



15 November 2016

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To Whom It May Concern

LGAQ Submission Queensland Trading Hours Review

The Local Government Association of Queensland (LGAQ) is the peak body representing the states 77 councils who are all members of the Association.

The LGAQ welcomes the opportunity to make verbal and written submissions to the Inquiry. Our submission is shaped by a number of resolutions passed over the past decade at our Annual Conference and following recent discussions with a number of potentially affected councils.

We believe that Chapter 3 of the Inquiry's Issues Paper properly canvasses the range of options available to the State Government - indeed overall it's an excellent paper. That said, the LGAQ categorically rejects a fully deregulated model for trading hours on the grounds that it is not in the public interest and in the medium to longer term would expose many rural towns to either monopolistic behaviour or predatory pricing ie any efficacy for consumers would be outweighed by the loss of competition and deleterious effects on the social fabric of those towns.

A number of councils have made submissions to the QIRC along those lines in individual trading hours hearings over the past 18 months. Those submissions go beyond the purely economic and highlight the impact on social, sporting and cultural impacts in those country towns that a fully deregulated trading environment would bring about. I especially refer you to the Western Downs Council excellently researched Paper to the most recent Trading Hours hearing for that community. Furthermore we especially note the submission of the Goondiwindi Co- operative to a QIRC hearing in 2016 wherein it stated that it had returned \$5m dollars over the past decade to old people's homes, sporting and charitable bodies in that community. Moreover, that community dividend would cease immediately upon the commencement of a fully deregulated trading hour environment in that community.

All that said the LGAQ acknowledges the many anomalies highlighted in the Inquiry's Issues Paper and therefore supports a harmonisation of arrangements, especially within kindred undertakings and supports further refinement of existing definitions of what constitutes exempt or independent retail shops. We favour a model where trading hours are set in legislation and subject to automatic seven year review, and which also limits the order making power of the QIRC. Such a change would give certainty to small operators and relieve them of the considerable personal and financial costs of being represented in the QIRC at regular interviews, yet protect the State's broader interests by providing for a seven year review. Thank you once again for the opportunity to make a submission.

Yours sincerely

Greg Hallam PSM
CHIEF EXECUTIVE OFFICER