



RENTAL VEHICLE
ASSOCIATION

Rental Vehicle Association New Zealand Incorporated

Level 3,
93 Boulcott Street, PO Box 9336,
Wellington 6141, New Zealand

P +64 4 499 7334
F +64 499 7353

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Ministry of Business, Innovation & Employment
15 Stout Street
PO Box 1473
Wellington 6140

Attention: Responsible Camping Submissions

Introduction

1. The Rental Vehicle Association (RVA) represents the majority of the rental fleet in New Zealand, including a wide variety of van, camper and motorhome operators.
2. The RVA supports the strategic intention of the *Supporting Sustainable Freedom Camping in Aotearoa* discussion document to address the impacts of freedom camping on New Zealand's natural environment and our tourism brand. It's critical the effects of today's tourism are negligible at popular sites, so tomorrow's visitors can enjoy these sites unimpeded.
3. Strengthening the regulatory system is one mechanism in addressing the issues outlined in the discussion document. It is critical that any new regulatory system is a catch all and provides the appropriate incentives and penalties to address the underlying issues that are the rationale for the proposals.
4. We also support the Government investing in more tourism related infrastructure, which addresses issues with freedom camping, through the International Visitor Conservation and Tourism Levy and additional Crown appropriations. The Government should assist local government in investment in appropriate amenities and facilities too. This proactive investment approach has the added benefit of providing infrastructure for non-freedom campers to use too.

Proposal 1 and 2

5. The RVA broadly supports these proposals.
6. These proposals largely reflect the current status quo for commercial operators. A survey of our campervan members last year showed that of over 600 vehicles only one was not self-contained. Additionally, rental operators educate

travellers on how to travel in self-contained and non-self-contained vehicles at the point of hire, upholding their Tiaki Promise commitments by educating travellers on how to travel responsibly and providing information on commercial or conservation campsites where there are appropriate facilities.

7. Conversely it is the RVA's understanding that the majority of private sales or rentals of campervans are completed with little to no information regarding responsible camping.
8. Proposal 1 relies heavily on compliance and infringement to deliver the proposed reduction in waste and is quite narrow in scope. For this approach to work, there needs to be an emphasis on the regulatory system and the mechanisms to effectively manage compliance and infringements.
9. We support Proposal 2, as it is broader than Proposal 1. It could also reduce the non-compliance risk associated with Proposal 1, by incentivising the staying at sites with appropriate facilities. For this proposal to work, we support additional investment in short-term and permanent solutions to ensure the management of any additional congestion at these sites.
10. We predict both these proposal options will mostly impact those who travel in private vehicles. The RVA contends that these vehicles are the cause of most freedom camping problems.
11. In contrast to the private sector, travellers renting from commercial rental operators generally pay \$150+ per day on rental vehicle hire and participate in high-cost tourism activities. Their tourism dollars are widely dispersed across the country on local tourism, retail, and hospitality businesses. These are types of high valued tourists that the Minister of Tourism is seeking to attract more of in the future.

Proposal 3

Strengthened Regulatory System

12. The RVA supports the proposal to establish a improve regulatory system, and sees the establishment of a nationwide register as the single biggest action to streamline the industry
13. Current standards are vague and are monitored by a range of certifiers. The RVA recommends a national regulatory system and a nationwide vehicle register of certified vehicles, to be run by an appropriate agency such as Waka Kotahi NZTA.
14. This would remove older/uncertified vehicles from circulation, encourage responsible camping, and drive business towards paid campsites. Thereby

reducing the negative impacts of tourism across more of the environment, and ultimately improving brand Aotearoa and cementing our position as the best country in the world for a self-drive holiday.

15. This should be supported by stronger infringements and an educational campaign targeted at private sale of campervans.

Collection of Fines by Rental Operators

16. The RVA strongly opposes making rental operators liable for the collection of freedom camping fines.
17. There are administration costs associated with the retrieval of fines.
18. Where fines are issued to the operator, these come by mail long after the hire is completed and the customer has potentially left the country, making it incredibly difficult to recoup these debts.
19. If this proposal is implemented, the timely electronic issuing of fines to operators rather than the current delayed hardcopy system would make the collection of these fines by operators easier.
20. In the event that the rental operator cannot retrieve these fines, they should not ultimately be held liable as this would be contrary to concepts of natural justice.

Proposal 4

21. Limiting the types of vehicles which can be self-contained will stifle innovation in the industry and should not be required if the certification process is regulated as per Proposal 3.
22. The market is best placed to make judgments on the appropriateness of which vehicles should have self-contained facilities.

Conclusion

23. The RVA supports the strategic intent of the changes to freedom camping as well as most of the proposals outlined.
24. The RVA would like to specifically see a national register of self-contained vehicles and for this to be administered by an appropriate agency.
25. The RVA would like to emphasize that the majority of problems associated with freedom camping comes from those utilising private vehicles that are not fit for purpose.

26. We would like to ensure that rental operators are not unfairly disadvantaged by the proposal to make operators liable for the collection of fines.

Kind regards

Alex Voutratzis

Acting Chief Executive of the Rental Vehicle Association