

Susan Brown

From: [REDACTED]
Sent: Friday, 11 February 2022 3:29 PM
To: Jeff Hamilton
Cc: Susan Brown; Alex Smaill
Subject: Re: Merger submission [CCNZ-IMANAGE.FID319196]
Attachments: THL competition.PNG

Hi Jeff

[REDACTED]

I am concerned that the coming freedom camping reforms will significantly alter the competitive landscape in which THL and Appollo operate. The Minister of Tourism alluded to a couple, including the requirement for fixed toilets in campervans. This is mentioned in the following press release:
<https://www.beehive.govt.nz/release/new-freedom-camping-rules-right-vehicle-right-place>

These changes will impact the operators highlighted in the attached excerpt from the THL submission. Therefore, my concern is that the market share data TLH included may be accurate as of today. However, with the new reform, a high percentage of their stated competitor's vehicles do not have fixed toilets and will soon be non-compliant. Like THL, all of Apollo's vehicles have fixed toilets, so they will be compliant. The combined entity will have an unrivalled position in the market, which will take years and substantial capital investment by their competitors to equal.

[REDACTED]

Happy to discuss.

Thanks

[REDACTED]

[REDACTED]

Table 1: Estimated motorhome fleet FY22

Operator	Estimated Fleet FY22	Estimated Market Share FY22
<i>thl</i>		
Jucy		
Apollo		
Wendekreisen		
Escape		
Spaceships		
Tui		
Wicked		
Pacific Horizon		
Lucky Rentals		
TAB		
Mad Campers		
Wilderness		
McRent		
Other traditional rental operators		
Privately owned rental platform vehicles		
- Highway		
- ShareAcamper		
- Outdoorsy	141	
- Camplify	94	
TOTAL		100.0%