

Submission

Submission on discussion document regarding supporting sustainable freedom camping in Aotearoa New Zealand

To Ministry of Business, Innovation and Economics (MBIE)

Name of Submitter: Fire and Emergency New Zealand (Fire and Emergency)

This is a submission on the discussion document titled: "Supporting sustainable freedom camping in Aotearoa New Zealand" for public consultation prepared by MBIE. Fire and Emergency's submission is in partial support of the following proposals:

- Proposal one (1) - to make it mandatory for freedom camping in a vehicle to be done in a certified self-contained vehicle.
- Proposal four (4) - to strengthen requirements for self-contained vehicles.

Fire and Emergency has a responsibility under the Fire and Emergency New Zealand Act 2017 to provide for firefighting activities to prevent or limit damage to people, property and the environment. Specifically one of Fire and Emergency's main functions is to promote fire safety (Section 11(2)(a)). In order for Fire and Emergency to achieve their principle objective which includes reducing the incidence of unwanted fire and the associated risk to life and property, protecting and preserving life, and preventing or limiting injury, damage to property land, and the environment, Fire and Emergency requests that MBIE give consideration for the inclusion of fire safety regulations in NZS 5465: 2001. The risk of fire represents a potential adverse effect of low probability but high potential impact to people, property and the environment.

There is currently no requirement for the safe installation and use of cooking appliances in self contained vehicles, or the requirement for the installation of fire alert and management devices such as smoke alarms or fire extinguishers in the NZS 5465: 2001. Fire and Emergency has attended a number of camping related fire events generated by gas leaks or camp stove malfunctions in vehicles that have been converted by the vehicle owners. In January this year, the Rarangi Volunteer Fire Brigade tended to a fire event in Marlborough when a minibus converted by the owners into a self-contained vehicle caught ablaze from a gas cylinder. In addition, Fire and Emergency has attended fires involving camper vans that have resulted in deaths.

Taking into consideration the above, Fire and Emergency seeks that it is mandatory for freedom camping in a vehicle to be done in a certified self-contained vehicle. In order to reduce the risk of a fire and associated adverse impacts on people, property and the environment, Fire and Emergency seeks that the following recommended requirements are incorporated into any new standards and certification process for self-contained vehicles:

- Require working smoke alarms to be fitted in all self-contained vehicles.
- Require a fire extinguisher with a current warrant of fitness to be fitted in all self-contained vehicles.
- Provide supporting objectives and definitions within the regulations.
- Require cooking facilities to be fitted by a suitably qualified person.
- Require gas cylinders to be secured at all times while a vehicle is in motion.
- Require any unfixed cooking appliances to be used away from vehicles.
- Limit the volume of gas that can be stored in a campervan by establishing a maximum volume/weight.

Fire and Emergency wishes to discuss the above recommended amendments to the Standards with MBIE and would be happy to assist with more details on the provisions.

Privacy of natural persons

Signature of person authorised to sign on behalf of

Fire and Emergency

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