



**ASSOCIATED RESIDENTIAL  
PARKS QUEENSLAND INC.**

**ANNUAL GENERAL MEETING**

**TUESDAY 25<sup>th</sup> OCTOBER 2022**

**Agenda item 8 – Advocacy Report**

Advocacy and representing the interests of home owners and prospective home owners in manufactured home residential parks is a major part of why the ARPQ exists. A summary of what has been achieved in this aspect of the Association's work can be found in my President's Report. Here I will focus upon putting those achievements into the context of ARPQ's longer term advocacy goals and the important work that lies ahead in this area in the coming 12 months.

When the nature of the 2017 reforms to the Manufactured Homes (Residential Park) Act, 2003 became clear, ARPQ quickly recognised that they were unlikely to provide adequate protection to home owners in the face of the business practices of increasingly corporatized park owners intent on maximising the income they could pass on to their shareholders. Experience has proved our assessment at the time to be correct. Over the past five years the focus of our advocacy has been upon persuading the government to review the Act once more with a view to making changes that will provide greater consumer protection to our members.

The sections of the Queensland Housing and Homelessness Action Plan, 2021-25, issued by the Department of Communities, Housing and the Digital Economy (DCHDE), that refer to the manufactured homes industry are a source of hope that home owners are being heard and that meaningful and effective legislative and regulatory changes could be made in the next 12 to 18 months. This outcome is however far from certain. Achieving it is likely to require further strong advocacy by ARPQ and all home owners during the period in which the reform processes, which are already underway, are being worked through.

The Action Plan outlines two areas that will be reviewed and reforms considered: (a) Site Rents and Sale of Homes; (b) Management of Disputes. The processes will be the same but separate for the two areas. The Department of Communities, Housing and Digital Economy (DCHDE) have given us a clear picture of what these processes will entail.

They can be thought of as falling into two parts. In the first part there will be three stages:

Step 1 - Problem Identification - In the case of site rents and sale of homes the Issues Paper and Residents Survey published by the Department in June and analysis of the feedback given to them will enable the identification of issues.

For dispute management the research by consultants commissioned by the Department in 2021 and other feedback from stakeholders, including ARPQ, will be used

Step 2 – A Consultation Regulatory Impact Statement (CRIS) will be published for each of the two areas. These will outline what the Department believes are the problems and issues that need to be addressed and are based on Step 1. They will also put forward a range of options for legislative, regulatory and other reforms to address the problems along with discussion of the wider implications of implementing each of them.

The Minister and DCHDE officials have told us that they aim to publish these Consultation RIS along with calls for further feedback from home owners and stakeholders by the end of 2022 or early in 2023.

Step 3 – A Proposal Regulatory Impact Statement (RIS) (I believe this is the correct name) will be published by DCHDE drawing on the outcomes of the the Consultation RIS. In it they will outline the set of proposals for reforms they intend to take to the Minister and Government. Again feedback from home owners and stakeholders will be sought.

The outcome of this first part of the process will then be a set of proposals for legislative, regulatory and other reforms in relation to first, site rent and sale of home issues and second, dispute management issues.

In the second part of the process these proposals will go to the Government who will make a decision on the content of draft amendments to the Act to present to parliament. There they will be considered by a parliamentary committee before being voted upon by the Legislative Assembly.

When I met a few weeks ago with Minister Leanne Enoch and her advisors in my role as ARPQ President, she assured me that she will be very disappointed if these processes are not completed by the end of 2023.

These processes mean that there will be opportunities for ARPQ and home owners to give feedback to the two rounds of regulatory impact statements. It is likely that there will also be the opportunity to make submissions when the draft amendments to the Act are considered by a parliamentary committee.

As well as giving feedback it will be important for the ARPQ Committee, our members and indeed all home owners in manufactured home residential parks to engage in strong political advocacy if we are to achieve the sort of reforms which will make the Act the strong piece of consumer protection legislation we all desire.

**Roger Marshall, Ph.D., M.Ed.**

**President, ARPQ**