

Mr. Graeme Watts,
Principal Compliance Officer Retail Trading
Automotive, Marine and Trading Hours Branch
Department of Commerce
Locked Bag 14, Cloisters Square
Perth WA 6850

23rd August 2016

Dear Mr. Watts,

Re: 2016 Christmas Trading Extensions Perth Metropolitan Area

The Property Council of Australia welcomes the opportunity to provide comment on the Department of Commerce's review of Christmas Trading hours.

The Property Council of Australia is the peak industry body for the property development and investment sectors in WA. In regards to the proposed Christmas trading extensions for the Perth Metropolitan area, The Property Council's members include major retail property owners and managers who will be impacted by the proposed changes.

Christmas and New Year is the most important period of the year in the retailing calendar and many businesses would struggle to meet annual budgets if a poor Christmas and New Year season was encountered. It is therefore very important that the provision of special trading hours in this period is optimally structured to suit the retailing marketplace, including centres, retailers and consumers.

From the consumer perspective it is the experience of our members that as Christmas approaches, there is widespread uncertainty over the extended trading hours. This creates confusion and frustration for customers and often leads to a loss of revenue for small businesses and retailers. Furthermore, shopping centres and individual retailers devote significant resources to advertising these special hours to ensure customers understand them.

Recommendations

The Property Council would like to put forward the following recommendations:

- **Weekdays - 7am-9pm (instead of the normal 8am-9pm),**
- **Saturdays - 7am-9pm (instead of the normal 8am-5pm), and**
- **Sundays – 8 am-6pm on Sundays and public holidays (instead of the normal 11am-5pm),**
- **The Department of Commerce expedite their decision**

The Property Council recognizes the great economic and social benefits that extended trading hours can bring, particularly in the Christmas period. The recommendations put forward will bring flexibility for consumers, individual retailers and shopping centres and make it easier for them to know exactly when the shops are going to be open through the holiday period.



It is critical that the Department of Commerce expedite their decision to give consumers, individual retailers and shopping centres the greatest amount of time to understand, prepare and advertise the extended trading hours.

The Property Council is appreciative of the opportunity to comment on the Department of Commerce's proposals on Christmas trading extensions for the Perth Metropolitan area. We look forward to continuing our dialogue regarding the key recommendations outlined in this submission.

Kind regards,

A handwritten signature in black ink, which appears to read "L. Iacomella". The signature is fluid and cursive.

Lino Iacomella

Executive Director