

**Admin, LACO**

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**Subject:** FW: Inquiry into Short-Stay Accommodation - Brief Submission- sub no. 174

**From:** Michael Tucak

**Sent:** Friday, 25 January 2019 5:45 PM

**To:** Committee, Economics & Industry Standing <[laeisc@parliament.wa.gov.au](mailto:laeisc@parliament.wa.gov.au)>

**Subject:** Inquiry into Short-Stay Accommodation - Brief Submission

Dear Sir/Madam,

I wish to make the following submission to the Inquiry into Short-Stay Accommodation.

My submission relates variously to matters in items 1 and 4 of the Terms of Reference.

Whether short-stay accommodation is to be regulated by State or local government, there is in my view too much attention focussed on regulating the individual provider of accommodation (ie the house or property owner), and not enough on the booking and listing websites. In my view it is open to governments to regulate the booking or listing sites, whether in terms of where they can accept listings from, what requirements they must fulfil to accept listings (in terms of compliance with State or local laws) and even scope for fees or other payments for listings (fees that fall on the booking / listing site, rather than directly onto the house or property owner). My view is based on the model for 'short stay' booking/listing sites being to 'flip' the typical business model (eg AirBnB not owning/leasing properties, and by analogy Uber not owning/leasing cars), but they have to date benefitted from the regulatory approach remaining orthodox (ie regulator focus is on the house or property owner). The sites do conduct a commercial activity in the State or local government area, albeit online, by providing their services to owners in a government area - and of course the sites benefit enormously from owner use, but without any responsibility or accountability to that area for enabling that owner activity.

My submission is not necessarily that "short stay" should be discouraged/encouraged, but that whatever regulation is considered should as much address the booking/listing sites and the activity they conduct (and revenue they generate) as the individual users.

It is my view that the scope to do this should form part of any enquiries into regulation.

In terms of disclosure, I am currently a local government councillor (Town of Cottesloe) and have in the past operated an accommodation listing on a "short stay" booking site.

Thank you for the opportunity to make a submission.

My contact details are as follows if required.

Yours faithfully,

Michael Tucak