

18 August 2017

Mr Darrell Channing
Director
Adjudication Branch
Australian Competition and Consumer Commission (ACCC)
GPO Box 3131
CANBERRA ACT 2601

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Dear Mr Channing

And by email: adjudication@acc.gov.au

**Shopping Centre Council of Australia– application for re-authorisation
A91591 & A91592 – interested party consultation**

Charter Hall supports the application by the Shopping Centre Council of Australia (SCCA) to re-authorise the Casual Mall Licensing Code of Practice.

Charter Hall owns and operators more than 70 shopping centres across all States and Territories, and a range of diverse urban and regional locations, including Cooma (NSW), Katherine (NT), Mackay (QLD) and Manuka (ACT).

Casual mall licensing is a critical component of successful shopping centre operations.

In addition to our traditional leasing activity – generally over longer-terms such as 5 to 20-year periods – casual mall licensing enables us to offer lower cost and shorter-term opportunities for tenants.

A key observation we make for the ACCC's benefit is that over the years, there has been a preference by some retailers for short-term opportunities. This includes trialling new concepts in a market before they 'commit' to a lease, or providing them with an opportunity to clear excess or out-of-season goods.


As a national operator, a key benefit of the Code is that it provides a harmonised and consistent approach to our operations (with the exception of South Australia).

In addition, in our experience, it is a framework that has worked effectively and we are not aware of any significant or structural issues with the Code or its application.

We would be happy to discuss this letter with the ACCC. In the interest of transparency, Charter Hall is a member, and Director, of the SCCA.

Yours sincerely

CHARTER HALL RETAIL MANAGEMENT LIMITED


Scott Dundas
Fund Manager


Greg Chubb
Group Executive - Retail