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PPT Manager Limited  
ABN 37 054 494 307



**Centro™**  
Properties Group

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ARSN 091 043 793

24 September 2007

The Better Regulation Office  
GPO Box 5341  
SYDNEY NSW 2001



Dear Sir / Madam,

### Reform of Shop Trading Hours in NSW

Centro Properties Group is a retail investment organisation specialising in the ownership, management and development of retail shopping centres. Centro manages both listed and unlisted retail property and has an extensive portfolio of shopping centres across Australia, 210 in total. With funds under management now exceeding \$26.6 billion. Centro Properties currently has 25 retail shopping centres within NSW.

Centro Properties Group strongly supports the reform of shop trading hours in NSW.

The present system of regulation, which retains controls over Sunday and public holiday trading hours is complex and confusing and as a result many retailers are probably unwittingly trading on Sunday in breach of the law.

We believe restrictions on Sunday trading should be removed, as they were removed for Monday to Sunday trading nearly 20 years ago. This would bring the law in NSW into line with that of Victoria, Tasmania, the Australian Capital Territory and the Northern Territory. This would also remove confusion among retailers.

On public holiday trading we consider it exceptional that NSW restricts trading on more public holidays than all other States and Territories, except the highly regulated States of South Australia and Western Australia. We believe the Government should also remove restrictions on public holiday trading (as in the ACT and Northern Territory). You will be aware that in these Territories large shops and shopping centres voluntarily close on Christmas Day, Good Friday and on the morning of Anzac Day. Alternatively the Government could adopt similar legislation to Tasmania and remove restrictions on trading hours on all but those 2 ½ days. Either approach would provide greater clarity and certainty for retailers, consumers and retail property owners.

Centro Properties Group is a member of the Shopping Centre Council of Australia and endorses the more comprehensive submission and recommendations made by the SCCA on this matter.

Yours sincerely,  
Centro Properties Group

**PETER TURNER**  
**NSW STATE MANAGER**

cc John Pearce – National Property Manager (Centro Properties Group)

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