

**Master Plumbers, Gasfitters and Drainlayers New Zealand Inc. submission on**

***'Discussion Document: Supporting sustainable freedom camping in Aotearoa New Zealand'***

Master Plumbers, Gasfitters and Drainlayers NZ Inc. welcomes the opportunity to comment on the Ministry of Business, Innovation and Employment's discussion document 'Supporting Sustainable Freedom Camping in Aotearoa New Zealand'. As an industry association representing 70% of all registered plumbers, gasfitters and drainlayers in New Zealand, we, on behalf of our members, have a vested interest in the proposed changes to the regulation surrounding freedom camping in New Zealand, particularly in regards to parts of proposal three.

Please find our comments below.

**1. *Proposed regulatory system for self-contained vehicles***

- 1.1 The discussion document identifies a number of potential functions, chief among these "recognising and licensing persons and organisations that may undertake sanitary plumbing work on vehicles and certify that the work meets the legislated requirements for a vehicle to be self-contained."
- 1.2 Currently, only a certified plumber can carry out sanitary plumbing work in residential homes. Master Plumbers considers that mobile homes are an extension of residential homes, and therefore it should be specified that only a certified plumber is allowed to complete the work.
- 1.3 The document further specifies that "plumbers who currently install and certify vehicles to the self-contained vehicle standard would likely need to take steps to become issuing authorities and/or testing officers, and to meet audit requirements."
- 1.4 Master Plumbers would further like to suggest a method of self-certification for plumbers working on self-contained vehicle standards that will be amenable to the plumbing industry, self-contained vehicle owners, and the ministry.
- 1.5 This method would firstly have the plumber complete the necessary plumbing work for self-containment, and would be followed by a certification process where, similar to the current model, the plumber is able to certify their work.
- 1.6 The continuance of the self-certification model is of vital importance to the plumbing industry. In a May 2020 report to the Ministry of Business, Innovation and Employment, Sapere Research Group found two areas of alignment on the subject of self-certification in construction industry trades despite the identification of a wide variety of views on the readiness of the industry for self-certification. These areas of alignment were that "some low risk work does not need independent inspection" and that "it might be possible to gather evidence for some 'inspections' without a site visit."<sup>1</sup>
- 1.7 Plumbing work in regards to the self-containment of vehicles can justifiably be described as low risk as the danger to public health is low as long as the self-certified work is verified. This verification can be completed remotely. The gathering of evidence for inspections of such work can be achieved through plumbers simply taking a picture of the work completed and uploading

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<sup>1</sup> Vhari McWha, Sapere Research Group, *Self-Certification in Construction Industry Trades*, May 2020, p. 6

it to the proposed national register of certified vehicles, where it could then be verified remotely by the controlling regulatory agency.

## **2. Proposal for establishment of national database**

- 2.1 Master Plumbers supports the proposal to establish a national database of all vehicles that are certified self-contained.
- 2.2 Such a database should be easily accessible for local councils and authorities, and contain a simple search function by registration to establish whether a vehicle is certified self-contained. It would also be important for the national database to include images and information uploaded by the plumber responsible for the self-containment work, as stated in 1.7.

## **3. Strengthening the requirements for self-contained vehicles**

- 3.1 Master Plumbers submits that the best form of protection is for each self-contained vehicle to have, at minimum, a permanently plumbed in system. This would exclude motor homes with cassette toilets.
- 3.2 MBIE will have to assess the risk that this requirement will prevent many types of motor homes and related vehicles, such as vans and people movers, from achieving compliance with the new standard.
- 3.3 Master Plumbers believes that any plumber registered under the Plumbers, Gasfitters and Drainlayers Act 2006 should be able to certify to the standard.
- 3.4 We believe that once a vehicle has passed its initial certification, only licensed plumbers should be able to re-certify it. The self-containment systems are intricate, and general wear could cause a diminishment of these systems; only a licensed plumber would have the skills and knowledge to recognise and rectify this.

## **Conclusion**

Master Plumbers, Gasfitters and Drainlayers NZ Inc. submit that if the above recommendations were taken then the costs associated with freedom camping in New Zealand could be diminished. At the same time, new regulatory requirements means that there is a definite opportunity to pursue an expanded model of self-certification, which would be advantageous to the plumbing industry. We would be happy to work with the Ministry of Business, Innovation and Employment on implementing a plan going forward, and would welcome any comments or concerns.

Regards

Greg Wallace

Privacy of natural persons