



## Supporting Sustainable Freedom Camping in Aotearoa New Zealand – Submission Form

### How to provide us with feedback

The Ministry of Business, Innovation and Employment (MBIE) is collecting written submissions to gather a range of views on the Government's proposals to improve the management of freedom camping in New Zealand.

This submission form brings together all the questions asked throughout the discussion document *Supporting Sustainable Freedom Camping in Aotearoa New Zealand – Proposed changes to support effective management of freedom camping in New Zealand*.

Please feel free to answer as many or as few of these questions as you wish.

For more information and discussion about these topics please refer to the discussion document available at <https://www.mbie.govt.nz/have-your-say/supporting-sustainable-freedom-camping-in-aotearoa-new-zealand>.

Your submission can be returned by email to [responsiblecamping@mbie.govt.nz](mailto:responsiblecamping@mbie.govt.nz). Submissions are due by midnight on Sunday 16 May.

### Use and release of information

After the consultation period has closed, MBIE will publish a summary of submissions on our website at [www.mbie.govt.nz](http://www.mbie.govt.nz).

We will not be publishing any individual submissions or names of individuals who made a submission. We may wish to include part of your submission in the summary of submissions; in that case, MBIE will first ensure we have your permission to do so.

If you are submitting on behalf of a business or organisation, MBIE will consider that you have consented to the content being included in the summary of submissions unless you clearly state otherwise. If your submission contains any information that is confidential or that you do not want published, you can say this in your submission.

The Privacy Act 2020 applies to your submission. Any personal information you supply to MBIE through your submission will only be used by MBIE for the purpose of producing a summary of submissions. The summary will present themes and no personally identifiable information will be included. The summary will be reported to the Minister of Tourism and be published online.

Submissions may be subject to requests for information under the Official Information Act 1982 (OIA). If your submission, or part of it, comes within the scope of an OIA request, MBIE would normally release it (excluding any personal information) to the person who asks for it. If you consider there are reasons for MBIE to withhold any of the information you are providing, please indicate these reasons in your submission.

## Your details

**What is the name of the person making this submission?**

Kevin Whiteside

**If you are submitting on behalf of an organisation, what is the name of that organisation?**

Happy Campers NZ Ltd and Kiwi Campers New Zealand Ltd

**Is it okay for your organisation's details to be published if we publish which organisations made a submission, or include part of your submission in the summary of submissions?**

- Yes, you can publish my organisation's details with information from my submission.  
 No, keep my organisation's details confidential.

**Can we use information in your submission as a case study in the summary of submissions?**

- Yes, you can include information from my submission as a case study in the summary of submissions.  
 No, keep my information confidential.

**Please provide us with your email address in case we need to contact you about your submission.**

Email

Privacy of natural persons

**What sector(s) does your submission most closely relate to, if applicable?**

For example, the sector in which you may work or operate, or which you represent.

- Accommodation provider  
 Rental vehicle business  
 Iwi, hapū or Māori organisation  
 Individual or camper  
 Other \_\_\_\_\_ (please specify)  
 N/A
- Other tourism business  
 Non-tourism business  
 Local Government  
 Club or club representative (eg camping club)

## Context to Supporting Sustainable Freedom Camping in Aotearoa New Zealand

1.1 How much do you agree that certain types of vehicle-based freedom camping is a problem? Please write a (Y) next to the option which applies to you				
Strongly agree	Agree	Neutral	Disagree	Strongly disagree Y
				Y

**1.2 What are your views on freedom camping in vehicles?**  
When answering this question you may like to think about:

- Is vehicle-based freedom camping an issue in your area?
- Have you observed any specific issues?
- Are there specific behaviours which impact on your use of local amenities/infrastructure?
- What benefits does vehicle-based freedom camping provide for your region?

**Our views on Freedom Camping refer not only to rental vehicles being hired and used by our clients but also for normal New Zealanders who have a right to Freedom Camp.**

**Any issues we have observed by Freedom Camping is predominately that caused by visitors to New Zealand arriving here and purchasing an unsuitable vehicle to use in their travels. Rental vehicles that are freedom camping are explained where they can camp when they pick the campervan. All our campers that are not self-contained are specifically told they cannot Freedom Camp unless there are facilities where they are camping and also that the Local Authority authorises it.**

**As can be seen during the last 12 months with Freedom Campers travelling New Zealand a lot of the issues have been caused by New Zealanders. The comment that the Freedom Campers are shitting in the bushes etc is absolutely rubbish and have been over exaggerated. Personally, I have seen numerous people in cars stopping and going to the toilet on the side of the road and in bushes on a daily basis when travelling.**

**Freedom Campers respect the environment and just want to enjoy what New Zealand has available to visit and stay outside of Camp Grounds.**

**The benefits that Freedom Campers bring to the local communities is substantial. All Freedom campers will purchase food/Petrol/eat out, visit local attractions etc.**

**How much do you support the proposal to make it mandatory for vehicle-based freedom campers to use a certified self-contained vehicle?**

2.1

Please write a (Y) next to the option which applies to you

Strongly agree	Agree	Neutral	Disagree	Strongly disagree Y
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**Do you support this proposal?**

When answering this question you may like to think about:

- Do you consider this option will improve camper behaviour?
- 2.2 • Will this option support or improve tourism outcomes in your region?
- Will this option decrease pressure on the environment and local government infrastructure?
- Are there impacts of this proposal that you are concerned about?
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**We strongly disagree with any proposal to make it mandatory for freedom campers to use a certified self-contained vehicle.**

**All this will create is an elitist group of campers who can freedom camp. Not everybody in New Zealand or clients hiring from overseas can afford expensive self-contained vehicles which have permanently plumbed in toilets.**

**We do agree however that vehicles that do not comply with the existing self-contained requirements should not be allowed to Freedom camp unless toilet facilities are available. That is why in our companies we will not self-contain sleepervans as there is no room for a portable toilet to be available to be used at night as per the requirements of NZS5465:2001.**

**Any larger vehicle where you can stand up and have a portable toilet available at night and which comply with the above-mentioned standard's should be allowed to be self-contained.**

**How might this proposal impact you?**

2.3 When answering this question you may like to think about:

- Will this proposal increase or decrease the likelihood of you camping?

- Will this proposal have a direct financial impact on you or your business?
  - If yes, please indicate if this is a personal or business expense, and quantify how much you estimate it would impact you.
- Will this option increase or decrease the attractiveness of visiting other regions in New Zealand?

#### Commercial Information

**These proposed changes are just a heavy-handed punitive measure that threatens the freedom to enjoy the outdoors exercised by a majority of campers, both New Zealanders and overseas visitors.**

**It will effectively remove the opportunity for a large number of New Zealanders who will no longer be allowed to freedom camp due to cost of purchasing a vehicle that is fully self-contained. It will allow freedom camping to become a class issue.**

#### **What things should Government consider to implement this option?**

When answering this question you may like to think about:

- 2.4
- What exceptions should Government allow under this proposal?
  - Do you have any ideas about how this proposal could be implemented?
  - Should this option be considered alongside other options proposed in this discussion document?

**This proposal should not be implemented because the present system is working perfectly.**

**There may be a small problem with a minority of campers who use vans without toilets but if this proposal is implemented it will affect all users of campervans who have always acted responsibly and add unnecessary further costs to those owners.**

**How much do you support the proposal to make it mandatory for freedom campers to stay in vehicles which are certified self-contained, unless they are staying at a site with toilet facilities (excluding public conservation lands and regional parks)?**

3.1

Please write a (Y) next to the option which applies to you

Strongly agree Y	Agree	Neutral	Disagree	Strongly disagree
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**Do you support this proposal?**

When answering this question you may like to think about:

- Do you consider this option will improve camper behaviour?
- 3.2 • Will this option support or improve tourism outcomes in your region?
- Will this option decrease pressure on the environment and local government infrastructure?
- Are there impacts of this proposal that you are concerned about?

**We are in full support of this proposal.**

**Why do you need a camper to be self-contained if it is staying in a site with toilet facilities?**

**This option will certainly decrease pressure on the environment but there may be a requirement for more Government initiatives to provide funding to councils for toilet facilities. A very small cost to pay when you consider the Billions that are bought to the economy by visiting New Zealanders and Overseas visitors going to the regions of New Zealand.**

**How might this proposal impact you?**

When answering this question you may like to think about:

- Will this proposal increase or decrease the likelihood of you camping?
- 3.3 • Will this proposal have a direct financial impact on you or your business?
  - If yes, please indicate if this is a personal or business expense, and quantify how much you estimate it would impact you.
- Will this option increase or decrease the attractiveness of visiting other regions in New Zealand?

**Commercial Information**

**This proposal would definitely increase the attractiveness of visits to all regions of New Zealand.**

**3.4 What things should Government consider to implement this option?**

When answering this question you may like to think about:

- What do you think is required to achieve this option?
- What exceptions should Government allow under this proposal?
- How far from toilet facilities should a person be able to freedom camp if not in a vehicle with a toilet? eg, 100 metres, 200 metres?
- Should this option be considered alongside other options proposed in this discussion document?

**The present requirements for a vehicle being self-contained are perfectly acceptable at present.**

**The Government just needs to assist more councils to provide toilet facilities where required.**

**We would suggest that any vehicle should be within 200m of any such facilities.**

**A good example of an area where toilet facilities work really well is a camping area near Bowentown (Bay of Plenty) in a carpark next to the beach. All types of campers can be seen parking there and there has been no problems. It is a facility which could be used as a template elsewhere in New Zealand.**

**How much do you support the proposals to improve the regulatory tools for government land managers?**

4.1

Please write a (Y) next to the option which applies to you

Strongly agree	Agree	Neutral	Disagree	Strongly disagree Y
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**Do you support this proposal?**

When answering this question you may like to think about:

4.2

- Are there any specific parts of this proposal you support or propose?
- Do you consider this option will improve camper behaviour?
- Will this option support or improve tourism outcomes in your region?
- Will this option decrease pressure on the environment and local government infrastructure?
- Are there impacts of this proposal that you are concerned about?

Commercial Information

**Provided that this proposal does not limit the issue of self-containment certificates to only one organisation we would accept part of this proposal with certain limitations.**

**There would need to be a lead in time of at least 5 years to allow for all campervans to be able to get certification.**

Commercial Information

**The cost of \$125 that has been proposed we believe will not cover the cost of administrating, certifying by inspectors, administration and the cost of setting up a national database of vehicles that are certified self-contained.**

**Overall, the concept is sound but the cost will be prohibitive which will affect once again the ability of only the elite to have self-contained vehicles.**

**It would be a lot easier if you just banned all vehicles that you cannot stand up in and which use the whole vehicle for a bed. That way it is impossible for any small vehicle to be self-contained.**

**There is concern that this proposal is an emotive claim by owners of large campervans that there is a problem and it will just end up being the Government approaching this problem with a for this extra level of cost heavy-handed regulatory approach.**

**It is every New Zealanders right to camp in New Zealand and what this regulatory approach will stop that right for the majority of them.**



### How might this proposal impact you?

When answering this question you may like to think about:

- 4.3
- Will this proposal increase or decrease the likelihood of you camping?
  - Will this proposal have a direct financial impact on you or your business?
    - If yes, please indicate if this is a personal or business expense, and quantify how much you estimate it would impact you.
  - Will this option increase or decrease the attractiveness of visiting other regions in New Zealand?

**This proposal will limit the rights of New Zealander's to be able to camp in New Zealand.**

Commercial Information

**This would be a fair and reasonable thing to do as Rental companies are facing the major costs in this exercise.**

### What things should Government consider to implement this option?

When answering this question you may like to think about:

- 4.4
- What would you like to see in practice?
  - Should this option be considered alongside other options proposed in this discussion document?

**We see no need for the Government to implement this extra level of cost to both individuals and Rental companies.**

### What would be an appropriate penalty?

When answering this question you may like to think about:

- 4.5
- Should non-compliant vehicles be confiscated? If so, under what conditions?
  - If vehicles are confiscated, what conditions should be placed on returning the vehicle?
  - Should fines be similar to those for not holding a valid Warrant of Fitness for a motor vehicle?
  - What levels should fines be set at?
  - Who should collect a fine?

**The current level for infringement notices is more than sufficient.**

**We do not believe that there is any need to turn New Zealand into a Police state by allowing vehicle confiscation. It seems very extreme and would only lead to an escalation of violence. This would be an extreme measure.**

**Can you imagine the difficulties of trying to confiscate a vehicle at 3.00am which is the time the council inspectors check for infringements? Is this problem so bad that the people would be told to get out of the vehicle? Where would they go etc.**

**This idea fringes on Human rights and is the problem in New Zealand that bad we do not think so.**

**Our rental company at present does try and collect Freedom camping fines from clients but if you make it mandatory then once again further costs are being put onto the rental companies.**

**At present we can do a declaration to the local authorities if we are unable to collect the fine and that will need to be continued. This is the same declaration that is given to the Police over speeding fines. This I understand is a legal right.**

**This needs to be continued if collection is to be mandatory.**

**Do you think that the requirements for self-containment should be strengthened?**

5.1 Please write a (Y) next to the option which applies to you

Yes

Neutral

No Y

**Is the current standard fit for purpose?**

When answering this question you may like to think about:

5.2

- Should there be a requirement that self-contained vehicles have fixed toilets?
- Should there be specific reference to the types of vehicles that can be self-contained?

**There should be no requirement that self-contained vehicles have fixed toilets. That is an over expensive cost which will meant that only the elite can get self-contained vans.**

**Portable toilets are perfectly suitable provided they can be used at night in the campervan.**

**The present rules cover that position.**

**We certainly agree that the standard could be amended to allow certain vehicles not to be allowed to be self-contained.**

**As suggested previously It would be a lot easier if you just banned all vehicles that you cannot stand up in and which use the whole vehicle for a bed. That way it is impossible for any small vehicle to be self-contained.**

**These non-self-contained vehicles should still be able to be used to camp in provided they either use a campground or stay in an area that has toilet facilities and is also approved for camping by a local authority.**

**Who should certify to the Standard?**

When answering this question you may like to think about:

5.3

- Should any Plumber registered under the Plumbers, Gasfitters and Drainlayers Act 1976 be able to certify to the Standard, or should certifiers be separately recognised and licensed?
- Once a vehicle has passed its initial certification, should other entities be able to re-certify it?

**Plumbers who are Registered should still be able to certify the Standard.**

**There are also other groups who should also be able to certify the Standard as well. There is no reason why they cannot be separately recognised and licenced. These would include individuals in the industry and also Companies who are involved in the manufacture of Campervans and the hire of Campervans.**

### **What transition arrangements should be in place?**

When answering this question you may like to think about:

- 6.1
- How long should Government give people to upgrade or dispose of their vehicles?
  - Should currently certified self-contained vehicles be exempt from any new rules?
  - Are there any other transition arrangements we should consider?

**If there are to be any changes to be made then serious consideration should be given to the time that must be given.**

**There should be a minimum of a five-year period to allow people to upgrade.**

**We however are of the view that there is no change necessary and people can still use a non-self-contained vehicle to camp in provided they do not use those campervans in areas where only self-contained Campervans can park.**

**Provided there are toilet facilities available, Campgrounds with facilities and DOC camp grounds they should be allowed to camp.**

**Current Self-contained vehicles should be exempt from the new rules and people have an expectation that they have a self-contained vehicle which complies with the Standard at present.**

### **How could Government ensure vulnerable groups are not further disadvantaged?**

- 6.2
- Could Government make homelessness exempt from any new regulatory system? What might this look like?

**7.1 Is there anything else on the proposed changes or discussion document you would like to mention?**

**We presently have a substantial campervan rental business which has been severely affected by the lack of overseas clients being able to travel because of covid restrictions.**

**If substantial changes are to be made to limit what is a self-contained vehicle to effectively large campervans that have fixed toilets and not allow smaller campervans that comply at present with portable toilets the that could have a serious effect on the future of our business.**

**There is no evidence that freedom campers with portable toilets are less inclined to use them than those campers with fixed plumbed toilets.**

**We do not want to turn freedom camping into an elitist option. It is the average New Zealanders right to freedom camp provided they have toilet facilities portable or plumbed or available to be used nearby.**