



Australian
Retailers
Association



The Pharmacy
Guild of Australia



Restaurant
& Catering

14 October 2020

Ms Danielle Staltari
Director
Adjudication Branch
Australian Competition & Consumer Commission
GPO Box 3131
CANBERRA ACT 2601

By email: adjudication@accc.gov.au

Dear Ms Staltari,

Shopping Centre Council of Australia - AA1000529 - Submission

We are writing to provide our collective support for the Shopping Centre Council of Australia's (SCCA) application for the reauthorisation of the Casual Mall Licensing Code of Practice for a ten year period, until 31 December 2030.

1. The effectiveness of the Code and the CAC's operation since 2017

The CAC has proven to be a productive forum for parties to engage on relevant issues in relation to the Code and its administration.

2. The effect of operational changes, including increased retailer representation on the CAC and the appointment of an independent Chair.

To ensure parity continues, we are supportive of the increased retailer representation and the appointment of an independent Chair to the CAC.

3. The likely public benefits and public detriments of the Code.

The Code provides an opportunity for retailers of all sizes, to participate in using mall sites for clearing excess stock in an orderly fashion for such events or to participate in a centre-wide promotion for a special event. We do not see any detriment to the public from the application of the Code.

4. Whether 10 years is an appropriate period for reauthorisation.

We are supportive of a 10 year reauthorisation period of the Code and the efficiencies that this presents in terms of preparing applications and submissions.



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5. Your experiences with the dispute resolution process provided by the Code.

We are not aware of any issues arising in respect of the Casual Mall leasing code in the past three years.

6. Any other aspect of the Code.

N/A

Please do not hesitate to contact any of the undersigned should you wish to discuss this further.

Yours sincerely,



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