AUSTRALIAN COMPETITION & CONSUMER COMMISSION

Discovery Holiday Parks – four Breeze Holiday Parks

MN-01103

Phase 1 Determination

Acquisition may be put into effect

16 July 2026

1. Determination

Notified acquisition	Discovery Holiday Parks Pty Limited (DHP) and Beston Parks Land Co Pty Ltd (Beston), propose to acquire the business, assets, and real estate of four holiday parks: • Breeze Holiday Parks – Halls Gap, also called Halls Gap Caravan Park, located in Halls Gap, Victoria • Breeze Holiday Parks – Grampians, located in the Grampians, Victoria • Big4 Breeze Holiday Parks – Busselton, located in Busselton, WA, and • Big4 Breeze Holiday Parks – Katherine, located in Katherine, NT (the **Acquisition**)
Determination	The Australian Competition and Consumer Commission has determined under section 51ABZE(1) of the *Competition and Consumer Act 2010* (Cth) that the Acquisition may be put into effect.
Parties to the Acquisition	The acquirer, DHP is a national supplier of over 90 accommodation offerings throughout Australia, including cabin, caravan and camping sites, as well as other short and long stay accommodation under the Discovery Parks and Discovery Resorts brand names. Beston, the acquirer of freehold interests in the transaction, is wholly owned by Discovery Parks Holdings Pty Ltd, which also wholly owns DHP. Australian Retirement Trust (**ART**) holds 95% stakes in the relevant parent companies, Discovery Parks Holdings Pty Ltd and Beston Accommodation Parks Trust. DHP is also the sole owner of Australian Parks Licence Co Pty Ltd (**APLC**), which operates "G'day Parks", a holiday park network providing a range of services to licensee parks, including access to web listings and an online booking engine, G'day Parks branding, national marketing campaigns, and industry and customer insights benchmarking data. The vendor of the holiday parks is Katherine Park Holding Pty Ltd, Katherine Park Pty Ltd, and Frank Davies Investments Pty Ltd, who currently operate the four holiday parks as "Breeze Holiday Parks".
Reasons for determination	The reasons for the ACCC's determination are set out in section 2.

2. Statement of reasons

2.1. When making a determination in Phase 1, the Australian Competition and Consumer Commission (**ACCC**) undertakes a competition assessment and considers whether it is appropriate for an acquisition to be approved or subject to further assessment in Phase 2 in accordance with section 51ABZJ of the *Competition and Consumer Act 2010* (Cth) (the **Act**). In doing so, the ACCC must have regard to the object of the Act and all relevant matters, including the interests of consumers.

2.2. For more information about the ACCC's approach to considering notified acquisitions, see the ACCC's merger assessment guidelines and interim merger process guidelines.

2.3. In conducting its competition assessment, the ACCC has considered the information and documents that were submitted with the notification form, additional information provided by the merger parties, market feedback and publicly available information.

2.4. For the reasons given below, the ACCC has determined that the Acquisition may be put into effect.

Overlap between the parties

2.5. The parties both operate holiday parks in Busselton and Katherine. In both local areas, the parties overlap in the supply of short-term roofed accommodation and powered caravan and camping sites. The parties do not overlap in the Halls Gap and Grampians areas.

Competition assessment

2.6. The ACCC has considered the effects of the Acquisition by comparing the likely future state of competition if the Acquisition proceeds against the continuation of the current state of competition (being the likely future state of competition if the Acquisition does not proceed).

Relevant areas of competition

2.7. The ACCC considered the effect of the Acquisition on competition in the supply of powered caravan and camping sites in each of Katherine and Busselton.

2.8. The ACCC considered whether short-term roofed accommodation, such as cabins, hotels and motels, was substitutable for powered camping and caravan sites. The ACCC concluded that such substitutability would be weak. Powered and caravan and camping sites serve self-setup travellers bringing their own caravan, camper or tent, meaning they are unlikely to see a cabin, hotel or motel as a close substitute. In addition, short stay roofed accommodation is generally priced higher than caravan and camping sites.

2.9. The ACCC also considered whether unpowered sites were substitutable for powered sites. The ACCC considers unpowered sites would likely be weaker substitutes, as consumers may require or prefer powered sites for operating their caravans.

2.10. For the purposes of this assessment, it was not necessary for the ACCC to form a concluded view on the precise scope of the affected markets, because it does not materially alter the ACCC's competition assessment.

2.11. The ACCC also considered the effect of the Acquisition in the supply of short-term roofed accommodation, such as cabins, hotels and motels in Katherine and Busselton, but this theory of harm was not supported by the material before the ACCC.

Horizontal unilateral effects in the supply of powered camping and caravan sites

Busselton

2.12. The ACCC considers that the Acquisition is unlikely to have the effect of substantially lessening competition in the supply of powered sites in Busselton. The parties do not supply unpowered sites in Busselton.

2.13. In Busselton, the merged entity would continue to face competition from five providers with comparable amenities to the merged entity, four of which have a similar capacity of powered sites .

Katherine

2.14. The ACCC considers that the Acquisition is unlikely to have the effect of substantially lessening competition in the supply of powered camping and caravan sites in Katherine.

2.15. The ACCC estimated that post acquisition, DHP would have a large proportion (an estimated 40%) of powered sites currently available in Katherine, with other suppliers generally being smaller.

2.16. The ACCC has considered how closely each of the suppliers of powered and caravan and camping sites in the Katherine local area compete, having regard to the quality and range of facilities offered, their distance from the target site, their capacity, and the price of staying at a powered and unpowered site. In reaching its decision, and based on the materials before it, the ACCC makes the following findings:

- The Parties compete closely, both being in the Katherine local area, and having similar pricing and amenities.
- The merged entity would continue to face competition from alternative suppliers of powered caravan and camping sites offering substantially similar amenities within the Katherine local area, and that have capacity for more customers.

3. Applications for review

3.1. A notifying party, or other person who has been allowed to do so by the Australian Competition Tribunal, may apply for review if they are dissatisfied with the determination. Pursuant to section 100C of the Act, applications for review of the determination are to be made to the Australian Competition Tribunal before the end of 14 calendar days after this statement of reasons was included on the ACCC's Acquisitions Register. To confirm whether there has been any application for review, please contact the Australian Competition Tribunal.

Determination made by a division of the Commission constituted by a direction issued pursuant to section 19 of the Act