



August 5, 2018

Airbnb in Norway - Formal response consultation paper

Dear Ms. Ingjerd Karlson,

Thank you very much for sharing the consultation paper on the Property Unit Ownership Act, the Housing Cooperatives Act, the Cooperative Housing Association Act and the Real Estate Alienation Act. It is a great pleasure for Airbnb to share our thoughts and recommendations with the Norwegian Ministry of Local Government and Modernisation on this important topic. Airbnb is proud to be part of Norway's thriving tourism sector. We are committed to working in partnership with governments across the world, as they address the challenges and opportunities of the Collaborative Economy.

Founded in 2008, Airbnb's mission is to create a world where people can belong when they travel by being connected to local cultures and having unique travel experiences. Airbnb's online community marketplace provides access to millions of unique accommodations from apartments and villas to castles and treehouses in more than 81,000 cities and 191 countries – including Norway. Airbnb is committed to making cities a better place to live, work and visit. As part of that commitment, we are cooperating with places all around the world where our community has a significant presence and where there is support for the right of people to share their homes.

In the discussions about new regulatory frameworks to define and manage home sharing, it's crucial that we do not forget the very real economic, social and environmental benefits that this brings for individuals and the communities in which they live. In December of last year, we released a study¹ on the Airbnb community in Norway highlighting the economic and social benefits of travel using Airbnb for local families and their communities. The study showed that there are over 17,000 hosts in Norway who have welcomed 671,000 guests into their homes in 2017 – the latter representing an increase of 56 percent on the previous year. Hosts typically are regular people and earn kr 19,800 by sharing their home for 25 nights a year. Across Norway, hosts earned a total of kr 572 million by sharing their homes with guests. On average, hosts have been living in their hometown for 26 years, and for many Norwegians, being able to turn their greatest expense – their home – into a source of additional revenue is good news.

¹ Norway.airbnb.com, [The Airbnb community in Norway. 2017](https://www.airbnb.com/press-releases/the-airbnb-community-in-norway-2017)



We are delighted to see the Ministry takes a positive approach towards the sharing economy. We fully agree that digital sharing platforms have created new opportunities for short-term letting and this contributes to better utilisation of housing resources. We are also happy to see that the Ministry is fundamentally critic to restricting the freedom of action of private individuals as this is for many Norwegians an important source of income. Indeed, a rule that restricts the individual owner's right to let out will represent an encroachment on the owner's free right of disposition over his assets. We support the Ministry's principle that any rule must be worded such that the property unit owner retains his legal right of disposition over his unit and only affects the most intensive and irregular form of short-term letting.

Following this principle, we have some questions regarding the basis of the limitation of 90 days for joint housing ownerships, including a possibility for joint owners to lower it to 60 days. Host earnings suggest that a typical unit of housing in Oslo would need to be rented for up to around 206 nights per year (depending on the neighborhood) to be more financially attractive to its owner than a long-term rental². We strongly believe legislation should be necessary and proportional. The current proposal provides no evidence to justify a 90 day limitation. On the contrary, the Ministry states there is little to indicate that short term rental via online platforms like Airbnb has led to increased pressure on house prices and fewer properties available for long-term lets in Norway. In addition, the Norwegian Sharing Economy Committee recommended not to implement any regulatory intervention to regulate that offered in the short-term letting market. We believe a 90 day limitation would mean an unnecessary restriction. A higher limit would contribute to the democratization of tourism, leading to more benefits for local residents, more opportunities for guests to have a true local experience, better promotion of sustainable tourism and an economic boost for cities.

We welcome the possibility for housing cooperatives to rent out apartments without permission from the board. However, a low limit of 30 days is again unnecessary and not proportionate.

It is essential for Airbnb to value its users trust and therefore takes its users privacy very serious. Therefore any data access or data sharing has to be in line with all national and European privacy laws that apply to Airbnb Ireland UC as operator of the platform for users that reside in Norway. Respective principles are also outlined

² This is based on rental prices of a 1-bedroom apartment taken from Numbeo and the average host revenue of an entire home listing per night



in Airbnb's Privacy Policy³.

We thank the Joint Committee for the opportunity to respond, and hope that the information we have shared provides useful context about our activities in Norway, and our community of hosts who use their homes to generate extra income for themselves and their families. We look forward to further discussions on the matter and would be honored to have this conversation in person.

Best regards,

Pieter Guldemon
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³ https://www.airbnb.no/terms/privacy_policy