

Australian Parks License Co.
 Top Parks of Australia
 Level 7, 60 Light Square,
 Adelaide SA 5000



24/01/2019

RE: SHORT STAY INQUIRY SUBMISSION

ABOUT US

Top Parks is the largest group of independent parks in Australia, promising holiday-makers the most parks in the most places. This gives us the collective strength of over 270 independently owned and operated parks across Australia.

AIRBNB COMPETING WITH COMPLIANT ACCOMMODATION PROVIDERS

In Western Australia (WA), all commercial businesses are required to be compliant with the law. In this instance, caravan parks are required to be compliant with the *Caravan Parks & Camping Grounds Act 1995 and Caravan Parks & Camping Grounds Regulations 1997*. Local and State Government are required to approve the operation of caravan parks and camping grounds, and inspect these businesses, to ensure they comply with standards and specifications set out in the law.

This regulatory regime is contained within the planning and Local Government laws in WA and aims to preserve and protect the environment and secure the safety of visitors. Councils are tasked with monitoring the implementation and operation of the regulations that apply to legitimate registered caravan parks and camping grounds so that the industry is not compromised.

Across Australia, our Parks are required to be licensed in accordance with their own State Legislation, required to pay rates and utilities at a commercial rate; required to hold a duty of care to all guests, required to comply with both State and Federal Occupational Health and Safety Regulations, required to be audited and inspected on a regular basis from many different branches of Local and State Government.

The entire Hospitality and Tourism Industry, not just Caravan Parks have continued to support local community events, sponsorships of clubs and the local business economies of their regions and continue to go above and beyond their legislative requirements in this space.

Airbnb properties/hosts are not subject to any of the above requirements, nor immerse themselves into communities in such a positive way.

An example from one of our 40 Parks within Western Australia;

Park; Anonymous

4 Star Rated Holiday Park | 113 Powered Sites | 24 Cabins

15 Employees (10 FTEs)

Legislative Requirements

Caravan Park & Campgrounds License | Public Liability Insurance \$20m | Aquatic Facilities Cert of Compliance | Chemical Accreditation | Dangerous Goods License | Waters & Rivers License (operating a bore for commercial purposes) | Working with Children License | White Card License | Heavy Ridged License | Regulatory Certificates & Licenses (chainsaw, bobcat etc.) | Gas Compliance Certificates | Work Occupational Health and Safety Compliance

Yearly Expenses

Gross Wages: \$486,000
 Superannuation: \$46,170
 Gross Turnover: \$1,200,000

Community Sponsorship & Involvement

Local Business Memberships: \$3,500
 Charity Donations: \$5,000
 Local Business Contracts & Suppliers: \$120,000

Park Anonymous Cabin Occupancy

December 2018: 59.63% down 10.86% on December 2017
 November 2018: 54.31% down 5.8% on November 2017

Western Australian Occupancy

*December 2018: 44.44% occupancy within Cabin accommodation**

However, Airbnb properties have increased 47% in Western Australia alone, as at March 2017. Currently, listings are growing at a rate of 6% per month.

The occupancy of Caravan Parks not only within WA, but across Australia is clear indication our compliant, regulated Parks are unable to compete against Airbnb properties. The basic legislative requirements and overheads listed above do not allow for a large enough margin for Caravan Parks to reduce their tariffs any further.

We respectfully request all Airbnb properties be subject to the same commercial conditions as all other accommodation providers, immediately.

Kind Regards,



David Smith
 Head of Licensed Parks
dsmith@discoveryparks.com.au
 T: 08 8219 3000 | M: 0418 929 910



**Source Cabin Accommodation Statistics Report, December 2018. Statistically compiled by BDO*