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Ministry of Business, Innovation & Employment
P O Box 1473
WELLINGTON 6140

Attention: Responsible Camping Submissions

Dear Sir/Madam

Submission on Supporting Sustainable Freedom Camping

Taranaki Regional Council (“TRC”) thanks Ministry for Business, Innovation and Employment (“MBIE”) for the opportunity to submit on the consultation paper on Supporting Sustainable Freedom Camping (“the Paper”).

TRC is the manager of three world class gardens within the Taranaki Region – Pukeiti, Hollard and Tupare. We provide facilities for freedom campers at the first two of those sites, including parking spaces and sewage collection facilities. Although not specifically for freedom camper use, the fact that garden facilities are accessible 24 hours a day means that there are also toilet facilities at or near those camping sites.

In our capacity as manager of the garden facilities, TRC submits its strong support for Proposal 1 (vehicle based freedom camping only allowed in certified self-contained vehicles) and strong opposition for Proposal 2 (freedom camping only allowed either conducted a certified self-contained vehicle or at a site with toilet facilities).

As the Paper notes, the principal concern relates to vehicle based freedom camping. Proposal 1 is very focused on both vehicle based camping and addressing the potential negative effects that it creates. On that basis, TRC supports this proposal.

By comparison, Proposal 2 would effectively prohibit (or at least strictly limit) any future cycle touring or motorbike touring activities. Aside from the former being very contrary to New Zealand’s “clean green” image, pushing people who would otherwise use those options into cars and vans runs the risk of exacerbating the current problem. We are also concerned at the potential negative impacts on tourism and “work holiday” (eg. WOOFERs) from limiting cycling. Given the poor targeting and potential for unintended negative effects, TRC opposes this proposal.

As well as the specific comments on the two proposals, TRC would like to make a submission in our capacity as regulator of environmental discharges and the lead in developing Taranaki’s regional land transport strategies.

TRC worked closely with district councils, over 20 years ago, and was instrumental in establishing a network of stock truck effluent collection points across the region. We worked closely with the stock transportation industry to promote installing containment on their vehicles and encouraging drivers to use the dedicated stock truck effluent dumping facilities across the region

We are finding that a number of self-contained freedom camping vehicles are using these dumping facilities to empty their containment tanks – despite notices to the contrary. Adding human waste to the animal waste stream means that the total contents of the containment tank needs to be processed in municipal wastewater treatment plants. However, those plants are not designed to handle the highly fibrous animal waste as part of their normal waste stream. As a result, additional filtering and treatment is required before the contaminated stock truck waste can be processed in the municipal plants. All of this process adds significant cost for the territorial authorities who operate those plants.

TRC would therefore submit that the Regulations should be amended to increase the fines that are able to be charged for incorrect disposal of camper van waste. We realise that an effective regime would need surveillance systems and the ability to track the vehicle ownership (be that to a rental agency or otherwise). As we note that this option is discussed in other capacities in the Paper, we would submit that it should be expanded to this issue as well.

Conclusion


TRC again thanks MBIE for the opportunity to make this submission.

Freedom camping is and will continue to be a significant part of New Zealand's tourism mix. Ensuring that the activity is conducted in a way that is consistent with both environmental and social expectations is therefore crucial. Taking steps such as presented in this submission to ensure the sustainability of these activities are key to ensuring that those expectations are reasonably met.

As we do so, TRC offers to provide on-going feedback and to contribute as requested throughout this process.

Yours faithfully
S J Ruru
Chief Executive

Privacy of natural persons



per: A D McLay
Director - Resource Management