



Research Director
Finance and Administration Committee
Parliament House
George Street, Brisbane Q 4000
fac@parliament.qld.gov.au

Dear Committee,

Re Trading (Allowable Hours) Amendment Bill

We wish to state our objection to any change to existing Motor Dealer Trading Hours in Regional Queensland.

FR Ireland Pty Ltd is

- a Motor Dealership which commenced business in 1923;
- a significant local employer with over 160 employees;
- located on a 4+ hectare site in Cairns;
- franchised for Holden, HSV, Mitsubishi, Chrysler, Jeep, Dodge, Fiat, Alfa Romeo, Fiat Professional, RAM Trucks and, Isuzu Trucks.

The restraint from trading on a Sunday is one of the few 'Red Tape' items that we are in favour of. Our current available trading hours,

- assist in attracting quality employment candidates with a preferred demographic and, provides improved access to this industry for working mothers who seek employment with us;
- provide us a comparably stable workforce of very good quality people, who apply to work for us because we don't open on Saturday afternoons and Sunday like businesses have to in other retail or tourism sectors;
- provide Regional Qld dealers a far more family friendly employee environment vs dealers in Metro with weekend and public holiday trading;
- provide consumers with time to look at vehicles after hours and on Sunday's, without our sales staff on site;
- are actually more convenient towards consumers today, compared to 20 years ago, as many shift workers have time off during the week now;
- do not impose costly Sunday employment overtime rates on the business;
- enable our business to be open, in most cases, for 58 hours a week. (M-F 7:30 to 6; Sat 7:30 to 1) In fact, we don't open on a Saturday afternoon as it is unnecessary, unproductive and expensive in overtime, and this is the case for almost all Motor Dealers throughout regional Qld;
- absolutely do not prevent dealers from having displays at car and caravan shows (for which overtime is paid anyway). We can attend and display vehicles at any car show on any day we wish, if we want to pay the overtime rates;
- actually DO NOT prevent a Motor Dealer from selling a car after hours or on a Sunday now, as long as the customer has an appointment and the premises are not 'open for business'.

We find this push, relating to Motor Dealership hours concerning. It appears to be driven by entities who do not represent Motor Dealers interests.

A survey was undertaken to ascertain the contemporary view of the Association's motor vehicle sector membership on trading hours for the purpose of this submission. It indicated 90% support for the retention of the existing Vehicle Order.

Comments to the survey indicated that under the existing regime it was difficult to get salespersons to work on a Saturday. This situation would be compounded if Sunday trading was introduced.

The change to trading hours will not increase business the same number of vehicle sales will be spread over a 7-day period having a direct impact on our operating costs which will ultimately impact the consumer.

For those of us that operate across the State in the motor vehicle sector the proposed change may be putting at risk our business, livelihood and employee arrangements. In a deregulated motor vehicle sector market, SME's may be compelled to compete or risk trade diversion to larger entities that over the medium to longer terms threaten the viability of their businesses.

Failure to evaluate trading hours as industry policy including the industrial relations framework and employment policies has the potential to put SMEs at risk of the loss of business opportunity leading to business failure and insolvencies.

Recommendations

In the interest of business sustainability and ultimately consumer impact resulting from impost of higher operating costs for business we urge government to act responsibly now. Our recommendations are as follows:

- (a) The Government evaluate trading hours in the context of a holistic industry policy which includes the industrial relations framework and employment policy to provide for a robust evaluation of the trading hours for the motor vehicle sector.
- (b) The Government note that industry is unaware of any significant breaches of the Order by relevant dealerships or of any groundswell of public opinion seeking a change to the current provisions.
- (c) The Government note that our business strongly opposes changes to the trading hours' 1990 *Trading Hours – Non-Exempt Shops Selling Motor Vehicles State Order*.

Again, we wish to state our strong objection to any change to existing Motor Dealer Trading Hours in Regional Queensland and thank you for your consideration.

Regards,
FR Ireland Pty Ltd

Richard Ireland B.Com C.dec
Joint Managing Director