



10 September 2026

CBOS
PO Box 56
Rosny Park TAS 7018

Via email: cbos.consultations@justice.tas.gov.au

**Re: Consultation: Documents relating to the Residential Parks
Regulations 2026**

We welcome the opportunity to provide input into the *Residential Parks Regulations 2026*.

Model Residential Park Rules

We support the proposed model rules as drafted.

Infringement Notice Scheme

Infringement notices should strongly deter park owners from breaching the new laws. A fine cannot simply become a “cost of doing business”. The proposed infringements are only 10 per cent of the maximum penalty. This can be contrasted with the *Residential Tenancy Act 1997*, where infringements are 20 per cent of the maximum penalty (though identical in an absolute sense). We are concerned that a fine of \$2,130 would not adequately deter certain conduct where the owner stands to obtain an advantage regardless. For instance, charging rent above the amount fixed by a TASCAT order.

There are also certain serious breaches of the legislation that do not have infringements attached to them. We understand that the intent behind this may be that they are too serious for the comparative ‘slap on the wrist’ of an infringement notice. However, based on our experience with the enforcement of the *Residential Tenancy Act 1997*, we would be highly concerned that breaches of these provisions will instead simply go unpunished.

Abandoned Property Threshold

We support a low threshold in s 87(b), for the following reasons:



1. Even with a lower threshold, there are unlikely to be many items that collectively have a resale value that meets the threshold. As such, the burden on the owner will be low.
2. With a mid-range or higher figure, many items of genuine value and utility may be disposed of: TVs, computers, phones, games consoles, appliances, furniture.
3. As there is only so much property that can kept in a caravan or cabin, particularly large furniture, the burden of sorting through and storing the property is unlikely to be onerous.
4. Whilst they would not fall within the definition of personal documents, it is highly likely that any phones or computers left at the premises would have personal documents stored on them.
5. Given the socio-economic status of most caravan park residents, the value of their possessions will likely constitute a large portion of their personal wealth. In other words, the marginal value of these items is likely to be higher for the resident than it would be for a member of the general population.
6. It should not be assumed that a caravan park resident has abandoned property out of a desire to make life difficult for the owner. There are many legitimate reasons a resident may need to leave on short notice – such as fleeing family violence – and as such the regulations should err on the side of allowing former residents an opportunity to recover abandoned property. It is unlikely that a resident would leave valuable property behind if they had other options available to them.
7. Owners should be discouraged from creating waste, particularly e-waste. Functional items should be re-used and re-sold, where at all possible.

We do not support the figure being indexed, as the prices of items most likely to be subject of this provision do not necessarily increase over time – consumer goods like TVs, computers, phones and kitchen appliances have, for the most part, decreased in cost as time has gone on. The main drivers of inflation are housing, food, alcohol and tobacco, and healthcare. Tying the threshold to CPI would therefore have the effect of increasing the threshold in absolute terms, rather than preventing erosion.

Approved Forms

We support the approved forms as drafted.

Yours Sincerely,



Alex Bomford
Senior Solicitor

Tenants' Union of Tasmania