

From: [REDACTED]
Sent: Tuesday, 20 January 2026 7:47 pm
To: Registrar
Subject: NPD/Gull

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Hi,

I am contacting yourselves in respect of the Gull / NPD merger application outlined here:
<https://www.comcom.govt.nz/news-and-media/news-and-events/new-holder-page-2/clearance-sought-for-the-merger-of-npd-and-gull/>

I am submitting as an interested party.

My business uses fuel cards and is a current on-account client with NPD.

My business has previously also had a Gull account (via. Cardsmart).

This is in addition to account fuel cards with the others (BP, Z/Caltex, Mobile and Waitomo)

All of our fuel is purchased between Manawatu and Auckland.

It is my observation the main drivers of competition are NPD and Waitomo, and additionally Costco in West Auckland.

While Gull was widely acknowledged as bringing competition in years ago, its my observation they are now rarely competitive. This is especially so taking into consideration on-account discounts offered by all the players except them.

Furthermore, it is essential to maintaining a competitive market there are as many players as possible including downwards pressure from newer options like NPD and Waitomo.

For these reasons I am opposed to any merger.

Kind regards,