



15th of January 2019

Re: Air BNB: Level playing Field

To whom it may concern,

We have been in the hospitality industry providing site and onsite accommodation for the past 10 years. Our business is a family run business, which employs 7 staff members . We provide coastal accommodation and sites in the beautiful seaside town of Mandurah. We have 12 onsite accommodation cabins and 94 tourist sites. We provide accommodation for a range of guests including grey nomads, back packers, workers, overseas guests, clubs and sporting groups and families. We provide good, clean and affordable accommodation is a close to the beach and local attractions. We engage a number of local contractors regularly including electricians, plumbers, pool contractors, arborists, fire and safety auditors and support other local business-like linen providers and bedding suppliers to name a few.

The past 3 years has been particularly a tough time for our business with less tourism, fewer workers being contracted in the local area, upkeep of older accommodation, renovation expenses, software upgrades and more competition. We have also had to compete with Airbnb operators who operate without all the additional overheads that we have, and don't have to comply with any safety, building and fire requirements. The number of Airbnb listings in our local area is growing and I am finding that many hosts, host more than 1 listing, meaning they are operating this as a commercial entity but without the necessary safety audits and checks. How is this creating a level playing field?

Airbnb has provided more competition in an already competitive and tight market. It has impacted on our occupancy and our turnover, which in turn impacts of our spending in areas such as staff employment, use of local services and renovations. Meaning we employ less people, pay less taxes and don't call local contractors as often.

As a park operator we need to comply with the following

1. Residential Long Stay Tenancies Act
2. Caravan and Camping Grounds Act

We also need to comply with requirements listed below which add additional costs to running our business.

BELVEDERE CARAVAN PARK

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1. Health (costs incurred in providing an adequate number of toilet facilities, treatment of effluent etc.)
2. Safety (costs incurred in providing safety equipment and auditing of fire extinguishers, fire pumps)
3. OHS (costs incurred in providing staff training and PPE, MSDS)
4. Noise Restrictions (costs incurred in enforcing the restrictions)
5. Payroll (taxes, super, holiday pay, sick pay, personal leave etc, and costs incurred in implementing and understanding all requirements of this payroll, and costs incurred in time to pay staff and record staff entitlements)
6. GST (costs involved in prepared bas and accountants' costs)
7. Local Government Rates (higher than normal residential rates as we pay commercial rates)
8. Costs involved in marketing our business
9. Commercial insurance costs

To create an even playing field for all operators I would like to see implementation of the following for Air BNB providers

1. Home sharing properties registered with a fee payable to fund compliance monitoring.
2. Hosts only being able to use their primary residence as an Air BNB
3. **Having Air BNB providers having to meet fire, safety, building and insurance requirements of short-term rentals.**
4. Ensuring neighbours of AirBNB, co tenants and landlords have a say if a property is to be used as an air BNB.

Lastly, I would like to point feedback on Air BNB from a friend of mine who recently chose to stay with Air BNB. When she arrived at her chosen place of stay, she had the following experience which demonstrates that Air BNB is an accident waiting to happen. It is only a matter of time before someone dies as a result of the inadequate safety regulations currently in place for these providers.

1. A railing that was not compliant for safety on height, i.e. it was less than 1m high and was simply a single wire railing, meaning there was no barrier underneath to stop a fall from the double story landing. (non-complaint for safety)
2. The railing was not secured properly to the landing, meaning it pushed away from the stairs as one went up the stairs. (also, non-complaint for safety)
3. No fire extinguisher or fire blanket was provided, yet a fully functional gas cooktop and oven was provided. (non-complaint for safety)
4. Inadequate ventilation. The bedrooms were mouldy from moisture in the walls and there were instructions to not open the upstairs windows. (health risk?)
5. An air conditioner that did not work
6. A bed that collapsed when her son lay down on it. (non-complain for safety)

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I ask you to create an even playing field for all accommodation providers and not have some providers being able to provide a cheaper alternative that is unsafe and will affect the economy and the provision of jobs long term.

Yours sincerely

Marisa Arena

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Emaculate Pty Ltd A.C.N. 119 508 600 As Trustee For The Belvedere Caravan Park Trust