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Luonnos hallituksen esitykseksi rakentamislain muuttamisesta

Lausunnonantajan lausunto

Lausuntopalaute lyhyt vuokrausta koskeviin säännöksiin

Limiting the exploitation of short term rentals in all its form and shapes will have severe and unintended consequences for the tourism industry in Finland.

Short term rentals are a part of a healthy tourism economic system. They cater to a diverse types of tourists who would not find suitable services in a tourism eco system dominated by resorts and hotels.

Limiting short term rentals will decrease the amount and type of guest available to independent service providers, local restaurants, local shops and other small local entrepreneurs. Any subsequent increase in hotel and resort beds will not compensate for the loss of revenue to local businesses. Visitors to hotels or resorts are often "captive consumers" as they buy relatively less from local independent businesses and more from the hotel or its affiliated program providers.

The loss of choice in the accommodation market will deter many specific types of clientele from travelling to Finland. Families with children for instance, or those staying for longer periods will have their choices limited.

The loss of profitability for independent businesses who's clientele prefer short term rental will lead to reductions in staff and services, less innovation and competition.

Regulations regarding the exploitation of short term rentals should promote citizen entrepreneurship, recognise and promote the economic and societal benefits that such citizen entrepreneurship brings and bring the excesses of short term rentals under control.

A requirement to register with local authorities, meet certain minimum safety and regulatory criteria and pay into the tax coffers through for instance a tourist tax, would benefit all.

Tulisiko lyhyt vuokrauksessa vapaa-ajanasuntoihin (mökkeihin) soveltua eri säännökset kuin vakituksessa asuinkäytössä oleviin asuinrakennuksiin ja asuntoihin?

The rules for short term rental of summer cabins should be similar to those of short term rental of apartments. Any other solution would lead to unfair advantages to the less regulated real estate owners.

Lausuntopalaute rakennusten energiatehokkuutta koskeviin säännöksiin

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Rakentamislain 37 §:n mukaan energiatehokkuutta on parannettava rakennuksen rakentamisluvanvaraisen korjaus- ja muutostyön tai rakennuksen käyttötarkoituksen muutoksen yhteydessä, jos se on teknisesti, toiminnallisesti ja taloudellisesti toteutettavissa. Onko säännöksen soveltaminen syytä sitoa rakennushankkeen luvanvaraisuuteen?

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Lausuntopalaute rakennustuoteasetuksen rikkomisen seuraamussäännöksiin

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Lausuntopalaute suunnittelutehtävän kelpoisuuksia koskevaan siirtymäsäännökseen

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Muu lausuntopalaute

Tourism is one of the main Industries in Lapland. It is a job creator, and a source of export revenue that actually pays ALV into the Finnish governments coffers. Tourism is also one of the few lappish industries that has a very low participation threshold. Mining requires large investments, long term planning and the need to navigate a myriad amount of laws and regulations. Forestry requires landownership and/or capital heavy investments in machinery.

Tourism is however open to any and all participants, regardless of socio economic status, education or financial means.

Anyone can participate, from single parents who wish to clean Airbnb's, to inheritance estates that wish to put inherited real estate to use through Airbnb and many more such micro entrepreneurs. It is one of the few modern industries where hard work, perseverance and entrepreneurship can bring you success regardless of where and how small you started. Students, immigrants, single parents, the unemployed, the unqualified (diploma wise) all can participate and with some luck "make it"

Heavy handed regulation has always benefited the established businesses by putting up regulatory hurdles to new competitors. Any regulation that skews the market in favour of large established tourism and accommodation businesses, comes at the cost of competition, innovation and local smaller entrepreneurs who do not benefit from their establishment status.

Short term rentals create completely new tourism eco system that allows local, small and independent business services to thrive. They are preferred almost exclusively by what is called "fully independent travellers (FIT)" These travellers buy their services from independent service providers, buy services and goods from local brick and mortar shops, eat at independent restaurants, cook their own meals with ingredients bought from local super markets.

They do not eat breakfast at hotel restaurants or book their services with foreign package tour operators. The money they spend goes directly to the citizens, housing cooperatives and local

businesses. Sacrificing FIT travellers accommodation choices to appease established economic players would have serious consequences for employment in the rovaniemi area.

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