Evidence from the German Fuel Market. *George J. Stigler Center for the Study of the Economy & the State Working Paper*, (344).

Option 2 (Voluntary reporting)

Evidence and findings about market pricing impacts for Option 1 apply similarly to Option 2, noting that the impacts of a voluntary scheme in Option 2 are likely to be even more uncertain. If uptake in the voluntary reporting scheme is low the impacts would be similar to the base case, whereas higher uptake would result in larger impacts closer in magnitude to Option 1.

5.4.2 Other consumer benefits

Option 1 (Mandatory reporting)

Regardless of the impact on the average price paid, price transparency schemes can provide net benefits to consumers. The benefits to consumers result from improved accuracy, timeliness and comprehensiveness of fuel price information available. As previously noted, the current fuel price information available in Victorian across the available services is estimated to cover between 60-70% of retail sites. In addition, the degree to which the published prices are current is dependent on the frequency of updates from fuel retailers or consumer updates crowdsourced for certain sites.

As such, consumers may benefit because the scheme may reduce their search costs and improve their satisfaction with the price they pay. For example, it may result in consumers:

- spending less effort in searching for lower priced fuel[71]
- refuelling at more convenient locations[72]
- being more satisfied knowing they paid a fair price and suffering less disappointment from prices being higher than they expected.

Valuing these benefits is nevertheless difficult. We have not identified any research that is practical to use to estimate the search cost savings to consumers or more generally consumers' willingness to pay for improved price information.[73]

It is clear consumers value having access to information on retail fuel prices. As reported in the recent ACAPMA survey,[74] 41 per cent of Australia consumers use fuel price apps to help them shop around. It is also noteworthy that the use of such apps is lower in Victoria (at 32%) where a price transparency scheme is not in place.

There is also evidence that paying a fair or good price is important beyond just the price savings. For example, a recent survey[75] found 39 per cent of respondents were willing to drive 5-10 km, and 8 per cent more than 10 km, to save just 5 cents per litre on fuel. For a 60-litre tank this saving equates to

[71] For example, before heading out on a journey a consumer may quickly check the app to confirm the best place to purchase fuel. With poorer information they may spend more time reviewing price boards on their journey.

[72] For example, more accurate price information may lead to consumers purchasing at locations they might not otherwise have used because of the concern they would pay too much.

[73] There is some related research. Seim et. al (2017) examined the pricing of driving schools in Portugal and found consumers are willing to pay a significant amount for price transparency, on average 11% of the service price. Seim, K., Vitorino, M. A., & Muir, D. M. (2017). Do consumers value price transparency?. *Quantitative Marketing and Economics*, *15*, 305-339. Available at https://www.maria-ana-vitorino.com/docs/SeimVitorinoMuir2017_PriceTransparency.pdf

[74] ACAPMA, National Monitor of Fuel Consumer Attitudes, 2024, p. 17.

[75] For example, https://www.carexpert.com.au/car-news/how-far-australian-motorists-are-willing-to-travel-for-cheaper-fuel

just $3 and, after allowing for variable costs of travel (~15 cents per km)[76], suggests that such drivers value their time to obtain a cheaper price at less than the minimum wage.[77] This is consistent with consumers placing a high value on paying what they consider a 'fair' fuel price.

Value to consumers might be indicated by considering what consumers might be willing to pay for better pricing information. A useful thought experiment is to consider how many of Victoria's 5.3 million licenced drivers would be willing to pay for the improved information to obtain the benefits described above in reducing their search costs (as distinct from the price savings they might achieve). For example, assuming introducing the price-transparency scheme increased the fuel price app usage in Victoria (currently 32%) to the average level in Australia excluding Victoria (44%), then an additional 0.6 million motorists would be using the app. In such case, a $1 per year annual benefit per additional user equates to $0.6 million benefit, while $10 per year annual benefit per additional user then equates to $6 million benefit.

A second category of consumer benefit relates to the distributional impacts. Even if there is no change in the average price paid, a fuel price transparency scheme is likely to greater benefit those consumers who are financially constrained and that are more likely to use such price information to pay less. There is likely to be two broad groups of price sensitive consumers. Firstly those that are under cost of living pressure with limited discretionary income. As discussed in Chapter 3, transport costs are a significant category of household expenditure; this is particularly for lower income households. Secondly consumers who are motivated by value in terms of paying a fair fuel price.

Option 2 (Voluntary reporting)

We expect Option 2 will result in great level of fuel pricing information however less coverage and accuracy than Option 2 because it is a voluntary scheme. There is a reasonable risk of low participation in Option 2. It is therefore likely to deliver lower consumer benefits in reducing consumer search costs and have lower distributional benefit in enabling those consumers who are more price sensitive to save more.

MCA assessment

Option 1 (Mandatory reporting) is given a score of +5 and Option 2 (Voluntary reporting) is given a score of +2 relative to the base case. Option 1 is assessed between moderate and significant positive impact because it will maximise coverage and accuracy of fuel pricing information for consumers who most value the information. Option 2 is assessed lower because there will be gaps in coverage with a reasonable risk of low participation.

[76] Variable costs for a 5 km trip are $0.45 assuming around 15 cents per km cost. https://www.smh.com.au/money/planning-and-budgeting/how-far-should-you-travel-for-cheap-petrol-i-did-the-sums-20210219-p57407.html

[77] A 5 km journey in city location will take 7.5 minutes assuming a typical city travel speed of 40km per hour, which equates to an opportunity cost of $3 at a minimum wage of $24. In summary, if drivers value their time at the minimum wage, then applying the assumptions above, the cost of travelling 5 km will be ~$3.50 and for a fuel saving of $3.

5.5 Preferred option

A summary of the MCA is provided in Table 7. Option 1 (Mandatory reporting) is assessed as the preferred option and likely to deliver a net benefit over Option 2, due to the significant uncertainty of participation in Option 2 and consequently benefits that might be realised.

Table 7 MCA scoring summary

	Unweighted score		Weighted score	
	Option 1	**Option 2**	**Option 1**	**Option 2**
Costs to industry (25%)	-3.5	0	-0.9	0
Costs to government (25%)	-4	-3	-1	-0.75
Benefit to consumers (50%)	5	2	2.5	1
Total			**0.6**	**0.25**

We note there is uncertainty as to the benefits and some of the costs for both Options 1 and 2. Nevertheless, on balance, we expect that in the medium to long-term there will be net benefits realised from Option 1 relative to the base case. This is based on the following:

- Benefits to consumers
    - Mandatory reporting will result in greater level of geographic market coverage and accuracy of retail price information to the benefit of consumers
    - The scheme will deliver additional consumer benefits in reducing consumer search costs and will have some distributional benefit in enabling those consumers who are more price sensitive to save more.
- Benefits to industry
    - There are potential costs savings in the short-medium term to retailers in the costs of obtaining competitor data
- There are additional costs to both government and industry associated with the management of the scheme and provision of information by retailers of approximately $24.5 million (NPV) over 10 years ($13 million of Government costs and $11.5 million of retailer costs, equating to $2.5 million of costs per year in total).

As discussed in section 4.4.2, a relatively small benefit per consumer per year (e.g. $5 or $10 per consumer) would be expected to outweigh the total costs.

Table 8 provides a high-level summary of impacts across to the options. For simplicity, Option 1 is presented as relative to the base case and Option 2 relative to Option 1.

Table 8: Option comparison

	Option 1 - mandatory reporting	Option 2 - voluntary reporting
Government costs	~$1.3m p.a. NPV (excluding sunk costs), including: • System development and app development costs • Ongoing system maintenance costs • Monitoring, compliance and enforcement costs	Slightly lower costs at ~$1.1m p.a. NPV
Retailer impacts		
Costs of providing data and compliance	~$1.15m p.a. NPV (~$11.5m over 10 years), including: • Registration • Reporting prices • Compliance requirements Potential for ongoing additional staff training	Slightly lower as retailers who find the system burdensome would opt out
Cost reduction benefit to retailer in reducing cost of obtaining competitor prices	Potential costs savings to retailers in relation to the costs of obtaining competitor data (assuming reciprocal data provision) – variable across retailers and difficult to quantity	Lower benefit to the extent there is lower participation in the scheme
Market price impacts	No net benefit, noting uncertainty of market and price impacts	Lower benefit to the extent there is lower participation in the scheme
Consumer benefits	Distributional benefits, e.g. reduced search costs, for most price sensitive consumers	Lower benefit to the extent there is lower participation in the scheme

6. Summary of preferred option

The preferred option (Option 1) is Mandatory price reporting with government publication.

Under Option 1, new Regulations would be made to prescribe a Code of Practice under the Australian Consumer Law and Fair Trading Act (2012).

Under the new Code of Practice, all fuel retailers in Victoria will be required to register their business with Service Victoria and report their normal fuel price, trading hours and the brands and types of fuel offered for retail sale.

All fuel retailers will be required to notify the Service Victoria CEO of any change in the normal price (increase or decrease) within 30 minutes of changing the normal fuel price on the fuel pump display, for publication on the Service Victoria application.

They will also be required to report if a fuel offered for sale is temporarily unavailable within 30 minutes of the fuel becoming unavailable.

Fuel retailers must continue to adhere to the Code of Practice for Fuel Price Boards under section 232 of the ACLFT Act, which came into effect in 2016 and sunsets on 31 May 2026 (see description of Chapter 1). The proposed 2025 regulations will revoke the 2016 regulations, however the 2025 regulations will continue to regulate the display of fuel prices on price boards and fuel pumps at service stations in addition to the new requirements under Option 1.

Monitoring, compliance and enforcement of the new Regulations will be undertaken by Consumer Affairs Victoria.

7. Small business impacts and competition assessment

7.1 Small business impacts

The Victorian Guide to Regulation also considers it good practice for a RIS to consider the impacts of proposed Regulations on small businesses. Small businesses may experience disproportionate effects from regulation for a range of reasons. This may include that the requirement applies mostly to small businesses, or because small businesses have limited resources to interpret compliance requirements or meet substantive compliance requirements compared to larger businesses. Small businesses may also lack the economies of scale that allow regulatory costs to be spread across a large customer base.

There are several relevant small business impacts and competition matters for consideration. In part these depend on the implementation of the proposed regulation.

Market for fuel suppliers

IBISWorld data indicates that across Australia seven fuel retailers make up 58.5 per cent of total market revenue[78]. IBISWorld indicates that outside of the major players, the industry is highly fragmented. In stakeholder consultation we spoke to a range of retailers, from a retailer business that owns three country town service stations to retailers that own several hundred service stations.

A small business in retailing for the purpose of this RIS is considered as a business that owns less than 5 sites[79].

The cost of implementation for retailers may be proportionately larger for small businesses with potential economies of scale for larger retailers. For example, it will cost more per service station site to understand the requirements and set up a system for inputting data for a retailer with 4 sites compared to a retailer with a few hundred service station sites. The smallest retailers owning one or two sites are more likely to input data manually rather than establish reporting systems; it was estimated in section 5.3.1.1 that this could take about 10 minutes a week, equating to a cost of about $1,000 per petrol station site per year.[80]

Market for supply of fuel price information

The regulation will impact the market for the supply of fuel price information. This market includes businesses such as Petrol Spy and Fuel Maps Australia (see Table 2 in Section 2.2.2). Competing fuel price apps may benefit or be disadvantaged by the regulation depending on how it is implemented.

Assuming the fuel price information is made publicly accessible via API (i.e. reciprocal data), then fuel apps such as Petrol Spy will benefit by being able to use the information to enhance the value of their

[78] IBISWorld 2024, Retail Trade G4000, *Fuel Retailing in Australia*, Ampol 17.6%, Viva Energy Australia 9.4%, BP Australia 7.6%, 7-Eleven Stores Pty Ltd 6.6%, Chevron Australia Products Pty Ltd 4.3%, EG 10.9%, United Petroleum 2.1%.

[79] Sapere definition for this RIS.

[80] Indicative estimate and will depend on retailer processes.

apps to their customers. Furthermore, they may also benefit to the extent that they can save costs of obtaining information from other sources.

However, if the fuel price information is not accessible then existing fuel apps may lose customers to the Service Victoria app. This will harm the apps to the extent that they benefit from customer traffic to their website/app or incur additional costs in obtaining.

7.2 Competition assessment

The Victorian Guide to Regulation requires a RIS to assess the impact of regulations on competition. Regulations can affect competition by preventing or limiting the ability of businesses and individuals to enter and compete within particular markets.

A measure is likely to have an impact on competition if any of the questions in Table 9 can be answered in the affirmative.

While there may be disproportionate impacts on small retailers, overall there are unlikely to be significant competition impacts as a result of this proposal.

Table 9: Analysis of competition impacts

Test question	Assessment	Reason
Is the proposed measure likely to affect the market structure of the affected sector(s)	Uncertain/ unlikely	There is no change in market structure in other jurisdictions with similar regulation.
Will it be more difficult for new firms or individuals to enter the industry after the imposition of the proposed measure?	No / unlikely	The regulatory burden costs are small. While it is difficult to assess the market impacts, it appears very unlikely that the regulation would change market dynamics to the extent of providing a barrier to entry
Will the costs/benefits associated with the proposed measure affect some firms or individuals substantially more than others (e.g. small firms, part-time participants in occupations etc.)?	Yes	Small retailers are disproportionately affected due to fixed costs of compliance. However, the impact does not appear large.
Will the proposed measure restrict the ability of businesses to choose the price, quality,	No	The regulation being considered only affects price transparency for specified products. As noted in section 5.4.1, the market impact of introducing price transparency schemes on petrol prices is

Test question	Assessment	Reason
range or location of their products?		uncertain. There are two potential main impacts. Greater price transparency may lead to: • higher fuel prices resulting from increased (or more effective) tacit collusion / strategic pricing by fuel retailers • lower fuel prices due to improved consumer information that drives greater price competition among retailers. It is uncertain which of these impacts will be larger in the Victorian market context. There is a substantial literature on the impact of fuel price transparency schemes from around the world (see Box 1 in section 5.4.1). The results are mixed, with some studies finding evidence of price-reducing impacts and some (fewer in number) finding evidence of price-increasing impacts.
Will the proposed measure lead to higher ongoing costs for new entrants that existing firms do not have to meet?	No	The regulatory burden will vary by firm size but not materially by when a firm enters the market.
Is the ability or incentive to innovate or develop new products or services likely to be affected by the proposed measure?	No	Improved price transparency is unlikely to inhibit traditional retailers' ability to innovate.

8. Implementation plan

Implementing the proposed Regulations

The Regulations will prescribe a Code of Practice under the *Australian Consumer Law and Fair Trading Act* (2012). The Department will be primarily responsible for the implementation of the proposed changes discussed in this RIS.

The key elements of the implementation plan will include the following:

- Finalisation of the proposed Regulations
- Completion of the solution design and testing of the Victoria Fuel Finder App by Service Victoria
- Retailer onboarding and registration process in advance of launch of the Service Victoria Fuel Finder
- Development of a compliance monitoring and enforcement approach by Consumer Affairs Victoria including determining the transition period for compliance.

The stages and timing for implementation is provided in the table below.

Table 10 Implementation stages

Stage	Title	Start/End Dates	Objective
1	**Consultation with industry**	January – August 2025	Engagement with fuel stakeholders to inform the development of the enabling technology and how the Victorian Government can support industry and retailers throughout implementation.
2	**Public consultation stage for RIS via Engage Victoria**	May – June 2025	Opportunity for the Victorian community to provide input on the Regulatory Impact Statement (RIS) on how fuel pricing information can be improved.
3	**Early Access Retailer Onboarding**	June/July 2025	Onboarding to support early retailer adoption and partner engagement
4	**User Acceptance Testing**	June/July 2025	Fuel product user testing involving key business stakeholders
5	**Public consultation: analysis and feedback**	July 2025	Analyse the public feedback on the RIS and the draft code and regulations.
6	**Statement of Reasons**	July 2025	Victorian Response to feedback received during the Public Consultation Phase and preferred option.

Stage	Title	Start/End Dates	Objective
7	**Commencement of regulations**	July 2025	Regulations commence following consideration by the Governor in Council
8	**Launch of live fuel pricing on Service Victoria app**	August 2025	App will enable industry to report their fuel price data and will improve live fuel pricing information for consumers across Victoria.

Finalise the Regulations

The release of the proposed Regulations and this RIS for a 28-day public comment period will provide key stakeholders and members of the public the opportunity to consider the proposed changes to the Regulations and provide feedback. At the conclusion of the public comment period, the Department will review and consider each submission and take account of the feedback on both the proposed Regulations and the RIS in finalising the Regulations.

The Department will prepare a document, which will discuss the comments provided in in response to this RIS and respond to those comments.

The Office of Chief Parliamentary Council will review and settle the Regulations, which will then be submitted to the Minister for Consumer Affairs for approval.

Communications plan

The Department will develop a communications plan to support the launch of the Service Victoria Fuel Finder. This will include:

- Formal communication to fuel retailers in advance of the launch to communicate the timing for the new Regulations to come into effect, registration process and reporting obligations
- Wider communication strategy to the Victorian consumers to promote awareness of the Service Victoria Fuel Finder feature on the Service Victoria app.

9. Evaluation strategy

The Regulations will sunset 2035 being 10 years after the commencement of the Regulations the Department will actively monitor and evaluate the effectiveness and efficiency of the Regulations throughout the life of the Regulations. Supporting this, the Department will continue to consult and gather feedback from key industry stakeholders on a frequent basis.

Once the regulatory change has been implemented, the Department will conduct a short term review (18-24 months following implementation) of retailer compliance with requirements, and petrol consumer usage of the Service Victoria app. This will inform whether an additional education and awareness campaign is needed to support compliance and usage.

Structured evaluation of the Regulations will be undertaken before the sunsetting of the Regulations. To support this evaluation the department will develop an evaluation plan including evaluation questions, available data and data gaps to assess any potential gaps in evidence. Key evaluation questions will be designed to align with the Department of Treasury and Finance Resource Management Framework, such as:

- Problem justification: What is the evidence of continued need for the Regulations and role for government?
- Effectiveness: To what extent has the primary objective of the Regulations been achieved?
- Have the Regulations been effective in providing more information for petrol consumers?
- Efficiency: do the Regulations achieve the objectives in the most efficient way?

Data assessment will include consideration of indicators such as:

- Customer usage of the Service Victoria app
- Surveys of customers using the app, either:
    - Direct surveys of consumers using the app
    - Market wide surveys of price apps usage as conducted by ACAPMA (next survey undertaken will be 2026) – this has been undertaken over time and will provide baseline information for comparison
- App ratings and usage
- Data on pricing as collected by the Service Victoria app
- Compliance data from CAV.

Media reporting could also be used as an indicator of retailer and customer satisfaction with the Service Victoria app.

Appendix A: Stakeholder consultation undertaken

The Department of Government Services has been engaging with a range of fuel industry stakeholders since December 2024 to inform the policy design for the introduction of the Fair Fuel Plan. The engagement process has incorporated:

- Fuel industry roundtables with representatives of peak bodies, retail chains and independent petrol stations
- Follow on industry engagement through a Technical Working Group and Policy Working Group.

Who was consulted for the preparation of this RIS?

As part of the preparation of this RIS, the Department and Sapere have consulted with the fuel industry stakeholders detailed in the table below:

Fuel retailers	7 Eleven, Express Diesel, EG Australia, AA Connect, Mineral Springs Fuel Stop (a single site independent retailer)
Industry representative groups	Australasian Convenience and Petroleum Marketers Association Victorian Automobile Chamber of Commerce
Fuel price information providers	Informed Sources (incorporating MotorMouth) Royal Auto Club of Victoria
Other jurisdictions and agencies	Australian Competition and Consumer Commission (ACCC) Northern Territory Government - Fuel Watch Western Australian Government - MyFuel NT

How where they consulted?

The consultations were all one-on-one video call consultations.

What information was collected?

The consultations with **fuel retailers and industry representative groups** focused on the sources of costs of the proposed regulations (compared to their current practices) including IT and ongoing costs of activities to provide prices and ensure compliance with the proposed regulations. We also covered their experiences with the schemes operating in other jurisdictions where applicable.

The consultations with **fuel price information providers** focused on their current arrangements in Victoria and how the proposed regulations would impact on market coverage and their commercial operations. We also covered their experiences with the schemes operating in other jurisdictions.

The consultations with **other jurisdictions** covered how their respective schemes are operating, current market coverage and usage and their compliance activities. The consultation with the **ACCC**

discussed the rationale for price disclosure regimes and evidence of the impacts of these regimes on consumer and market outcomes.

How has this information been incorporated into the RIS

The information gathered has be incorporated in the RIS to inform the categories of costs and benefits associated with the proposed regulations and where available inform quantitative estimates of the compliance costs for business. The observations provided on the current arrangements in Victoria and operations of fuel price reporting schemes in other jurisdictions has informed the options analysis and identification of likely outcomes from the introduction of the new regulations in Victoria.

About Sapere

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'Sapere' comes from Latin (to be wise) and the phrase 'sapere aude' (dare to be wise). The phrase is associated with German philosopher Immanuel Kant, who promoted the use of reason as a tool of thought; an approach that underpins all Sapere's practice groups.

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For more information, please contact:

David Graham, Managing Director

Mobile: +61 407 505 320

Email: dgraham@thinkSapere.com

Wellington	**Auckland**	**Sydney**	**Melbourne**	**Canberra**	**Perth**	**Brisbane**
Level 9 1 Willeston Street PO Box 587 Wellington 6140	Level 20 151 Queen Street PO Box 2475 Shortland Street Auckland 1140	Level 18 135 King Street Sydney NSW 2000	Level 11 North Tower 80 Collins Street Melbourne VIC 3000	GPO Box 252 Canberra City ACT 2601	PO Box 1210 Booragoon WA 6954	Level 18 324 Queen Street Brisbane QLD 4000
+64 4 915 7590	+64 9 909 5810	+61 2 9234 0200	+61 3 9005 1454	+61 2 6100 6363	+61 8 6186 1410	+61 7 2113 4080

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