



# Questionnaire: IAG - RAC Insurance

MN-65005

## Deadline to respond: 12 March 2026

The Australian Competition and Consumer Commission (**ACCC**) is currently assessing Insurance Australia Group's (**IAG**) proposal to acquire 100% of the shares in RAC Insurance Inc (**RACI**) from the Royal Automobile Club of Western Australia Inc (**RAC**) and enter into a 20-year agreement for RAC to exclusively distribute insurance products underwritten by IAG under the RAC brand (the **Acquisition**).

For further information about the ACCC's assessment of the Acquisition, see the ACCC's [Acquisitions Register](#).

The ACCC is assessing the impact of the Acquisition on competition and is seeking your views. The ACCC invites you to provide submissions or information in response to the questions below by 12 March 2026 via email to [mergers@acc.gov.au](mailto:mergers@acc.gov.au) with the title *Submission re: IAG - RAC Insurance*. The ACCC must complete its assessment within strict statutory timelines which also impacts the time available for consultation.

If you would prefer to speak to a member of the ACCC case team, please email [mergers@acc.gov.au](mailto:mergers@acc.gov.au) with the title *Request for call re: IAG - RAC Insurance*. Someone from the case team will contact you to find a suitable time for a call.

Please note that:

- This request is made in accordance with section 51ABZZD(2)(a) and (c) of the *Competition and Consumer Act 2010* (Cth) (the **Act**). This means that while the ACCC may take into account submissions or information received after the due date, it is not required to do so.
- In responding to the questions below or when providing a submission, please highlight and/or mark any confidential information and indicate why the information is confidential (as brief reasons in footnotes in your response or submission, or in a separate document such as the ACCC's [confidentiality claims template](#)). The standard terms on which the ACCC accepts confidential information are outlined at the end of this document.

## Questions

1. Provide a brief description of your business or, organisation including any relationships with IAG, RAC and/or RACI.

2. Outline any concerns you have regarding the impact of the Acquisition on competition.

**Questions about motor insurance and home and contents insurance**

3. Explain whether there are any features of the motor insurance and/or home and contents insurance markets in Western Australia and/or certain areas of Western Australia which differ compared to the rest of Australia.

4. Describe how effective a competitor RACI is in Western Australia, and on what factors it competes most strongly (e.g. price, service quality, coverage, etc). Also explain on what factors it does not compete strongly.

5. Describe how effective a competitor IAG is in Western Australia, and on what factors it competes most strongly (e.g. price, service quality, coverage, etc). Also explain on what factors it does not compete strongly.

6. Describe how closely IAG and RACI compete in the supply of motor insurance and/or home and contents insurance Western Australia (e.g. in terms of price, service quality, coverage, etc).

7. Explain how strongly established insurers and mid-tier insurers compete in Western Australia. Explain the extent to which established insurer and mid-tier insurers would prevent the merged IAG/RACI from increasing premiums, reducing coverage, reducing its product range or diminishing the service provided in Western Australia. Please also include the level of constraint insurers with larger market shares outside of Western Australia are likely to impose.

8. Explain any challenges being faced by the insurance industry and the impact this could have on insurers and insurance products, including whether RACI is likely to experience heightened vulnerability to these challenges as a state-based, mutual organisation.

9. Identify any insurers that have entered or exited in the last 12 months or known upcoming examples of entry or exit in the supply of motor and home and contents insurance in Western Australia or Australia.

**Questions about repair services**

10. Explain the extent to which the merged IAG/RACI would be in an enhanced position to foreclose or frustrate competing insurers' access to each of (i) smash repair services, (ii) windscreen repair and replacement services, and (iii) building repair services.

11. Explain the extent to which the merged entity IAG/RACI would be able to reduce prices or degrade the terms on which it acquires repair services. Please explain why you consider the merged entity would (or would not) be able to do this, including whether competition from other insurers would prevent the merged entity from doing so.

**Other issues**

12. Provide any additional information or comments that you consider relevant to the ACCC's assessment of the Acquisition.

**Confidentiality of responses**

During the ACCC's assessment of a notified acquisition, the ACCC may receive information that is properly regarded as being confidential, and which is provided to the ACCC in confidence. The ACCC is committed to treating this information responsibly and in accordance with the law. The ACCC understands the importance of confidentiality to parties involved in a notified acquisition, as well as to third parties that provide

information to the ACCC.

The standard terms on which the ACCC accepts confidential information are:

- there is no restriction on the internal use, including future use, that the ACCC may make of the confidential information consistent with the ACCC's statutory functions
- confidential information may be disclosed to the ACCC's external advisors and consultants on condition that each such advisor or consultant will be informed of the obligation to treat the information as confidential, and
- the ACCC may disclose the confidential information to other third parties if compelled by law or in accordance with section 155AAA of the Act. This includes disclosures made in the performance of official duties or functions, which include transparency requirements which are part of the merger control regime.

**For further information on confidentiality, see the ACCC's [interim merger process guidelines](#).**