

SCENTRE GROUP

23 December 2020

Ms Danielle Staltari
Director
Competition Exemptions
Australian Competition and Consumer Commission
GPO Box 3131
CANBERRA ACT 2601

By Email: exemptions@accc.gov.au

Dear Ms Staltari

Shopping Centre Council of Australia– AA1000529 - Submission

We refer to your letter of 3 December 2020 and to the Shopping Centre Council of Australia's (**SCCA**) application for re-authorisation (**Application**) of the Casual Mall Licensing Code of Practice (**Code**).

Scentre Group supports the Application, and thanks the ACCC for giving us the opportunity to make this submission.

Casual Mall Licensing

Scentre Group shares the SCCA's views on casual mall licensing, in particular:

- casual mall licensing is important to the success of our shopping centres;
- casual mall licensing facilitates a great range of goods and services to, and competition for the benefit of, the consumer; and
- the Code provides a longstanding and appropriate framework to manage casual mall licensing, and as a national Code also enables efficiency / harmonisation across jurisdictions.

Scentre Group regards casual mall licensing as a vital incubator for new Australian retailers. It allows new retailers to test their product, and enhance their skills, in a low cost and flexible environment. As such, it provides an innovation pathway for new entrants.

Casual mall licensing adds to the vibrancy of our shopping centres and has been a success story for not only the Australian shopping centre industry, but also for many retailers and the consumer.

One measure of the Code's success is the de minimis level of disputes that have arisen under the Code. Where they do arise, the Code's dispute resolution provisions provide an efficient, informal and low cost method of dealing with them.

SCENTRE GROUP

Length of Authorisation – Support for the ACCC's Proposal

Scentre Group believes that, given the length of time that the Code has been in operation (13 years – after having been authorised in 2007, and re-authorised in 2013 and 2017), the Code is mature and does not require another short term authorisation period.

Accordingly, Scentre Group supports the ACCC's proposal to grant re-authorisation of the Code for 10 years.

If you would like to discuss our submission further, please do not hesitate to contact me on (02) 9358 7730.

Yours sincerely,
Scentre Group Limited



Paul Giugni
General Counsel