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**From:** Steven Hebb <info@princesinletretreat.com>  
**Sent:** March 11, 2019 3:33 PM  
**To:** Office of the Legislative Counsel  
**Subject:** Bill 101 - Tourist Registration Act

Previously submitted March 11, 2015.

To the Nova Scotia Tax and Regulatory Review

Submission by Steven Hebb of Prince's Inlet Retreat Limited:

As a concerned citizen of Canada and a small business owner of a tourism accommodation property in Nova Scotia (25 years of operation), I'm contacting the Nova Scotia Tax and Regulatory Review with concerns of an underground economy that has been growing within the accommodation sector of our tourism industry. With licensing and regulations I believe there is a golden opportunity for our provincial government to collect more tax revenue and foster healthy growth in the accommodation sector of Nova Scotia's Tourism Industry. It could also be a model nationally.

The underground economy, the so called "sharing economy", within our tourism industry in Nova Scotia is growing out of control. Numerous properties in the province (most likely in the thousands for 2015) are unlicensed and unregulated and being promoted as tax free daily and weekly rentals on sites like Airbnb.com, FlipKey.com / TripAdvisor.com, vrbo.com, stayinnovascotia.com and other tourism portals and through some real estate companies too. This has been growing for at least 10 years or longer and is eroding away at the business occupancy and livelihood of legitimate small family accommodation businesses like Prince's Inlet Retreat. Regulations and licensing have never been more important that they are today in 2015.

I've been working very hard and communicating with many facets of government for several years requesting that licensing and regulations be reintroduced similarly as they were when we started our business back in 1990 for tourism related accommodation rentals. All of my concerns to date have fallen on deaf ears. When we started the Retreat back in 1990 the playing field was level and licensing and regulations were enforced.

The ease to promote an unlicensed and unregulated property through the internet has grossly leveled the playing field in Nova Scotia and has allowed an unethical business advantage for those property owners. These conditions do exist in growing numbers within our industry in the province and most people don't even realise there is an issue as serious as this when they are searching for and booking their vacation accommodations in Nova Scotia. There are also public health and safety guidelines that go along with licensing and regulations for tourists. Without licensing and regulations public health and safety can become a serious issue too.

I would also like to point out that the role of licensing and regulations help keep all of us safe. We all know that we live in a very volatile world when it comes to public safety. I'm concerned that radical groups may exploit sites like Airbnb.com to promote their ideology, their violent agendas & campaigns and figure out a way to disrupt our western way of life. At least with licensing and regulations in Nova Scotia and hopefully all of Canada we will have some type of handle on who is participating in our provincial and national tourism industry. Also, regulations and licensing ensures that guest registries are kept which, again, can help keep all of us safer. As the underground economy (the sharing economy) continues to grow there are no guarantees that proper records are maintained and my belief is that public safety is at risk because of this and becoming more and more of a grey area.

Thank you for taking the time to read my submission and I will be forwarding it on to hopefully create a provincial/national discussion.

Sincerely,  
Steven Hebb, GM

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PS: Prince Edward Island has a very comprehensive Tourism Industry Act. Part of their act address the unlicensed accommodation owner and the penalties if caught owning and operating an unlicensed accommodation property.

It's very impressive the way PEI is dealing with this very serious issue and the way they are protecting the small licensed accommodation operators/owners interests. It's a model for Nova Scotia and in my opinion for all of Atlantic Canada and the country too.