

On 14 November 2017 the ACCC received a confidential submission from an interested party in relation to applications for authorisation A91580-82.

The ACCC has prepared a de-identified version of the submission for publication on the ACCC's public register, with the consent of the interested party.

***Proposed undertaking and discounts***

The ACCC should not let Woolworths fund any part of the shopper docket discounts so the current arrangements are maintained. If the transaction goes ahead, the Woolworths 'fuel division' will no longer exist so any contribution by Woolworths to the discounts at BP sites will be funded by grocery shoppers. The ACCC should also make sure that Woolworths cannot fund shopper docket discounts at BP sites due to other aspects of the BP/Woolworths commercial relationship.

The ACCC should not let BP offer extra discounts on top of the 4cpl if customers buy certain products in store. The Woolworths Rewards Loyalty Program has 9 million members so the ability to distort competition by offering extra discounts is high.