

1. JFCCT notes the administrative overhead and unhappiness with the TM.30 form
2. JFCCT proposes significantly reduced scope, greater ease of use, and urges regulatory reform in the medium to long term.
3. As an initial and immediate step, without it being the full regulatory solution, certain groups should be removed from the compliance requirement:

Ref	Category	Current	Recommended change about TM.30
<i>a</i>	<i>Permanent Residents</i>	Not in scope	No change
<i>b</i>	<i>Diplomats</i>	Not in scope but some press reports suggest they could be	Confirm not in scope
<i>c</i>	<i>Chamchuri Square OSOS users – personnel of BOI promoted companies, of companies with THB 30m paid up capital, smart visa holders and other permitted OSOS users.</i>	In scope currently, but as a matter of practice, TM.30 evidence not required for visa applications; although this does not remove the TM.30 requirement.	For TM.30 obligations, change to make out of scope/ non applicable
<i>d</i>	<i>Hotel stayers</i>	Hotel reports relying on TM.6 information	No change
<i>e</i>	<i>Work permit holders with business visa</i>	Currently in scope	Change to make out of scope – register on first arrival, report changes of residence but not required to file TM.30 reports;
<i>f</i>	<i>Retirement visa holders, students</i>	Currently in scope	Change to make out of scope – register on first arrival, report changes of residence but not required to file TM.30 reports; school campuses are under control of the school
<i>g</i>	<i>Anyone with a long-term visa filing a 90-day report</i>	Currently in scope	Change to make out of scope – register on first arrival, report changes of residence but not required to file TM.30 reports
<i>h</i>	<i>Visitors who are not staying in registered hotels. These consist of people staying in hostels (up to 20 rooms) and personal residences, whether as guests (eg family friends) of people already living there or as short-term tenants.</i>	Currently in scope	Options (i) Rather than using a TM.30, the premises owner could simply maintain a record which could be inspected (“inspectable record”). The premises owner could do this online, creating a simpler alternative to the TM.30 process; and (ii) Landlord allows tenant to use TM.30 app (as a ‘permitted user rather than by providing his own PW) and can check that registration is done; or (iii) some other process

Any foreigners for whom reporting may still be required (ie not made 'exempt' or outside the scope) such as those in category h, should be able to self-report as a first alternative to the landlord reporting. One means for doing this is suggested for case h, above.

Foreign property owners (eg condo owners) should not have to self-report. Such persons have or can have a house book.

4. In all cases of continuing required use, a fully functional, on-line experience should be available (including via a downloadable mobile app (at least supporting Android and iOS) and via browser-based access on a computer), supporting all required categories and use cases. The foreigner should be able to complete the process him or herself, with only a one-time registration and then functionality for reporting subsequent changes. Only highly unusual, one-off situations should require an in-person interaction with an Immigration official.
5. Remove unnecessary evidentiary requirements such as proving title to a property. Penalties for misreporting can be used to ensure compliance.
6. JFCCT also urges medium- to long-term regulatory reform, such that that TM.30 be ceased unless a compelling case can be made for retaining its use in certain specific cases or situations.
7. JFCCT proposes that if there are any demonstrable, actual benefits to the TM.30, they be identified and, covered by another, existing process or instrument.
8. Review s.37 (3) and (4) to eliminate all reporting requirements which cover the same situation within s.37, and across ss.37 and 38.