

# Accountable at the Source:

Why Platform Accountability  
Can't Be Left Out of Vancouver's  
Short-Term Rental Regulation



## Introduction

Airbnb removes rental housing stock from Canadian cities - this is the conclusion of a growing number of independent reports, academic studies and government research.<sup>1</sup> That Airbnb consumes large amounts of Vancouver's rental housing stock during one of the city's worst housing crisis has been shown by researchers and housing advocates as early as 2015.<sup>2</sup> It is of little surprise then that the City of Vancouver has taken a leading role among Canadian municipalities on this problem. Vancouver's Mayor Robertson candidly acknowledges that Airbnb and other short-term rental companies "have gobbled up a lot of the long-term rental supply."<sup>3</sup>

Developing policy to protect long-term rental housing from being consumed by short-term rentals has become a policy issue in a number of Canadian cities. In Vancouver, City Council directed staff to study Airbnb's housing market impact and to develop a plan to develop a regulatory framework in April 2016. In October of the same year, the Standing Committee on Policy and Strategic Priorities reviewed a draft regulatory framework and directed staff to continue consultation and to report back with a proposal for short-term rental regulations. Moving through the policy process comparatively quickly, staff reported back to Vancouver's City Council with a regulatory framework for consideration in July 2017.<sup>4</sup>

Fairbnb.ca previously commented on Vancouver's proposed short-term rental framework, saying that it includes much from which other Canadian municipalities can learn, particularly as far as the city's commitment towards protecting its secondary suite and lane way housing stock from short-term rental use is concerned.<sup>5</sup>

However, upon closer review, and following current developments in other cities, we fear that the City of Vancouver is setting itself up for regulatory failure.

We say this because Vancouver's lack of platform accountability measures and its reliance on negotiating a special deal with the \$30-billion company effectively leaves Airbnb off the hook for taking responsibility for unlawful properties that might be advertised and rented through the platform once regulation is enacted. Without platform accountability measures, we predict, Airbnb will continue its feast on Vancouver's rental housing market. No measure of goodwill or talk is going to avoid this scenario, unless Airbnb

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and other short-term rental companies are made to re-tool their platforms to effectively enforce the city's own rules and regulations.

It is not too late to avoid this outcome. It is Fairbnb.ca's contention that Canadian cities should learn from other jurisdictions and avoid making the common mistake of passing inadequate regulation, only to have to return to the drawing board a year or two later. Canadian cities are in a unique position to get it right the first time. San Francisco, Airbnb's hometown, provides an important case study on how regulators around the world can hold short term rental platforms accountable. Platform accountability is key to ensure enforcement of short-term rental regulation will take place.

In what follows, this report will briefly outline how platform accountability can be used as a way to circumvent the enforcement problems that many cities face when it comes to short-term rental activities. We will use the case of San Francisco as an example to highlight that holding platforms accountable, and making them police their own host community, is indeed a workable and feasible option. Most importantly, we caution staff and decision makers to not rely on Memorandums of Understandings (MoUs) between Airbnb and the City of Vancouver, as these have been shown to be a highly inadequate tool to protect rental housing supply and help govern a city's short-term rental activity.

## What is Platform Accountability and Why Establish it?

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What Fairbnb.ca means by "platform accountability" is simple. Short-term rental platforms like Airbnb must be held accountable and liable for illegal properties advertised on their websites once short-term rental regulation has been passed. Just like any other business in Canada is held accountable for following rules and regulations, Airbnb must be held accountable for each and any illegal property listed on its website. In too many cities that have already established short-term rental regulations, Airbnb continues to advertise and profit from properties that are violating local bylaws. Real platform accountability means Airbnb polices its own host community, ensuring that all advertised rental properties comply with local short-term rental regulation.

Without platform accountability measures, Airbnb continues to advertise and profit from illegal listings and government authorities won't be able to achieve their public policy objectives. In Whistler, for instance, short-term rentals of less than four days are illegal, yet Airbnb advertises and rents plenty of such properties to tourists.<sup>6</sup> In New York City, the vast majority of properties advertised on

Airbnb continue to be illegal, despite state and city laws that seek to regulate this market.<sup>7</sup> In Berlin, despite regulation, the advertisement of illegal properties increased on Airbnb's website by 54% in a little over one year.<sup>8</sup> In Barcelona, municipal government authorities have gone so far as to put up public art installations, placing beds in strategic locations with signs in several languages saying: "Just because this bed is available on the internet doesn't mean it is legal."<sup>9</sup>

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## How to Establish Platform Accountability?

Establishing platform accountability is a three-step process. First, local government authorities have to develop rules and regulation around short-term rental activity. Second, a permit system will have to be set up to permit properties for short-term rental use according to the developed rules and regulations. Third, short-term rental platforms would have to be licensed and the license agreement must entail terms and conditions that legally bind platforms to only advertise properties with a valid, city-issued permit number. Should platforms like Airbnb advertise illegal listings, i.e. properties that are not permitted and thus don't comply with local rules and regulations, platforms should be fined for each day an illegal listing is advertised and, in the last instance, lose their right to operate within a given jurisdiction.

Establishing platform accountability is the most efficient way to regulate the burgeoning short-term rental market. It forces platforms like Airbnb to effectively police their host community and ensures that local policy objectives are met without exception. The company has the financial resources and technological capacity to re-tool its platform in ways that ensure that only lawful properties will be advertised for rent. The most obvious way to go about this is to treat a city-issued short-term rental permit number like credit card information. Providing an invalid short-term rental permit number, just like an invalid credit card number, should automatically put a stop to the registration process. Airbnb has to become accountable for the properties advertised on its site. This is the most efficient way to weed out unlawful properties and to ensure municipal policy objectives will be met.

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## Important Lesson: San Francisco and Platform Accountability

Being directly held accountable for unlawful properties advertised on its website has long been opposed by Airbnb. The company's political playbook thus far has relied on downloading

responsibility and accountability to thousands of individual hosts and therewith absolving itself of responsibility vis-à-vis government authorities. This attitude is clearly expressed in the following statement made by Alex Dagg, Airbnb's public policy manager for Canada: "Essentially, it's really the host's obligation to comply with laws, it's part of our terms of service that we have."<sup>10</sup> There are examples, however, that lead the way towards establishing platform accountability, for instance in San Francisco, where "Airbnb says it is ready to police its San Francisco hosts, taking actions it has long resisted as invasive, unrealistic or unwieldy."<sup>11</sup>

Just how did Airbnb change its attitude in its hometown? The following section provides a brief summary of the ways in which San Francisco discovered that an approach relying on Airbnb's host community to comply to local short-term rental regulation was not feasible. It provides lessons for Canadian cities, Toronto and Vancouver included.

In February 2015, San Francisco legalized short-term rental companies such as Airbnb, HomeAway, VRBO, FlipKey and others. In order to be legalized, hosts have to obtain a business registration certificate and register with the San Francisco Treasurer and Tax Collector. They must ensure that they have proper liability insurance and pay the City's 14% 'transient occupancy tax.' Importantly, to prevent landlords from evicting tenants to create ghost hotels, second homes and investment properties are excluded from the short-term rental market, and entire home listings must be tied to a host's principal residence and are capped at 90 days per year.<sup>12</sup>

Yet, after a 15-month period, only 15% (1,282 out of 7,046) hosts had complied with San Francisco's ordinance,<sup>13</sup> while Airbnb listings continued to grow.<sup>14</sup> The City's Board of Supervisors realized that the city's rules and regulations are ineffective if platform accountability and liability are not part and parcel of the policy response. On June 7, 2016 San Francisco's Board of Supervisors voted on an additional set of rules, in a 10-0 vote, requiring short-term rental websites to only post rental listings by hosts who have registered with the City, or face up to \$1,000 in daily fines.<sup>15</sup> Aaron Peskin, Member of the San Francisco Board of Supervisors referred to this important amendment in the following way: "We are closing a long-standing loophole by holding the hosting platforms accountable for the hundreds of units (rented by) unscrupulous individuals who have taken multiple units of affordable housing off the rental market."<sup>16</sup>

The same day San Francisco's Board of Supervisors arrived at its unanimous decision to establish platform accountability and liability, Airbnb sued the City claiming it had violated the Communications Decency Act, a federal law that protects websites from liability for the content uploaded by users.<sup>17</sup> On November 8, 2016, a federal judge rejected Airbnb's request to block San Francisco's ordinance. Judge James Donato rejected the company's claim that the ordinance violated

a federal law that protects internet companies from liability for content they post. Donato said that the San Francisco ordinance “does not regulate what can or cannot be said or posted in the listings. It creates no obligation on plaintiffs’ part to monitor, edit, withdraw or block the content supplied by hosts.”<sup>18</sup>

Not long after the federal judge rejected Airbnb’s request to block San Francisco’s ordinance, Airbnb agreed to co-operate with the city and help it enforce its rules. “In a dramatic about-face,” as the San Francisco Chronicle called it, “Airbnb says it is ready to police its San Francisco hosts, taking actions it has long resisted as invasive, unrealistic or unwieldy.”<sup>19</sup> The San Francisco case shows that Airbnb is clearly in the position to comply with municipalities’ rules and regulations, but only after they have exhausted all possible means to oppose them.

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## Toronto Proposes Platform Accountability

Learning from San Francisco means taking platform accountability seriously. Toronto, for instance, appears to have taken San Francisco’s approach to heart. City staff has developed a proposal for short-term rental regulation that includes permitting hosts *and* licensing short-term rental platforms to ensure that Airbnb and other websites will only post lawful listings, i.e. properties that have received a municipal permit number.<sup>20</sup> Vancouver should consider following San Francisco’s (and Toronto’s, if approved) lead and hold Airbnb and other short-term rental platforms directly accountable for any unlawful properties. Establishing such platform accountability would avoid the regulatory failure that has ensued in cities around the world, where short-term rental regulation is in place, but platforms are not being held accountable for the growth of illegal listings they continue to advertise and make their money off.

## Where is Vancouver at?

Given that Airbnb continues to rapidly grow its inventory, including unlawful properties, why would one not establish a legal framework that is persuasive enough to make Airbnb comply with local rules and regulations? Airbnb’s answer to that question: because Airbnb is just a website, it cannot be held accountable for the content posted on it by thousands of individual hosts.<sup>21</sup> To add insult to injury, Airbnb may even go so far as to argue that it is not a regular business, that because of its web based nature, it cannot be held to the same standards as local brick and mortar businesses. The

latter argument in particular has been used for years to avoid the payment of corporate taxes in the jurisdictions it operates in.<sup>22</sup>

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A close reading of Vancouver's proposed short-term rental regulations illustrates that Airbnb's arguments seem to resonate with city staff. The report states, without providing reference, that "there is an ongoing legal debate on whether online platforms (e.g. AirBnB, CraigsList, Uber, etc.) are actually "conducting business in Vancouver," or whether they are merely providing a platform which enables their users to conduct business."<sup>23</sup> Given the recent McGill

University planning study that showed how much revenue Airbnb generates by renting properties in Vancouver's market,<sup>24</sup> this claim seems to be rather baffling. Even more so, since staff conceded that if Airbnb would be a traditional hotel, it would be Vancouver's single largest.<sup>25</sup> In addition to the uncertainty as to whether Airbnb actually operates a business in Vancouver, staff seems unsure as to whether Airbnb can be licensed like any other business that makes money in the city. Again, the report states: "[b]usiness licences [sic] are currently required if STR Platforms have offices or staff based in Vancouver, but licensing requirements are unclear for Platforms based outside of the City."<sup>26</sup>

Needless to say, Fairbnb.ca considers these statements highly problematic as they set the tone and stage for regulatory solutions that absolve Airbnb of real accountability in one of Canada's largest marketplace for Airbnb.<sup>27</sup> The regulation as it is proposed today, presents an ideal scenario for short-term rental companies like Airbnb, one that will see its inventory of unlawful properties grow year by year.

## MoUs: Airbnb's Way to Avoid Accountability

What is staff proposing, in light of what appears to be a rather successful attempt by Airbnb to dissuade Vancouver from developing an approach towards direct accountability? Staff recommends coordinating joint meetings with short-term rental platforms to develop Memorandums of Understanding (MoU) to help govern short-term rental activity and support compliance with the proposed regulations.<sup>28</sup> Given that MoUs are legally non-binding expressions of goodwill,<sup>29</sup> and given the problematic history of MoUs "negotiated" between Airbnb and government authorities in other jurisdictions, Fairbnb.ca considers this approach highly unsuitable to govern short-term rental activity in Canada's third largest Airbnb market. It will not result in meeting its policy objectives.

A MoU between Airbnb and the City of Amsterdam, for instance, had Airbnb agree to "notify hosts in a powerful manner that they are obliged to offer homes for rent in compliance with applicable

rules.”<sup>30</sup> Needless to say, this didn’t prevent three-quarters of Amsterdam’s listings from violating local rules and regulations.<sup>31</sup> A MoU between the City of Seattle and Airbnb specifically states that it is “not intended by the parties to be a legally binding agreement or [to] create legal obligations for the parties.”<sup>32</sup> Rather than helping cities to regulate the short-term rental market, MoUs disempower government authorities in exchange of promises that come cheap and have not curtailed the dramatic increase of illegal listings. What we have learned from experiences in cities around the world is that city governments need to develop the exact opposite: legally binding language that can be used to hold short-term rental platforms directly accountable for each and every illegal property they advertise and profit from.

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Developing MoUs with Airbnb allows government authorities to gain some positive media headlines about “tackling” Airbnb related problems in the short-term, but in reality it does little but to exacerbate already existing problems. For Airbnb, MoUs present an opportunity to make public statements about “co-operating” with government authorities, while being absolved of any real responsibility or accountability.

In short, Fairbnb.ca suggests developing a regulatory framework that hinges on platform accountability as the most efficient way to enforce local short-term rental rules and regulations. Relying on the voluntary compliance of thousands of individual hosts has not been a successful solution in any jurisdiction that we are aware of.

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