

Please quote: CTS 24903/17  
Contact officer: Ms Maree Adshead  
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Department of  
Tourism, Major Events,  
Small Business and the  
Commonwealth Games

12 SEP 2017

Mr Darrell Channing  
Director, Adjudication Branch  
Australian Competition and Consumer Commission  
GPO Box 3131  
Canberra ACT2601

Dear Mr Channing

Thank you for the opportunity to comment on the Shopping Centre Council of Australia's application for re-authorisation in relation to the Casual Mall Licensing Code of Practice (the Code).

In my role as the Queensland Small Business Champion, I have had a number of issues raised with me regarding the Code's impact on small retail businesses. These issues include the Code's voluntary nature, that signatories to the Code may not necessarily comply with its provisions, and that further clarification of the Code's provisions would enhance its application.

Queensland is home to over 414 000 small businesses, almost 20 percent of all small businesses in Australia. These businesses employ 44 percent of Queensland's private sector workforce, and make a major contribution to the state's economy (in the order of \$110 billion per year). Ensuring a strong, effective regulatory environment is key to helping these businesses thrive and continue making such a significant contribution to our economy.

As part of this regulatory environment, an effective and appropriately applied Code is in the interests of Queensland's more than 24 000 small retail businesses, and the economy more broadly. I therefore urge the Australian Competition and Consumer Commission to conduct extensive consultation to ensure the impacts of the Code upon small business retailers are adequately evaluated and considered.

Should you wish to discuss this matter further, please do not hesitate to contact me at [smallbusiness.champion@dtresb.qld.gov.au](mailto:smallbusiness.champion@dtresb.qld.gov.au).

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Yours sincerely

A handwritten signature in black ink, appearing to read 'Maree Adshead', written in a cursive style.

Maree Adshead  
**Queensland Small Business Champion**