

Dexus Funds Management Limited
ABN: 24 060 920 783
AFSL: 238163

Level 25, Australia Square
264-278 George Street
Sydney NSW 2000

0290171346
0412340246
tim.phillips@dexus.com
dexus.com



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

And by email: adjudication@accc.gov.au

25 August 2017

Dear Mr Channing,

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

Dexus Property Group (Dexus) are a member of the Shopping Centre Council of Australia (SCCA) and represent ownership interest in, and manages, a number of Regional and Sub Regional Shopping Centres throughout Australia. We are writing to support the application made on our behalf by the SCCA on 25 July 2017 for re-authorisation of the Casual Mall Licensing Code A91591 & A91592

Casual mall licensing is a key aspect of successful shopping centre operations, and facilitates a great range of goods and services, and competition, over and above our permanent tenant mix, to the customers of our shopping centres. The Casual Mall Licensing Code, first authorised in August 2007, and subsequently reauthorised in 2013, provides a longstanding and appropriate framework to manage casual mall licensing across the shopping centre industry and importantly it provides a method of resolving any disputes that may arise between the landlord and the permanent tenants of the shopping centres. Since the introduction of the Code the disputes have been reduced substantially largely due to the guidelines contained in the Code. In addition, a national Code also enables efficiency and harmonisation across the various States and jurisdictions.

The current authorisations expire on 31 December 2017 and the SCCA application seeks reauthorisation for a further five years, to end December 2022. Dexus urge the ACCC to re-authorise the Code to ensure its continuation beyond 31 December 2017.

Sincerely,

A handwritten signature in blue ink, consisting of a stylized, cursive 'T' followed by a long, sweeping horizontal stroke that ends in a small upward flick.

Tim Phillips

Head of Shopping Centre Management & City Retail