

TO:

Office of Regulatory Policy
Department of Justice and Attorney-General
GPO Box 3111
BRISBANE QLD 4001

November 3, 2019

Dear Sir/Madam

Thank you for inviting submissions to the 2019 Standard Module Consultation Draft. SCA (Qld) has been privileged to be involved in the Queensland Property Law Review since its inception and we are excited to see the progress that has been made. We congratulate the Queensland Government for acting on these matters and look forward to the modernisation of the legislation governing strata communities.

About SCA (Qld)

SCA (Qld) is a non-profit, professional organisation for bodies corporate, body corporate managers and suppliers of services to the body corporate industry in Queensland. SCA (Qld), through its predecessor CTIQ, was established in 1984 and currently has nearly 800 individual and over 200 corporate members. SCA (Qld) members administer more than 65% (300,000) of all strata-titled properties in Queensland and an estimated 90% of all managed properties. The strata sector comprises of 513,878 lots in 50,446 strata community schemes.

SCA (Qld), as the peak body for the strata industry, is in a unique position to understand the sector from a variety of viewpoints. Our membership represents not only strata managers but also service providers, allowing us to take into consideration a diverse range of factors affecting strata communities.

General Comments

In many instances, the proposed changes over-complicate what is already complicated legislation. If the purpose of this new draft is to facilitate self-management, SCA (Qld) believes that it will not be effective. In several sections, the language used and the dense sentences require specialised knowledge that is relatively uncommon in what is essentially a volunteer position. We believe that sections of the draft are overly convoluted and will decrease transparency, thereby resulting in further reliance on strata managers and greater burden on the Office of the Commissioner for Body Corporate and Community Management in the form of adjudications and dispute resolutions.

If this is the path on which the government wishes to proceed, the Commissioner's Office must be given more resources to cope with the increased workload.

Body corporate committee membership	
Clarify when co-owners or representatives of lot owners can be a voting member of the body corporate committee based on ownership of more than one lot. (Relevant section: 11).	SCA (Qld) supports this change and believes it will help the formation of legitimate committees.
Streamline the appointment of committee members in community titles schemes with 3 or more lots and only 3 different owners for all the lots by deeming the committee in these schemes consists of 3 individuals who are owners, or the nominees of owners, of lots. (Relevant section: 13).	SCA (Qld) deems this change reasonable.
Facilitate voting in committee elections at a general meeting by electronic vote. (Relevant sections: 21-23, 25, 27-29, 31, 35).	<p>SCA (Qld) welcomes this modernisation enabling the ability for bodies corporate to use electronic voting technologies. However, we believe it is a prime example of the overcomplication of the module.</p> <p>SCA (Qld) questions why the lot owners must register in writing by post in order to vote electronically. We believe that a body corporate should require only an ordinary resolution made at a meeting and NOT the second step of registration outline in section 22 (2).</p> <p>SCA (Qld) would also like to see the addition of wording to cover the use of live voting in meetings. The accuracy, privacy, and reliability of online voting tools is progressing rapidly, so the introduction of regulations guiding bodies corporate in the use and acceptance of live votes will help future-proof the module for this inevitable technological advancement.</p>
Clarify that for elections of the committee at a general meeting, nominations for ordinary member positions must be invited at the meeting if a full committee has not been elected (that is, the number of ordinary and executive members of the committee is less than the maximum number of voting members for a committee). (Relevant section: 40; Supporting section: Schedule, definition maximum number).	SCA (Qld) supports this change and understands that it is already best practice for strata managers.
Clarify the two ways that a voting member of the committee can be removed by	SCA (Qld) is concerned that this proposed change reinforces the over-prescriptiveness

<p>ordinary resolution of the body corporate: (1) by 'plain' ordinary resolution removing the member or (2) by issuing a written notice of a breach of the code of conduct, followed by an ordinary resolution removing the member under the code breach process at section 47. (Relevant sections: 46-47).</p>	<p>of the regulation module. It is the experience of our members that no strata communities use this second method of removing a committee member from office for a breach of the Code of Conduct. The requirement to hold two general meetings is simply impractical.</p> <p>If it is proposed that a committee member be removed for a breach of the Code of Conduct, then that much can be stated either in the motion or its explanatory note. The committee member will obviously receive notice of what is proposed during the usual machinations of the general meeting being called to consider the motion. That committee member can then put forward their position to all owners in the ordinary course of lobbying that takes place during the minimum 21-day notice period.</p> <p>SCA (Qld) recommends that this second method be removed from the regulation modules to go some way to mitigating its already over-prescriptive nature.</p>
<p>Permit bodies corporate to decide by ordinary resolution that an open ballot may be used to decide a motion to engage a body corporate manager to carry out the functions of a committee and its executive members. (Relevant section: 76).</p>	<p>SCA (Qld) deems this change reasonable</p>
<p>Where the principal scheme in a layered arrangement of community titles schemes includes more than 7 lots, permit the body corporate for the principal scheme to decide by ordinary resolution to increase the number of voting members of its committee from 7 members to up to 12 members. (Relevant section: Schedule, definition maximum number).</p>	<p>SCA (Qld) has no position on this change. We believe that the government should be guided by the small number of layered schemes affected by this modification.</p>
<p>Prohibit a committee member from receiving a direct or indirect benefit from a caretaking service contractor or service contractor unless the body corporate has authorised the member to receive the benefit. (Relevant section: 81; Supporting section: 8).</p>	<p>SCA (Qld) welcomes this change and believes it will better protect consumers.</p>
<p>Committee meetings</p>	
<p>Provide that if a member of a body corporate submits a motion to the secretary</p>	<p>SCA (Qld) disagrees with this change as forcing committees to hear every motion will</p>

<p>for consideration by the committee, the committee must as soon as reasonably practicable include the submitted motion on the agenda for the next committee meeting or decide the motion outside of a committee meeting. (Relevant section: 60).</p>	<p>create a real and unnecessary burden.</p> <p>However, if this change is deemed necessary, the following points must be considered:</p> <ol style="list-style-type: none"> 1. If the purpose is to create greater transparency, then additional regulation will be required, setting out in detail the extent of the right to propose a motion, to ensure the right is not easily open to abuse. For example, it would be appropriate to limit the frequency at which the committee is required to reconsider substantially identical motions. 2. If the purpose is consumer-protection, then a time frame must be set within which the committee is to have considered and voted on the motion, with the absence of a declared vote by that deadline being automatically deemed a decision in the negative, opening access to the dispute resolution processes.
<p>Clarify that the committee may approve that a voting or non-voting member of the committee attend a meeting of the committee by electronic means. (Relevant sections: 63-64).</p>	<p>SCA (Qld) welcomes this modernisation but believes the change needs to include the definition of “electronic”. As it stands, the section may allow the committee to undermine the regulation and preventing lot owner attendance by determining what is regarded as electronic.</p> <p>We also believe that the intention of the amendment needs to be carefully considered:</p> <ol style="list-style-type: none"> 1. If the intention is to entice committee members to attend the meeting electronically, then the change will not have the desired effect unless the legislation also facilitates electronic voting and in particular, live voting in meetings.
<p>Extend the existing right of lot owners to attend a committee meeting to apply to</p>	<p>SCA (Qld) agrees with this change and believes it will make for a much fairer and</p>

<p>representatives of lot owners, provided the representative is recorded on the roll as the representative of a lot owner or presents evidence that a lot owner has asked the representative to represent the owner at the meeting. (Relevant section: 65).</p>	<p>more democratic process.</p> <p>However, more clarification is required. Is the representative in addition to, or in place of, the lot owner? And how many people may act as representatives?</p> <p>In order to avoid confusion, SCA (Qld) believes that “a representative” should be changed to “1 representative”.</p>
<p>Clarify that a voting member of the committee is ineligible to vote personally or as a proxy for another voting member at either a committee meeting or on a motion given outside of a committee meeting, if they or their nominating entity (for family representatives or a company nominee) owes a body corporate debt. Also clarify that committee members are ineligible to vote as a proxy of another member if the other member or their nominating entity (for family representatives or a company nominee) owes a body corporate debt. (Relevant sections: 66, 69).</p>	<p>SCA (Qld) welcomes the clarification of this issue but believes it is imperfect in its current form.</p> <p>Requiring the “nominating entity” of a committee member to always be financial will unfairly and unnecessarily impact the committee member. The committee member is there to represent the body corporate, not the nominator, so the financial status of the “nominating entity” after the member has joined the committee is irrelevant.</p> <p>The addition of this requirement also raises the following issues:</p> <ol style="list-style-type: none"> 1. What if the member has been nominated by more than one person? 2. It is going to be extremely onerous for committees to keep track of the “nominating entity” for each committee member, along with their financial status. <p>To mitigate these concerns, SCA (Qld) recommends removing section 66 (1b) regarding the financial status of the “nominating entity”. We believe that the inclusion of this section will cause unintended consequences without solving any problem.</p>
<p>Provide that members’ votes on a motion given outside of a committee meeting must be given within 21 days of the notice of the</p>	<p>SCA (Qld) welcomes this change.</p>

<p>motion being given. Also deem motions to be decided at any point within the 21-day period if there is a majority of votes for the motion, or half or more of the votes are against the motion. If sufficient votes to determine the motion are not received within 21 days, the motion is taken to have been not agreed to. (Relevant section: 71).</p>	
<p>First annual general meeting</p>	
<p>Require a motion submitted by a member of the body corporate before the first annual general meeting to be included on the general meeting agenda, if it is practicable. (Relevant section: 88).</p>	<p>SCA (Qld) agrees with this change and believes it is a beneficial addition to the rights of owners.</p>
<p>Expand the list of documents and other information that the original owner of a community titles scheme must hand over to the body corporate at the first annual general meeting to include, amongst other things, a development approval, facilities management plan and a five-year administrative fund forecast. (Relevant section: 98)</p>	<p>SCA (Qld) agrees with the purpose of this change but believes more alterations are required to achieve the desired impact.</p> <p>SCA (Qld) has a concern with respect to the imposition of the “facilities management plan”. As it stands, we believe that it will create confusion about its purpose and the delegation of responsibilities which may lead to bodies corporate being inundated with unnecessary information or differing expectations of the obligations of the body corporate to carry out the facilities management plan. Further, if the management rights agreements do not include duties that are consistent with the facilities management plan this will lead to a discrepancy in the expectations of the committee and the obligations of the manager.</p> <p>Additionally, a five-year administrative fund forecast may not be reasonable or useful. The accuracy of these long-term forecasts is questionable and may mislead the body corporate. SCA (Qld) recommends this document be reduced to a three-year forecast, which should still result in the desired impact.</p> <p>SCA (Qld) also recommends changing the penalty for non-compliance with section 98 (2), which the draft states is only 20 penalty units. We believe that raising this penalty to match the non-compliance of Section 98</p>

	<p>(1), which is 150 penalty units, will provide enhanced consumer protection and assist bodies corporate in obtaining the documents mentioned.</p> <p>Furthermore, we recommend listing disputes between bodies corporate and original owners in the type of disputes mentioned in section 227 of the Body Corporate and Community Management Act 1997, so a body corporate can seek an adjudicator's order if there is non-compliance.</p>
<p>General meetings</p>	
<p>Clarify how a motion with alternatives is decided when the alternatives for the motion would require different types of resolution (for example, special resolution or ordinary resolution) if they were to be considered as individual motions. (Relevant section: 91).</p>	<p>SCA (Qld) agrees with this change.</p>
<p>Require the committee to approve the agenda for each general meeting, either at a committee meeting or by a vote outside of committee meeting. (Relevant section: 95).</p>	<p>SCA (Qld) continues to disagree with this change. For a body corporate to comply with this section, they will require additional meetings, which will lead to extra time, cost and administrative difficulty for bodies corporate.</p> <p>From a practical perspective, the biggest impact of this section (due to the administrative difficulty of a committee to specifically approve an agenda) will be meeting the strict timeframes to issue a general meeting agenda within the 3-month window after the body corporate's end of financial year. This would then necessitate very regular, yet unnecessary, applications to the Commissioner's Office to seek permission for the late calling of general meeting. We believe that this is another good example of the module being overly prescriptive.</p> <p>Engagement is a struggle for most body corporate committees, so placing extra requirements on the members is likely to result in these obligations remaining incomplete, which in this case would be a</p>

	<p>failure to approve the agenda for the AGM. If completing this task is a condition of holding the AGM then the unintended consequence of this section will be the inundation of the Commissioner's Office with questions regarding the delay and the legality of the meetings.</p> <p>There is also the concern that lot owners may believe all items on the agenda come with tacit agreement from the committee leading to owners incorrectly being influenced to vote in a particular way on a motion. It may be necessary to allow for differentiation between committee sanctioned agenda items and other suggestions.</p> <p>The problem this section is trying to solve is already covered at the AGM by the ability of committees to rule items out of order and the right owners and committees have to submit motions for consideration at the general meeting. Owners are also still able to vote against motions if they disagree with them.</p> <p>If the inclusion of this change is deemed necessary, then an extra additional change ought to be made to allow a mechanism for deemed approval of the agenda if -</p> <ul style="list-style-type: none"> • there has been no attendance at the meeting; or • there has been no response to the motion to be voted outside of a committee meeting to approve the agenda. <p>Alternatively, in the absence of a committee resolution having been made, the secretary could be tasked with approving the agenda.</p>
<p>Permit bodies corporate to change how a quorum for a general meeting is to be calculated and the number of voters that must be present personally for a general meeting, within certain limits. (Relevant section: 101).</p>	<p>SCA (Qld) agrees with the intent of this change but thinks the change should go further to reduce the requirements of a quorum. For example, simply having one voter attend the meeting, as in practice, there is almost never any increase in attendance at the adjourned meeting.</p>

	<p>Alternatively, it is suggested that the default quorum is reduced to 10% of the number of voters for the meeting and not 25% as currently listed with the ability to increase the threshold.</p> <p>We believe giving the option to lower the quorum adds another unnecessary complication for bodies corporate. Most will use section 101 (3) to immediately amend to 10% in the first AGM anyway, so it's more useful to have that as the benchmark.</p>
<p>Restrict inappropriate use of powers of attorney by providing that a person may only vote at a general meeting under the authority of a power of attorney for one lot owner, unless the person is a member of the lot owner's family, or the power of attorney is given under sections 211 or 219 of the Act. (Relevant section: 102).</p>	<p>SCA (Qld) welcomes this change and believes it will provide more consumer protection.</p>
<p>Facilitate voting in committee elections at general meetings by electronic vote. (Relevant sections: 21-23, 25, 27-29, 31, 35).</p>	<p>SCA (Qld) welcomes this modernisation enabling the ability for bodies corporate to use electronic voting technologies. However, we believe it is a prime example of the overcomplication of the module.</p> <p>SCA (Qld) questions why lot owners must register in writing in order to electronic vote. We believe that a body corporate should require only an ordinary resolution made at a meeting and NOT the second step of registration outlined in section 22 (2).</p> <p>SCA (Qld) would also like to see the addition of wording to cover the use of live voting in meetings. The accuracy, privacy, and reliability of online voting tools is progressing rapidly, so the introduction of regulations guiding bodies corporate in the use and acceptance of live votes will help future-proof the module for this inevitable technological advancement.</p>
<p>Facilitate voting on motions for general meetings by electronic vote. (Relevant sections: 105-106, 108-109).</p>	<p>SCA (Qld) welcomes this modernisation enabling the ability for bodies corporate to use electronic voting technologies. However, we believe it is a prime example of the overcomplication of the module.</p>

	<p>SCA (Qld) questions why lot owners must register in writing in order to electronic vote. We believe that a body corporate should require only an ordinary resolution made at a meeting and NOT the second step of registration outlined in section 108 (3).</p> <p>SCA (Qld) would also like to see the addition of wording to cover the use of live voting in meetings. The accuracy, privacy, and reliability of online voting tools is progressing rapidly, so the introduction of regulations guiding bodies corporate in the use and acceptance of live votes will help future-proof the module for this inevitable technological advancement.</p>
<p>Require minutes of general meetings to include the reason given for a motion being ruled out of order. (Relevant section: 115).</p>	<p>SCA (Qld) supports this change and believes it will assist with transparency.</p>
<p>Allow voting by proxy at a general meeting in a community titles scheme that is the principal scheme in a layered arrangement of community titles schemes, if the person giving the proxy is the owner of a lot in the principal scheme, but retain the restriction on voting by proxy for subsidiary scheme representatives. (Relevant section: 128).</p>	<p>SCA (Qld) agrees with this change.</p>
<p>Body corporate managers and caretaking service contractors</p>	
<p>Clarify and improve requirements for a body corporate manager or caretaking service contractor to disclose any commission, payment or other benefit they are entitled to receive that is associated with a contract the body corporate is considering entering into (including insurance). (Relevant section: 154).</p>	<p>SCA (Qld) welcomes this change and believes it will aid with transparency.</p>
<p>Financial management</p>	
<p>Permit committees to put in place or to renew a policy of insurance under chapter 8, part 6 of the regulation module that is above the relevant limit for committee spending for the community titles scheme (Relevant section: 170). If the spending required to put in place or renew a relevant policy of insurance is more than the relevant limit for major spending, the committee must obtain and consider at least 2 quotations for the policy of</p>	<p>SCA (Qld) welcomes this addition. The Committee is best placed to make the decision on the insurance on behalf of the owners. The current legislation is impractical, requiring a large number of schemes to call Extraordinary General Meetings to consider the insurance renewal. This is costly for Bodies Corporate and, in our view, unnecessary for this mandatory, annual occurrence.</p>

<p>insurance. (Relevant section: 172).</p>	<p>SCA (Qld) proposes that the limit per lot is increased to \$200 and total spending limit to \$10,000 per scheme to ensure compliance with the requirement to obtain insurance.</p>
<p>Property management</p>	
<p>Provide that the facilities management plan to be provided by the original owner at a first annual general meeting must include maintenance and inspection schedules for any maintenance and inspection reasonably required to prevent damage or failure to common property, body corporate assets and specified features of relevant schemes. (Relevant section: 98).</p>	<p>SCA (Qld) has a concern with respect to the imposition of the “facilities management plan”. As it stands, we believe that it will create confusion about its purpose and the delegation of responsibilities which may lead to bodies corporate being inundated with unnecessary or differing expectations of the obligations of the body corporate to carry out the facilities management plan. Further, if the management rights agreements do not include duties that are consistent with the facilities management plan this will lead to a discrepancy in the expectations of the committee and the obligations of the manager. SCA (Qld) requests that there be more detailed guidance on what a “facilities management plan” is.</p>
<p>Provide that the five-year administrative fund forecast to be provided by the original owner at a first annual general meeting must estimate the cost of common property and asset maintenance, insurance and other recurrent expenditure for the first five financial years of the scheme. (Relevant section: 98).</p>	<p>SCA (Qld) agrees in principle to this change but recommends a reduction in the length of the proposed plan.</p> <p>A five-year administrative fund forecast may not be reasonable or useful. The accuracy of these long-term forecasts is questionable and may mislead the body corporate. SCA (Qld) recommends this document be reduced to a three-year forecast, which should still result in the desired impact.</p>
<p>Provide additional contemporary examples of utility infrastructure that relate only to supplying utility services to an owner’s lot that a lot owner is responsible to maintain. (Relevant section: 179).</p>	<p>SCA (Qld) agrees with this change and believes it provides a good description of what is required.</p>
<p>Require the agenda for the second annual general meeting to include a motion proposing the engagement of an appropriately qualified person to prepare a defect assessment report for property for</p>	<p>SCA (Qld) agrees with this rationale behind this change but recommends several modifications.</p>

<p>which the body corporate must take out reinstatement insurance. (Relevant section: 180).</p>	<p>Many strata schemes are still controlled by the developer at the time of the second AGM, which introduces the possibility that reports with adverse findings may not be appropriately disclosed and/or acted upon. Additionally, SCA (Qld) believes that many defects are not apparent by the second AGM. For these reasons, we recommend that the defect assessment motion be placed on the agenda for the scheme's fourth AGM.</p> <p>Additionally, we recommend that the term "appropriately qualified person" mentioned in section 180 (3) be changed to "independent, appropriately qualified person who is not associated with the original owner or builder" to provide enhanced consumer protection.</p>
<p>Allow bodies corporate to establish a voluntary defect assessment scheme for community titles schemes containing standard format plan lots. (Relevant section: 181).</p>	<p>SCA (Qld) supports this change.</p>
<p>Insurance</p>	
<p>Extend the current requirements for disclosure of details about each policy of insurance held by the body corporate at the annual general meeting to also include disclosure of the name of any insurance broker or intermediary involved with the taking out of the policy and details of any benefit given, or to be given, by any insurance broker or intermediary. (Relevant section: 194).</p>	<p>SCA (Qld) agrees with this change.</p>
<p>Administrative matters</p>	
<p>Streamline and modernise communication in bodies corporate by enabling documents, notices or other information that may be given under the Act or regulations to be emailed if the recipient has provided an email address as part of their address for service. (Relevant section: 214).</p>	<p>SCA (Qld) welcomes this change.</p>
<p>Allow documents, notices or information that may be given by lot owners to the committee or secretary, as well as copies of committee minutes, to be given by way of electronic communication. (Relevant section: 218).</p>	<p>SCA (Qld) deems this change reasonable.</p>

<p>Permit a body corporate and the owner of a lot to enter into an agreement about how documents, notices or information required or permitted to be given under the regulation will be given (for example, by providing the document through an online file-sharing website). However, certain critical notices, such as by-law contravention notices, required or permitted to be given under the Act, must be given personally or to a person's address for service (including an email if provided). (Relevant section: 216).</p>	<p>SCA (Qld) agrees with this change.</p>
<p>Shorten the time for the owner of a lot, or a mortgagee for a lot, to give particular notices to the body corporate from 2 months to 1 month. (Relevant section: 219).</p>	<p>SCA (Qld) deems this change reasonable</p>
<p>Clarify the information provided by lot owners to the body corporate that must be recorded on the body corporate roll, including requirements that information in various notices establishing persons as representatives of lot owners or subsidiary schemes, or relating to transfer of ownership or change of address, be recorded on the roll. (Relevant section: 220).</p>	<p>SCA (Qld) agrees with this change.</p>
<p>Provide the body corporate must record information required to be on the body corporate roll within 14 days after the body corporate receives the information. (Relevant section: 221).</p>	<p>SCA (Qld) agrees with this change in principle but believes that holiday periods should be considered. We recommend that the "14 days" mentioned in section 221 be changed to "10 business days"</p>

SCA (Qld) further submits the following proposed changes:

- that section 195 BCCMA (new draft Act s215) be a mandatory address for service update that incurs a penalty if not done in a specified timeframe. There are many issues arising from an address not being updated in a timely manner (or not at all) for example
 - o in 'slip and trip' litigation matters where a person sues and the registered address is not updated, not only will the wrong party be made a party to the claim, the body corporate usually misses the statutory period to respond. For the old body corporate manager this usually is costly and time consuming as it requires all steps to be followed to compulsory mediation before they are released; or
 - o The recent cladding regulation imposed issues where the address hadn't been changed and the timeframes were so short that many struggled to meet the first stage reporting deadline as a consequence.

- Section 104 of the proposed Standard Module controls how subsidiary bodies corporate appoint and authorise representatives to their Principal Body Corporate. It also expressly states that the representatives must vote in the manner directed and (subject to the directions they receive) in the best interests of the body corporate. There is no equivalent provision for appointing the body corporate representative when a Building Management Committee is created by a Building Management Statement.
SCA (Qld) is aware of developers who have appointed themselves to be the bodies corporate representative and, in that role, voted to approve provisions in the Building Management Statement which benefit the developer but are not in the bodies corporate best interest. The body corporate committee may not have been advised of the proposed vote and the body corporate appears to have limited (if any) ability to challenge the result of the vote, which may be permanently binding once the Building Management Statement is registered.
SCA (Qld) believes it is appropriate to include in the Regulation a section, equivalent to section 104, which is applicable to body corporate Building Management Committee representatives.

- SCA (Qld) would like to raise an additional question in regard to the funding source which should be used to pay the shared facility expenses for which the body corporate is liable under a Building Management Statement. Where a shared facility is part of a body corporate's common property, it is clear that the body corporate's proportion of the cost to repair and replace the shared facility should be funded from the sinking fund account.
It is unclear whether the body corporate's contribution toward the cost of repairing and maintaining infrastructure owned by another entity, which contribution is effectively a payment for the right to use the infrastructure, should be paid out of the sinking fund or the administrative fund.
Section 158 (4) of the proposed Standard Module requires subsidiary bodies corporate to pay the PBC administrative and sinking fund levies from the administrative fund. If the same principle applies to shared facilities which are not part of the common property, bodies corporates have no way to accumulate funds toward large expenses like lift replacements and external painting. The lack of clarity regarding how these expenses can (and should) be funded may have serious long-term budget consequences. Bodies corporate risk either facing large special levies or having raised sinking fund amounts that it is subsequently ruled cannot be used to fund these expenses. SCA (Qld) suggests that there may be an opportunity to clarify this issue as part of the review.

Conclusion

Overall, Strata Community Association (Qld) applauds the government for their action but proposes that a few small changes be made to afford consumers greater protection and simplify the legislation. The current draft has sections that an average reader, without legal training, may struggle to understand, which will lead to disputes and decreased transparency. By implementing our proposed changes, the new legislation may result in

greater understanding by owners and reduce the burden on the Office of the Commissioner for Body Corporate and Community Management.

For further questions, the SCA (Qld) Board of Directors is available to the Attorney-General. Please contact me on (07) 3839 3011, 0458 120 917 or via email: katrin.watson@strata.community.

Yours faithfully,



Katrin Watson
SCA (Qld) Executive Officer