

Fairbnb – April 26, 2021

Here are my comments. Thank you for including these:

In general, Fairbnb is pro home-sharing, but we draw a line in the sand to prevent the commercialization of this activity. We don't believe housing stock, planned, zoned, approved and build as residential, should be converted to hotel-type use at the expense of neighbours and those looking for a permanent residence.

**1. Principal Residence Requirement:**

This is good. No secondary or investment properties should make it onto the platforms. That's where the problems start. For neighbourhood cohesion as well as housing market impacts. Keep it at home-sharing. Not allowing secondary suites and basement apartments is a great way to preserve housing stock for long-term tenants.

**2. Maximum number of rooms to be rented:**

3-bedrooms per dwelling unit invites property owners to install a 'caretaker' in one unit. This person will register the property as a principal residence and rent out the rest of the building full-time, year-round. Most people don't have 3 bedrooms to spare to begin with. One bedroom per dwelling unit is recommended to maintain home-sharing. Don't turn housing into party hostels.

**3. 180 nights per calendar year is a recipe for disaster:**

180 days invites commercial activities. The rental income per night that can be fetched on the short-term rental market is much higher than on the long-term market. A 180-night cap allows for superhosts and profiteers to rake in enough money that they will withhold that property from residential use. 180 days ensures that you will lose housing stock to quasi-hotel use in residential areas. No one who wants to live next to a ghost hotel. If balancing occasional home-sharing with housing availability and neighbourly peace is an objective, reducing the total number of nights to 60-90 per calendar year would be appropriate. It allows for some extra cash when away on vacation, provides some flexibility, but prevents most unnecessary and negative impacts on housing availability and sense of community.

**4. Platform accountability is needed:**

Platforms like Expedia, Airbnb, Homeaway etc. need to be held accountable for the product they advertise and profit from. All platforms should be registered and licensed with the City and legally required to only list properties when their hosts are legally permitted. Platforms need to legally agree to not post/list any property without a permit and to display the valid permit number prominently with each listing. Without this level of accountability, it will be very difficult to identify and contact that owners of problem properties. Platform accountability ensures that it is the platforms that effectively enforce your bylaw. You want to avoid platforms being able to download responsibilities to hundreds if not thousands of individual hosts. If this becomes the norm, the City will waste time and resources enforcing its own bylaw.

In Toronto, Deputy Mayor Bailao referred to this by making an analogy to supermarkets. It's not up to the City to police the supermarket isles to ensure the products for sale are legal and not expired. It's the supermarkets that do the work. Similarly, here, the City ensures that hosts

receive a permit if their property is their principal residence, but it needs to be up to the platforms to greenlight only legally permitted properties.

The company and the City can create an API that makes this process very easy, efficient and cost effective. That way the platforms can verify with the City that a given permit number is valid BEFORE they activate it online. Platforms must de-activate listings that have reached the ideally 90-nights a year limit and listings that are illegal should never make it onto the platforms in the first place.

**Informed consent/ notification is a community builder:**

Neighbours should be notified, similarly to a building permit request, that a neighbour is planning to use their property for short-term rental activity. Properties that engage in short-term rental use should post a sign onto their doors, similarly to the ones Uber/Lyft drivers use, so that their surroundings know that this location might host tourists, travellers and transient short-term rental guests.

**5. Data sharing requirements:**

Part of platform accountability measures outlined above. Platforms and short-term rental hosts must share rental data with the City on a quarterly basis. This data must include number of nights booked, location, rental income, etc. Without this fine-grained data, it will be difficult for City's to engage in proper planning. Company licensing and host permitting regimes must include legally binding language to routinely share the required data.

This data is also important to ensure that hosts won't go over the ideally 90 nights a year.

**6. Pandemic Restrictions:**

Ensure that platforms legally agree to comply with public health measures and *de-activate* listings during pandemics and Provincial short-term rental bans to help mitigate the spread of the disease. It is a lot easier if you have this in writing to hold platforms accountable for the activities that it facilitates during public health crises. It is easy for companies to geofence their inventory for the duration of Provincial bans to help prevent the spread of communicable diseases. Your City will be better off if Airbnb and others can be asked to shut down their websites for your City. They have done this before and they can easily set up a portal for frontline workers in need for housing, if need be.

Best,

**Thorben Wieditz**

[www.fairbnb.ca](http://www.fairbnb.ca)

647.409.8997 | @twieditz | [fairbnb@fairbnb.ca](mailto:fairbnb@fairbnb.ca)

Greater Toronto Apartment Association – April 23, 2021

Thanks for sending the meeting summary and draft bylaw. I have reviewed both.

Consultation meeting summary:

- I also noted that STRs generally contravene the RTA by requiring a safety deposit and/or damage deposit. The RTA strictly prohibits safety and/or damage deposits. The RTA allows for last month's deposit.

I see "PART VIII– GENERAL REQUIREMENTS 18. Short-Term Rentals are not permitted in multi-unit dwellings."

This prohibition will assist in retaining purpose-built rental housing as long term housing instead of removing rental units from the housing inventory.

Thanks!

Regards,

Daryl Chong  
President & CEO  
Greater Toronto Apartment Association

Inside Airbnb – April 22, 2021

Thanks again for including me in this conversation and inviting me to your round table.

I mentioned some of these thoughts during the round table, but also have some additional comments after looking at your draft By-law.

**1. The 180 nights calendar year restriction for entire-unit rentals is too generous and will incentivize commercial use**

Without even considering the ability to enforce a 180 night calendar year restriction for entire-unit rentals (see #2), this relatively large cap:

- normalises commercial activity in residential neighbourhoods
- incentivises and rewards commercial use by non-residents, if they can exceed their housing expenses within the cap
- provides an additional revenue and incentive stream for investors treating housing as a commodity, capital gain or safe-haven

Most cities that wish to restrict entire-unit rentals to occasional use by the legal permanent resident opt for caps between 30 and 90 nights per calendar year, which is more in line with reasonable definitions of "home sharing".

**2. No mechanism to measure/enforce 180 night calendar year restrictions for Entire-Unit Rentals**

How would the city measure and/or enforce this requirement?

Cities typically require: hosts to submit a regular report; platforms to submit a regular report (preferred); and/or platforms to block calendars once a listing has reached the limit.

In addition, hosts do and will create multiple listings to bypass a yearly requirement, so your Bylaw should try to address these expected behaviours, either via tracking the registration number across listings and via data reporting.

**3. Short-term rental hosts should display their registration number in all advertisements.**

There should be a requirement for every short-term rental host to post their registration number in all advertisements. Without this requirement, it would not be possible to tell if a listing is registered, or is unregistered and requires investigation.

Most platforms have a field for their hosts to enter the license number for a listing, when it is required by the city. In addition, platform-scraping services can collect the license number, or lack of, for analysis and compliance efforts.

Almost all cities that have registration schemes for short-term rentals have a requirement for the host to display the registration number in all advertisements.

**3. No platform accountability**

Platforms should be legally required to only advertise, or accept transactions for properties that are registered.

Without platform accountability, it is very difficult to find the location of, and/or owners of unregistered short-term rentals.

Most cities that have introduced mandatory registration systems without platform accountability have experienced very low levels of compliance (e.g. Berlin [20%](#); San Francisco: [20%](#)), with platforms refusing to remove unregistered listings.

At the least, platforms should only accept an advertisement for a short-term rental where a registration number is provided, but most cities also have a process for advising platforms that a license has been revoked or expired, or requesting that a platform remove a listing, e.g. if the listing is unregistered, or is using a fake or duplicate registration number.

Some draft platform accountability laws require the platforms to verify with the city that a registration number is valid.

It is also reported that some platforms provide tools to cities for reporting illegal listings, e.g. Airbnb's [City Portal](#), but only where required by law, i.e. if platform accountability is not required by law, your city will not be able to use these features in the platform.

#### **4. Platform Data ensures success of short-term rental by-laws**

Platform data provides an easy and efficient means to ensure that all short-term rental properties are registered and are not exceeding the city's calendar year restriction (if the data includes some booking data).

Without platform data, the city would require a platform scraping service to regularly survey platforms to identify unregistered properties.

--

Please let me know if you would like to discuss any of the above points. I can also connect you with cities that have experience with some of the problems and solutions I referenced.

All the best

--

Murray Cox (he/him [\[?\]](#))

**Creator of [Inside Airbnb](#)**

Providing data and advocacy on Airbnb's impact on residential communities

*Consider supporting the supply of FREE Airbnb data by [donating](#) to the project.*

Expedia – April 22, 2021

My comments --

For the purpose of this By-law, a Short-Term Rental Host shall be deemed to have only one Principal Residence at any time.

WE WOULD PREFER TO SEE THIS EXPANDED TO INCLUDE SOME LEVEL OF NON-PRINCIPAL RESIDENCES (LIMITATIONS COULD BE INCLUDED).

Short-Term Rentals are not permitted in multi-unit dwellings.

AGAIN, WE SEE THIS AS VERY EXCLUSIONARY AND WOULD RECOMMEND THE CITY ALLOW SOME LEVEL OF STR OPERATION IN MULT-UNIT BUILDINGS.

PART XVI – INSURANCE 66 (1) Every Person shall, before the issuance of a Licence to him or her, provide proof of Commercial General Liability insurance against all claims for personal injury including bodily injury resulting in death, and property damage with an inclusive limit of not less than Two Million Dollars (\$2,000,000.00) per occurrence insuring him or her against liability imposed by law for any loss or damage resulting from the carrying on of the business to which the Licence relates.

THIS IS AN EXCESSIVE AMOUNT OF INSURANCE. WE INITIALLY SAW THIS SAME AMOUNT IN CITIES LIKE TORONTO AND OTTAWA, BUT THE CITY DECIDED TO LOWER IT TO \$1M AS IS THE STANDARD INDUSTRY PRACTICE.

Thank you again for allowing Expedia Group to participate in this process. I look forward to continuing this discussion.

Have a great day!

**Walter R. Gonzales**

Regional Government and Corporate Affairs Manager

11920 Alterra Parkway

Austin, Texas 78758

Airbnb – April 21, 2021

Dear Brampton city officials,

On behalf of Ontario's Airbnb host community, we want to thank you for reaching out to consult with us on your proposed bylaw. As we begin to see hope on the horizon and attention turns to economic recovery, it's important to consider how travel and tourism can play a vital role. In particular, there is a tremendous opportunity for individuals to leverage their homes, often their most expensive and valuable asset, to earn extra income. This is particularly important as, in 2019, 52% of our hosts in the province said that they host because it helps them make ends meet. Among them, 57% are women, one of the worst impacted demographics during the pandemic.

While every municipality has unique needs when it comes to regulating short-term rentals (STR), we are concerned that the city is considering moving forward with an extremely restrictive short-term rental bylaw. **The plan, as currently designed, is far outside the national standard for regulation and will create a significant burden on hosts and on the city administration.**

While we have many concerns with the draft bylaw we would like to outline a number of specific concerns:

1. **Primary residence restriction:** Our main area of concern with this proposal is with regard to the primary residence restriction. Brampton has a relatively small number of listings and most of those listings are already private rooms in the homes of our hosts. As I mentioned earlier, Airbnb hosts come from all walks of life and only host on an occasional basis, especially in Brampton.

Our host community relies on the income they earn from home sharing to make ends meet. During a very difficult economic crisis that is expected to last for some time, we are surprised that Brampton would work to further limit the earning potential of these individuals and families in the city. They're normal everyday people who live and work in your community. They're parents with children away at school, snowbirds who rent their home in the winter when, in better times, they left the city for warmer destinations. They're individuals who often can't put their home on the long-term secondary rental market for a variety of reasons and are trying to make ends meet to support their families while living in a challenging and expensive real estate market.

Between the pandemic job losses and a Canada-wide housing bubble, it is imperative that people be able to leverage their most expensive and valuable asset as a tool of economic empowerment and growth.

2. **No short-term rentals in multi-unit buildings:** This restriction is out of line with the national standard of regulations in Canada. The restriction discriminates against those living in condominium units or apartments and restricts home sharing only to those who can afford a single-family home.
3. **Limit on number of nights rented:** Nights caps are complex and costly to enforce — governments are required to invest money and resources into compliance systems. Japan is an example of how difficult it is for a jurisdiction to efficiently and effectively enforce night caps without expensive and cumbersome compliance frameworks.

The city is already considering a restriction to primary residences and thus this additional restriction simply penalizes those who are trying to leverage their property to make ends meet.

4. **Insurance:** Airbnb provides \$1 million in liability insurance to our hosts. We encourage you to reduce this requirement to meet the national standard.

While Airbnb and many of our hosts support regulation like host registration, the additional restrictions considered in Brampton are extreme, cumbersome and unnecessary. The city is taking an approach that is fundamentally more restrictive than other cities like Calgary, Vancouver or Mississauga where we have worked closely to achieve an unprecedented degree of cooperation between the platform and the city officials.

### **Airbnb's Commitment to Collecting Taxes and Supporting Public Services**

Airbnb believes that STRs should support core public services. That's why, in addition to developing critical public safety tools, we are committed to working with the province to efficiently and effectively collect and remit lodging taxes on behalf of our hosts and guests.

For example, in 2019, we collected and remitted nearly \$100,000 in MAT to the city of Windsor on behalf of our hosts worldwide. While Airbnb is not in a position to enter into additional voluntary collection agreements in Ontario at this time, we encourage the Town to advocate for changes to the MAT as outlined in our Ontario budget submission attached here. Airbnb is the only platform with voluntary collection agreements in Ontario and BC. Our competitors are not collecting these accommodation taxes. Our proposal calls on Ontario to make the MAT province-wide, mandatorily collected by platforms and remitted to the province to be then sent to municipalities based on the amounts collected.

### **Trust and Safety**

Our community's safety, both online and offline, is our priority. There have been more than half a billion guest arrivals in Airbnb listings to date, and negative incidents are extremely rare.

Even so, we're constantly working to improve our platform, our policies, and our protections, because even one incident is one too many. As a result, we have pioneered a series of tools that are already available to Airbnb users at no charge and which cover all jurisdictions where we operate. You can find a detailed report of these initiatives by reading our latest [Trust Report](#).

Some of the most important tools available include:

- [Neighborhood Support Line](#): Providing direct access for guests, hosts, and the communities in which we operate is critical to trust on our platform. In January 2020, we launched a neighborhood support hotline in Canada so that neighbors can reach us directly with their concerns.
- Party House Ban: In November 2019, our CEO took a stand against "party houses" and formally [banned](#) them from our platform in accordance with our policies. We went on to expand on that ban with more [transparency about the policy](#), including a ban on "open-invite" parties.

While we recognize the need of some jurisdictions to limit aspects of STR, we urge Brampton to develop common-sense rules for engaging in home sharing which set clear expectations for the



## Appendix 2 – Stakeholder Comments

host community. We believe it is possible to set in place fair guidelines which target bad actors without stifling the economic opportunities and flexibility home sharing provides families. Airbnb welcomes the opportunity to discuss regulatory solutions for your town. Please do not hesitate to reach out with questions or concerns.

All the best,

Nathan Rotman

### Appendix: Additional concerns and comments

Draft	Concerns and questions
10(1) (a) proof of citizenship, permanent resident status or other employment authorization issued by the Government of Canada.	This has not been a requirement in other Canadian municipalities in the past.
(b) a statement from the Applicant as to whether charges against the Applicant are pending under all federal and provincial legislation and municipal by-laws, including but not limited to the Criminal Code of Canada, the <i>Controlled Drugs and Substances Act</i> , the <i>Building Code Act, 1992</i> , the <i>Fire Protection and Prevention Act, 1997</i> , the City's Zoning By law, this By-Law.	This has not been a requirement in other Canadian municipalities in the past.
(e) a letter of approval issued by the Medical Officer of Health.	We have many questions and are very concerned by this burdensome requirement. What conditions and requirements is the Medical Officer of Health looking for in a private home?
16 (2) (2) a floorplan outlining what part(s) of the property will be used as Short-Term Rental, the square footage of the dwelling, and any such documentation required for determining occupancy limits in accordance with the City's Minimum Maintenance By-Law 104-96 enacted under s.15.1 of the <i>Building Code Act, 1992</i> that prescribes standards for the maintenance and occupancy of property as amended, or any successor by-law;	Short-term rentals are taking place in homes. The home is already built, having been provided with the appropriate permits. This is a redundant and burdensome requirement.

<p>18. Short-Term Rentals are not permitted in multi-unit dwellings.</p>	<p>This would be the most restricted bylaw in Canada if this passed. This provision discriminates against lower-income individuals and those living in condominiums and apartments from engaging in home sharing to make ends meet.</p>
<p>19. No more than three (3) Bedrooms are to be rented in the principal residence.</p>	<p>In a city where there are many multi-generational families living together we are very surprised to see this requirement. While we have no opposition to following regular building requirements, such as 2 adults per room, we find this requirement unnecessary. Many of our guests in Brampton come for family gatherings and this limitation will require them to seek more listings for their families.</p>
<p>26. No Short-Term Rental Host shall rent a property as an Entire-Unit Rental for a total of more than one hundred eighty (180) nights per calendar year.</p>	<p>Nights caps are complex and costly to enforce — governments are required to invest money and resources into compliance systems.. Japan is an example of how difficult it is for a jurisdiction to efficiently and effectively enforce night caps without expensive and cumbersome compliance frameworks.</p> <p>Furthermore, enforcement shifts compliance problems from good platforms to bad platforms — as nights caps compliance frameworks are created, non-compliant, off-shore platforms can facilitate compliance evasion and regulatory flight, requiring either further compliance investment or simply, a change of policy. London is an example of how hard it is for regulators to enforce rules in a competitively neutral way.</p>
<p>59. Any Licence issued under this By-law shall be posted on the property of the business of the Short-Term Rental, to which the Licence relates in a conspicuous place that is clearly visible to the public.</p>	<p>Posting a licence that is visible to the public could put hosts at risk of vandalism or theft. We encourage the city to remove this requirement. We are happy to share examples where host properties have been targeted.</p>
<p>66 (1) Every Person shall, before the issuance of a Licence to him or her, provide proof of Commercial General Liability insurance against all claims for personal injury including bodily injury resulting in</p>	<p>Airbnb provides \$1 million in liability insurance. You can learn more here: <a href="https://www.airbnb.ca/d/host-protection-insurance">https://www.airbnb.ca/d/host-protection-insurance</a></p>

## Appendix 2 – Stakeholder Comments

death, and property damage with an inclusive limit of not less than Two Million Dollars (\$2,000,000.00) per occurrence insuring him or her against liability imposed by law for any loss or damage resulting from the carrying on of the business to which the Licence relates.	
<p>67. (1) The Licence Issuer or Inspector, may enter on any land and building or structure thereon, at any reasonable time for the purpose of carrying out an inspection to determine whether any one or more of the following are being complied with:</p> <ul style="list-style-type: none"><li>(a) the provisions of this By-law;</li><li>(b) an order made under this By-law;</li><li>(c) a condition of a Licence issued under this By-law; or</li><li>(d) an order made under section 431 of the <i>Municipal Act, 2001</i>.</li></ul>	<p>While we do not oppose reasonable bylaw compliance requirements. Inspections of properties are outside of the national standard if done without cause.</p> <p>While parties and events are banned in Airbnb listings, Airbnb provides neighbours with a 24/7 phone line where individuals who are experiencing a nuisance from an Airbnb listing may contact us for a remedy. We work closely with bylaw officials to ensure that hosts understand their responsibilities and are in compliance with local health and safety requirements.</p>

--



Nathan Rotman  
Public Policy

April 22, 2021

Mirella Palermo, Policy Planner, Land Use & Housing  
Planning and Development Services Dept.  
City of Brampton  
2 Wellington Street West, 3rd Floor  
Brampton, ON L6Y 4R2

**Re: Short-Term Rental Stakeholder Consultation, City of Brampton**

Dear Mirella,

On behalf of the Ontario Restaurant Hotel and Motel Association (ORHMA) and the Greater Toronto Hotel Association (GTHA), we are writing to you regarding the City of Brampton short term rentals (STR). ORHMA and GTHA have been instrumental in shaping STR policies across Ontario and the City of Toronto. I encourage you to read our letter along with the attachments as you create such policies.

Short-term accommodations, also referred to as illegal hotel rooms are an ongoing concern for the hotel community in the City of Brampton. Municipalities across North America experience problems stemming from sharing unit rentals affecting housing availability, housing pricing and neighbourhood issues such as noise, parking and safety. Independent studies in the USA and most recently in Canada are showing that short term rentals are affecting hotel brand investment decisions while negatively influencing hotel demand.

The City of Brampton must level the playing field for hotels with the short-term rental accommodations. These rentals are currently not paying commercial property taxes to your town and meeting other rules and regulations that hotels are required to meet. These illegal rooms are also not paying HST which contributes to funding health care, education, transit and infrastructure and other benefits that the City of Brampton and Ontario residences expect.

**ORHMA and GTHA strongly supports a regulatory framework which includes zoning by-laws which meet the same standards of developing a hotel that levels the playing field with the hotel industry.**

Competition should be encouraged. We welcome it. This is how growth occurs in every aspect of the business and how we find new opportunities. Among each other the hotel industry is highly competitive business nonetheless respects government rules. We expect all those competing to play by these rules.

The STR sector is no longer an emerging concept as governments around the world have been implementing rules and regulations. Without rules short term rentals belong to the professional underground economy.

The key concern with the short-term accommodations is that they are being commercialized with hosts operating multiple properties as a business. Even Airbnb reports support this theory by continually boosting that *"The vast majority of Airbnb's Ontario hosts share their primary residences."* Regretfully this theory is not the practice.

In 2017 the Hotel Association of Canada released a study<sup>1</sup> in partnership with the Ontario Restaurant Hotel and Motel Association (ORHMA) which spotlighted 11 key markets across Canada and examined the short- term rental market in comparison to Canada's hotel sector. Specifically, the study had a key focus on Airbnb as the most widely used digital

---

<sup>1</sup> <https://www.nanos.co/wp-content/uploads/2018/09/2018-1208-Hotel-Association-AirBnB-August-Populated-report-with-Tabs.pdf>

home-sharing platform in Canada. Results demonstrated that commercial operators are growing exponentially, far outpacing actual home sharing activity. Approximately 7-in-every-10 units on the Airbnb distribution platform are entire-home rentals, with guests having complete and sole access of the entire unit during their stay. Over the last two years, the commercial side of Airbnb's business, those renting multi-unit entire homes, grew by 108%. Entire home rentals as a whole, including multi-listing hosts, generated 83% of Airbnb's revenues. Multi-unit hosts account for over 30% of all revenue generated on Airbnb in Canada.

Further, a 2017 study conducted by McGill University entitled *Short-term cities: Airbnb's Impact on Canadian Housing Markets* found that Airbnb alone has removed as many as 13,700 units of housing from rental markets in Montreal, Toronto and Vancouver. In 2019, Fairbnb reported that in Toronto alone, Airbnb has taken 6,500 long-term rentals off the market. According to the Ontario Mars report *"Fundamentally, home sharing is about sharing your own home, your primary residence. If it is a secondary residence or a commercial property being rented, it is no longer considered home sharing. Related to this is the maximum number of nights per year that a space is rented out"*

#### **ORHMA / GTHA OWNERSHIP RECOMMENDATIONS:**

- The rental unit must be the principal residence.
- The owners must reside in the unit.
- There must be only one listing per household.
- No host should be allowed to list multiple units.
- Define the cap on maximum number of rooms sold annually.
- Hosts cannot rent out their property for stays of less than 30 days unless they are registered as a hotel or a B&B as it is the case of a B&B where a resident must be present.

As well in order to address short-term rentals there is a need for enforcement to work effectively and easier. In order for your city to enforce such by-laws their needs to be accountability. We recommend a license registration process to be included with penalty fees and holding the platform accountable.

#### **ORHMA / GTHA ENFORCEMENT RECOMMENDATIONS:**

- Require registration for rental platform such as Airbnb at a set fee and the platform to include the rental unit's registration number on its listings.
- Hold rental platform such as Airbnb responsible for compliance of set rules and policies designed by the City of Brampton.
- Require registration of rental unit operations at a set fee with the City of Brampton and the registration number is to be posted on all advertisements including on line listing platforms.
- Require registration for rental platform such as Airbnb at a set fee and the platform to include the rental unit's registration number on its listings.
- Hold rental platform such as Airbnb responsible for compliance of set rules and policies designed by the City of Brampton.
- Develop penalty fees within the city's enforcement policies for not meeting your rules to both the rental units and the rental platform.
- Rental units to contribute to any tourism tax imposed on hotels.

ORHMA and GTHA strongly support a regulatory framework for illegal hotel rooms which includes zoning by-laws that meet the same standards of developing a hotel, and proper taxation that levels the playing field with the hotel industry. We appreciate the importance of short-term rental bylaws and recommend a municipal accommodation tax structure to follow.

**TAXATION RECOMMENDATIONS:**

- Municipal Accommodation Tax to be collected and paid.
- The City should review the opportunity to apply commercial property assessment.

Anyone operating in the commercial accommodations space should be subject to the same rules and regulations as other businesses doing exactly the same kind of work. The traditional lodging industry welcomes competition and is prepared to compete on quality, experience and price; but the rules of the game have to be applied evenly to all players. To be clear, we are not opposed to an individual using a home-sharing platform to rent out a room in his or her home to help make ends meet. This is about fairness. These laws and regulations should be upheld by anyone running a commercial operation.

Thank you for your time and consideration of our recommendations. It is important we work together to protect and regulate all short-term rental and commercial accommodations in the City of Brampton. Please do not hesitate to contact me to discuss further.

Yours truly,



**Tony Elenis**, President & CEO  
Ontario Restaurant Hotel & Motel Association (ORHMA)



**Terry Mundell**, President & CEO  
Greater Toronto Hotel Association (GTHA)