



**Ministry of Business,  
Innovation and Employment**

**Supporting  
sustainable freedom  
camping in Aotearoa  
New Zealand**

**16 May 2021**

For more information please contact:

Jane Murray

NMDHB Public Health Service

Email: [jane.murray@nmdhb.govt.nz](mailto:jane.murray@nmdhb.govt.nz)

Phone: (03) 543 7805

## Submitter details

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Ministry of Business, Innovation and Employment's *Supporting sustainable freedom camping in Aotearoa New Zealand*.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
3. This submission sets out particular matters of interest and concern to NMH, particularly in relation to sewage, litter disposal and the location of safe drinking water.

## General Comments

4. NMH supports Ministry of Business, Innovation and Employment's intention to improve responsible camping in New Zealand to reduce any associated actual or potential negative environmental impacts. Enhanced rules would also provide national consistency making it easier for international and domestic freedom campers to understand expectations.
5. In order to ensure proper sewage and waste disposal practices are followed, it is important that freedom campers know where they are able to safely dispose of their sewage and waste. NMH would like to see the requirements for all freedom camping sites to include signage for the location of sewage and waste disposal facilities

*Recommendation 1:* that the location of sewage and waste disposal facilities be clearly signposted at freedom camping sites.

6. Information about safe drinking water should also be communicated to freedom campers to reduce the risk of waterborne illnesses. Councils should ensure that other water sources which are not suitable for drinking, e.g. from taps in public toilet facilities, are clearly signposted to warn campers that the water is not of drinking quality and should be boiled before use.

*Recommendation 2:* that Councils ensure freedom campers know where they can refill potable water

7. It is important that information, especially relating to toilet facilities, sewage disposal, litter disposal and drinking water, is effectively relayed to campers in a

manner that is easily understood as English is a second language for many campers.

*Recommendation 3:* that all information communicated to freedom campers be simple, clear and available in multiple languages.

### **Specific Comments**

8. NMH strongly supports Proposal 1 to make it mandatory to have a certified vehicle in order to freedom camp with exception as outlined in section 5(2) that include temporary parking, day trip exclusions, resting to avoid driver fatigue. This would result in the reduction of inappropriate disposal of human waste which is a public health concern. This also allows for simple national messaging
9. NMH notes that consideration has been given to extending the exceptions list to support driver safety e.g. not requiring people to drive to alternative accommodation when under the influence of alcohol. NMH supports this on principle, but cautions that there is the danger of an unintended consequence that campers in a non self-contained vehicle drink at each campsite to circumvent this rule.
10. In the first instance, NMH prefers Proposal 1; however if Proposal 1 is not adopted, NMH support Proposal 2 to 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 as this would create greater national consistency of freedom camping rules to ensure that campers stay at places which have the means to host them.
11. NMH notes that this may lead to increased congestion at some camping sites so consideration would need to be given to increasing the number of toilet facilities at popular sites.
12. NMH agrees that consideration needs to be given to the distance from the toilet facilities to the camping location, this distance will be site specific but it should not be so great that people fail to use the toilet facilities because it is considered too far.
13. NMH supports Proposal 3 to improve the regulatory tools for government land managers. Anecdotally, NMH has been informed that many people have avoided paying fines. Increasing penalties for breaches and the introduction of a regulatory system for self-contained vehicles standards would lead to a more robust system which would work towards improving environmental outcomes.

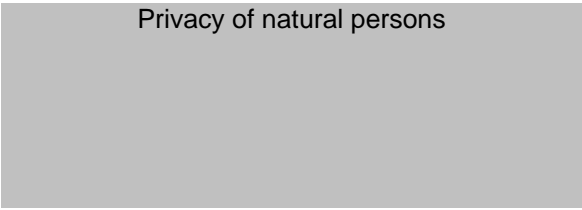
14. NMH supports the introduction of increased fines that would enable better recovery of costs by local authorities for enforcement activities.
15. NMH supports a new infringement for those vehicles which fraudulently claim to be certified self-contained. Anecdotal evidence has shown that previously self-contained stickers have been easy to acquire via travellers' websites, leading to some travellers camping in inappropriate vehicles and subsequently leading to inappropriate sewage disposal.
16. NMH has concerns around the potential for broadening the vehicle confiscation rules to include confiscation for those who have received multiple fines for breaching requirements as it may be those who are homeless who are affected. As acknowledged in the consultation document, some people who freedom camp do not do so out of choice but because they are homeless. It is important that careful consideration is given to the possible effects the proposed amendments may have on homeless people. It is unlikely that homeless people will have access to fully self-contained campers and they may therefore be in breach of the regulations if they camp in non self-contained vehicles. Given the significant stigma around homelessness, Ministry of Business, Innovation and Employment and local councils must ensure enforcement of the regulations does not contribute to this stigma and further shame or financially penalise these already vulnerable people. NMH recommend that Ministry of Business, Innovation and Employment support local authorities to link homeless people with relevant services that can offer assistance with housing issues.
17. NMH supports the introduction of new regulatory powers to an existing agency to provide national oversight of the legislated requirements for self-contained vehicles.
18. NMH supports allowing local councils to enforce rules on other government owned land.
19. NMH supports Proposal 4: Strengthen the requirements for self-contained vehicles. NMH recommends that the database for self-contained vehicles is easily accessible by local councils. NMH notes that certification process does not include details about recertification. Consideration should be given to setting a timeframe to ensure that there is continued compliance over time.
20. NMH supports the introduction of transition arrangements to enable people to upgrade as required.

## Conclusion

21. NMH thanks the Ministry of Business, Innovation and Employment for the opportunity to comment on the *Supporting sustainable freedom camping in Aotearoa New Zealand* consultation.
22. NMH believes that the recommendations contained in this submission will go towards reducing any actual and potential environmental effects associated with freedom camping.

Yours sincerely

Privacy of natural persons



Lexie O'Shea

**Chief Executive**

Lexie.oshea@nmdhb.govt.nz