

**From:** Michael [REDACTED]  
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**To:** Registrar  
**Subject:** NPD/Gull

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I wish to submit that the proposed merger would have a negative effect on consumers with the loss of competition between the two primary 'discount leaders'. The loss of the competitive tension between NPD and Gull would likely lead to consumers paying a higher price for fuel. Both discount through a mixture of discount days and through their baseline prices.

A merged entity, even if it persists in discounting, could easily raise its base retail prices and/or reduce the level of discounting by several cents per litre which without the other competing party, would lead to a loss to the consumer. The current discounting leads to other retailers under brands such as Mobil, Z and Waitomo to actively compete to retain market share. Again, an increase in retail price and/or reduction in discount levels would reduce this competitor discounting.

Less competition in this space will impact the consumer through potentially higher base prices and reduced discounting. Accordingly the Commerce Commission must be convinced that there is a consumer benefit from the merger which on the face of it is difficult to identify, and therefore clearance should be declined.

This is a personal submission on behalf of myself as an individual consumer.

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Christchurch