



**Victorian Automotive
Chamber of Commerce**

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24 June 2025

The Hon. Natalie Hutchins
Minister for Government Services
Minister for Treaty and First Peoples
Minister for Prevention of Family Violence
Minister for Women
121 Exhibition Street
Melbourne Vic 3000

Via email: minofficehutchins@ecodev.vic.gov.au

Dear Minister

Fair Fuel Plan proposed Regulations and Regulatory Impact Statement

I am writing to express the Victorian Automotive Chamber of Commerce's (VACC) concerns regarding the Fair Fuel Plan proposed Regulations and Regulatory Impact Statement (RIS). While the automotive industry supports efforts to improve fuel price transparency in the interests of consumers, the preferred option in the RIS poses risks to competition dynamics in the Victorian fuel retailing market, and places undue regulatory burden on fuel retailers, including the members of the VACC.

VACC is Victoria's peak automotive retail industry association, representing the interests of more than 5,000 members across 15 retail automotive sectors, including service station and convenience store retailers, that employ over 50,000 Victorians.

VACC acknowledges that the proposed Fair Fuel Plan is intended to help motorists by increasing fuel price transparency. However, VACC is concerned that the proposed Regulations are being rushed through, when there is no evidence that fuel transparency schemes, as recommended by the RIS, lead to material benefits to consumers.

The VACC agrees that the preferred option in the RIS will help certain consumers make point-in-time saving by identifying the cheapest available fuel in their town or local area. However, there is no evidence that fuel price transparency schemes lead to lower prices overall. The RIS notes that Victoria is the only Australia state without a mandated fuel price transparency scheme, yet fails to demonstrate that Victorians are paying higher prices for fuel than their interstate counterparts – more rigorous economic analysis could provide further insights, and should be sought to ensure there is a clear case for regulatory intervention.

Comments regarding the proposed Regulations

VACC is concerned about the impact of the proposed Regulations on fuel retailers, adding to the significant regulatory costs already faced by the sector, including the recently introduced tobacco licensing laws. In particular, VACC considers that the 30-minute reporting timeframe to be too short and excessively burdensome. VACC urges the Victorian Government to review this proposal, including further consultation with industry.

VACC also considers that the Regulations would benefit from additional clarity in relation to what constitutes an emergency as a defence for breaching the Code. VACC suggests that the list of defences be expanded to include breaches due to any cause over which the relevant person had no control.

VACC welcomes the Victorian Government's proposal to conduct a short-term review of the Regulations within 18-24 months of implementation, as outlined in the RIS. However, VACC strongly recommends that a structured review of the Regulations be undertaken after no more than 5 years and urges the Victorian Government to commit to repealing the Regulations should this review find them to be ineffective.

VACC looks forward to collaborating further with the Victorian Government in the identification and implementation of other issues of material industry and consumer benefit, such as the ongoing financial and emotional costs to fuel retailers resulting from fuel and convenience store thefts. We would welcome the opportunity to discuss these issues further and provide insights directly from our members.

Please feel free to contact me further on this important matter.

Yours faithfully

A handwritten signature in black ink, appearing to read "Imogen Garcia Reid". The signature is written in a cursive, flowing style.

Dr Imogen Garcia Reid
Executive Manager, Industry Policy
VACC