



THE SMART WAY TO RENT MOTORHOMES.

50 Gateway Park Drive, Pokeno 2402 / 12 Holt Place, Burnside, Christchurch 8053

16 May 2021

To the:

Ministry of Business, Innovation and Employment  
15 Stout Street  
PO Box 1473  
Wellington 6140  
Attention: Responsible Camping Submissions

Our position at McRent supports the view of MBIE and the Tourism Minister to better control and improve the flow of freedom campers across New Zealand in the future. Most recent pre-COVID years have shown that overcrowding and incorrect interpretation and non-enforcement of the requirements set in the Freedom Camping Act are causing distress and upset in many of our communities. We have the wonderful opportunity in these challenging times to press the reset button towards a prosperous and sustainable future for New Zealand's Tourism Industry. After hearing the Minister speak at the recent TRENZ Hui event in Christchurch, it became clear that the goal is set and we are now discussing the 'HOW', not the 'IF' of this implementation. We support the following proposal combination for future implementation:

**Proposal 2 in conjunction with improved regulatory tools (Proposal 3), combined with a permanent toilet being a key requirement for a vehicle to obtain the freedom camping certificate. (Proposal 4). Considering only a minority of vehicles in NZ currently have a 'plumbed-in' toilet, we strongly suggest including vehicles that come equipped with a permanent toilet cassette system in the pool of accepted vehicle types, that are eligible to receive the certificate.**

We acknowledge that the current problem is related to more than just the discussion around waste. For us it has become clear, that councils will need to play a more in-depth role going forward in controlling the flow of vehicles to avoid overcrowding in freedom camping hotspots. We also believe that private vehicles, often owned by low-budget travellers that explore the country on their work and holiday visas, are one of the main contributors to the raised concerns.

We support to handle fines issued under an improved regulatory system and suggest putting the focus on quick communication, so that the fine can be settled ideally before the renter finishes their holiday. We suggest increasing the fines to \$400-500 to deter misuse. We believe that currently issued Freedom Camping Certificates should remain valid until they run out, by which the new regulatory shall come into effect to spread out the pressure on the rental industry.

We strongly recommend for portable toilets used mainly in smaller vehicles, not to be accepted as being freedom camping compliant going forward. Based on my personal experience being in the Motorhome Rental Industry for more than ten years, I can confirm that only a small minority of customers I dealt with in the years 2010 – 2014, who travelled in a hi-top vehicle without built-in facilities, ended up using their portable toilet on their travels averaging 18 days each.

Since 2017 McRent customers are renting Concierge-Supported Luxury Motorhomes and mainly choose a combination of overnight locations while travelling. They consist of fully equipped campgrounds, basic sites (e.g. DOC) as well as choosing to freedom camp at times. We strongly recommend putting the focus on supporting campgrounds and other Tourism businesses in the coming years by encouraging travellers to spend funds for overnight stays instead.

Feel free to contact me on [Privacy of natural persons](#) or the business owner Jonas Ng on [Privacy of natural persons](#) if you have further questions

Kind regards  
Claudia Schoushkov  
McRent Rental Sales Manager



Please see comments from Manatū Hauora / Ministry of Health below.

### **General feedback on freedom camping proposals**

Overall, we strongly support the moves to ensure that Freedom Camping has a lower impact on the environment, and thereby protects the health and wellbeing of people. Particularly, as Treaty partners, we have a responsibility to promote and protect wai ora, healthy environments, as we work towards achieving Pae ora, healthy futures for Māori. This is outlined in the Ministry of Health's Whakamaua: Māori Health Action Plan 2020-2025. This action plan explains wai ora as "reflect[ing] the need for Māori to have access to resources (ie good housing, safe drinking water, clean air, healthy food) and to live in environments that support and sustain a strong flourishing mauri and a healthy and empowered whānau." We believe these changes will support that. Additionally, from a public health perspective, it is critical that these changes do not exacerbate any existing inequities. In the final section of the discussion document, homelessness is raised under 'other considerations'. The document mentions that local authorities report that people experiencing homelessness use freedom camping sites. We recommend referring to the [Aotearoa/New Zealand Homelessness Action Plan](#) for appropriate guidance on supporting people experiencing homelessness.

### **Specific feedback on the four proposals**

To the four proposals to strengthen freedom camping regulations, we support a combination of the recommended actions to support environmentally and socially sustainable freedom camping. Overall, we support a combination of all proposals, providing that any changes will not exacerbate existing inequities. Please see additional comments below.

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

- The reduction of inappropriate disposal of human waste will reduce any associated public health risk, therefore we support this option, excepting the scenario outlined in proposal 2.

*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 (excluding public conservation lands and regional parks).*

- Where local authorities have provided sufficient toilet facilities, we support this option.

*Proposal 3: Improve the regulatory tools for government land managers.*

- We generally support this, providing that it does not further exacerbate inequities.
- We do suggest imposing a maximum time period of 48 hours for people to stay in a freedom camping area, then requiring people to move on, or if staying in the region to move to an official camping ground.

*Proposal 4: Strengthen the requirements for self-contained vehicles. Requirements for self-contained vehicles are currently set out in the voluntary New Zealand Standard, NZS 5465:2001 Self-containment of motor caravans and caravans (which is more commonly known as the Self Contained Vehicle Standard - SCVS).*

- We recommend that a self-contained vehicle should include permanent plumbing for fresh, black and grey water, and have a minimum requirement for storage of each. We recommend requiring that toilets are permanently plumbed into the vehicle, and that they should be one of three types of toilet: an efficiency flushing toilet, a marine toilet or a permanent toilet.
- We support the position that it should always be a registered plumber and gasfitter (under the Plumbers, Gasfitters and Drainlayers Act 2006) and/or a certified electrician that initially certifies a self-contained vehicle. For re-certification, we recommend that this becomes part of the routine WOF, and if anything requires servicing, are referred back to a registered plumber, gasfitter or electrician.

### **A further question**

- What transitional arrangements will there be for non-compliant vans which are already on the market for sale in New Zealand or on order to be imported from overseas? Eg, will they need to be retrofitted before use in the country?

Please let us know if you have any questions, we are happy to discuss further.