Observation-7: Australian Strata Economics.

Community Titles Scheme (CTS) Strata Data from various internet sources, treat all data as estimated as needs to be validated by government. We need precise strata apartment home economics post code numbers from our Queensland and Federal Government regulators to improve our NQ Insurance policy decision making.

Table-B: CTS Strata Apartments Economics 1

	Australia	Queensland	Townsville
CTS - Strata Schemes ² & ³	340,601	50,722	1,527
CTS Lots – apartment units	2,869,845	509,467	15,322
Building Insured Value (BIV) 4	\$1,117 billion	\$203 billion	\$13.4 billion
Employment Direct	9,330	1,825	125
Trade Services pa	\$5,728 million	\$845 million	\$69.3 million
Professional Fees pa	\$903 million	\$304 million	\$10.9 million
CTS Insurance Premiums⁵pa	\$995 million	\$192 million	\$53.6 million
CTS GST (10%) pa	\$99.5 million	\$19.2 million	\$5.36 million
CTS Stamp Duty (9.9%) pa		\$19.0 million	\$5.31 million
Broker & Intermediary ⁶ Commissions/fees (20%) ⁷ & ⁸ & ⁹ & ¹⁰	\$198 million	\$38.2 million	\$10.7 million
CTS ARPC Terrorism Tax			\$60,000
CTS Body Corporate Committee Volunteers	600,000	150,000	7,000

- Our TsvLog 2021 studies indicate there are an estimated 120,000 apartment residents who live and vote in North Australia (NA). On average they are paying around 5 times more home strata insurance than the 330,000 Australian strata buildings below the Qld "Rockhampton Line" of home insurance discrimination.
- ACCC report¹¹ NQ has 6,610 CTS residential strata policies (60,000 apartments = 90,000 voters)
- ACCC report NA has 9,013 CTS residential strata policies (90,000 apartments = 120,000 voters)

¹ A25.3 - Info UNSW National Strata Data Report 2020, Other table numbers presented are ratio'd and or estimated.

² A14.6p124 - ACCC reports the 9013 North Australia Strata policies make 3% of national strata policies,

³ A25.3B City Futures at cityfutures.be.unsw.edu.au/research/projects/national-strata-data-analysis 2020 national strata schemes ⁴ A25.3.p12 - City Futures at cityfutures.be.unsw.edu.au/research/projects/national-strata-data-analysis

⁵ CTS Insurance premiums Tax invoices study depict averaged premiums around 0.5% of BIV for TSV and 0.1% for rest of Australia..

⁶ A34.6p5: ICA 2012 submission Residential Strata Insurance, that product is sold by Brokers and Strata Managers acting as agents. 7 A7.6 info Strata Ratings agency serve over 300,000 strata schemes in Australia nominal Insurer paid insurance commissions.

⁸ A14.6p445 ACCC-20 report Figure-16.22 – 17.5% commissions on strata revenues of \$14 million to \$60 million increase 2019 9 A14.6p501

ACCC-20 report chapter 19 15-20% commissions are common. 10 A14.6.p507

ACCC The scale of payments to intermediaries, \$650 million for Australia, \$62 million for Northern Australia 11 A14.6p427 ACCC-20 report Table 16.2

Observation-20: Queensland Community Titles Scheme Statistics.

Local Government Area	Community Title Schemes	Lots	
LGA	Number of CTS 17	Lots -	
Cloncurry Shire Council	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	10	
Cook Shire Council	8	80	
Charters Towers Regional Council	13	130	
Torres Shire Council	14	140	
Hinchinbrook Shire Council	20	201	
Mareeba Shire Council	43	431	
Weipa Town Authority	90	903	
Mount Isa City Council	93	933	
Isaac Regional Council	96	963	
Burdekin Shire Council	99	993	
Tablelands Regional Council	139	1,395	
Cassowary Coast Regional Council	157	1,575	
Livingstone Shire Council	245	2,458	-
Douglas Shire Council	313	3,141	
Whitsunday Regional Council	423	4,244	
Bundaberg Regional Council	568	5,699	
Mackay Regional Council	1,089	10,927	
Townsville City Council	1,527	15,322	Lots
Cairns Regional Council	1,858	18,643	
NQ CTS above Rockhampton Line	6,796	68,218	
Queensland CTS Total	50,772	509,467	13.4%

- 100% of Qld Strata buildings must be insured per BCCM regulations.
- 6,796 of the 50,772 Queensland Strata homes are in North Queensland (NQ).
- 100% of NQ strata lot owners on average pay 5 times the Insurance premium containing 5 times more GST (10%) & Stamp Duty (9%) & Commissions (20%) than the strata insured below the Rockhampton line¹.
- Q1 Who established this Queensland dividing Rockhampton Line? Government or Insurers?
- Q2 Why cannot NQ strata community have the same "material" building insured premium as Southeast Queensland is entitled to?
 - SEQ strata buildings gross insurance premiums are on average invoiced at 0.1% of their building sum insured value². NQ TSV strata insurance tax invoice surveys indicate TSV strata are invoiced on average around 0.5% of their sum insured value.
- Q3 How can NQ strata insurance prices keep increasing when there is no change in NQ natural disasters risks for the last 11 years?
 - The 90,000 NQ strata insurance gouged residents are voters.

¹ TSV.LOG Townsville Strata Insurance tax invoice study 2021.

² ACCC-Northern Australian Insurance Inquiry 2020 final report.

Observation-27: Australian Cyclone History Statistics

For the 53 years from 1967 to 2020 there have been 520 BOM named cyclones. Of which only 23 years incurred 26 cyclone damage events to make this listing. The years 1967, 1974 and 1990 had double cyclone damage events. And yes, cyclones are decreasing in annual number since 1967. But claims losses are increasing in later years and are believed to contain much higher new generation claims administrations vagaries, gold-plated FIFO repair and numerous recovery costs loadings¹. Strata damage loss component is ACCC estimated to be less 3% of the total damages reported below.²

Rank	*	Name	¥	State	w	Year	Y	Losses	*	1
14		Cyclone Elaine		Qld		196	57	\$	35	90
7		Cyclone Dinah		Qld		196	57	\$	8	78
6		Cyclone Ada		Qld		197	70	\$	1,0	10
10		Cyclone Althea		Qld		197	71	\$	64	48
25		Cyclone Daisy		Qld		197	72	\$	1	16
4		Cyclone Madge		WA.NT.Qld	1	197	73	\$	1,49	92
21		Cyclone Zoe		Qld.NSW		197	74	\$	1	7:
1		Cyclone Tracy		NT		197	74	\$	4,10)(
12		Cyclone Joan		WA		197	75	\$	39	98
16		Cyclone Alby		WA		197	78	\$	20	55
15		Cyclone Hazel		WA		197	79	\$	28	3
19		Cyclone Cliff		Qld		198	31	\$	20	05
18		Cyclone Winifred		Qld		198	36	\$	20	0.5
24		Cyclone Herbie		WA		198	88	\$	1:	1
22		Cyclone Aivu		Qld		198	39	\$	13	38
23		Cyclone Joy		Qld		199	0	\$	12	2:
20		Cyclone Nancy		Qld.NSW		199	0	\$	19	37
9		Cyclone Justin		Qld		199	7	\$	65	50
17		Cyclone Sid		Qld		199	8	\$	24	15
26		Cyclone Vance		NT		199	9	\$	10	3(
8		Cyclone Larry		Qld		200	6	\$	79	99
13		Cyclone Tasha		Qld		201	0	\$	39	3
3		Cyclone Yasi		Qld		201	1	\$	1,53	2
5		Ex-TC Oswald		Qld.NSW		201	4	\$	1,13	0
11		Cyclone Marcia		Qld		201	5	\$	54	4
2		Cyclone Debbie		Qld		201	7	\$	1,56	5

A34.2 Suncorp Submission to Insurance 2018 NAII 51 pages *insurance losses, estimated loss value in 2015 dollars (apart from Cyclone Debbie, actual losses) Source: www.disasters.org.au

¹ A14.6.p129 – ACCC Figure 5.14 & 5.15 Gross claims expense for all northern Australian home, contents and strata products, 2008–2018. \$450 million NA & \$4,200 million ROA is unclassified by the ACCC.

² A36.0.p23 – Northern Australia Insurance Premiums Taskforce 2015 Finity consulting

Townsville Lot Owners Group (TLOG)

Observation-42: NQ Cyclone Reinsurance Tax Invoice Visibility.

For the 17thDecember 2021, the Federal Treasury Cyclone Reinsurance Pool (CRP) requested stakeholder draft legislation views. Below are some segments of our TLOG submission back then.

The ARPC draft legislation factsheet extract:- Improving insurance affordability for Northern Australia (NA). The Government is implementing a reinsurance pool for cyclones and related flood damage, which will be backed by a \$10 billion Government guarantee and cover household, residential strata and small business property insurance policies. The Australian Reinsurance Pool Corporation (ARPC) will operate the pool from 1 July 2022. The pool will improve the accessibility and affordability of insurance for households and small businesses in cyclone-prone areas across Australia.

Our TLOG submission focused on the draft CRP legislation's lack of project outcomes visibility when this CRP project gets underway.

We asked that the CRP legislatively specify that all insurance policies requesting cyclone re-insurance be issued to strata consumers in a single standalone CRP cyclone specific insurance tax invoice. This is to prevent the cyclone insurance cost visibility being lost if it is comingled or bundled with the current shopping list of "prescribed" and "optional" insurance products that are currently evasively tax invoiced to the strata consumer¹. Doing this stand-alone CRP insurance tax invoice per property applicant will provide the Governments, the ACCC (the CRP roll out regulator) and the strata consumers with enough visibility to monitor the Northern Australia (NA) and North Queensland (NQ) CRP uptake and proof that the 58% affordability savings are being delivered to Northern Australian strata homes.

We asked that the Treasury direct APRA to create a new suite of CRP reporting statistics to match the Treasury ARPC-C Factsheet Attachment-A listing that defines the ten eligible policy and property types that can qualify for the CRP insurance. APRA must direct the insurers to deliver this Attachment-A "granular" cyclone liability insurance by separated building types with post code and street address resolution. This CRP granular reporting will allow economic planners to now calibrate cyclone insurance premiums, liabilities, and claims profiles with post code resolution and in time will yield which building type is the most cyclone resilient for NA. This new CRP home insured data-set will then enable the future proofing of Australia's cyclone building codes and mitigation spending activities to achieve improved cyclone building resilience and natural disasters recovery in NA and NQ.

	History	10000000					
Ref-1 A14.6 ACCC Fig-5.14 & 5.15 and 16.18	1995-2015		08 -2018	19	1995-2018		
Ref-2= NAIPT 2015 Inquiry Finity Table-3.3	million	million				million	
all Northern Australia Strata Claims	\$ 113	S	18				
Australia Home Contents & Strata Claims	\$ 2,442	S	1,700	S	4.142		
NA/Australia	5%	7	1%	3%			
			270		370		

¹ ACCC-NAII – Northern Australia Insurance Inquiry 2020 – Recommendation-18.6:- Insurers to disclose premium impacts of optional inclusions and exclusions. Still no traction on this insurance products lack of visibility recommendation from Treasury Canberra.

Cyclone Reinsurance Pool Submission 13 - Attachment 1

Townsville Lot Owners Group (TLOG)

Federal Treasury has inquiry reports that indicate since 1995 the \$1.0 trillion national Table-14.C strata industry has created a \$1.0 billion unregulated strata insured economy in Australia. The NA strata insured have made a mere \$131 million (3%) damage bill claim of the national all homes insured cyclone claims of \$4.142 billion. Federal Treasury report the 225 named cyclones between 1995-2018 have inflicted on average a meagre \$5 million per year cyclone damage to the 9,013 strata buildings in NA²³. Future APRA cyclone specific building insurance reporting will, if in place, continue to confirm these historic strata damage metrics and to substantiate the CRP project success outcomes.

We asked that, all CRP Insurance products should be sold as a Sum Insured Value (SIV) product and not as a Full Replacement Value (FRV) product. We believe there has been no reported strata building ever making a FRV claim for cyclone damage in Queensland since 1997. Fire can destroy a building; cyclones only damage a building. The FRV is an obsolete and over insured economic waste of money as FRV cyclone claim events have not occurred in Queensland strata.

By permitting strata bodies corporate the AGM discretion on what value their buildings cyclone SIV should be set at would further improve the CRP affordability. Savings made on CRP premiums can be wisely AGM invested in strata mitigation spending plans⁴.

Strata building common property insurance is BCCM⁵ mandatory. For a single house, home insurance is "opt out able" as is optional. Any decrease in cyclone home insurance policies can only be caused by the optional insured leaving the market. The strata insured therefore carry the home insurance base load in Queensland because the state BCCM insurance regulations do not allow opting out and guarantees the Federal GST and State Stamp Duty revenues. The strata insured are unfairly exploited by insurers as the "cash cow ATM" insurance subsidiser of home insurance in NO.

We asked that - insurance sales commissions to be abolished. The ACCC-NAII-2020 insurance inquiry proclaimed 20% as the average Australian home insurance sales commission. The three BCCM mandatory strata insurances should not incur any sales commissions because strata insurance being compulsory and prescribed requires no sales effort. Our national superannuation industry is mandatory and requires no sales commissions to function. Strata sales commissions are an economic waste of funds that deliver no value to the strata consumer. Annual sales commissions can be more than claims made each year and thus for no work⁶. "Pay as you go" for the new CRP premiums, liabilities and claims makes the APRA's cyclone industry economic behaviours reporting all the more visible.

By having APRA committed to providing public access to CRP specific home insurance granular statistics reporting should ensure good community visibility on the performance of this new CRP project. We pray that our Federal Treasury have finally come up with a quality solution to the decade long NA & NQ home insurance crisis.

⁶ 2017 Banking Royal Commission observation on insurance sales commissions.

² ACCC-NAII-2020 report Qld has 6,610 strata buildings. 67% of the Northern Australia total of 9,013 strata buildings

³ ACCC report the Northern Australia strata insurers collected \$61 million in premiums sales in 2019.

⁴ We believe all strata mitigation spending plans are to be "blessed" by insurers prior to installations. All mitigation spends are conditional to the Insurers terms and conditions in order to obtain premium CRP discounts. Without an insurer's confirmed blessing, the mitigation spending would be wasteful exercise for all.

⁵ BCCM = Queensland Body Corporate Community Management Act-1997 – Community Titles Scheme. (Strata's)

Observation-44 The Rockhampton Line defines insured Northern Australia.

The Rockhampton line is a discriminatory and economical damaging strata insurance community dividing line. A farcical line that allows insurers without any pricing controls to unreservedly game and plunder the 6,700 strata communities above this line. The Qld Government prescribed compulsory strata insurance now have unfettered premiums supply running at around ten times and more the strata home insurance premiums offered to the 44,000 "materially" similar Queensland strata buildings below the Rockhampton line.

Many Insurance companies will not quote insurance above this Rockhampton line. The remaining insurers' have selectively isolated and now freely discriminate Northern Australians (NA) with much higher home insurance all based on false risk rhetoric that NA has more natural disaster events than the rest of Australia. Sadly, this line and lie is tolerated by both Federal and State Governments as they unconscionably benefit from the much higher GST and Stamp Duty funds collected from those who buy outrageous NA home insurance.

Northern Australia

Australia

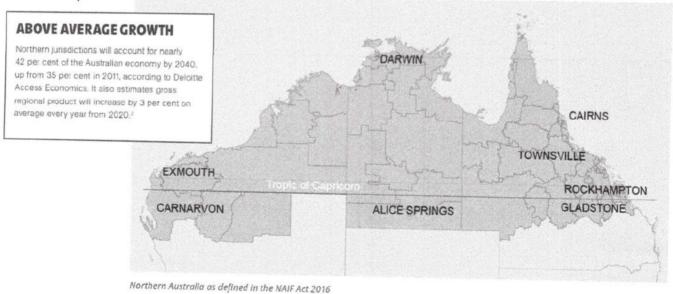


The unofficial geographic term Northern Australia includes those parts of Queensland and Western Australia north of latitude 26° and all of the Northern Territory. Those local government areas of Western Australia and Queensland that lie partially in the north are included.

W Wikipedia

The Federal Governments' 2015 NA White Paper and 2016 NA Infrastructure Facility (NAIF) lay out the plans to deliver economic growth and job opportunities for both Queensland and Australia through infrastructure investment. The Queensland Government is on record as promoting investment in North Queensland and continues to allocate significant funding to support the development of new infrastructure.

NAIF and the Qld Government will never fully achieve these outcomes until this Rockhampton "insurance" discrimination line is banished. The NA strata insured must be allowed access to the same ACCC¹ strata home insurance 0.1% affordability formula as supplied to the 330,00 Australian strata buildings below the Rockhampton line. The NAIF and Qld economic future designers did not contemplate the economic damage, impact and stifled migration now caused by this NA home insurance affordability crisis.



¹ ACCC-Northern Australia Insurance Inquiry 2020 determined that the 330,000 strata buildings below the Rockhampton line for the last decade paid an average premium priced at 1000th (0.1%) of the full sum insured value of the building.

Townsville Lot Owners Group

Observation-56: The Australian Cyclone Reinsurance Pool Promises

The Federal Treasury is launching the \$10 Billion ARPC-Cyclone Reinsurance Pool (CRP) fix for the Northern Australian (NA) home Insured on the 1st of July 2022. This CRP is the 7th fix attempt by Treasury to solve the strata and home insurance crisis that has economically damaged NA and NQ homes since 2011.

The claim: Promises No-1 to 6

Treasury Media Release 7th Feb 2022: Morrison Government to Deliver Reduced Premiums Through Reinsurance Pool, over 880,000 residential, strata and small business property insurance policies in northern Australia (NA) are expected to be eligible to be covered by the reinsurance pool for the risk of cyclone and related flood damage. The pool is expected to reduce insurance premiums by up to \$2.9 billion for eligible insured, strata and small business insurance policies over 10 years. Homeowners in northern Australia with the most acute cost pressures are expected to benefit from up to 46 percent premium discounts, strata properties up to a 58 percent discount and SMEs up to a 34 percent discount. Prime Minister Scott Morrison said the establishment of a reinsurance pool would deliver the Government's commitment to ensure Australians in cyclone-prone areas have access to affordable insurance.

The Math, do the eligible CRP participants add up?

- o 880,000 eligible NA home/building policies reported by Treasury to the NQ MP's of parliament.
- Less 344,000 eligible NA insured homes as reported by the ACCC¹
- Less 86,000 (20%) eligible NA uninsured houses as reported by the ACCC².
- Less 9,013 NA strata building policies reported by the ACCC³.
- = 526,987 NA SME⁴ insurance policies, that are now eligible to a 34% insurance savings,

Are there this many people in NA!

Additional info we read in the federal media releases.

- The \$2.9 billion savings for the 880,000 policies over ten years equates to an average savings of \$329 per policy per year.
- The following buildings are excluded from the CRP legislation.
 - o All accommodation with a building insured valuation (BIV) of more than \$5 million.
 - o Commercial short-term accommodation in tourism hot spots like Airlie Beach, Hamilton Island and Townsville.
 - o Commercial buildings with 50% or less accommodation residents
 - O Residential home care buildings,..... which we hope is a media typo and not for aged care.

Promise No-7: To ensure the reinsurance pool is delivering for northern Australia, the Government will provide \$18.4 million over five years to the Australian Competition and Consumer Commission (ACCC) to monitor the premiums of insurance policies covered by the pool from 2022. The ACCC will collect data to evaluate the impact of the reinsurance pool and assess whether the savings from the reinsurance pool are being passed through to policyholders.

¹ Australian Consumer Competition Commission – ACCC – Northern Australian Insurance Inquiry Dec-2020 final report

² Australian Consumer Competition Commission – ACCC – Northern Australian Insurance Inquiry Dec-2020 final report ³ ACCC report 9,013 NA strata buildings. Which contain some 90,000 apartment units which house some 135,000 residents.

⁴ SME – small medium enterprise = small business buildings – standalone or strata workshops not sure .

NO Home Insurance Trauma Evidence. Observation-101:

By the Home Insurance cabal who make North Queensland unaffordable and profit from the process. Are our regulators proactively listening on the insurance abuse games the NQ home insured must endure. Why is there an insurance reluctance in complaining to our regulators not investigated? Scared?



One homeowner in Douglas near Ross River has been asked to pay a 53.6 per cent or \$3093 increase in their annual premium by Suncorp, while another homeowner in Kirwan has been told by Youi they are unable to offer a

According to a report by Canstar on October 28, the average cost for home and contents insurance for North Queenslanders (above Rockhampton) was \$5058 per year, a 10.9 per cent increase on 2021's figures.

> One million households in Australia already face "extreme" levels of insurance stress. How does your household compare?

Read more ->

paid for damage to a value of about \$25,000.

Ms Hynard said annual premiums for the 92-unit and commercial complex had jumped from \$92,443 in 2009-10 to \$320,173 in 2012-13.

insurers were based in Sydney and Brishane and did no risk assessment and appeared to base their assessments on post codes. "When are they going to do a risk assessment?" Ms Hynard said.

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Type of cover **Building & Contents** insured address South Townsville QLD 4810 Home sum insured \$509,000 Contents sum insured \$25,000 **Optional Covers** Your excesses Home excess \$750 Malcolm Mal 1d - 22

MEDIA RELEASE

Buyer Beware: high insurance costs devaluing NQ apartments.

Ah, the annual joust with the insurance company about the

premium for next year, how I look forward to it. A phone call to enquire as to the basis of a 20% increase in our home insurance turned into a 45 minute verbal chess game resulting in a premium several hundred dollars lower than the quote. Amazing....

• Telstra 🗢 10:48 am Done 3 of 3

> Townsville Questions & Answers 3 h . 15

Hey all, looking to buy a house in Townsville and wanting thoughts on home and content insurance. I have googled a few and they want \$9000 + per year. This is just crap

66 comments

80%

Unaffordable insurance hikes hitting

WHO CONTROLS NATIONAL STRATEGIC ASSETS?

Insurance costs are set

to soar for thousands.

These areas face the

biggest hikes

THE AUSTRALIAN

Shirley Smith: Yes, I was gobsmacked when my House Insurence this year increased by \$900 to over \$5,000. Got other Quotes, not much difference, so 🐞 threw my hands up in the air when I phoned my current Insurer asking for a Discount because I have been a loyal Customer for over 50 years, was told auma stories. they don't do that anymore. Talk about being between a rock and a hard place @