

Submission to Victoria's proposed Fair Fuel Plan

June 2025



Contents

Introduction	2
About RACV.....	2
RACV fuel finding apps.....	2
1. RACV App.....	2
2. Arevo.....	2
Response to the proposed Fair Fuel Plan	3
1. Improving competition and consumer choice	4
2. Alignment with principles of open data	4
3. Levels of redundancy if the government platform fails	5
Conclusion	6

Introduction

RACV welcomes the opportunity to respond to Victoria's proposed Fair Fuel Plan.

RACV supports the proposed Fair Fuel Plan as a mechanism to improve transparency and access to real-time fuel prices across Victoria **subject to** the Department of Government Services expanding the scope of this framework to enable third party apps – such as RACV's fuel findings apps – to access the same data through an appropriate and timely data feed.

About RACV

RACV is proud to provide exceptional experiences for our members and customers through a range of products and services across motoring and mobility, home, energy and leisure. These include Emergency Roadside Assistance, Motor Insurance, Home Insurance, Home Trades and an increasing range of options in the cleaner energy space, such as RACV Solar. In addition, RACV has ten Club and Resort properties across Australia and a range of domestic and international holiday packages, tours and cruises from our trusted travel partners.

RACV represents over 2.2 million members and has a proud history of supporting improved outcomes for all Victorians.

Helping Victorians is at the heart of RACV. Last year, RACV:

- provided 1.2 million members with motor insurance policies
- covered 1.6 million members for Emergency Roadside Assist
- responded to 700,000 Emergency Roadside Assist call outs
- provided 898,000 members with home insurance policies; and
- assisted with 52,000 home emergencies through Emergency Home Assist.

This means RACV is in a Victorian home every six minutes.

RACV is a member of the Australian Automobile Association (AAA). Through initiatives such as the AAA's Transport Affordability Index, RACV has had an extensive track record improving information to consumers and helping them make informed choices.

RACV fuel finding apps

RACV is committed to helping Victorian motorists to shop around for cheaper fuel. RACV supports a free fuel finding feature on two application platforms:

1. RACV App

The RACV App features a Fuel Finder function that enables members to locate fuel pricing. The app enables members to apply filters to narrow a search based on fuel type and brands. The map-based fuel price visualisation includes a green icon so that consumers can easily identify the lowest prices in a chosen geographic area.

The RACV App also facilitates access to member fuel discounts and a voucher to save 5c/L at EG Ampol stations.

2. Arevo

Arevo is a distinctly branded stand-alone app, primarily focused on mobility and journey planning, while also including a Fuel Finder feature. From a fuel price comparison perspective, Arevo is distinct from the RACV App

because it does not require RACV membership to utilise. Like the RACV App, it is free to download and has many of the same visualisation features, while also enabling the user to set up personalised fuel alerts. These alerts will let the user know when prices are rising and falling, plus notify them of the cheapest fuel in their local area.

Given that one of the objectives of the Fair Fuel Plan is to help Victorians save money, there is an increased benefit if consumers are able to access pricing data and relevant fuel discounts within the same application. This will make it easier for consumers to save money – the more places from which the data can be accessed, the greater the reach and potential overall consumer savings.

Neither the RACV App nor Arevo are advertiser funded and are not commercial apps. We do not earn revenue from making fuel price data available to consumers and we do so at our own cost. We do not publish the data for profit.

Both platforms rely on a commercial arrangement with a third-party to supply the fuel price data across all common fuel types, updated every 15 minutes. While the quality of the current fuel price data is robust and consistent with proposed standards of the Service Victoria platform, our fuel price data is supplied on a voluntary basis by fuel retailers and there are consequently gaps in geographical retailer location information. This is due principally to some independent fuel retailers opting not to participate in the provision of fuel price data. This shortfall represents about 25 per cent of the market not being displayed in current member-based and commercial platforms.

Victoria's proposed Fair Fuel Plan provides an opportunity to address these gaps and to provide a comprehensive picture of available fuel prices for Victorian motorists.

Response to the proposed Fair Fuel Plan

RACV supports the proposed Fair Fuel Plan as a mechanism to improve transparency and access to real-time fuel prices across Victoria. Wider and more comprehensive access to fuel prices lay the groundwork to improved consumer choice and greater competition across fuel retailers.

RACV supports regulations that require all fuel retailers in Victoria to report current fuel prices. This includes the proposal that retailers must notify Service Victoria within 30 minutes of changing the price at the pump, or when a fuel type becomes temporarily unavailable. RACV agrees that better information about fuel prices will help consumers to make more informed decisions about when and where to buy fuel.

However, while RACV appreciates the value and practicality of funnelling fuel price data into a new Fuel Finder feature on the Service Victoria platform, it is imperative that the Department of Government Services expands the scope of this framework to enable third party apps – such as RACV's fuel findings apps – to access the same data through an appropriate and timely data feed.

Third-party access to the same fuel price data as that available in the Service Victoria platform will:

1. Improve competition and consumer choice.
2. Align with the Victorian Government's principles of open data.
3. Build-in a level of redundancy should the Service Victoria platform fail.

Mandatory reporting of fuel prices with government publication of data already exists across most Australian jurisdictions, and the principle of mandatory reporting clearly supports competition and consumer outcomes. However, should third parties be unable to access fuel price data in real time, Victoria would be the only state in Australia with a commercial monopoly on fuel price data, ultimately at the detriment of the consumer. When the fuel price transparency data was introduced in New South Wales, the public API feed was made available from the commencement of the scheme in line with the NSW Government's open data policy.

The *Regulatory Impact Statement for Fuel Reforms* has captured the benefits of competition and consumer choice with a narrow focus on the Service Victoria platform only. For example, on page viii of the Regulatory Impact

Statement, the evaluation strategy refers to consumer usage of the Service Victoria platform, when RACV considers that any future evaluation of the regulation should take into consideration widespread usage of fuel price data available across as many applications as possible.

RACV looks forward to working with the Department of Government Services to develop a solution to support data feeds into third-party fuel finding apps, thereby realising improved consumer outcomes for Victorian motorists. We stand ready to harness our communication channels to 2.2 million members to increase awareness of the Fair Fuel Plan. RACV is also open to providing the Department of Government Services with analytical insights and to utilise our platforms to engage with users through surveys.

1. Improving competition and consumer choice

RACV supports increased competition and consumer choice in the retail fuel market. As a member-based organisation, RACV continues to educate customers about the need to shop around and seek out cheaper fuel and discounts. A key component of being able to shop around is being informed about where there are cheaper fuel options. Consumer-based platforms such as the RACV App and Arevo contribute towards increased knowledge and therefore better-informed customers driving improved competition and pricing outcomes.

This is consistent with the Premier's media release of 20 January 2025 which provided that fuel price transparency underpins cost-of-living initiatives, because the provision of improved pricing information supports families in making the best choices about where and when to purchase fuel.

The principle of a fuel finder intended to provide up-to-date and readily accessible information for consumers is sound. However, competition and consumer goals can only be achieved if comprehensive price data is shared with existing and future commercial and non-commercial apps that Victorian motorists will continue to use for other reasons (e.g. because those apps are a platform to access fuel discounts that the Service Victoria is unable to provide).

By not sharing data, the Department is disadvantaging consumers that are already engaged with apps that provide this information. Conversely, if the Victorian Government did share the data then there would be more immediate realisation of the benefits because the data would be available to a group of consumers through apps that are already used for this purpose, helping the Government spread awareness and immediately help consumers save money.

2. Alignment with principles of open data

RACV supports the Victorian Government's open data principles, being a significant step towards open and accessible information generated by government. In particular, DataVic's Access Policy recognises the following benefits of open data:

- stimulate economic activity and drive innovation and new services to the community and business
- increase productivity and improve personal and business decision making based on improved access to data
- improve research outcomes by enabling access to primary data to researchers in a range of disciplines
- improve the efficiency and effectiveness of government by encouraging better management practices and use of the data.

The proposed Fair Fuel Plan will generate government data. It is therefore consistent and appropriate that the Department of Government Services provide a fuel price data feed to third parties to ensure alignment with the government's own principles of open data.

Underpinning the DataVic Access Policy are five core principles:

Principle 1	Government data will be made available unless access is restricted for reasons of privacy, public safety, security and law enforcement, public health, and compliance with the law.
Principle 2	Government data will be made available under flexible licences.
Principle 3	With limited exceptions, government data will be made available at no or minimal cost.
Principle 4	Government data will be easy to find (discoverable) and accessible in formats that promote its reuse.
Principle 5	Government will follow standards and guidelines relating to release of data and agency accountability for that release.

RACV notes that there are no specific reasons why fuel price data should be restricted given that it is not personal information and does not impact public safety, security or law enforcement, public health or compliance with the law.

The remaining core principles all support the provision of a data feed to third parties. Government data should be made available under flexible licenses, at minimal cost, easily discoverable and reusable, and governed by appropriate standards and guidelines.

3. Levels of redundancy if the government platform fails

Currently there are a range of free, member-based and commercial platforms available to Victorian motorists to use to shop around for fuel prices. This includes platforms – such as the RACV App and Arevo – that rely on third-party provision of data and other platforms that utilise crowd sourcing to update fuel prices.

The development of a fuel feature on the Service Victoria platform creates an additional fuel finding function, it does not replace the existing apps. As noted above, this is because existing apps provide additional features and functions the government app cannot and never would provide (such as fuel discounts for members).

Given the expectation that existing platforms would continue into the future, through sharing comprehensive fuel price data with third parties, the Victorian Government has an opportunity to build-in a level of redundancy should the Service Victoria platform fail or go offline for a period of time.

It is not uncommon for government apps or systems to fail or go off-line unexpectedly. For example, in 2023 the PTV app could not upload its search or the Myki function for a period of time. In the event that the Service Victoria app should also fail or go offline in the future, the risk to consumers and competition is significantly mitigated if the same data is available in member-based or commercial apps.

Conversely, there is a risk that some apps that continue to provide fuel data to consumers will potentially have inaccurate or inconsistent information if the Victorian Government does not provide fuel price data to third parties. This is a confusing and suboptimum outcome for Victorians.

Conclusion

The Fair Fuel Plan is an opportunity for the Victorian Government to work with the private sector to communicate and share data.

In summary, the proposed Fair Fuel Plan provides a milestone opportunity to increase consumer choice and competition in the fuel retail market – and RACV invites the Victorian Government to work with us to ensure that fuel price data remain open and accessible to as many Victorian households as possible.