

23 August 2017

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

By email: adjudication@accc.gov.au

Dear Sir

Re: A91591 & A91592 – Shopping Centre Council of Australia - submission

We are writing in support of the application by the Shopping Centre Council of Australia for authorisation of the Casual Mall Licensing Code of Practice (**CML Code**), and request that the Australian Competition and Consumer Commission reauthorises the CML Code to ensure its continuation beyond 31 December 2017.

Casual mall licensing is a key aspect of successful shopping centre operations, facilitating a greater range of goods, services and competition in shopping centres thereby improving the diversity and value of the offering to customers.

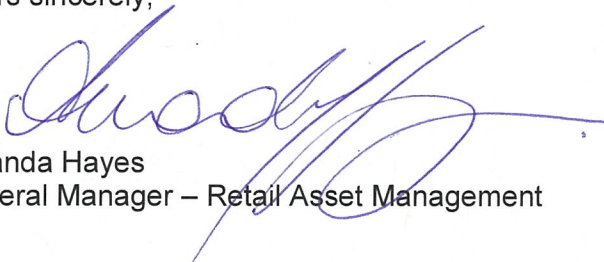
The CML Code has provided a longstanding and consistent framework to manage casual mall licensing and streamline the interactions between landlords, tenants and licensees. That consistent framework has helped to reduce the amount of disputes between stakeholders by standardising the approach to casual mall licensing, and reducing the potential disruption to permanent tenants in shopping centres.

In addition, as a national instrument, the CML Code has improved efficiency by harmonising casual mall licensing in shopping centres across all jurisdictions, benefitting not only landlords, but tenants and licensees alike.

We request that the Australian Competition and Consumer Commission has regard to our submissions when considering the application to reauthorise the CML Code for a further five years until 31 December 2022.

We look forward to following the progress of the application. Please do not hesitate to contact me if you have any questions or require any further information.

Yours sincerely,



Amanda Hayes
General Manager – Retail Asset Management