

20 April 2021



Ministry of Business, Innovation and Employment

15 Stout Street

PO Box 1473

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Attention: Responsible Camping Submissions

Holiday Parks New Zealand Position on

“Supporting Sustainable Freedom Camping in Aotearoa New Zealand” discussion paper.

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

Strongly Support

This proposal will improve camper behaviour by ensuring that all non-certified self-contained vehicles will be using DOC campsites, commercial holiday parks, camping grounds and designated sites.

This will improve tourism outcomes in regions across New Zealand.

This will decrease pressure on the environment and local government infrastructure.

Many commercial operators of non-certified self-contained vehicles recommend that their customers use holiday parks and DOC campsites.

Commercial Information

By having one consistent policy for local authorities, it will be a lot easier for visitors to understand where they can or cannot freedom camp.

We do not believe that there should be any exceptions to this proposal.

An option for implementing this proposal could be to include the wording **“freedom camping is only permitted in a certified self-contained vehicle”** in the Freedom Camping Act.

This proposal should be supported by proposals 3 and 4.

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Proposal Two: 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.

Strongly Oppose

This will encourage campers in non-certified self-contained vehicles to seek out free sites where local government is providing facilities. This will have a financial impact on local government who will then seek financial support from central government to fund the development of facilities and the operational costs involved in maintaining them.

This proposal may create a perception for visitors that it is OK to freedom camp in a non-self-contained vehicle at any place where there are toilets.

This proposal will not improve camper behaviour and may have the opposite effect.

This proposal will not improve tourism in the regions.

This proposal will increase pressure on the environment and local government infrastructure.

Commercial Information

Proposal Three: Improve the regulatory tools for government land managers.

Strongly Support

We strongly support the introduction of a regulatory system for self-contained vehicles.

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We support the introduction of a stronger infringement scheme including a new infringement for those vehicles which fraudulently claim to be certified self-contained.

We strongly support the introduction of a new regulatory agency, or add new regulatory powers to an existing agency to provide national oversight of legislated requirements for self-contained vehicles.

We believe that vehicle confiscation should be a last resort with a progressive fine system starting at \$200 then going to \$1,000 then confiscation. Confiscation may apply to vehicles which fraudulently claim to be certified self-contained.

This would have a major impact in protecting the environment in areas where freedom camping is prohibited.

We strongly support allowing local councils to enforce rules on other government land for example land administered by Waka Kotahi or LINZ.

We strongly support the introduction of a regulatory system for the Self -Contained Vehicle Standard. We believe that this may be best achieved by changing from a Standard to a Regulation.

This option would sit alongside proposals 1 and 4.

Consideration should be given to introducing an “instant fine” system.

Proposal Four: Strengthen the requirements for self-contained vehicles.

Yes

We strongly support strengthening the requirements for self-containment.

The standard must be made non voluntary with a Government agency taking responsibility for the Standard.

We support the development of a database/central register of certified self-contained vehicles and with a database of all issuing authorities.

We strongly believe that toilets must be fixed and plumbed in. This will ensure that portable toilets are not removed from the vehicles.

We agree that any plumber registered under the Act should be able to certify the standard. There should also be an audit process to ensure a high level of compliance is met. This is the same as any gas or electrical certification in vehicles such as campervans, caravans, and motorhomes.

We agree that once a vehicle has passed its initial certification that other entities should be able to re-certify it. This could be part of the WOF process.

Transition arrangements

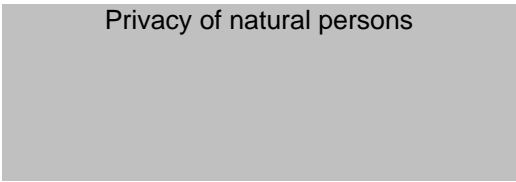
We agree that one year should be allowed for people to upgrade or dispose of their vehicle.

We oppose allowing for vehicles which are currently certified to the CCVS to continue for as long as the certification is valid.

Homelessness

We support local authorities, government agencies and not for profit organisations to work together on referral pathways for homeless people.

Privacy of natural persons



Fergus G Brown
Chief Executive