

Ministry of Business, Innovation and Employment  
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Submitted by email to: [responsiblecamping@mbie.govt.nz](mailto:responsiblecamping@mbie.govt.nz)

**ChristchurchNZ submission on discussion document:  
*Supporting Sustainable Freedom Camping in Aotearoa New Zealand***

Thank you for providing the opportunity for ChristchurchNZ to provide feedback on the proposal to make freedom camping in New Zealand more sustainable.

ChristchurchNZ is the economic development and regional tourism organization for Christchurch with a purpose of stimulating sustainable economic growth for a prosperous Ōtautahi Christchurch.

This submission reflects a need to strike a balance between allowing freedom campers to enjoy the high-quality visitor experience that New Zealand has to offer while ensuring that freedom camping does not undermine this very experience through the erosion of tourism's social license and environmental degradation.

Freedom campers contribute economically to the tourism sector. In New Zealand freedom campers have been found to engage in high-value activities at comparable rates to visitors staying in commercial accommodation, despite a strong proclivity to engage in free activities.<sup>1</sup> Freedom campers also travel for longer periods of time and visit more remote geographical regions than non-freedom campers.

However, freedom camping has produced some negative and undesirable effects under the current policy setting, the impacts of which have been borne by resident communities and the natural environment.

ChristchurchNZ's RTO area spans multiple districts and within these exist contextual differences that impact on each district's relationship with freedom camping. These differences include but are not limited to: the existence of freedom camping bylaws; levels of residential development; geographical terrain; and existing provision of facilities for freedom campers. ChristchurchNZ acknowledges that submissions are being made by some of these district councils and encourages the thorough consideration of these submissions as the best reflection of need at the local authority level.

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<sup>11</sup> Peter Fieger, Girish Prayag, C. Michael Hall & Chris North (2020) The tourism value of international freedom campers to New Zealand, *Tourism Recreation Research*, 45:2, 265-270, DOI: 10.1080/02508281.2019.1660042

It is also important to balance this acknowledgement of local differences with an emphasis on a need for national consistency. ChristchurchNZ takes the view that setting expectations at the system level is an important factor in driving responsible visitor behavior. This submission is therefore guided by the perspective that a national framework for managing freedom camping is required. This will ensure there are clear and consistent expectations of responsible camping behavior that support a sustainable freedom camping sector. This national framework could still allow local councils to use their regulatory powers to respond to freedom camping issues within their respective districts if required.

**ChristchurchNZ supports the need for regulatory change to ensure that freedom camping supports sustainable economic growth.**

Comments from ChristchurchNZ in relation to each proposal are provided below:

**Proposal 1:** Make it mandatory for freedom camping in a vehicle to be done in a certified self-contained vehicle.

Making the use of certified self-contained vehicles mandatory for freedom campers would send the clearest message to freedom campers about expectations of responsible visitor behavior. This would reduce confusion as visitors travel between different regions. An increase in the number of campers using self-contained vehicles would also likely improve tourism's social license to operate within resident communities, given that instances of inappropriate waste disposal are expected to reduce.

We note that compliance costs may be high for some campers and campervan companies who are required to convert their vehicles to meet the self-containment standard. The cost of compliance may also encourage some campers to avoid meeting the requirements for self-containment simply by using a tent in addition to their vehicles. This potential loophole limits the effectiveness of this proposal in addressing the issue that it intends to fix.

**Proposal 2:** Make it mandatory for freedom campers to stay in a vehicle that is certified self-contained, unless they are staying at a site with toilet facilities.

This proposal would deliver a nationally consistent framework for freedom camping as visitors travelling in non-self-contained vehicles would know they are required to stay at sites with toilet facilities wherever they are in New Zealand. A benefit of this proposal is that it also allows for some flexibility in how districts respond to and manage freedom camping within their respective areas. An important consideration in relation to this proposal is access to information for visitors to ensure they understand where they can stay dependent on their vehicle type.

ChristchurchNZ shares the concerns raised by the Christchurch City Council, that if councils are to provide camping facilities for free then they would be essentially operating in competition with campgrounds. Camping grounds are an important part of the accommodation sector and wider tourism industry. The introduction of council-funded 'free' facilities would have a detrimental effect on operators that are already faced with reduced occupancy in some locations due to COVID-19.

As discussed above, ChristchurchNZ supports aspects of both Proposal 1 & Proposal 2. At a minimum, Proposal 2 is an important step forward to increase the number of freedom campers travelling in self-contained vehicles. Full support for this proposal would require further action to

address the impact of council provision of freedom camping facilities on existing campgrounds. Support for this proposal is also on the assumption that requirements for self-contained vehicles are strengthened as per Proposal 4.

**Proposal 3:** Improvement to the regulatory tools for government land managers through the introduction of a new regulatory system for self-contained vehicles.

A streamlined regulatory system for self-contained vehicles is an important step forward. This proposal aligns with key recommendations made by the Parliamentary Commissioner for the Environment regarding national oversight for the certification process. A national regulatory framework will reduce system fragmentation and improve consistency across the sector. Proposals for the formation of a regulatory body with national oversight, the introduction of a national register for self-contained vehicles and more cohesive regulation of licensing persons and organizations are all supported by ChristchurchNZ.

ChristchurchNZ therefore supports proposal 3.

**Proposal 4:** Strengthen the requirements for self-contained vehicles.

The low usage of on-board toilets that are likely to meet the current SCV standard by international freedom campers indicates there is a weakness within the current standard.<sup>2</sup> As highlighted by the Christchurch City Council, by-laws that only allow freedom camping in self-contained vehicles in Christchurch City have been in place since 2016. Despite this, freedom camping issues still exist in the district, with weaknesses in requirements for self-containment a likely contributor to this. Strengthening the requirements for self-containment will improve the quality and suitability of onboard toilets and therefore the incentive for freedom campers to use them.

ChristchurchNZ therefore supports proposal 4.

## Conclusion

We thank you again for the opportunity to comment on the proposed changes to how freedom camping is managed. The pursuit of a more sustainable freedom camping sector is a commendable objective that aligns with ChristchurchNZ's commitment to stimulate sustainable economic growth.

Yours sincerely,

Privacy of  
natural persons

Loren Heaphy

General Manager- Destination & Attraction

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<sup>2</sup> As cited in MBIE's discussion document: of the international freedom campers who hired a budget vehicle or purchased a vehicle with a toilet that was likely to have met the SCV standard, 28% used this toilet.