

15 February 2022

Mr Riccardo Rivera
Principal Legal Officer, Strategic Policy
Department of Justice and Attorney-General
GPO Box 149
Brisbane, QLD 4001

via email: riccardo.rivera@justice.qld.gov.au

Dear Mr Rivera

RE: WORKING DRAFT OF THE PROPERTY LAW BILL

The Australian Retailers Association (ARA) welcomes the opportunity to contribute to the Queensland Government's targeted stakeholder consultation into the new Property Law Bill. Our interest in this consultation is in Part 9 – Leases of the draft Bill.

The ARA is Australia's oldest, largest and most diverse industry retail body representing two-thirds of a \$360 billion sector that employs 1.3 million Australians. Our members have over 100,000 shopfronts and online stores around the country and operate in all retail categories - from food to fashion, hairdressing to hardware, and cosmetics to computers. In addition to our large national members who have extensive store networks across Queensland, we have 1,000 small and medium sized members in your state.

Further to correspondence with the Premier in January of this year, the ARA acknowledges the work of the Queensland Government to support the retail sector over the past two years, particularly through implementation of the *National Cabinet Leasing Code of Conduct* that provided rental relief and protections for commercial tenants in the first year of the Covid-19 pandemic.

While rental relief schemes have been extended in New South Wales and Victoria, we note that the Queensland regulation enabling the Code lapsed in 2020 and remains inactive. We believe that this Bill provides a unique opportunity for Queensland to enshrine these protections into legislation that will prevail beyond the pandemic.

Given the technical nature of the consultation, other stakeholders would be better placed to respond to the 22 queries raised in Part 9 of the Bill. However, we would make a general point about the effectiveness of the Code in supporting our sector through the worst of the pandemic and believe that the need for similar relief packages, in response to future market shocks, should be contemplated in the drafting of this Bill.

Kind regards,



Chief Executive Officer

CC: imelda.bradley@justice.qld.gov.au