



May 25, 2020

Dear Mayor and Council,

We are writing on behalf of Airbnb hosts in Burnaby who are sharing their homes to make extra income. Before the pandemic struck, these hosts were an essential part of the economic fabric of your city, providing space for business travel, tourism and family visits in your city. Our host community has struggled with the downturn in tourism and stands ready to support rebuilding Vancouver's tourism industry and local economy when appropriate.

While short-term rentals have been part of Burnaby's economy for generations, we recognize the desire of the community to develop short-term rental rules that foster healthy home sharing. Our experience working with governments around the world has consistently shown that broad and thoughtful consultation, drawing upon facts and constructive experiences in other cities and communities, are the best way to reach a positive outcome for hosts, guests, neighbours, and the entire community. Airbnb hosts are also proud to be tax collectors in the city as the report notes. We are proud to contribute to local revenue through both the MRDT and PST collection agreements with the provincial government.

Given the size of the host community in Burnaby, we would like to re-emphasize the importance of taking an approach that accounts for the size and scale of the community. A light-touch framework that avoids an unreasonable burden on responsible hosts would be better suited to achieving Burnaby's compliance and enforcement objectives. Cities with small host communities have had greater success when they choose to not duplicate the regulatory frameworks of larger municipalities with very different needs. We encourage you to continue to look for a tailored, made-in-Burnaby solution that reflects the actual scale of home sharing in the city. With that in mind, we would like to inform you of some of our concerns on your current regulatory framework.

### **Business license**

We understand and support the implementation of a business licensing system. We encourage staff to explore the option of an online registration system, if this is not already being done. Our experience around the world has shown that providing a simple online registration process encourages higher compliance rates.

As can be seen in Vancouver, a registration system designed in conjunction with industry actors will help to ensure that the system is effective. However, it is critical that the government work in direct conjunction with platforms in order to design a system that works with the technology of short-term rental websites. Airbnb's agreement with the City of Vancouver was the result of years of close collaboration and cooperation throughout the entirety of their regulatory process. We would welcome the opportunity to share our experience designing and implementing registration systems with other jurisdictions around the world.

Furthermore, we would encourage the system to be as simple as possible and as such encourage you to reduce friction in registration. Requiring proof of principal residence or condo/strata permission is onerous on the host applicant in a digital age when many registrations are done at the same time as a host is registering their property on the Airbnb platform. Vancouver's system operates through a system of self-attestation and works very well.

**Principal residence restriction**

We are concerned that this approach is not taking into consideration the types of people who are visiting Burnaby, and that it will have a detrimental impact on the city's economy. Without flexibility regarding primary and secondary residences, many hosts would be unable to continue sharing their homes. For example, many hosts in Burnaby rent to university and college students for example during the academic year and then short-term rent during the summer months.

Most cities have always had some dedicated rentals in their community. While the advent of Airbnb has made this easier to find, it is by no means a new phenomenon. The need for these types of rentals is real and diverse. In our experience, a balance on this issue is possible by looking at a two-tiered approach that ensures simple and light-touch requirements for people who are sharing their primary residence, while requiring a more strict regulatory framework for dedicated rentals. This can take the form of higher licensing fees and/or stricter inspection and reporting requirements.

**Strata or condo permission letter**

The requirement that Airbnb hosts must get landlord or condo board approval imposes an unnecessary and repetitive bureaucratic burden. Requiring either a tenant, with a legally binding lease agreement, or a condo owner with a legally binding set of condominium by-laws, to seek additional clarity and permission is burdensome and unnecessary.

If the lease agreement and/or condo by-laws are legally binding documents, there is absolutely no reason that such a repetitive regulation should be put in place. Airbnb would argue that, like in many other jurisdictions, the host confirms their eligibility through self-attestation. Airbnb would gladly provide examples of jurisdictions in Canada or elsewhere where self-attestation is functioning well.

**Deferral of decision**

Lastly, we are concerned with the timing of this meeting and kindly ask that you defer any decisions to the Fall. As you can imagine, the Covid-19 pandemic has brought significant hardship to our host community. Global travel is at a standstill and many of our hosts have been left with little to no income. Deferral to the fall would ultimately allow the City to reassess the need to regulate and well as allow our hosts to attend any Council meetings in person to make their voices heard.

We sincerely hope that this input will prove to be helpful as you consider your policy options.

We stand by our commitment to be a good community partner and we continue to urge you to not over-regulate the entire home sharing community - a community that is made up of Burnaby residents who are helping bring recognition to the hospitality of your city to travellers from around the world. Please let us know if you have any follow-up questions or concerns.

Sincerely,

Nathan Rotman