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Ms Kim Richards
Member for Redlands
Chair
Education, Employment and Training Committee
Parliament House
BRISBANE QLD 4000

15 October 2021

Dear Ms Richards

I attach The Mckell Institute Queensland's submission to the your Parliamentary Committee's current inquiry into the Trading (Allowable Hours) Act 1980.

The Mckell Institute, as you may well be aware, is an independent public policy thinktank dedicated to developing practical and innovative solutions to the public policy problems of our time.

Our primary areas of specialisation are economic policy, industrial relations and inequality.

Either I or another member of The Mckell Institute team would be happy to give evidence to the committee in order to elaborate on our submission should the committee so desire.

We thank the committee for its work on this important issue.

Yours sincerely

Hon Rachel Nolan
Executive Director



T H E M C K E L L I N S T I T U T E

Submission into the Queensland Parliament's Inquiry
into the Operation of the *Trading (Allowable Hours)*
Act, 1990

Edward Cavanough & Rachel Nolan

October 2021

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About this Submission

This submission was prepared by the McKell Institute for the consideration of the Queensland Parliament's Education, Employment and Training Committee as it reviews the 2017 trading hours reforms passed by the Palaszczuk Government.

This submission reflects a suite of research the McKell Institute has conducted on trading hours reform in Australia, including:

- Proceed With Care (2016)
- High Risk, Low Reward (2018)

About the McKell institute

The McKell Institute is a progressive research institute dedicated to providing practical and innovative solutions to contemporary policy challenges. www.mckellinstitute.org.au

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Introduction

In 2017, the Queensland government legislated the *Trading (Allowable Hours) Act 2017*, partially deregulating some elements of the state's trading hours. The legislative change followed a review conducted by the Hon John Mickel which received submissions urging deregulation from a range of interest groups including the National Retailers' Association.

Proponents of deregulation argued that more flexible hours would lead to an increase in retail expenditure and employment. At the time, the McKell Institute also produced a report which was submitted to the review. In *Proceed With Care*, the Institute noted that the various arguments put forward in favour of deregulation were often speculative, and that deregulation often favoured larger retailers in preference of smaller, community based retail outlets, which have seen a declining market share in recent years.

It is demonstrated that there has been moderate growth in trade and jobs. Concerningly, however, the number of small retailers continues to decline, demonstrating a shift in market share away from small community owned businesses towards major retailers.

In Part 1, this report then explores the 2017 changes and their effects, finding that employment hasn't been significantly improved, and that small retailers continue to dwindle. This report also examines in detail the Special Events Clauses of the 2017 changes, which allow local communities to deregulate their trading hours when a special event is happening in the town. Ultimately our analysis demonstrates that the local deregulation resulting from these events hasn't resulted in any demonstrable employment gains.

In Part 2, this submission explains why any further efforts to deregulate trading hours should be resisted. It explains that deregulating trading hours will not increase aggregate demand in retail, will not be sufficient to reverse a broader trend towards online retailing, and that the strong performance of Queensland's economy during the pandemic reflects no need to further liberalise trading hours.

Importantly, this submission presents polling data commissioned specifically for the Queensland Parliament's consideration. The poll of 402 Queenslanders conducted between October 8 and 12, 2021 finds there is very little public support, nor demonstrable public need, for a significant liberalisation of Queensland's trading hour regime. Further, most Queenslanders are unaware that their local shops may be open for extended hours during special events. Simply, there is little appetite or expectation amongst Queenslanders for a liberalisation of the state's trading hour regime.

Key Findings

1. Since trading hours were partially deregulated in 2017, Queensland job growth in retail, and the overall economic activity in retail, has been on the same trendline as prior to the reforms, reflecting no statistically significant impact on overall employment figures since the reforms.
2. Deregulation of trading hours around special events has not improved local employment outcomes. In each of the local areas where exemptions to trade longer hours have been granted around major events, there has been no discernible improvement in local employment outcomes.
3. The number of small retailers in Queensland has declined from above 13,000 in 2015 to under 10,000 in 2019. This reflects a growing concentration of the retail market in Queensland by larger retailers.
4. Section 5 of the *Trading (Allowable hours) Act 2017*, which enables special exemption status to be granted around 'special events', is extremely broad. As it is currently worded, the special events status can be readily granted in a broad range of circumstances and is rarely rejected. The Queensland Government should consider strengthening Section 5 of the act to provide more specificity over which events can enable special exemption status to be granted.
5. There is no demonstrable public appetite for further trading hours reform in Queensland. The polling found that:
 - 66 per cent of Queenslanders felt their local shops' trading hours were 'about right'.
 - 75 per cent of Queenslanders had no need to shop outside of existing trading hours in the week they were surveyed.
 - 65 per cent of Queenslanders were not aware that shops are open for longer hours during special events.
 - 59 per cent believed the existing trading hours 'achieve the right balance for consumers'.

Part 1: The Impact of the 2017 Reforms

1.1: An Overview of the 2017 Reforms

In 2017, the Palaszczuk Government passed the *Trading (Allowable Hours) Act 2017*, which was Queensland's largest reform of trading hours since the 1990s.

The *Trading (Allowable Hours) Amendment Act 2017* (Qld) was enacted to reduce existing restrictions on retail trading hours.¹ The changes broadened the number of shops in Queensland that have "exempt" status, which means that they have unrestricted trading hours. In addition, those 'non-exempt' shops were allowed more trading hours, varying based on geography. See **Appendix 1** for a table the status of trading hours under the 2017 changes.

In the lead up to these changes, McKell released '*Proceed with Care*,² urging caution in regard to liberalisation. The report contained two central warnings. First it was predicted that retail employment was unlikely to increase. Second, the McKell Institute warned that the changes may lead to a decrease in the number of small retailers in the economy.

The 2017 changes require a review of the effectiveness of the Act within 5 years from commencement. That means a review must be completed before 31 August 2022.³

1.2: Queensland's Retail Performance Since the 2017 Reforms

Since the passage of the 2017 reforms, Queensland's retail sector has continued to grow on a similar trendline evident prior to the reforms. As Figure 1.1 shows, overall spending in Queensland's retail sector has risen at a steady and consistent pace over the past decade, with no notable deviation from that trajectory until the COVID-19 pandemic. Despite recording a notable drop in overall consumption during the early phases of the pandemic, Queensland's retail sector has largely recovered, returning to the growth trajectory that was evident prior to the pandemic. Notably, there was no significant uptick in retail consumption in Queensland after the passage of the 2017 reforms.

Figure 1.1: Retail spending in Queensland 10 years to August 2021

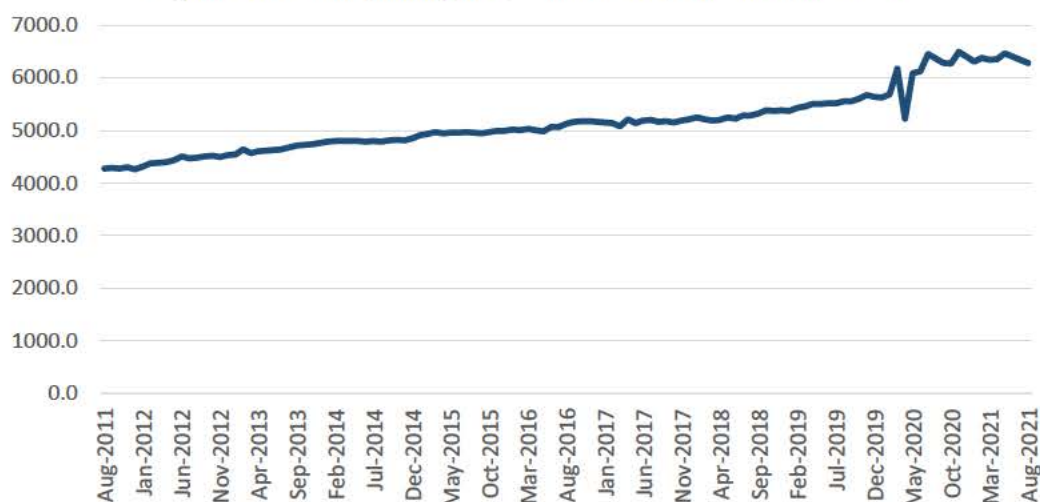
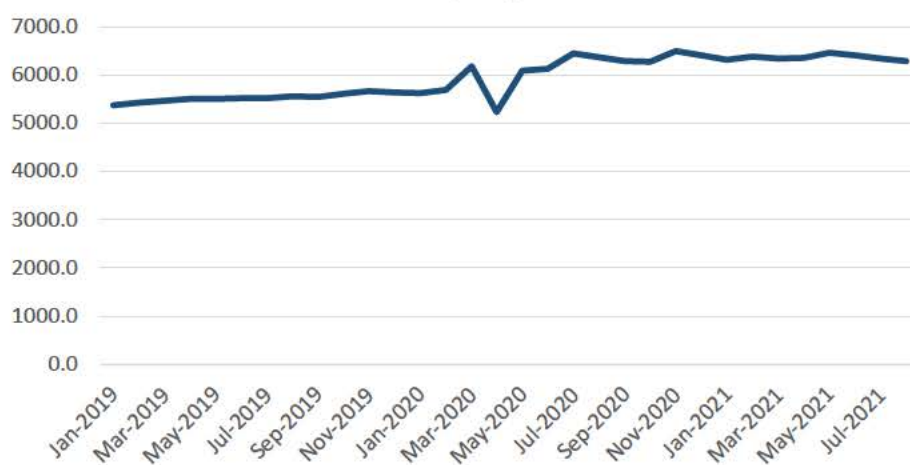


Figure 1.2: Steady growth of Queensland retail spending evident, even during the pandemic

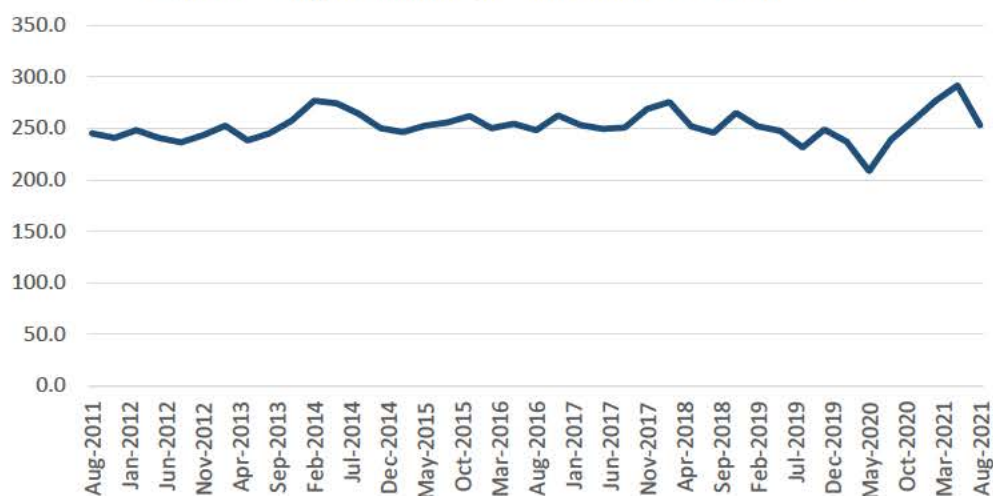


Overall, retail trade in both Australia and Queensland has followed a gentle trajectory upwards, expanding over time. The growth in retail trade however covers all retail, including online shopping and the growth of large multinational retailers in Queensland and Australia.

Retail employment growth has been modest, growing marginally since the pandemic

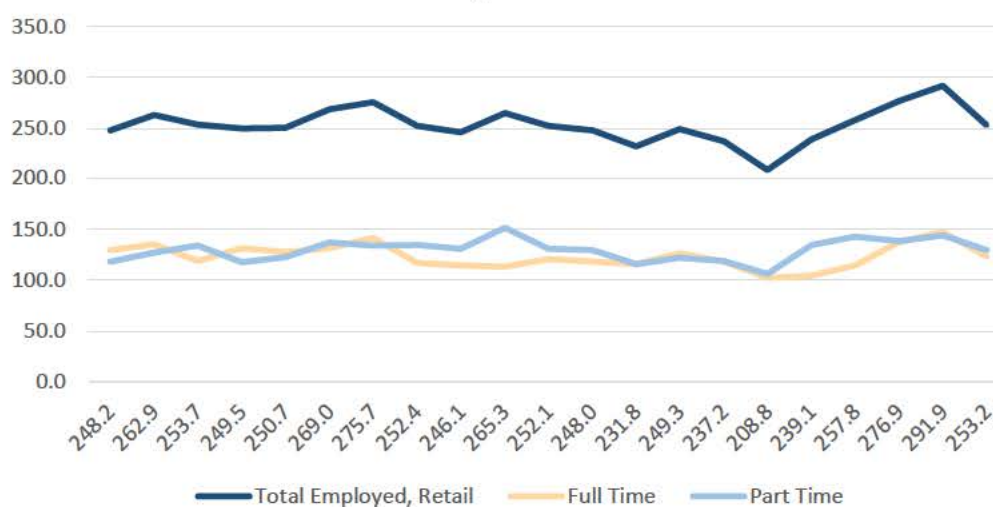
Growth in retail employment in Queensland has been modest over the past decade. As of August 2011, there were 241,000 Queenslanders employed in retail, while as of August 2021, there were 253,000 Queenslanders employed in retail. This comes despite a steady increase in overall demand in retail over the corresponding period. It is likely that the lack of directly correlation between the increase in demand in retail and job creation is associated with an increase of automation within the sector, with fewer workers needed to perform each job function resulting from the widespread adoption of automated technologies.

Figure 1.3: Employment in Queensland Retail, 10 Years to 2021



The pandemic did, however, alter this dynamic slightly. A sharp rise in demand on the back end of 2020 resulted in a spike in employment in retail in Queensland.

Figure 1.4: Employment in Queensland retail industry, two years to August 2021



These trends in Queensland follow the trends in Australia generally. Retail jobs have been stagnant since 2007, with no significant growth or decline, irrespective of the trading hours regimes in place within jurisdictions.

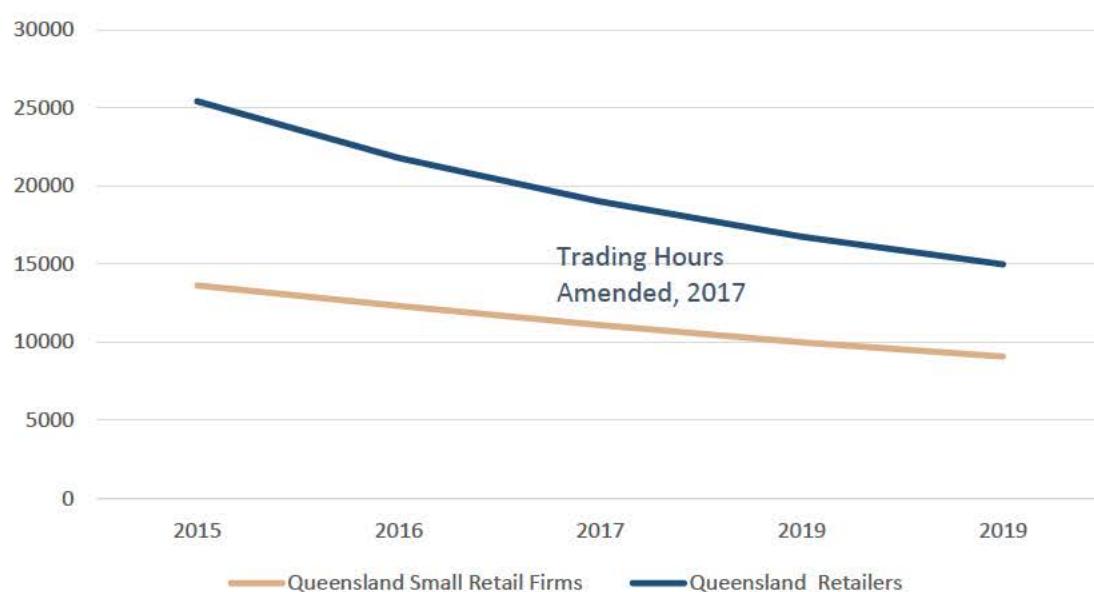
Small retailers in Queensland have continued to decline since 2017.

Between June 2015 and June 2019, the survival rate for small retailers in Queensland was a mere 64%. There were 8206 small retailers in June 2019, a significant decline from 2015 where the total number exceeded 13,000.

As stated in McKell Institute's 2017 report, an increase in retail spending combined with a decreasing number of small retailers, means that Australia is witnessing a concentration of the market. For example, in grocery stores – the large supermarkets are further encroaching on the market share of smaller groceries each year. Since March 2006, the market share of small groceries in Australia has dropped from 13.8% to 9.1%.⁴ Meanwhile the combined share of Woolworths, Coles and Aldi continues to grow.

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Figure 2.4: Number of Queensland Retail Firms, Total and Small, 2015-2019



1.3: The Special Events provision in 2017 trading hours reforms has led to little job creation

The adjustments have focused on ‘special events’

Additionally, the 2017 legislation introduced a provision whereby regulated retailers could be granted an exemption from trading hours restrictions for a short time on the basis of a local special event.

The legislation provided for examples of such special events that would qualify - such as the *2018 Commonwealth Games*. However, the provisions have general terms, which make for a wide array of potential applications, regardless of the size of the event. Since enactment, 10 applications have been made to the Queensland Industrial Relations Commission. Of these 10 applications made, 9 have been approved.

For example, the National Retail Association Limited applied for an exemption for the Ayr/Burdekin Annual Show in June 2019. The Queensland Industrial Relations Commission approved the application, allowing for the businesses in the area to relax their trading hours.⁶ The Tribunal agreed with the argument that the relaxation would “benefit local main street businesses as it allows them to “trade and draw visitors into the business region throughout the day”.

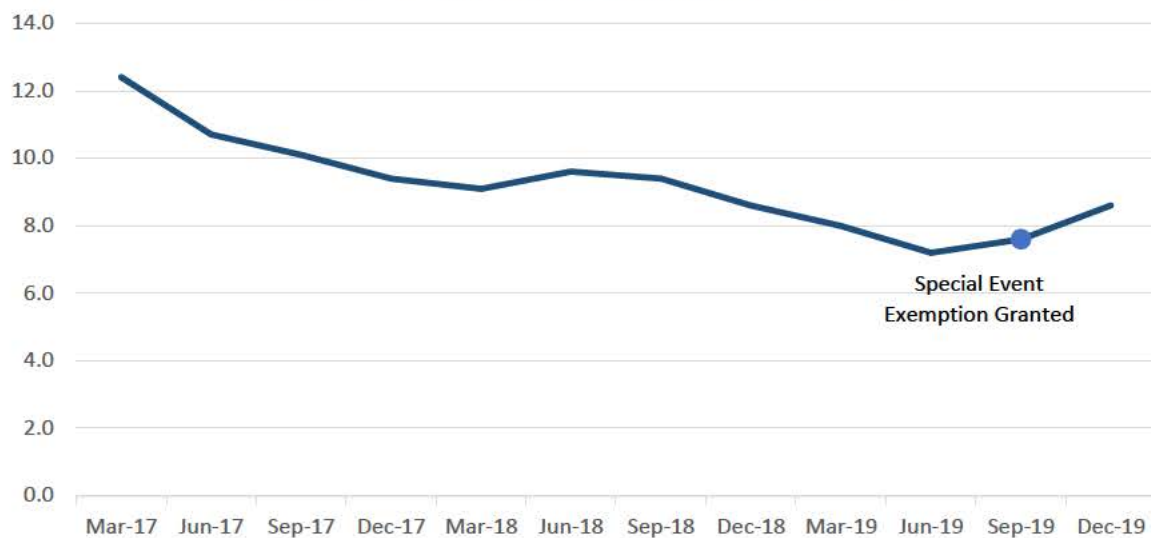
As stated above, one of the main goals of the introduction of special event clauses was a predicted benefit to local employment, allowing businesses to trade into the night and employ more members of the community. Figure 2.1 depicts unemployment in the town over time. As seen, there was no decrease in unemployment in the period of the exempt event, nor afterwards.

The 2017 changes have had no discernible impact on employment

It was argued that the legislation would “support up to an additional 945 full-time equivalent (FTE) jobs”. Using the commencement date of the legislation as a benchmark, the number of full-time retail trade jobs in Queensland has decreased. In the year after, full-time equivalent jobs decreased from 127,000 to 114,000. Currently the figure stands at 103,000 however this figure should be viewed cautiously in light of the COVID-19 Pandemic’s effect on retail jobs.⁷

Regardless, the changes saw a *decrease* in the number of full-time retail jobs. This directly contrasts with the argument that there would be (albeit a small) increase in full-time work. Without any increase in employment, it is difficult to see what benefit the deregulatory changes brought to the state of Queensland.

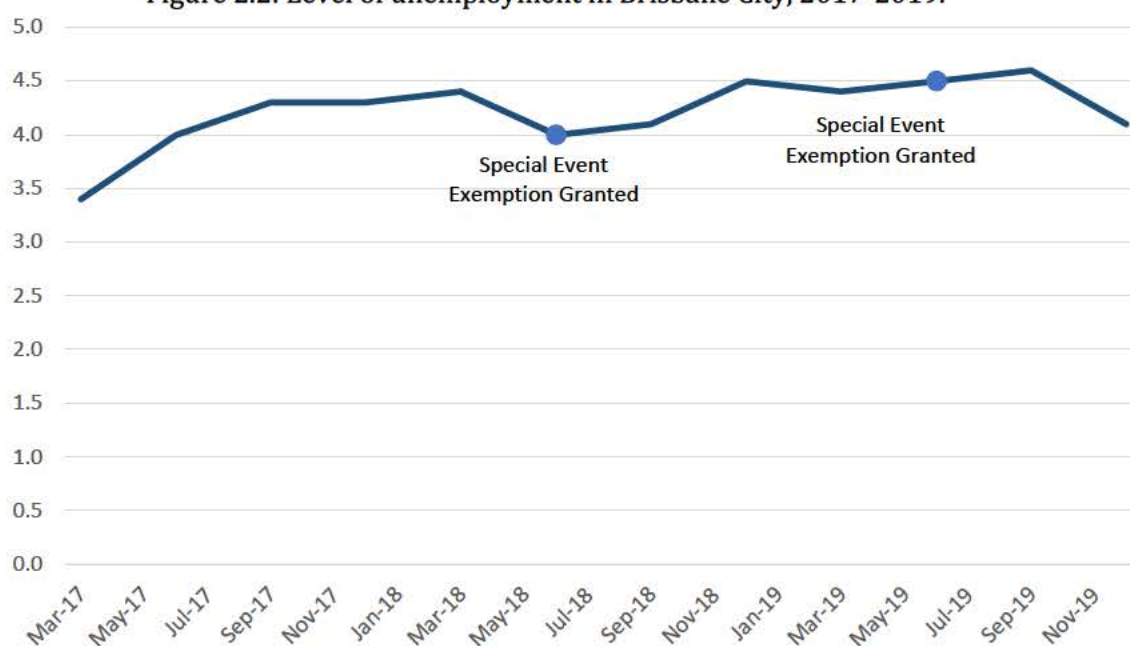
Figure 2.1: Level of Unemployment in Ayr, 2017-2019



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In the Brisbane CBD , two special event exemptions were granted. In both of these cases, the period afterwards saw an increase in unemployment in the local community.

Figure 2.2: Level of unemployment in Brisbane City, 2017-2019.



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Special Event	Level of Unemployment in LGA		
	Quarter Before Event	Quarter of Event	Quarter After event
<i>Brisbane - Cth Games</i>	4.40	4.00	4.10
<i>Mount Isa Rotary Rodeo 2018</i>	7.40	8.60	9.40
<i>Gold Coast - Cth Games</i>	4.60	4.40	4.30
<i>Chinchilla Melon Festival</i>	5.10	5.60	5.10
<i>Ayr/Burdekin Annual Show</i>	7.20	7.60	8.60
<i>Brisbane Festival</i>	4.50	4.60	4.10
<i>Mount Isa Rotary Rodeo 2019</i>	10.70	9.30	8.20
<i>Gold Coast 600 Motor Race</i>	5.80	5.70	5.50
Average	6.21	6.23	6.16

Table 2.3 - Level of unemployment in SA2s before, during and after special event status granted.¹⁰

Proponents of the changes argued that retail workers would benefit from an increased range and number of potential working hours, increased flexibility and higher incomes.¹¹ However, that hasn't manifested in any of the areas in which the Special Event exemptions have been granted. In fact, overall as shown in **Table 2.3**, the level of unemployment remained stagnant in the periods prior to, during, and after the special events.

This paper is not arguing that the exemptions caused that increase in unemployment, but that the reforms and provided no assistance to the level of jobs in the community. The fact that the number of jobs went down is a clear indication that the exemptions do not provide the community with additional jobs as proponents of the law have argued. Rather, it has little to no effect on the employment level in the community.

The overall number of retail firms in Queensland has declined, hurting competition

The number of retail firms, including small retail firms has been in decline since 2015. As seen below in Figure 2.4, the deregulation of trading hours has done nothing to ameliorate this continuing decline.

Part 2: Why further deregulation of trading hours should be resisted

2.1: Public opinion demonstrates little appetite for reform

For the purpose of this submission, the McKell Institute commissioned independent polling of 402 Queenslanders to ascertain public views on trading hours in Queensland. The poll was conducted between 8 and 12 October, 2021.

The poll put 5 questions to the respondents related to the current trading hours in their area, the respondents' understanding of trading hours regulations, and the degree to which respondents desired any changes to the status quo.

Question 1	%	
Do you think the current hours in which shops are open in your local area are:	About right	66%
	Open too often	13%
	Not open enough	17%
	Unsure	4%
	<i>n</i>	402

Question 2	%	
In the last week, have there been any occasions when you wanted to go shopping but the shops you needed were closed?	Yes	22%
	No	75%
	Unsure	3%
	<i>n</i>	402

Question 3	%	
Do you support changes to trading hours which would require retail workers to work late at night?	Yes	32%
	No	47%
	Unsure	21%
	<i>n</i>	402

Question 4	%	
Have you been aware of the shops in your area being open for longer as a result of a special event?	Yes	24%
	No	65%
	Unsure	11%
	<i>n</i>	402

Question 5		%
The Covid -19 pandemic has impacted and changed the retail sector dramatically with the rapid expansion of online shopping, Do you agree the current trading hours achieve the right balance for consumers?	Yes	59%
	No	19%
	Unsure	22%
	<i>n</i>	402

The polling data demonstrates a weak appetite for trading hour reform in Queensland

The polling illustrated that a majority of Queenslanders see little need, or have little desire, to further deregulate trading hours in the state. An overwhelming majority of consumers (75 per cent surveyed) felt their shopping preferences were not limited by trading hours in their local area. While there is modest appetite for further liberalisation of trading hours in the state, this appears to be a minority perspective. Given the broader economic risks to small business associated with the further liberalisation of trading hours, policymakers in Queensland should feel reassured that resisting the further liberalisation of trading hours will be supported by most Queenslanders.

Liberalisation of trading hours would likely only see modest increase in demand

The polling data reflects only modest demand for a deregulation of trading hours in Queensland. With only 17 per cent of poll respondents believing their local shops were 'not open enough', and 22 per cent stating that they desired to visit shops that were not open in the past week, it is evident that a further liberalisation of trading hours would not have a significant impact on aggregate demand in Queensland's retail sector.

Given the lack of a clear increase in aggregate demand that would be associated with a liberalisation of trading hours, proceeding with any significant deregulation would disadvantage smaller retailers, who would be unable to capture a significant portion of any modest increase in aggregate demand. Further deregulation would, however, increase the operational overheads for many smaller retailers in Queensland, weakening their trading position in the market.

Ultimately, for any lofty jobs promises associated with trading hour deregulation to be realised, a significant increase in aggregate demand in the retail sector would have to occur concurrently. There is no evidence that deregulating trading hours would automatically give Queenslanders the urge to consumer a statistically significant amount more than they

currently do under the existing regime. Without such an increase in aggregate demand, Queensland's smaller retailers would struggle to remain afloat, allowing some of Australia's largest firms to consolidate even more of Queensland's retail sector market share. This outcome would have a deleterious impact on jobs in Queensland .

2.2: Evidence from elsewhere suggests broader trading hours reform would not create more secure jobs for Queenslanders

There are some concerns that the modest trading hour reforms that were passed in 2017 could pave the way for a further liberalisation of trading hours. But arguments in favour of such liberalisation are typically based around inflated jobs creation forecasts put forward by proponents of the reform.

Evidence from other jurisdictions, and from the partial liberalisation of trading hours in Queensland in 2017, demonstrates little correlation between trading hours reform and jobs creation in retail. In a 2011 report, the Productivity Commission reported that deregulation in New South Wales and Victoria produced no statistically significant economic benefits impacts, including on employment, with a marginal increase in retail spending equating to lower consumer spending on other economic activity, for a negligible net benefit.¹² The PC also noted that there was insufficient evidence that aggregate employment hours within the retail sector grew after trading hours were liberalised in NSW, ACT and Victoria. The 2011 report states:

*"On the one hand, for those retailers allowed to trade for longer following deregulation, it would be expected that hours of employment would increase as they respond to consumer preferences to shop at more convenient times. On the other hand, for those retailers previously protected from competition by restricted trading hours, the increase in competition may result in them exiting the market, reducing employment hours"*¹³

The PC cited evidence from Access Economics that there was scant evidence of a net increase in hours worked within retail after liberalisation in the jurisdictions assessed.

The McKell Institute's report on South Australia's changes to retail trading hours made similar predictions, concluding that there was no evidence of jobs growth from these changes.¹⁴

In Western Australia, a 2016 report into the retail sector found that there was no material lift in employment in WA since deregulation of opening hours occurred in 2010 - 2011.¹⁵ "In fact, the total number of retail jobs fell in the period since deregulation. Total hours worked did not improve above and beyond its usual cyclical drivers following deregulation."¹⁶

The picture gained from each of these states is very clear— there is no evidence that there will be a significant gain to employment that results from the deregulation of trading hours. This

reflects the economic reality that, for trading hour deregulation to lead to an increase in employment, a significant increase in demand needs to occur. There is currently no evidence that expanded trading hours fundamentally shift the demand/supply dynamic in Queensland retail, or retail elsewhere in Australia.

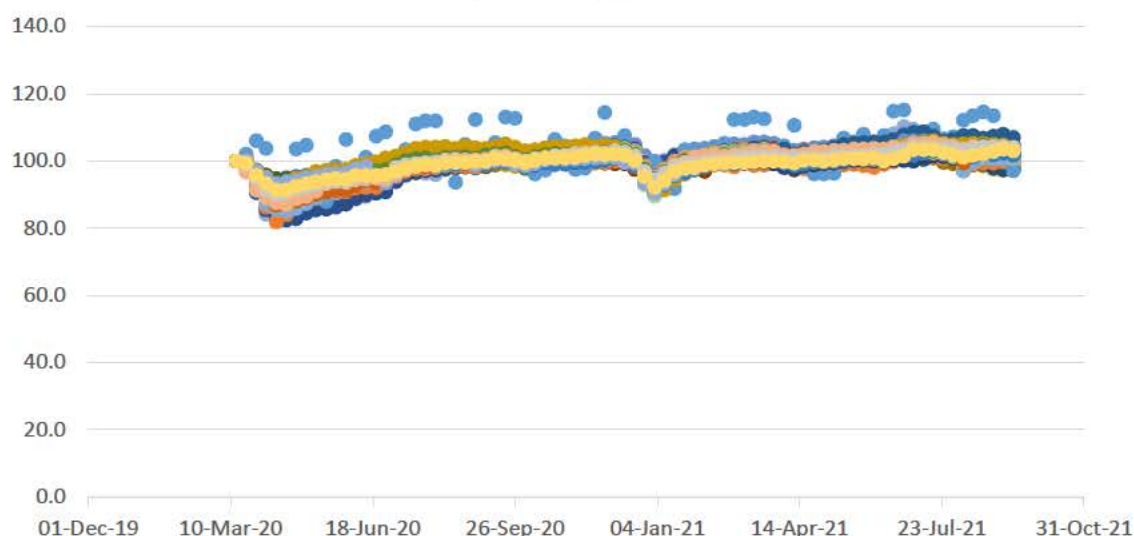
2.3: Queensland's economy and jobs performance is strong – even during the pandemic

Arguments in favour of deregulating Queensland's trading hours regime as a means of stimulating job creation fail to recognise the already strong performance of the Queensland economy, and its sustained low levels of unemployment. Queensland's economy has fared remarkably well during the pandemic. As the state has inoculated itself from the spread of COVID-19, it has also remained largely open, enabling a higher degree of economic activity than in locked-down Australian jurisdictions.

The result has been a consistent economic performance, buoyed by state and federal government stimulus.

Today, most employed Queenslanders are earning more money than they were at the onset of the pandemic. Figure 2.1 collates the payroll jobs data across every SA2 area in Queensland throughout the duration of the pandemic. It finds consistent increase in wages across Queensland during the COVID-19 period. This coincides with an official unemployment rate of just 5.1 per cent. The strong performance under the status quo reflects no acute need for radical policy interventions to stimulate employment, particularly in the retail space.

Figure 2.1: Overall remuneration has increased in Queensland during the pandemic (Index)

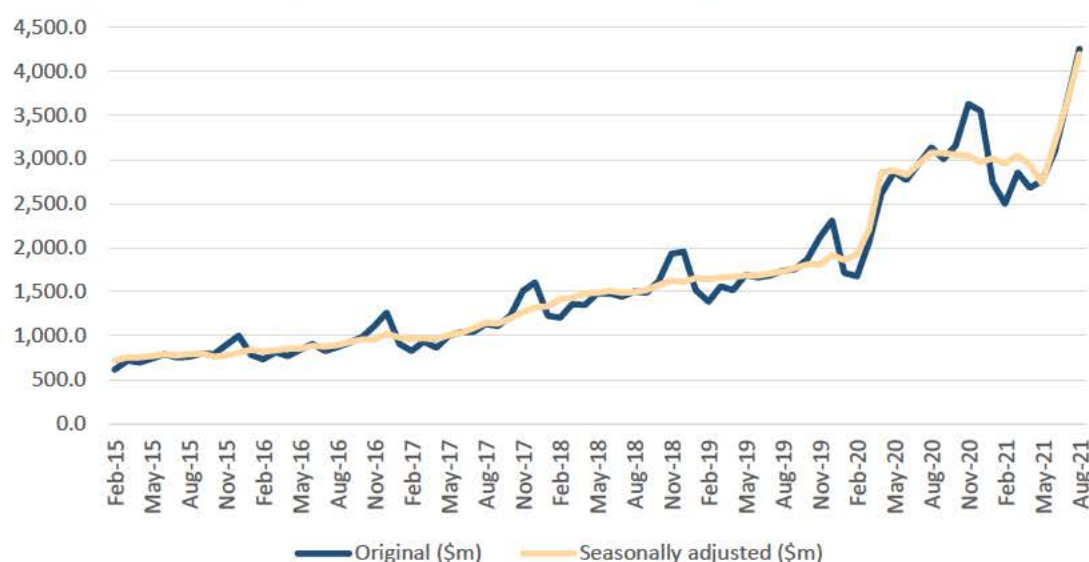


2.4: The growth of online retailing will not be contained by trading hour reform

Traditional arguments related to online retail competitiveness don't stack up

As online retail has consolidated an increasing portion of market share in Australia, there have been arguments made in favour of trading hour liberalisation as a means of enabling brick and mortar stores to efficiently compete with online retailers. This argument has become central to the debate around trading hours, but it reflects a misunderstanding of the nature of retail consumption.

Figure 2.2: Online retail in Australia (\$m) 2015-2021



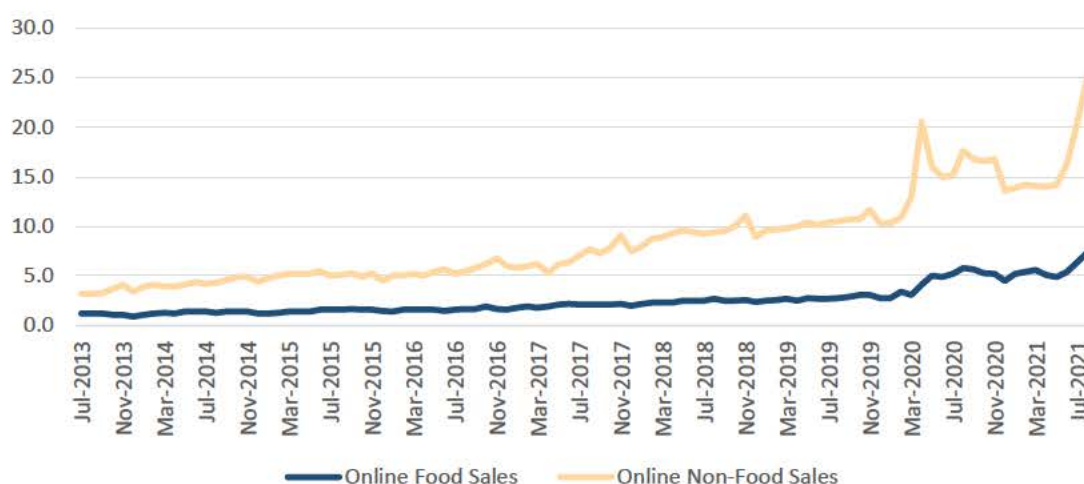
Australians, including Queenslanders, have embraced online retail during the pandemic and in the years prior. The ABS estimates that, on the eve of the pandemic, Australians spent approximately \$2.8bn on online retail a month. As of August 2021, this had climbed to \$4.2bn.

A majority of the growth in this spending has been for 'non-food' retailing – items such as clothing or household goods. The growth in this spending is often argued as a justification for liberalising trading hours. If retailers were simply allowed to open for more hours, consumers would spend less on online retail, instead heading into brick and mortar premises. While these arguments are common, they fail to reflect the broader dynamics behind online retailing, and why consumers are increasingly drawn to online retailing, irrespective of the hours in which they engage in this form of retailing.

Consumers gravitate towards online retailing not simply because they can order products after hours. They engage in online retailing due to its broader conveniences, which would not be able to be fundamentally addressed or mitigated against simply by amending trading hours in brick and mortar retailing outlets.

Further, many of the retailers that are experiencing a rise in online sales do also maintain brick and mortar premises. Indeed, major retail chains selling both food and non-food products have been highly profitable during the pandemic. The major supermarket chains have also increasingly seen online retailing as a way to reach consumers who otherwise would struggle to enter a brick and mortar premises, be that consumer a busy parent, employee, elderly Australian or a mobility impaired Australian. Retailers are increasingly offering online retail not as a way to work around restrictive trading hours, but to target new markets who otherwise would be less willing to enter physical stores and engage in trading.

Figure 2.3: The rise of online shopping in food and non-food sales



Queensland's online retailers are overwhelmingly small businesses

Policymakers should also be cognisant that any reform aimed at disadvantaging online retailers as a means of artificially creating more demand for brick and mortar premises would be disproportionately affect small business owners in Queensland. As of February 2021, there were 2,555 businesses in Queensland that were categorised as 'online store based retailing' – businesses that exclusively use online stores as a means of reaching customers. Of these online businesses:

- 1,218 were sole traders
- 1,267 employed between 1-19 Queenslanders.
- 68 employed between 20-199 Queenslanders.
- Only 3 employed over 200 Queenslanders.

Recommendations

Recommendation 1: “Special event” provisions need to be reconsidered

Since the ‘Special Event’ provision was enabled, it has rarely been rejected by authorities, despite, as this submission notes, there being no evidence that the change has made any improvement to local employment outcomes in the jurisdictions where the special event exemptions have been granted.

Out of all the applications for special event status, only one was not approved. According to the Queensland Industrial Relations Commission, these approvals have been in line with the framework offered by the legislation.

The fact that there is such a high rate of approval suggests that the legislation has been open-ended, and not specific enough. Special Events should be restricted to those events where there will be a period of abnormally high economic activity, such as the 2018 Commonwealth Games. In the absence of that, it is difficult to justify temporarily changing the legal status of shops.

Recommendation 2: Further pushes to liberalise trading hours should be resisted by the Queensland Government

As this submission has noted, the core arguments in favour of trading hour deregulation do not have basis in empirical fact.

Trading hour deregulation does not lead to notable increases in employment, nor does it create more secure jobs for Queenslanders. It doesn’t enable Queensland businesses to compete on a ‘more level playing field’ with online retailers, as consumers tend to use online retailing for reasons beyond the hours of operation. Further, many of the newer jobs in retail are insecure jobs in which some newer workers industry has less certainty and workplace agency than in other industries.

Fundamentally, the liberalisation of trading hours disproportionately impacts small businesses in the state, while advantaging larger retailers – especially the major supermarket chains. The decline of small retail businesses has been evident in Queensland over the past five years, with this trend likely to increase should further liberalisation of Queensland’s trading hours occur.

Conclusion

The 2017 legislation mandated a review of the prior to August 2022. This submission provides an overview of the impact of the 2017 reforms and explain why further deregulation is unlikely to achieve positive economic outcomes of Queenslanders.

Specifically, this submission has drawn attention to the issues with Section 5 of the *Trading (Allowable Hours) Act 2017*, which enabled special event exemptions to trading hours laws to be passed. It notes that there is little evidence that this special exemption status has made any statistically notable improvement to employment outcomes.

This submission has concluded by highlighting the broader issues related to any further deregulation to trading hours in the state. Notably, it cites public polling commissioned exclusively for this submission that demonstrates little public appetite for significant trading hours reform in the state.

Appendix 1: Current State of Trading Hours Regulation in Queensland¹⁷

Type of shop		Monday to Friday	Saturday	Sunday	Public Holidays
Exempt		<i>Unrestricted</i>	<i>Unrestricted</i>	<i>Unrestricted</i>	<i>Unrestricted</i>
Independent Retail Shop		<i>Unrestricted</i>	<i>Unrestricted</i>	<i>Unrestricted</i>	Must remain closed on Good Friday, Christmas Day and until 1pm on Anzac Day.
Non-Exempt shops	South-East Queensland	7am 9pm	7am 9pm	9am 6pm	9am 6pm Except must be closed Good Friday, Anzac Day, Labour Day, Christmas Day
	Tourist Area	6am 10pm	7am 10pm	7am 9pm	7am 9pm Except must be closed Good Friday, Anzac Day, Labour Day, Christmas Day
	Schedule 1AB area	7/8am 9pm	8am 6pm	9am 6pm	9am 6pm Except must be closed Good Friday, Anzac Day, Labour Day, Christmas Day
	Seaside resort	8am 9pm	8am 6pm	<i>Closed</i>	9am 6pm Except must be closed Good Friday, Anzac Day, Labour Day, Christmas Day
	Other areas	8am 6pm	8am 6pm	<i>Closed</i>	<i>Closed</i>

References

- ¹ <https://www.parliament.qld.gov.au/documents/tableOffice/TabledPapers/2017/5517T316.pdf>
- ² <https://mckellinstitute.org.au/research/reports/proceed-with-care/>
- ³ <https://www.parliament.qld.gov.au/documents/tableOffice/TabledPapers/2017/5517T316.pdf>
- ⁴ [Looking beyond the panic-buying, Australia's big supermarket story is Aldi's growing market share](#)
- ⁵ Australian Bureau of Statistics 8165.0 - Counts of Australian Businesses, including Entries and Exits, June 2015 to June 2019
- ⁶ https://www.qirc.qld.gov.au/sites/default/files/2019_th2_decision_170619.pdf?v=1560749870
- ⁷ ABS 6291.0.55.003 Labour Force, Australia, Detailed, Quarterly. Table 05. Employed persons by State, Territory and Industry division of main job (ANZSIC)
- ⁸ <https://www.employment.gov.au/small-area-labour-markets-publication-0>
- ⁹ <https://www.employment.gov.au/small-area-labour-markets-publication-0>
- ¹⁰ <https://www.employment.gov.au/small-area-labour-markets-publication-0>, Author's calculations
- ¹¹ <https://www.parliament.qld.gov.au/documents/tableOffice/TabledPapers/2017/5517T316.pdf>
- ¹² <https://www.pc.gov.au/inquiries/completed/retail-industry/report/retail-industry.pdf>
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