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**From:** Eagles Nest Retreat [REDACTED]  
**Sent:** Friday, 20 February 2026 2:39 PM  
**To:** Taxpolicy Advice  
**Cc:** Stuart Kent; Des Brown  
**Subject:** Submission on the Short Stay Levy Bill 2025 – Eagles Nest Retreat

[REDACTED]

To whom it may concern,

Thank you for the opportunity to make a submission on the *Short Stay Levy Bill 2025* consultation draft. We welcome any policy intent that responsibly supports Tasmania’s communities, housing affordability and tourism resilience. However, as a **second-generation, family-run agritourism and retreat business**, we have serious concerns with the current framing of the proposed levy — particularly its lack of clarity regarding exemption treatment for businesses like ours and the potential negative impacts on regional agritourism and farm-stay accommodation. Our business has no impact on housing availability yet under the bill our exemption is not guaranteed and a levy could cause us serious financial harm.

### **About Eagles Nest Retreat**

Eagles Nest Retreat is a **commercial property** that has operated as a short-stay accommodation business by permit from our local council for over 20 years. We are fully compliant with planning and commercial regulations, contribute to the regional visitor economy, and support local jobs, suppliers and partnerships. Our business model is rooted in **agritourism, outdoor experiences and boutique retreats**, attracting interstate and international visitors who seek authentic, place-based stays in Tasmania.

### **Key concerns with the draft Bill**

#### **1. Uncertainty around exemption for agritourism/retreat accommodation**

The draft legislation lists traditional accommodation types that are exempt (e.g., hotels, motels, bed and breakfasts, caravan parks) but does **not clearly guarantee an exemption** for property types such as ours — rural retreats, farm stays, eco-tourism lodges or similar experiences that are commercial in nature but **don’t fit the narrow “traditional bed and breakfast” definition**. The Bill states that exemptions include accommodation “as determined by the Treasurer”, but this leaves our sector exposed to **regulatory uncertainty** and potential unintended taxation of businesses that operate as commercial short-stay accommodation by statutory planning permission. Clarity is urgently needed to confirm that **commercial agritourism and farm-stay retreats approved under council permits are counted as exempt**.

#### **2. Unfair treatment of non-traditional commercial accommodation**

By limiting explicit exemptions to only a few defined categories, the Bill risks **disadvantaging innovative tourism operators** who have invested heavily to diversify regional tourism offerings. Many agritourism businesses do not meet the strict legal definition of a bed and breakfast (e.g., owner-occupied onsite), yet they are **legitimate tourism accommodation providers** just like hotels or caravan parks. Without clear exemption criteria, our business could become subject to the levy despite serving essentially the same market and regulatory role as other exempt accommodation types.

3. **Risk of adverse impacts on regional visitor economy and housing leverage**  
Agritourism and retreat properties deliver **regional dispersal of visitors**, drive **longer stays**, and provide economic multiplier benefits across small towns, farms and local suppliers. Additional administrative costs and pricing complexity from applying the levy to our accommodation will likely be **passed on to guests**, making Tasmania less competitive, particularly in *regional areas with limited commercial inventory*. This could reduce booking demand, harm occupancy rates and discourage investment in niche tourism enterprises. While the levy is framed around housing affordability objectives, it **must not penalise genuine regional tourism operators whose primary business is visitor accommodation**.
4. **Need for agritourism-specific policy consideration**  
Short-stay levies similar to those in other jurisdictions (e.g., Victoria, ACT) may help housing goals, but those models also clarify exemptions for unique property types and hosted accommodation. Our submission strongly advocates for **a tailored exemption pathway** within the Bill for agritourism, farm stays and retreat operators — including clear criteria that recognise:
- council-approved commercial land use,
  - alignment with regional tourism strategies,
  - contribution to local economies and employment,
  - absence of impact on housing stock.

## Recommendation

We respectfully request that the Short Stay Levy Bill 2025 be amended to include **explicit language that exempts commercial agritourism and farm-stay accommodation properties**, such as retreats, lodges and guest lodgings that operate under specific council permits. Without this, the Bill risks unintended outcomes that undermine regional tourism, discourage small business investment and unfairly burden operators who contribute significantly to Tasmania’s visitor economy.

We thank Treasury for considering this submission and would welcome the opportunity to discuss these issues further.

Yours sincerely,

Sheree Kent  
*Eagles Nest Retreat*

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