

22 January 2016

Department of Economic Development, Jobs, Transport and Resources
GPO Box 4509
MELBOURNE VICTORIA 3000

ATTN: Ms Barbara Cullen – A/Director, Small Business Victoria

Dear Ms Cullen

Impact of the 2015 AFL Grand Final Public Holiday

Thank you for the opportunity to provide feedback on the introduction of two new public holidays in Victoria in 2015, being AFL Grand Final Friday and Easter Sunday.

The Shopping Centre Council of Australia (SCCA) represents Australian’s major owners, managers and developers of shopping centres. In preparing this submission, we have held discussions with the Australian Retailers Association (ARA) and have viewed their submission. We generally support the comments outlined in their submission.

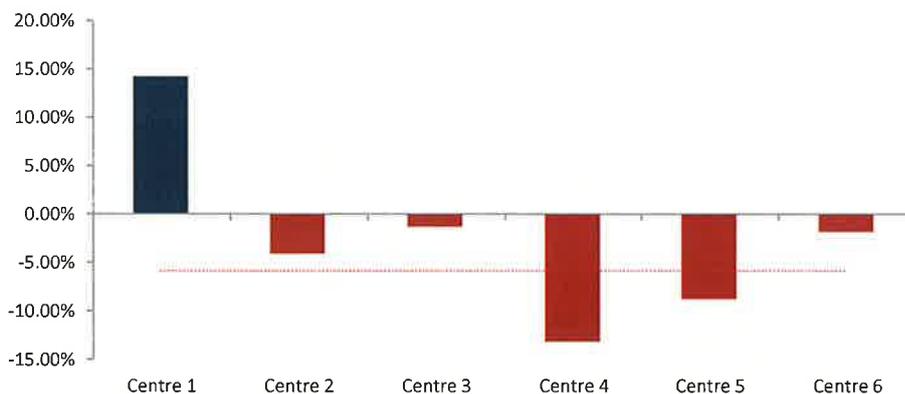
The SCCA provided a submission, dated 5 August 2015, in response to the *Regulatory Impact Statement on proposed new public holidays in Victoria*. While we acknowledged it was an election commitment, we did not support the gazettal of the two additional public holidays. In general terms, we expressed concern that this action would raise the possibility that shops may remain closed on what would otherwise be busy trading days. This would be to the detriment of retailers and customers. We also noted the views of the Productivity Commission, and the outcomes of other relevant reviews, which have made recommendations cautioning against the designation of additional public holidays by jurisdictions.

We continue to urge the Government to abandon the additional public holidays.

In the interest of the Government making an informed judgement as to the future of the AFL Grand Final public holiday, we obtained data and feedback from various SCCA members. The following analysis is from a number of shopping centres across metropolitan and regional locations in Victoria.

This analysis shows that there was a drop in customer foot traffic across the centres of close to 6% (2015 v 2014). Only one centre in this sample (Centre 1, as per below) experienced an increase in foot traffic on AFL Grand Final Friday.

Victorian Shopping Centre Trading
AFL Grand Final Period - Change in Foot Traffic 2015 vs. 2014



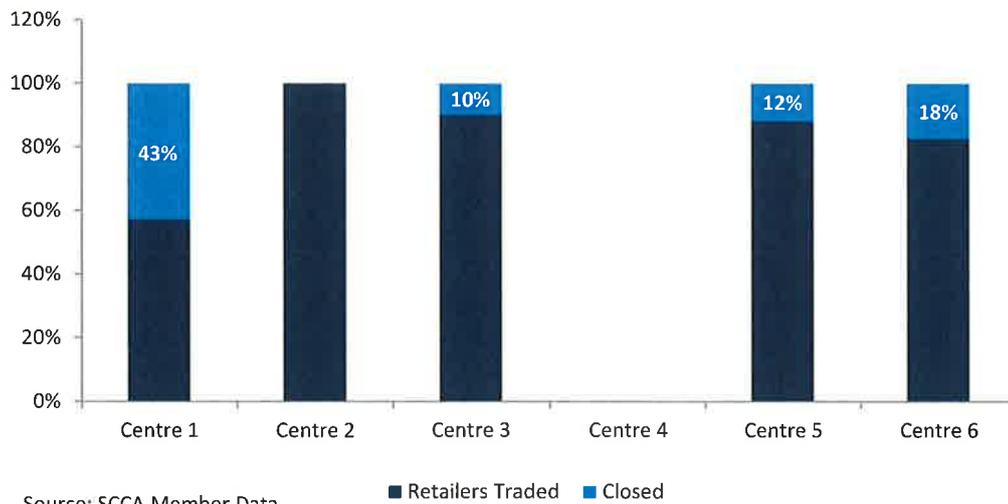
Source: SCCA Member Data

----- All Centres

Further member case studies provided detailed that at one centre there was a less than a 1% difference in foot traffic between Grand Final Friday in 2014 and 2015, and an even smaller impact when the three days of the weekend (Friday Saturday and Sunday) were considered together ie. there was only a very minor drop in visitation over the whole weekend. However, at another centre, there was over a 15% drop in foot traffic on AFL Friday when compared to 2014.

Analysis of retailer participation indicates that there was not a consistent impact across centres, with one centre having 100% of retailers open (Centre 2), with 43% of retailers in another centre (Centre 1) deciding not to opening (interestingly, Centre 1 was the only centre with an increase in foot traffic year to year, as per above).

Victorian Shopping Centre Trading
AFL Grand Final Period - Retailer Take-Up Rate



Our analysis and associated case studies suggests that, generally speaking, fewer people chose to visit shopping centres on AFL Grand Final Friday and that some retailers, although be it a minority of retailers, decided not to open. Feedback we received suggested this was due to concerns about lack of customers and higher wage rates. While it is possible that any reduction in customer foot traffic was made up across the weekend through increased visitation on Thursday night, Saturday and Sunday, there is no guarantee that the dispersal of foot traffic resulted in equalised retail sales over the weekend. Further advice on this point is best gained from the retailer associations.

We trust this information will assist the Government fully assess the benefits and impacts of the AFL Grand Final Friday public holiday. We would be pleased to meet with Small Business Victoria to discuss this and other member feedback if this would be helpful.

Please contact me on 02) 9033 1902 or at anardi@scca.org.au to discuss this letter. Alternatively, please contact the SCCA's Senior Adviser, Kristin Pryce, on 02) 9033 1941 or at kpryce@scca.org.au.

Yours sincerely,

A. Nardi 22.1.2016

Angus Nardi
Executive Director