

**Name**

Michael A Sherlock

**Organisation**

Michael Sherlock Pty Ltd

**Make a general comment**

With regard to Marketing Levies

- Legislate that a large percentage marketing funds collected must be expended on driving network sales - not used by the Franchisor as an income stream by charging excessive administration fees or to promote any purpose but to increase Franchisee sales
- Suggested maximum Admin fee 20%

With regard to Rebates

- ensure complete transparency as to the money and other benefits the Franchisor receives from all suppliers direct and indirect
- Have a "Bunnings" clause if a franchisee can buy an equal product /service for a lesser price the franchisor must match the price . This can be governed by a Democratic FAC (Franchisee advisory council).

Capital Outlays and Increased operation costs

- All costs that a franchisor can levy on a franchisee during the term of an agreement should be stated in the annexure summary . Any additional expenditure can not be imposed without agreement of the franchisee including the Franchisor amending the Operations manual .

Franchisee Deed Registration along with Annexures

- all should be registered as Commercial Property Leases are registered and can be discovered by anyone searching
- Annual registration fees apply to help fund ACCC
- Late fees applied for any Franchisee not registering by due date Say October 1 - Penalty fees for corporations directors Etc. should be high , if not registered the entities should be deregistered and prohibited from trading with their names published on the ACCC website