

20 February 2006

The Proper Officer  
Regulation Review  
Independent Pricing and Regulatory Tribunal  
PO Box 290  
QVB Post Office  
NSW 1230

Dear Sir/Madam

## Review of Trading Hours New South Wales

We are writing to express our opposition to the current regulation of trading hours in New South Wales and to request total deregulation.

The GPT Group is one of Australia's largest listed property groups with assets of over AUD\$9 billion (in New South Wales alone assets of over AUD\$4 billion) and an investor base of over 45,000. GPT's assets include quality investment properties located around Australia in the retail, office, industrial and hotel/tourism sectors.

We are a member of the Shopping Centre Council of Australia as well as the Property Council of Australia.

We find the current system of regulating trading hours on Sundays to be burdensome. There appears to be a great deal of uncertainty when public holidays approach as to whether or not retailers can open for trade. This in turn creates problems in the marketing of our centres' trading hours for public holidays. The fact that the Ministerial Order permitting trading on Australia Day 2006 was gazetted a month before the actual day exemplifies the difficulties the current system causes (this left a short time period for centre management and retailers to organise staff rosters).

We have also found that confusion arises when the New South Wales regulations require the closure of shops on certain public holidays when the same retailers are permitted to trade in other states on the same day.

It is our belief that removing all restrictions would free the Department of Commerce of a significant administrative cost each year as well as providing certainty for retailers and shopping centres.

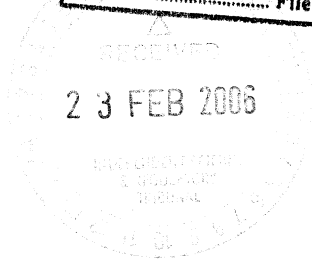
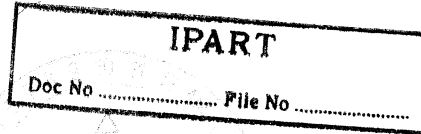
We note that trading hours in the ACT and Northern Territory are completely deregulated and in Victoria and Tasmania restrictions now only apply on Christmas Day, Good Friday and Easter Sunday.

Yours faithfully,  
THE GPT GROUP



**Mark Fookes**  
**Head of Retail**

c.c. Milton Cockburn, Executive Director  
Shopping Centre Council of Australia



GPT RE Limited  
ABN 27 107 426 504  
as Responsible Entity of  
General Property Trust  
AFSL 250126

Level 52  
MLC Centre  
19 Martin Place  
Sydney NSW 2000  
Australia

Telephone  
61 2 8239 3555  
Facsimile  
61 2 9225 9318

GPT Securityholder  
Service Centre  
Freecall  
1800 025 095

[gpt@gpt.com.au](mailto:gpt@gpt.com.au)  
[www.gpt.com.au](http://www.gpt.com.au)