



Airbnb Submission: Proposed Tasmania Short Stay Levy (SSL)

Date: 25 February 2026

To: **Gary Swain**, Secretary, Department of Treasury and Finance
taxpolicy.advice@treasury.tas.gov.au

From: **Jeff Fung**, Head of Tax, Asia Pacific
Erich Tschopp, Global Head of Indirect Tax
Airbnb

Airbnb would like to thank the Tasmanian Government for the opportunity to provide feedback on the proposed Tasmanian Short Stay Levy (SSL), as outlined in the draft Short Stay Levy Bill 2025 (“SSL Bill”) and Discussion Paper.

Executive Summary

- Airbnb supports fair and sustainable regulation of the short-stay sector in Tasmania. We have partnered closely with the Tasmanian Government since 2019 to help implement the current statewide regulations for short-stay accommodation.
- Airbnb believes it is critical that introduction of a levy does not disturb the existing statewide registration and data sharing arrangements that operate successfully across the state.
- Airbnb’s experience in helping to implement SSLs across the world means we are well placed to provide feedback on the design and implementation of the levy.
- Airbnb strongly recommends that the commencement date be delayed by at least 12 months from the date the bill achieves Royal Assent (i.e. to 1 July 2027), to allow for appropriate education and implementation across the industry. In addition, other exemptions, such as a Primary Residence exemption should be considered.
- Airbnb welcomes further close collaboration with the Tasmanian Government to ensure the SSL is appropriately designed to ensure the state’s vibrant visitor economy continues to grow, noting the importance of the industry to Tasmanians.



1. Airbnb and Short Stay Levies across the world

As a short stay accommodation platform that operates in over 200 countries globally, Airbnb collects and remit SSLs in over 34,000 jurisdictions. We have also worked closely with numerous governments across the world to assist them in designing a SSL that helps ensure that implementation and subsequent administration of the new SSL is as efficient and effective as possible.

Most recently, we worked with the United Kingdom (specifically the Scottish and Welsh Governments), as well as the Canadian Government, who have implemented successful SSLs. And as you may know, we provided feedback to the Victorian and ACT Governments.

As such, we very much welcome the opportunity to provide feedback to help Tasmania refine its adoption of the Victorian SSL, such that it can be a model that works well for the benefit of the Tasmanian Government, as well as the platforms and the short stay host community in Tasmania.

We look forward to your feedback once you have had the opportunity to review this submission.

2. The Airbnb Community in Tasmania

Airbnb's community has a strong track record of growing the visitor economy in Tasmania by providing a range of accommodation options in more locations and across a variety of price points. In 2025, our host community welcomed over 600,000 guests across Tasmania.¹

Airbnb, and tourism more generally, are important contributors to Tasmania's economy. Tourism in Tasmania directly and indirectly contributes around \$4.55 billion or 10.8 per cent to Tasmania's Gross State Product (GSP).² In fact, a recent study by Oxford Economics found that Airbnb alone contributed \$500 million to Tasmania's GSP, supported 3,300 jobs and \$200 million in wages.³

The construction of the new Macquarie Point Stadium will play an important role in accelerating the growth of Tasmania's visitor economy, attracting significant arrivals of interstate and international visitors for major sporting and entertainment events. This increased visitation aligns with the State's 2030 Visitor Economy Strategy, which aims to more than double annual visitor spending to over \$5 billion by 2030.

Airbnb and short stay rentals are, and will continue to be, an important part of the accommodation mix for these guests, and in helping Tasmania meet increased demand and support visitor growth. Our community of hosts throughout the state help to grow events tourism through the creation of unique accommodation supply. The surge capacity, or elastic supply, of our platform presents opportunities for attracting and hosting major events, such as live music and cultural festivals, sporting events, business conferences, or international exhibitions.

¹ Internal Airbnb data as at 1 January 2026.

² <https://www.tourismtasmania.com.au/industry/facts/>

³ The report presents results for the 12 month calendar period of 2024. Prevailing exchange rates at the time of study were applied, using proprietary data from [Oxford Economics](#). All dollar amounts are in AUD.



Airbnb also plays a crucial role in helping people remain in their homes and communities by providing them with the ability to supplement their income. In a survey of hosts across Tasmania, almost half (44%) of all hosts said the income they earn from hosting on Airbnb helps them to stay in their home.⁴ In turn, these hosts help drive economic growth and job creation, with many locals and small businesses relying on the valuable tourism dollars spent by Airbnb guests.

Moreover, the supplemental income earned through home sharing empowers Tasmanian women and older or retired persons to remain in their homes and communities: almost 70 percent of Airbnb hosts in Tasmania are women and over a third are 60 years or older.⁵ As the cost of living rises and interest rates increase, home sharing provides an economic lifeline for everyday Tasmanians in helping to make ends meet.

3. Short Stay Levies in Australia

Based on our substantial experience in supporting and implementing SSL globally, when it comes to a successful SSL in Australia, Airbnb suggests the following core principles, which the draft SSL generally applies:

- **Broad scope that applies to all types and methods of booking short stay** accommodation, which helps future-proof the short stay accommodation sector. As such, it should apply to all platforms, regardless of whether they facilitate payments to the underlying accommodation provider. (A number of platforms do not fully facilitate / process payments).
- **Simplicity** that encourages voluntary compliance. In our experience, a simpler regime maximises compliance, which decreases the cost of administration to the state revenue authority. This is particularly important as the Tasmanian State Revenue Office (SRO) is likely to be interacting with platforms domiciled outside Australia:
 - **Exemptions only where necessary**, which decreases the need to educate affected parties, as well as require bespoke changes to processes and systems by industry participants.
 - **Simple calculation of levy** - e.g. based on a percentage of the accommodation charge, paid by the guest to the host. SSLs calculated on number of rooms etc, increase complexity.
 - **Form of tax return** - we strongly recommend electronic submissions which merely require headline data - e.g. gross booking value during the tax period (including adjustments) and total tax liability on the gross booking value. This would align with what the ATO's implemented for non-resident simplified GST returns [here](#).
 - **Lodgement and payment options** - simplified lodgement and payment options should be created in expectation that the majority of platforms in scope of the SSL

⁴ Internal Airbnb data - self reported through a survey of 386 Airbnb hosts from August 2024 to February 2026.

⁵ Internal Airbnb data - self reported on the Airbnb platform as at 31 December 2025.



are domiciled outside Australia.

- **Administration** - to avoid double-taxation, any SSL should override any other separate local government scheme.
- **Transition period / commencement date** - any new SSL should also take into account the time it takes for the Tasmanian SRO to educate the public ahead of its implementation, as well as for industry participants to build systems and processes.

We note that the Tasmanian Government is proposing a 1 July 2026 implementation date. We strongly recommend that the commencement date be delayed by at least 12 months from the date the bill achieves Royal Assent (i.e. to 1 July 2027). From our experience, an adequate implementation period is critical for ensuring the public's confidence in the tax system and administrator. We also strongly recommend that, for simplicity and not causing undue confusion, that the levy is effective for bookings made on or after the effective date.

4. General learnings from the Victorian Short Stay Levy

There were significant complications with the Victorian SSL, due in part, to the significant number of exemptions and the prescriptive process involved to operationalise them, the circularity tax-on-tax issue, and the higher 7.5% rate of the SSL, which was compounded by the circularity.

We deeply appreciate that the Tasmanian Government sought to address these issues in the draft SSL bill. We have provided detailed feedback in section 4 (and Appendix 1), to assist the Tasmanian Government achieve, what we assume, was its legislative intent.

That being said, we have highlighted below our general learnings from the Victorian SSL.

(i) Impact on the Victorian economy

Since the Victorian SSL took effect on 1 January 2025, our observation has been that adding a 7.5% levy to all short stays in Victoria appears to have severely negatively impacted the tourism industry.

Analysis provided by Oxford Economics indicates that the Victorian SSL has so far resulted in reduced tourism demand to Victoria, with a decrease in short stay rental guest nights of 0.6%, while the rest of Australia grew.

As a result, in 2025, Oxford Economics estimates that **AUD63 million was stripped from Victoria's Gross State Product, with the equivalent of 550 fewer jobs supported** (in H1 2025), particularly in regional areas. It demonstrates that a SSL, set at a high rate, can have a significant impact on the local visitor economy and result in the state being less competitive from a tourism standpoint.

At the same time, long term renters continued to experience median rental increases of between 2.5% (in Melbourne) to 5% in Regional Victoria, with the number of rental bonds (signalling long



term rental accommodation) decreasing by 4% across Victoria.

Given the reliance on tourism by the Tasmanian economy, we presume that the Tasmanian Government has carefully considered the rate of the SSL, and its likely economic impact.

(ii) Inadequate implementation period

Due to what we understand were political pressures, the Victorian SSL was introduced with extremely little time for the Victorian SRO to appropriately educate short stay hosts and platforms on its implementation. (Formal guidance was provided less than a month before the 1 January 2025 implementation date).

Because of this, there was significant confusion amongst hosts, which resulted in a severe administrative burden for both the SRO and platforms in educating hosts and operationalising the SSL.

The short notice afforded for the SSL meant that platforms took varying approaches to its implementation, with one platform apparently paying the SSL out of pocket for a significant portion of 2025. This severely disrupted the natural competitive balance of the short stay accommodation industry.

Because of this, we cautiously posit that the inadequate implementation time may have affected the public's confidence in the tax system and administrator. Which unfortunately, has impacted the perception of Australia and specifically, the Victorian Government, on the international stage.

5. Section by section feedback on the draft SSL Bill

Airbnb supports the proposed levy in principle, however we believe there are a range of changes to the current SSL Bill that must be made to ensure its successful operation. We again, deeply appreciate Tasmania's efforts to learn from the shortcomings of the Victorian SSL implementation, and apply improvements to the draft SSL Bill. We have seen this, for example, in the drafting to resolve the circularity issue (i.e. where any amount on-charged by a platform to the guest, was also subject to the SSL, creating a circular calculation that increased the effective rate of the levy).

To assist Tasmania, we have provided at Appendix 1, proposed amendments to the Bill, alongside our explanatory comments. These amendments were prepared with the assistance of Minter Ellison, and are intended to clarify what we assume was the intent of the Bill, in order to provide greater certainty to platforms and hosts.

In relation to the proposed amendments, we would suggest that Tasmania consider the following suggestions:

- An exemption be provided in section 5(3) with respect to a "Primary Residence", that adapts the provision provided in the Victorian SSL, but instead replicates the meaning of "primary residence" in the Tasmanian Short Stay Accommodation Act 2019 -



“premises that a person uses, or intends to use, as his or her primary residence, where the owner or renter of those premises has provided the booking platform provider, prior to the making of the booking, a declaration that the premises are being occupied as their primary residence”.

- Amend the bed and breakfast exemption to ensure that it can be practically administered by platforms. (The current proposal does not provide platforms with any certainty regarding whether a host provided breakfast to a guest one morning).
- Follow the approach of ACT Revenue with respect to declarations (i.e. in not prescribing a form). The prescriptive process of the Victorian SRO⁶, unfortunately created significant practical challenges for platforms, hosts, and the SRO.
- Ensure that the return process follows the approach of ACT Revenue, by not requiring the provision of underlying transactional data for bookings that quarter. Any provision of underlying transactional data is significantly onerous to provide, and administer. As such, we recommend that where data is required (e.g. for compliance purposes), it could instead be requested under section 65 of the *Taxation Administration Act 1997* (Tas).

6. Preservation of state-wide rules

Airbnb believes it is important that the introduction of a levy does not disturb the existing short stay registration process, data-sharing and other applicable state-wide rules that operate successfully for the short stay accommodation sector in Tasmania. The existing state-wide frameworks have ensured clarity, fairness and administrative consistency while allowing the visitor economy in Tasmania to grow.

Airbnb strongly suggests that the SSL override any other separate local government regulation or charges. The imposition of fragmented rates increases across different local government areas (or other arbitrary restrictions on short stay accommodation) would mean that while the SSL would apply uniformly in a strict sense, the actual burden placed on hosts would vary significantly depending on what additional short stay accommodation rates (or other restrictions) their local council has decided to impose (or decide to impose at some point in the future). This in turn could reduce the overall revenue the government receives from the levy, and negatively impact the visitor economy at a time when the government has set itself ambitious tourism targets.

Already in Tasmania, some councils apply higher rates to short stay accommodation hosts and are consistently looking to impose additional short stay restrictions, at odds with the government’s ambitious tourism targets. Airbnb considers it critical to the proper implementation of the SSL, including the management of its economic impact, for the State Government to uphold their commitment to preserve statewide regulations and take arbitrary and piecemeal council short stay restrictions off the table.

⁶ Which requires all hosts / owners must download and complete the SRO’s version of the declaration form, and submit that to a booking platform provider - <https://www.sro.vic.gov.au/short-stay-levy/complete-declaration-premises-are-not-short-stay-accommodation>



Appendix 1 - Proposed amendments to the Draft Bill⁷

PART 1 – PRELIMINARY

1. Short title

[No amendments to this section suggested at this time]

2. Commencement

[No amendments to this section suggested at this time]

3. Interpretation

In this Act –

approved form means –

- (a) a form approved by the Commissioner; and
- (b) any information required to be provided with, or attached to, a form approved by the Commissioner;

booking platform – see section 4;

booking platform provider means a person who provides a booking platform;

Commissioner has the same meaning as in the *Taxation Administration Act 1997*;

direct booking means a short stay booking for short stay accommodation that is made without using a booking platform;

emergency or crisis accommodation means accommodation provided –

- (a) for a prescribed period (if any);
- (b) on a non-permanent basis;
- (c) on a non-profit basis; and
- (d) which is prescribed to be emergency or crisis accommodation;

[Note for drafts person: ordinary short stay accommodation can be used for emergency or crisis accommodation. It will be difficult for the owner or booking platform provider to verify whether the booking is for emergency or crisis accommodation other than to accept a statement of the guest or person making the booking. The Victorian model confines this exclusion to a specific class of accommodation in the *Residential Tenancy Act*. There does not appear to be an

⁷ Proposed amendments to draft Short Stay Levy Bill 2025 (Consultation Draft dated 5 November 2025).



equivalent provision in Tasmania. The amendment is proposed to align the definition of "short stay accommodation" with the equivalent legislation in Victoria. Adopting a different definition, as is currently proposed in the draft Bill, will require booking platform providers to incur additional compliance / red tape costs of building unique platforms for the Tasmanian market].

GST has the same meaning as in the *A New Tax System (Goods and Services Tax) Act 1999* of the Commonwealth;

premises means the whole, or any part, of –

(a) a building, within the meaning of the *Building Act 2016*; or

(b) a caravan or other vehicle;

registered short stay levy payer means a person registered under section 14;

return period means the period referred to in section 15;

short stay, in relation to premises, means occupation of the premises for a continuous period of less than 28 **nightsdays**;

[Note for drafts person: the amendment is proposed to align the definition of "short stay" with the equivalent legislation in Victoria and ACT. Adopting a different definition will require booking platform providers to incur additional compliance / red tape costs of building unique platforms for the Tasmanian market].

short stay accommodation – see section 5;

short stay accommodation provider means a person who provides short stay accommodation for short stays;

short stay booking – see section 6;

short stay levy means the levy referred to in section 10;

total booking fee – see section 7;

vehicle includes –

(a) a vehicle within the meaning of the *Traffic Act 1925*; and

(b) any vessel, train or aircraft;

year means financial year.

4. Meaning of **booking platform**

[No amendments to this section suggested at this time]

5. Meaning of **short stay accommodation**



(1) In this section –

bed and breakfast, in relation to premises, means accommodation at the premises where –

(a) a part of the premises is occupied by the owner or operator of those premises at the same time as a part of the premises is occupied by a person under the short stay booking; and

(b) breakfast is provided by the operator of those premises, at no additional cost to a guest, each morning of the short stay booking; and

(c) where the short stay booking of the premises is made through a booking platform, the owner or operator of those premises has provided the booking platform provider, prior to the making of the booking, a declaration that the matters in paragraphs (a) and (b) will be satisfied in respect of the premises.

[Note for drafts person: as currently drafted it will not be possible for booking platform providers to implement the law with appropriate certainty, as there is no mechanism for them to monitor whether the owner or operator does in fact occupy the premises at the same time as the guest and whether breakfast is provided for the entire stay. By requiring a declaration to be provided, this ensures booking platform providers will have sufficient information to administer the provision.]

health facility includes –

(a) a public hospital, or private hospital or day-procedure centre, within the meaning of the *Health Service Establishments Act 2006*; and

(b) a hospice; and

(c) a consultation room of a practitioner within the meaning of the *Health Service Establishments Act 2006*; and

(d) a facility used to provide health services within the meaning of the *Tasmanian Health Service Act 2018*;

mobile accommodation means premises that are a caravan or other vehicle that –

(a) has been hired, for consideration, for the purpose of being –

(i) operated as a vehicle; or



(ii) towed by a vehicle; and

(b) is hired to be used as accommodation at a location other than the location where the caravan or other vehicle is hired;

primary residence has the same meaning as in the *Short Stay Accommodation Act 2019*.

(2) For the purposes of this Act, short stay accommodation means premises within the State that may be used by a person for accommodation other than premises specified in subsection (3).

(3) Short stay accommodation does not include any of the following premises:

(a) accommodation at a hotel, motel, inn or similar commercial premises;

(b) accommodation at a bed and breakfast;

(c) accommodation at a hostel, boarding house, lodging house or similar commercial premises;

(d) accommodation at a caravan park, camping ground or similar premises;

(e) accommodation for a patient of a health facility, if the accommodation is provided by the entity who owns or operates the health facility;

(f) accommodation used for housing support services, within the meaning of the *Homes Tasmania Act 2022*, that is provided by a housing support provider within the meaning of that Act;

(g) a residential care service within the meaning of the *Land Tax Act 2000*;

(h) a retirement village within the meaning of the *Land Tax Act 2000*;

(i) premises that are primarily used to provide residential accommodation by, or on behalf of –

(i) a school within the meaning of the *Education Act 2016*; or

(ii) TasTAFE within the meaning of the *TasTAFE (Skills and Training Business) Act 2021*; or

(iii) an institution within the meaning



of the *Higher Education Funding Act 1988* of the Commonwealth;

(j) emergency, or crisis, accommodation for people in crisis that is –

(i) at premises used for emergency or crisis accommodation; and

(ii) provided by the entity who owns or operates the emergency accommodation;

(k) accommodation for a person who is employed, or engaged, by another person that is –

(i) at premises located at, or associated with, the place of that employment or engagement; and

(ii) provided by the other person in connection with that employment or engagement;

(l) a vessel that is mainly used for transport in the ordinary course of a business providing vessels for transport;

(m) mobile accommodation;

(n) accommodation that is declared, by order under section 21, as exempt premises;

(o) premises that a person uses, or intends to use, as his or her primary residence, where the owner or renter of those premises has provided the booking platform provider, prior to the making of the booking, a declaration that the premises are being occupied as their primary residence”.

[Note for draftsperson: we have suggested inserting a principal place of residence exemption, to align the Tasmanian SSL with Victoria. A declaration is critical as a platform has otherwise no certainty that premises are being occupied as the principal place of residence. By requiring a declaration to be provided, this ensures booking platform providers will have sufficient information to administer the provision.]

(4) In determining whether premises are short stay accommodation for the purposes of this Act, it is irrelevant whether or not –

(a) the premises are used for more than one purpose including, but not limited to –

(i) residential premises; and

(ii) a purpose other than the provision of short stay accommodation or



residential premises; and

- (b) the premises are –
 - (i) permanent or temporary; or
 - (ii) fixed to the land or mobile.

6. Meaning of *short stay booking*

[No amendments to this section suggested at this time]

7. Meaning of *total booking fee*

(1) For the purposes of this Act, the total booking fee for a short stay booking means the total amount that is payable for the booking, other than –

- (a) an amount that has been waived or provided as a credit or refund to the person who booked the accommodation; and
- (b) an amount charged in respect of the payment method used to pay for the booking; and
- (c) an amount, that is included in the amount payable due to the short stay levy, that does not exceed the amount payable under this Act for the short stay booking (including any GST that is payable in respect of this amount)

(2) For the avoidance of doubt, the total amount that is payable for a short stay booking includes –

- (a) any GST that is payable in respect of the Booking (other than any GST referred to in paragraph (1)(c)); and
- (b) any amount that is payable in respect of the booking, regardless of whether the person occupies the premises for the short stay, unless the amount is waived or provided as a credit or refund.

[Note for draftsman: as currently drafted, where the short stay levy is recovered from the guest, the recovery of that short stay levy will be subject to GST. As the total booking fee includes GST, it will also include the GST on the recovery of the short stay levy, even though the short stay levy is not included in the total booking fee. This creates a circular equation making it difficult to calculate the GST and short stay levy. It also increases the cost of the short stay levy. The amendments are intended to address this by making it clear that the exclusion of the short stay levy also includes GST payable on the recovery of the short stay levy].

8. Application of Taxation Administration Act 1997

[No amendments to this section suggested at this time]



9. Act binds Crown

[No amendments to this section suggested at this time]

10. Short stay levy imposed

[No amendments to this section suggested at this time]

11. When does liability for the short stay levy arise?

[No amendments to this section suggested at this time]

12. Who is liable to pay the short stay levy?

[No amendments to this section suggested at this time]

13. How to calculate levy if booking fee in foreign currency

[No amendments to this section suggested at this time]

14. Registration for payment of short stay levy

[No amendments to this section suggested at this time]

15. Return period for levy

[No amendments to this section suggested at this time]

16. Lodgement of return and payment of tax

[No amendments to this section suggested at this time]

17. Person to notify Commissioner if no longer liable to pay levy

[No amendments to this section suggested at this time]

18. Cancellation of registration for payment of short stay levy

[No amendments to this section suggested at this time]

19. Declaration that premises are no longer short stay accommodation

(1) Prior to any booking being made through a booking platform, ~~An owner or operator of premises person who has entered into an agreement with a booking platform provider in respect of premises~~ must provide the booking platform provider with a declaration, ~~in an approved form,~~ under this section if –

(a) the person has made the premises available for short stay bookings on the booking platform provided by the booking platform provider; and

(b) ~~after making the declaration,~~ the



premises are not, ~~or are no longer, to be able to be booked as~~ short stay accommodation ~~on that booking platform~~.

(2) A declaration under this section must contain the information, determined by the Commissioner.

[Note for drafts person: the intent of the current drafting is not entirely clear. Paragraph (b) refers to "after making a declaration" but it is not clear what the first declaration is that is being referred to. The current drafting also appears to require a declaration in circumstances where an owner removes a listing from the site of the booking platform. If this was intended, the purpose is not clear and it would be inconsistent with the requirements in Victoria and ACT.

The proposed amendments are aimed at aligning the requirements with Victoria and ACT, where a declaration is required if the owner wishes to have stays in the premises excluded as a short stay booking. The proposed amendments also address a shortcoming in Victoria by avoiding the need to have the declaration in a prescribed form which is difficult for booking platform providers to comply with and requires systems to accommodate multiple forms for different states. Rather, the proposed amendments allow the Commissioner to determine the information that should be included in the declaration. Ideally this should align with the requirements in the Victorian form].

(23) A booking platform provider who receives a declaration under this section ~~or section 5~~ must retain the declaration for at least 5 years after the ~~date the provider~~ booking platform received the declaration.

(34) If a person makes a declaration under this section in respect of premises –

(a) the Commissioner may determine that, despite the declaration, the premises are short stay accommodation; and,

(b) the person who made the declaration and the booking platform provider who received the declaration are jointly and severally liable to pay –

(i) any amount of unpaid short stay levies payable in respect of the premises; and

(ii) any interest or penalty tax imposed under the *Taxation Administration Act 1997* in respect of the unpaid short stay levy.

(45) A booking platform provider who pays an amount of unpaid short stay levy under subsection (34), in respect of premises, may recover the amount from the person who made the declaration in respect of the premises, as a debt due and owing in a court of competent jurisdiction.



(6) A booking platform provider will not be liable jointly and severally with a person who made the declaration under (4) except where the booking platform provider had reasonable grounds to believe the statement made by the person was false.

[Note for draftsperson: subsection (6) is intended to provide reasonable protection for the booking platform provider where they act reasonably and in good faith]

20. Non-application of Act

[No amendments to this section suggested at this time]

21. Minister may declare premises as exempt premises

[No amendments to this section suggested at this time]

22. Regulations

[No amendments to this section suggested at this time]

23. Administration of Act

[No amendments to this section suggested at this time]

24. Consequential amendments

[No amendments to this section suggested at this time]

* * * * *