



## 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?**

Alan Morton

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

Nature's Head N.Z.

**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.**

admin@naureshead.co.nz

**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.

- |  |  |
|--|--|
| <input type="checkbox"/> Accommodation provider          | <input type="checkbox"/> Other tourism business                        |
| <input type="checkbox"/> Rental vehicle business         | <input type="checkbox"/> Non-tourism business                          |
| <input type="checkbox"/> Iwi, hapū or Māori organisation | <input type="checkbox"/> Local Government                              |
| Individual or camper                                     | <input type="checkbox"/> Club or club representative (eg camping club) |
- Other N.Z. Importer and retailer of Nature's Head Waterless Composting Toilets (please specify)  
 N/A



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

1.1	<p><b>How much do you agree that certain types of vehicle-based freedom camping is a problem?</b></p> <p>Please write a (Y) next to the option which applies to you</p>			
Strongly agree	Agree	<b>Neutral</b> <u>Y</u>	Disagree	Strongly disagree
1.2	<p><b>What are your views on freedom camping in vehicles?</b></p> <p>When answering this question you may like to think about:</p> <ul style="list-style-type: none"> <li>• Is vehicle-based freedom camping an issue in your area? <b>No</b></li> <li>• Have you observed any specific issues? <b>No</b></li> <li>• Are there specific behaviours which impact on your use of local amenities/infrastructure? <b>No</b></li> <li>• What benefits does vehicle-based freedom camping provide for your region? <b>Substantial</b></li> </ul>			
<p>My town (Kawerau) was the first to be acknowledged as a “Motor Home Friendly Town” by the NZMCA. Our Council provides a number of places where freedom camping is permitted, some with free power for the first few nights and a moderate charge thereafter. These parking areas are used by both Self Contained vehicles and people camping/living in cars, but to my knowledge the occupants use Council toilets when needed. Dump stations are provided at two of the parking areas.</p>				



2.1	<b>How much do you support the proposal to make it mandatory for vehicle-based freedom campers to use a certified self-contained vehicle?</b>			
Please write a (Y) next to the option which applies to you				
Strongly agree	Agree	Neutral	<u>Disagree</u> Y	Strongly disagree

2.2	<p><b>Do you support this proposal?</b></p> <p>When answering this question you may like to think about:</p> <ul style="list-style-type: none"> <li>• Do you consider this option will improve camper behaviour? <b>No</b></li> <li>• Will this option support or improve tourism outcomes in your region? <b>No difference</b></li> <li>• Will this option decrease pressure on the environment and local government infrastructure? <b>No</b></li> <li>• Are there impacts of this proposal that you are concerned about? <b>Yes</b></li> </ul>
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Fouling the environment can be done **by people** (locals, tourists, day-trippers, surfers, trampers, cyclists, kayakers) , **not vehicles**. Generally people will not squat in the open unless forced to do so because the toilet facilities are either non-existent or so filthy that it's the better option.

2.3	<p><b>How might this proposal impact you?</b></p> <p>When answering this question you may like to think about:</p> <ul style="list-style-type: none"> <li>• Will this proposal increase or decrease the likelihood of you camping? <b>No</b></li> <li>• Will this proposal have a direct financial impact on you or your business? <b>Yes</b> <ul style="list-style-type: none"> <li>○ If yes, please indicate if this is a personal or business expense, and quantify how much you estimate it would impact you.</li> </ul> </li> <li>• Will this option increase or decrease the attractiveness of visiting other regions in New Zealand?</li> </ul>
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However, I do not support the proposals in the Draft Document because the problem lies with the **attitudes and actions of people**, not the type of vehicle they own.

It will make no difference to my options to visit other areas on NZ

2.4	<p><b>What things should Government consider to implement this option?</b></p> <p>When answering this question you may like to think about:</p> <ul style="list-style-type: none"> <li>• What exceptions should Government allow under this proposal?</li> <li>• Do you have any ideas about how this proposal could be implemented?</li> <li>• Should this option be considered alongside other options proposed in this discussion document?</li> </ul>
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Camper in non self contained vehicles should be allowed to park within a reasonable walking distance of a public toilet - which should be maintained in a useable condition by the Local Authority. They should also be allowed to use a portable toilet in a shower tent beside their vehicle.

The Freedom Camping Act should be amended to force Local Authorities to allow this in their By-Laws. Most of the proposals in the discussion document are unworkable and enforcement driven. If put into practice they will only lead to conflict and probable violence, putting the enforcement personnel at risk. Education is the way forward, not more and more Rules and Regulations.



3.1	<p><b>How much do you support the proposal to make it mandatory for freedom campers to stay in vehicles which are certified self-contained, <u>unless</u> they are staying at a site with toilet facilities (excluding public conservation lands and regional parks)?</b></p> <p>Please write a (Y) next to the option which applies to you</p>			
Strongly agree	<u>Agree</u> Y	Neutral	Disagree	Strongly disagree

	<p><b>Do you support this proposal?</b></p> <p>When answering this question you may like to think about:</p> <ul style="list-style-type: none"> <li>• Do you consider this option will improve camper behaviour? <b>No</b></li> </ul>
3.2	<ul style="list-style-type: none"> <li>• Will this option support or improve tourism outcomes in your region? <b>No</b></li> <li>• Will this option decrease pressure on the environment and local government infrastructure? <b>No</b></li> <li>• Are there impacts of this proposal that you are concerned about? <b>Yes</b></li> </ul>

The problems do not just lie with campers. It's only perceived by some people who like to make unsubstantiated (in most cases) assumptions that fouling of the environment is always done by tourist campers in small cars/vans. Virtually all of the evidence is anecdotal. I can take you to an area of bush at the northern end of the beach on pristine Lake Rotoma (Rotorua Lakes) where it is used as a toilet by day-trippers every single summer. The public toilet block is 600m away. NZ citizens are probably the worst offenders for using the bush as a toilet zone. Everyone can be 'caught short' at any time and if you've gotta go, you've gotta go! If the toilets are non-existent or broken/filthy then there is only one option. NZ citizens who have issues like Crohn's disease, irritable bowel syndrome etc cannot always make it to a toilet in time when travelling or having a picnic.

	<p><b>How might this proposal impact you?</b></p> <p>When answering this question you may like to think about:</p>
3.3	<ul style="list-style-type: none"> <li>• Will this proposal increase or decrease the likelihood of you camping? <b>No</b></li> <li>• Will this proposal have a direct financial impact on you or your business? <b>Yes</b> <ul style="list-style-type: none"> <li>○ If yes, please indicate if this is a personal or business expense, and quantify how much you estimate it would impact you.</li> </ul> </li> <li>• Will this option increase or decrease the attractiveness of visiting other regions in New Zealand?</li> </ul>

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	<p><b>What things should Government consider to implement this option?</b></p> <p>When answering this question you may like to think about:</p>
3.4	<ul style="list-style-type: none"> <li>• What do you think is required to achieve this option? <b>Lots more Rules, Rules, red tape!</b></li> <li>• What exceptions should Government allow under this proposal?</li> <li>• 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? <b>100m max</b></li> <li>• Should this option be considered alongside other options proposed in this discussion document?</li> </ul>



The more you makes Rules and Regulations, the more you have to come up with clear definitions to rule in or rule out every single eventuality so that there are no grey areas. The more you try to regulate, the more your will back yourself into a corner. Don't even go there. Education of NZ'ers and inbound tourists is the answer about what hygiene practices are acceptable. Set standards for hygiene - raise the bar.



4.1	<b>How much do you support the proposals to improve the regulatory tools for government land managers?</b>				
	Please write a (Y) next to the option which applies to you				
Strongly agree	Agree	Neutral	<u>Disagree</u> Y	Strongly disagree	

4.2	<b>Do you support this proposal?</b>				
	<p>When answering this question you may like to think about:</p> <ul style="list-style-type: none"> <li>• Are there any specific parts of this proposal you support or propose?</li> <li>• Do you consider this option will improve camper behaviour? <b>No</b></li> <li>• Will this option support or improve tourism outcomes in your region? <b>No difference</b></li> <li>• Will this option decrease pressure on the environment and local government infrastructure? <b>No</b></li> <li>• Are there impacts of this proposal that you are concerned about? <b>Yes, too much power in the wrong hands.</b></li> </ul>				

The testing and issuing of Self Containment Certification is fine as it is, however the details need to be held in one centralised database for easy access by those authorised. Setting up an Agency to test and certify vehicles is an unwarranted expense to all concerned.

4.3	<b>How might this proposal impact you?</b>				
	<p>When answering this question you may like to think about:</p> <ul style="list-style-type: none"> <li>• Will this proposal increase or decrease the likelihood of you camping? <b>Not at all</b></li> <li>• Will this proposal have a direct financial impact on you or your business? <b>No</b> <ul style="list-style-type: none"> <li>○ If yes, please indicate if this is a personal or business expense, and quantify how much you estimate it would impact you.</li> </ul> </li> <li>• Will this option increase or decrease the attractiveness of visiting other regions in New Zealand?</li> </ul>				

4.4	<b>What things should Government consider to implement this option?</b>				
	<p>When answering this question you may like to think about:</p> <ul style="list-style-type: none"> <li>• What would you like to see in practice?</li> <li>• Should this option be considered alongside other options proposed in this discussion document?</li> </ul>				



**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? **Absolutely NOT!**
- If vehicles are confiscated, what conditions should be placed on returning the vehicle? **Don't confiscate - educate!**
- Should fines be similar to those for not holding a valid Warrant of Fitness for a motor vehicle? **No**
- What levels should fines be set at? **Leave the same as at present in the Freedom Camping Act.**
- Who should collect a fine? **Local Authority**





<b>5.1 Do you think that the requirements for self-containment should be strengthened?</b>		
Please write a (Y) next to the option which applies to you		
Yes	Neutral	No Y

<b>5.2 Is the current standard fit for purpose?</b>		
When answering this question you may like to think about:		
<ul style="list-style-type: none"> <li>Should there be a requirement that self-contained vehicles have fixed toilets? <b>No way!!!</b></li> <li>Should there be specific reference to the types of vehicles that can be self-contained? <b>No</b></li> </ul>		

Compliance with The Standard is perfectly adequate. The type of vehicle has nothing to do with it - if the vehicle can comply with The Standard then that's all that needs to be considered. Use of the vehicle comes down to education about what is acceptable behaviour.

<b>5.3 Who should certify to the Standard?</b>		
When answering this question you may like to think about:		
<ul style="list-style-type: none"> <li>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?</li> <li>Once a vehicle has passed its initial certification, should other entities be able to re-certify it?</li> </ul>		

- Any plumber is fine, if they choose to undertake the work. Most won't want to be bothered if they have any sense! They can make more money for their business doing regular plumbing work. Certifying vehicles will not get them excited. The requirements in The Standard are perfectly clear. If you meet them, your vehicle will pass inspection regardless of who the certifying officer is. It's not exactly 'rocket science' to interpret The Standard.
- Not possible to answer this as 'other entities' is not defined. The requirements of The Standard at present are fine and not a problem to comply with for a re-test. The present system for a re-test is quite clear.



**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?

I am absolutely against any form of Government imposed rules which will cause present vehicle owners to have to dispose or upgrade their vehicles which have already been set up to comply with The Standard. The vast majority of people who currently have perfectly well set up fully compliant vehicles should not be penalised because the Minister of Tourism and the Commissioner for the Environment have hatched this hair-brained idea of using a sledge hammer to crack a walnut. The problem of fouling has not been proven to be exclusively caused by tourists or small van/car owners and certainly the thousands of kiwi campers who are playing by the Rules for Self Containment should not be made a whipping boy for the occasional people who have lower standards of hygiene, or who quite simply have been 'caught short'. Every parent who has raised a child has heard the words - Mummy, I need to go poos, NOW! This is also possible with every travelling NZ'er, particularly if they have Crohn's disease etc.

To even entertain the thought that people should be forced to pay to upgrade or dispose of their perfectly good vehicle which currently meets The Self Containment Standard is plainly more disgusting than the problem you are trying to resolve. - I'TS REALLY ABOUT EDUCATION of people! It's not the fault of the vehicle!

Let's make this an issue for the Parties next election and see where the votes go!

**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?

Try to adjudicate on this and you will get so tangled in red tape and definitions that you will regret even considering the idea! Try defining 'homeless' to those who choose to travel NZ sightseeing, but who don't have a permanent house or rental property that they call 'home' when not on the road. They are homeless by choice, not homeless through poverty.



7.1

Is there anything else on the proposed changes or discussion document you would like to mention? Yes, see next page



## Yes!

This whole question of **type of toilet** is plain ridiculous! The Standard clearly sets out the conditions that must be met for a toilet, in that it needs to be available for use with the bed made up. This means that if a car has a sleeping platform with storage beneath, and a porta pottie stowed in the tailgate at the back - it clearly does not meet the Standard and does not become certified as Self Contained. Simple.

The only modification to The Standard should be the removal of all reference to the Blue Sticker. These have of course been copied in the past and now serve no useful purpose whatsoever. The only thing that confirms certification is the blue card along with the Certificate which is issued after certification. It should be noted that failure to display the blue sticker is not a breach of The Standard. ref: Clause 15.3 and does not mean that the vehicle isn't currently compliant.

Portable Toilets must be restrained when travelling, but can be stored anywhere in the vehicle as long as they can be used with the bed made up. Many small vans are very well set up for one or two people and meet the requirements of The Standard in every way.

Portable toilets have a bowl/seat section mounted above the cassette holding tank in exactly the same way as a toilet which has a fixed bowl/seat mounted above a removable cassette. In terms of function, both of these toilets are identical in operation and there should be no discrimination against portable toilets by regarding them as sub-standard in any way. After all, they were supplied to residents in Christchurch for use after the earthquake, so they must be equally acceptable in a vehicle.

Likewise, there should be no discrimination between portable and fixed/cassette toilets, and marine style toilets attached to a black waste tank. All work equally well and hygiene is up to the operator when it comes to discharge of the waste. It is ridiculous to start trying to legislate which systems are acceptable, (portable, fixed cassette or plumbed to waste tank) probably by Brand, Model and type - a real red tape act of futility. The suggestion that fixed toilets with cassettes should be converted to having a discharge pipe connected to the cassette is plainly stupid thinking! Many owners of these toilets own two cassettes so that they can change them over to give 6-8 days capacity. A very sensible idea. The same applies to portable toilets - owning a spare cassette holding tank. Cars are designed so that they can be driven safely on the left side of the road. Portable or fixed/cassette toilets are each designed to operate in an identical manner. The choice to use a toilet according to the manufacturer's instructions is up to the user, in the same way that cars are not expected to be driven on the right side of the road according to the manufacturer. It's unfair to penalise the 99% of people for doing things correctly because of the 1% in non-Standard compliant cars who don't play by the rules. The Standard states that once a caravan has been certified as compliant to The Standard, a portable toilet can be used within the awning or in a separate toilet tent. Surely, if you want the 'kids in cars' to camp nicely and use their portable toilet, why don't you change The Standard to allow them to use a toilet tent which can also be used as a changing room. When parked, the toilet tent must be erected with the toilet in it or a fine is issued. End of problem. I have owned a camping store for over 10 years and am well versed in their use. Here's an example: <https://www.torpedo7.co.nz/products/T7RT9N5RTC6/title/torpedo7-shower-tent> It can also be used as a changing room, eliminating the usual 'spectator sport'. Finally, as I'm the importer and retail outlet for the Nature's Head Waterless Toilet (Composting) I would like to point out that our toilet has already been accepted in 2015 as compliant for Self Containment Certification by the NZMCA and has been fitted to a good number of motorhomes, caravans, vans etc since then. It is probably the leading composting toilet of choice in the USA, Australia, Canada, N.Z. and now also in Germany for both mobile and Tiny Home use. It's the only toilet of it's type in N.Z. to hold a PASS certification which shows that it can be compliant with the NZ Building Code as well as The Standard for Self Containment. The PASS (Product Assurance Supplier Statement) can be viewed at [https://static1.squarespace.com/static/55d63f62e4b06ae46f36212b/t/5eebe5c3ad4c8c208e30fed8/1592518085807/Natures\\_Head\\_Waterless\\_Toilet\\_PASS\\_v2\\_0.pdf](https://static1.squarespace.com/static/55d63f62e4b06ae46f36212b/t/5eebe5c3ad4c8c208e30fed8/1592518085807/Natures_Head_Waterless_Toilet_PASS_v2_0.pdf)

I'll include photos of a particularly well thought out installation in a Mercedes Sprinter van where the toilet has been mounted on a heavy duty drawer runner. This enables use with the bed made up, or not, within the privacy of the van.



In the last few weeks there has also been discussion about the need for a separate room within a vehicle for the toilet to be used. As a tramper and van camper of many years experience I can state that this is once again a step too far in regulations and appears to be pushed by those who consider themselves 'campers' but who drive around in shiny multi-thousand dollar vehicles which are no more than a home with wheels. Before 'showers' were installed and considered normal in N.Z. it was common for the population to bath once a week and to 'body-wash' every day in between. Things are no different in a camper van, shower or swim every few days and body wash in between. Generally a van with two occupants will use the toilet in such a manner that privacy is maintained by a simple curtain or divider - after all, they are travelling together so will be very familiar with one another's bodies anyway. If need for privacy dictates, then one takes a short walk or reads a book while the other performs their ablutions. So, there should be no need whatsoever to consider yet more Rules and Regulations about the internal layout of a camper home or van and the need or not for a shower or separate bathroom.

In closing, after the last amendments were made to The Standard for Self Containment it was suggested to me by James Ingram of the NZMCA that I register with Standards NZ on their website as a volunteer/consultant in terms of composting toilets and to contribute to any changes that might be made on the relevant section of the Standard. I duly applied to MBIE but to this day I don't recall having had any response to this offer, either from NZ Standards, or MBIE. It seems to me that changes to The Standard have been made by a 'secret' committee (no-one can tell me who was on the official committee for the last revision) without any practical knowledge of the use of composting toilets in vehicles, but the tab for the huge cost of the change was picked up by the NZMCA ! ??

My offer still stands if you care enough to communicate. I am happy to advise MBIE on the use of composting toilets in vehicles.

Cheers.

[www.natureshead.co.nz](http://www.natureshead.co.nz)



P.S. For what it's worth. I regard this submission form as an exercise in futility. It appears to have been written in such a way as to elicit responses which will support the pre-determined course of action/s set out in the Discussion Document - Supporting Sustainable Freedom Camping. The section headings are totally aligned with the Minister's current thinking and are not put in such a way as to seek positive solutions to a problem which is as much created by N.Z.'ers as tourists. To have to tick a heading from Strongly Agree to Strongly Disagree against a statement of intent is not a way to encourage open thinking and discussion which could produce some really good ideas not currently held by the Minister who appears to only have the ear of a few outspoken Mayors and Tourism Operators in our country, rather than those at the grass roots who



actively



engage in free camping and really understand how to protect the ecology of our Country. If he wants NZ clean and green, then he should start with education of the NZ population first - our roadsides and adjacent areas of bush are like rubbish tips!