

21 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 (“SCCA Application”) – interested party consultation

Vicinity Centres PM Pty Ltd, trading as ‘Vicinity Centres’ (**‘Vicinity Centres’**) is a member of the Shopping Centre Council of Australia (**“SCCA”**) and is one of Australia’s leading retail property groups with a fully integrated asset management platform. Listed on the Australian Securities Exchange, Vicinity Centres owns \$15.5 billion of retail assets and manages some \$25.3 billion in assets across the full retail asset spectrum.

Casual mall licensing is a key aspect of successful shopping centre operations. It facilitates a great range of goods and services and competition to the customer.

In our view, the Casual Mall Licensing Code of Practice (**“Code”**) provides a longstanding and appropriate framework to manage casual mall licensing and enables efficiency / harmonisation across jurisdictions on a national basis.

Accordingly, Vicinity Centres supports the SCCA Application and urges the ACCC to re-authorise the Code to ensure its continuation beyond 31 December 2017.

Yours sincerely



Justin Mills
Executive General Manager - Shopping Centre Management