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25 August 2017

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

And by email: adjudication@acc.gov.au

Dear Mr Channing

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

We are writing to support the application made to the Australian Competition and Consumer Commission (ACCC) by the Shopping Centre Council of Australia (SCCA) seeking re-authorisation of the Casual Mall Licensing Code of Practice.

QIC is a member of SCCA and strongly supports their application for reauthorisation of the Code for a further five years from expiration (to end December 2022).

QIC's Global Real Estate division (QICGRE) owns or operates more than 20 shopping centres across Australia.

The practice of casual mall licensing is an important and longstanding component of our shopping centre operations. It provides variety and choice for customers, adds to the vibrancy and dynamism of our centres, facilitates competition, and provides opportunities for retailers to test concepts and maximise sale and seasonal opportunities.

Critically, the Code provides for the balanced, consistent and certain management of casual mall licensing within our centres. This is important for QICGRE and the thousands of permanent retail tenancies within our centres.

There is wide familiarity with the Code and its application across our business and we are keen to achieve consistency and continuity in the application of the Code through a subsequent authorisation period.

We urge the ACCC to positively consider the SCCA's application for reauthorisation.

Yours sincerely

Blazenka Jurin
Head of Property Management – GRE