

## Body Corporate and Community Management and Other Legislation Amendment Bill 2023

**Submission No:** 48  
**Submitted by:** Townsville Lot Owners Group  
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**Attachments:** See attachment  
**Submitter Comments:**

31 August 2023

Committee Secretary  
Legal Affairs and Safety Committee  
Parliament House  
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## Queensland

### Body Corporate Community Management Other Legislation Amendment Bill 2023. (BCCMOLA) "Townsville Strata Public say" submission

Dear Secretary,

On behalf of the massive \$200 billion dollar Qld strata economy, we believe the 50,000 Qld Community Titles Schemes (CTS) contain 500,000 lot owners and house some 1.0 million strata residents are all to be subjected to these 56 new BCCMOLA changes. Noting the entire consequential funding and sustainability is solely and respectively funded by the persons groups listed above and not by policy writers and advisors.

We are bemused that this BCCMOLA Bill has been so rushed and the strata public avoided and throttled.

- 17 May-2023 First draft issued for select stakeholder review and prohibited to be used for public consultation. 42 BCCM-Act-1997 amendments were proposed.
- 25 Aug-2023 Second stakeholder and first public review. Open for public comment for 7 days to review the now 56 proposed amendments for comment.

Because of the rushed reply timeline, we can only review and comment on the 13 Strata insurance BCCMOLA specific amendments.

In summary - we understood the Bill insurance changes are for *the BCCM Adjudicators to replace the Commissioner and process all future **Alternative Insurance Applications (AIA)** as a disputes application process.*

**Our Comment:** We interpret this insurance specific BCCMOLA change indicates more resources are needed for the growing volume of non-compliant strata insurance CTS's seeking AIA relief.

**Warning: AIA Consequences:** The BCCM is actively underinsuring CTS communities of Queensland by permitting AIA endorsed reductions in insurance cover. These BCCM AIA band-aids damage Queensland as the tax payers and state balance sheet must now cough up more recovery funds when a natural disaster hits the underinsured. The BCCM has failed to detect the root cause of what is driving the growth of all these AIA's.

Our BCCM has failed to detect and correct the current 15 "**compulsory**" BCCM-Act 1997 defective and over insurance regulations creating consumer affordability abuse that was reported in the ACCC-Northern Australian Insurance Inquiry 2020. In 2021 the State Government commissioned a Community Titles Legislation Working Group to address this AIA strata affordability insurance crisis. Alas still not done, no

one listening, and our Qld strata and state is now undergoing AIA endorsed insurance dilution by policy and Commissioner blindness and or reluctance?.

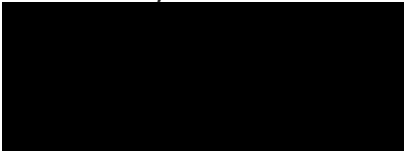
**Outcome:**

Tolerate the incoming Bill amendments. In order to prevent strata economic damage with this band aid AIA legislations, we need our Qld Legal and Safety committee to commission the BCCM to proactively and responsively determine the affordability consequences of it's **compulsory** strata insurance regulations and legislatively fix them. Doing so will eliminate the needs for future AIA's and reduce recovery burdens on the state's housing economy.

Help? We read a new Clause-30 - **s239BA** requires content of approved form for adjudication application about alternative insurance – Does this mean a new BCCM AIA form exists, if yes may we obtain a copy?.

Many thanks for listening,

Yours Truly



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**TLOG** - Strata Insurance Consumer Advocate..

**TLOG** Townsville Lot Owners Group. Strata Comparisons©™ Strata Data©™ Since 2011, a volunteer community service group who collect and analyse \$-billions of strata building insurance tax invoices and product policies and volumes of federal insurance inquiry reports to provide verifiable consumer evidence in facts, figures and correspondences to help our NA-NQ-TSV Strata Consumers and Regulators and Politicians improve their strata insurance arguments, actions and affordability. We trust these improved strata insurance understandings helps regulators to better manage the Queensland \$200 Billion Strata Body Corporate Community Titles Scheme economy that accommodates over one million diverse and vulnerable residents. One in five homes in Queensland is a strata home. The entire Queensland Strata economy is now operated by 150,000+ committee volunteers devoid of any dedicated regulator empathy to repair the defective legislations to deliver and future proof strata community economic well-being and safety.