



Level 11, 30 Makerston Street Brisbane, QLD 4000
PO Box 13162, George Street QLD 4003
Phone: (07) 3236 1445
Fax: (07) 3236 4552
Email: info@qtic.com.au
Web: www.qtic.com.au
ABN: 75 095 706 095

A member of the National Tourism Alliance (NTA)

Committee Secretary
House of Representatives Standing Committee on Legal & Constitutional Affairs
PO Box 6021
PARLIAMENT HOUSE
CANBERRA ACT 2600

13 March 2009

Dear Sir/Madam

SM
RECEIVED
16 MAR 2009
BY: LACA

Submission re: draft Disability (Access to Premises – Buildings) Standards Guidelines 2009

The Queensland Tourism Industry Council (QTIC) welcomes the opportunity to provide feedback on the draft 'Disability (Access to Premises – Buildings) Standards Guidelines 2009' (the Premises Standards). QTIC agrees with the feedback raised to the Committee from the Tourism and Transport Forum and wishes to reinforce these concerns as part of this submission.

Queensland Tourism Industry Council

QTIC is a private sector, membership-based tourism industry organisation. QTIC represents the interests of the tourism and hospitality industries, including business operators, Regional Tourism Organisations (RTOs) and sector associations.

All of Queensland's RTOs are members of QTIC as are 22 of the industry's sector associations and in excess of 3,000 regional members, operating in all sectors of the tourism industry.

Feedback

QTIC understands that the Committee is to consider whether the draft 'Disability (Access to Premises - Buildings) Standards' will have an unjustifiable impact on any particular sector. With this in mind, QTIC wishes to draw your attention to the impost that these standards may have on the tourism accommodation sector in Queensland.

The Queensland Government's recent 'draft guideline for the meaning of class 2 classification under the Building Code of Australia', has the potential to eliminate overnight some 80% of the short term, self-contained, holiday accommodation in Queensland's key tourist areas. With the design of these guidelines, the Queensland Government seeks to address the issue of residential (class 2) apartments being used for short term letting. The Government proposes that this type of accommodation should be considered as class 3 and must comply with the same fire and disability guidelines administered to class 3 buildings. These

Proudly supported by:



guidelines, if implemented alongside the introduction of the 'Premises Standards' (which apply to changes of classification), will seriously threaten the economic viability of operators offering self contained apartments for short term letting.

QTIC is currently coordinating the interests of industry stakeholders on this issue, all of whom are still very concerned about the implications of these guidelines and, in particular, the issue of retrospectivity. This working group continues to develop a constructive, and fully consultative, way forward and to deliver an appropriate and mutually desirable outcome for all stakeholders. These negotiations will become more important, and increasingly more difficult, if a number of the recommendations outlined in the "Premises Standards' are introduced.

In addition to this issue, QTIC would also like to make the following further comments:

1. To remain competitive and to provide a quality product, tourism accommodation providers must frequently upgrade their facilities for visitors. However, if the cost of adhering to the Standards is not reasonable in relation to the costs of a renovation project, tourism accommodation providers will be deterred from upgrading their facilities. In addition, as tourism accommodation providers upgrade and refurbish more frequently than other businesses (and as the 'Premises Standards' apply to renovations or extensions to an existing building) they will have to adhere to the Standards more frequently and at a significant cost.
2. The ratio of disabled rooms that are required under the "Premises Standards' is also beyond anything that is demanded by visitors. QTIC requests that greater research is undertaken to ensure that the ratio of disabled accommodation units required as part of the disability guidelines is reflective of the actual demand for short term disability accessible units.

QTIC appreciates the opportunity to provide feedback on the draft 'Disability (Access to Premises – Buildings) Standards Guidelines 2009'. If you have any questions regarding this submission please contact David Liddell, Policy Officer, on (07) 3236 1445.

Kind regards,

Daniel Gschwind
Chief Executive