

SUBMISSION TO: Ministry of Business, Innovation and Employment; Supporting Sustainable Freedom Camping in Aotearoa New Zealand

SUBMISSION BY: The Catlins Coast Incorporated (CCI)

Catlins Coast Incorporated appreciate the opportunity to provide a submission to the Ministry of Business, Innovation and Employment (MBIE); Supporting Sustainable Freedom Camping in Aotearoa New Zealand

Introduction and History

The Catlins Coast Incorporated (CCI) was established 2010 and is a non-profit organisation (community driven) with its aims and objects focused on the sustainable development of tourism, community development and protection of our environment in The Catlins (both in the Southland and Clutha districts). CCI also promotes activities that enhance the wellbeing of people who visit and/or live in The Catlins.

Catlins Coast Inc. operates using The Catlins Community Tourism Strategy 2016-2026 from which an Implementation plan was derived

To help deliver some of the many identified projects in the Strategy the CCI committee meet monthly and endeavour to work alongside and in cooperation with a number of other organisations from the local Communities, businesses, Clutha District Council (CDC), Southland District Council (SDC), Department of Conservation (DOC) and Te Runanga o Awarua on anything that effects The Catlins. All of these groups are also, in some way, involved in our Implementation Plan.

To further highlight what the CCI focus and involvement is within The Catlins, the following are some of the initiatives identified in the Strategy and Implementation Plan:

- CCI has developed and maintains the following resources to support The Catlins Community, businesses and to protect The Catlins Environment with consistent messaging:
 - **Website:** www.catlins.org.nz provides an advertising platform for local businesses along with providing upcoming event information and local news
 - **Care Code:** Single sheet of advice on driving, protection and respect of flora and fauna, responsible camping. Format is also incorporated into the brochure, map and information kiosks/panels.
 - **Tear off Map:** Advertising on the map supports this extremely popular means of guiding Visitors on their journey. The Map features landmarks and walking tracks, it highlights amenities and services for Visitor use i.e., toilets, dump stations, rubbish disposal, camping sites etc. It has also proved particularly useful in emergency events to support the messages from Emergency

Management for stranded visitors.

- **Visitor Guide (Purple Brochure):** This Advertising platform allows another means of spreading the consistent messages for protection of the environment and visitor safety as the Care Code and the Tear off Map are included in the brochure. It also includes historic insights and more details of local forest and fauna.
- **Information Panels & Kiosks:** Have been established in areas of interest to provide local historical information. These panels include the Map and Care Code. The Kiosks which are large formats of the Care Code and Map were established at the North and South entrances to The Catlins to inform and guide Visitors.
- CCI were pivotal in the initial discussion with DoC with regard to the Responsible Camping initiative implemented in The Catlins – a collaboration between DoC, CDC and SDC to fund a Ranger to travel the Catlins ensuring campers are following rules and camping responsibly.

Recommendations

PROPOSAL 1: MAKE IT MANDATORY FOR FREEDOM CAMPING IN A VEHICLE TO BE DONE IN A CERTIFIED SELF-CONTAINED VEHICLE

- This proposal is the CCI preferred option, but should take into account elements from the other 3 proposals.
- This option will improve camper behaviour and will be transparent to campers
- This option will support and improve tourism outcomes i.e., in The Catlins
- This option will decrease pressure on the environment however will still require Central government to support the provision of facilities/infrastructure i.e., fresh water, dumping station, recycling and rubbish as local Council and communities cannot afford to carry this cost. It should be clear to visitors what the outcomes/expectations are when camping in NZ with any camping information provided to them and in the Camping rules, and regulations
- The impacts of this proposal to which we are concerned about, is the strength of the self-contained regime. We need to be assured that certified self-contained is just that, with compliance and how this will be managed/policed
- Given we do not have any direct involvement in Freedom Camping, this proposal will not impact us directly. However, having support will improve community wellbeing, environment and local businesses such as camping grounds, therefore could also have a positive financial impact on some businesses.
- This option will increase the attractiveness of visiting other regions in New Zealand, given it will be transparent, consistent and sustainable for visitors

travelling around regions, which will work towards positive camping outcomes

- In implementing this option, Government should consider:

The effective policing and managing of camping to ensure the desired outcomes are achieved, along with funding this appropriately. Funding should not be a cost on locals.

Care is needed to ensure that any legislation allowing for the use of tents (for Hunters or the Great Outdoor experience for domestic visitors) does not create a loophole whereby if you have a tent, you can camp anywhere. The environment needs to be protected from all forms of intensive camping where adequate ablution facilities are not available. Freedom Campers must be Responsible Campers – those that take their waste and rubbish for disposal at appropriate facilities. The availability of appropriate facilities for human waste, rubbish (recycling and land fill) needs consideration as part of the impact of this proposal. Again, we reiterate this should not be a cost to locals.

- Ideas for how this proposal be implemented, could be in the regulations for those businesses who hire out Self-contained vehicles i.e., make sure they are certified and vehicles are certified. Businesses should not hire out any vehicle that is not fully self-contained and where there is any inappropriate behaviour (identified in the business terms and agreement for the hirer) the business should be responsible for making sure the hirer pays any infringement/fines etc
- This option may work in tandem/blended (in part) with the other proposals that support certified self-contained vehicles.
- This option needs to be managed, so it doesn't create overcrowding and to ensure the health and safety of community, visitors and the environment.

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

- This option will only improve camper behaviour up to a point as we believe it mirrors the 'current status' (in part) of freedom camping where the Local Authority has a Freedom Camping By-law e.g., Southland and Clutha District Council
- This option may support and improve tourism outcomes
- This option will not necessarily decrease pressure on the environment, as it could create pressure spots on the environment as seen in The Catlins i.e., Weirs beach, Fortrose, where demand/volume means existing toilet facilities are under pressure/inadequate.

The local by laws can signal where freedom camping/no freedom camping is allowed, however this can be considered a 'grey area' given each regional by-law differs. The current 'Certified Self-contained vehicles without plumbed toilet facilities, should go to camp grounds where facilities such as toilets, are supplied.

- The impact of this proposal to which we are concerned about, is as per the first point; we believe this proposal mirrors the current status (in part) of Freedom Camping i.e., non-certified self-contained vehicles

- Given we do not have any direct involvement in Freedom Camping, this proposal will not impact us directly. However, having support will improve community wellbeing, environment and local businesses such as camping grounds, therefore could also have a positive financial impact on some businesses.
- This option will limit the attractiveness of visiting other regions in New Zealand, given its lack of consistency therefore would be confusing when travelling around regions
- In implementing this option Government should consider:
 The effective policing and managing of camping to ensure the desired outcomes are achieved, along with funding this appropriately. Funding should not be a cost on locals.
 Care is needed to ensure that any legislation allowing for the use of tents (for Hunters or the Great Outdoor experience for domestic visitors) does not create a loophole whereby if you have a tent, you can camp anywhere. The environment needs to be protected from all forms of intensive camping where adequate ablution facilities are not available. Freedom Campers must be Responsible Campers – those that take their waste and rubbish for disposal at appropriate facilities. The availability of appropriate facilities for human waste, rubbish (recycling and land fill) needs consideration as part of the impact of this proposal. Again, we reiterate this should not be a cost to locals.
- Ideas for how this proposal be implemented, could be in the regulations for those businesses who hire out Self-contained vehicles i.e., make sure they are certified and vehicles are certified. Businesses should not hire out any vehicle that is not fully self-contained and where there is any inappropriate behaviour (identified in the business terms and agreement for the hirer) the business should be responsible for making sure the hirer pays any infringement/fines etc
- If this option were chosen, some of the elements need to work alongside/in tandem with the other options

PROPOSAL 3: IMPROVE THE REGULATORY TOOLS FOR GOVERNMENT LAND MANAGERS

- CCI strongly supports consistency for ALL Government land managers i.e., DoC, New Zealand Transit Agency (NZTA), LINZ managed Crown land as well as Territorial Authorities to manage Freedom Camping regulations with consistency and co-operatively.
- Regulations, also need to allow for areas where those ‘pull over’ to have a short rest when driving long distances, such as designated picnic/rest areas. Where and when these rest areas are appropriately used, those using them should not be penalised
- We believe this option will improve camper behaviour as it makes for consistency, given all will be aware of what the expectations/rules are
- We believe this option will support and improve tourism outcomes

- We believe this option will decrease pressure on the environment. However, there must be financial support from Central Government for infrastructure and policing of regulations e.g., Freedom Camping Ranger/Ambassador so the costs are not borne by local Councils and communities
- The impacts of this proposal to which we are concerned about, is the financial impact and the need to resolve regulations that may differ between publicly owned land managers and inconsistency in regulations which may differ from region to region
- We believe this option will increase the attractiveness of visiting other regions in New Zealand, given it offers transparency when travelling around regions, working towards positive camping outcomes
- In implementing this option Government should consider:

The effective policing and managing of camping to ensure the desired outcomes are achieved, along with funding this appropriately. Funding should not be a cost on locals.

Care is needed to ensure that any legislation allowing for the use of tents (for Hunters or the Great Outdoor experience for domestic visitors) does not create a loophole whereby if you have a tent, you can camp anywhere. The environment needs to be protected from all forms of intensive camping where adequate ablution facilities are not available. Freedom Campers must be Responsible Campers – those that take their waste and rubbish for disposal at appropriate facilities. The availability of appropriate facilities for human waste, rubbish (recycling and land fill) needs consideration as part of the impact of this proposal. Again, we reiterate this should not be a cost to locals.
- Ideas for how this proposal be implemented, would be for consistency in the Government Land manager regulations and being able to work together.

This option should be considered alongside other options proposed in the discussion document

PROPOSAL 4: STRENGTHEN THE REQUIREMENTS FOR SELF CONTAINED VEHICLES

- CCI believe the current standard is not fit for purpose.

There should be a requirement that self-contained vehicles have fixed toilets i.e., should have access to the toilets and be able to use them when sleeping in the van

There should be specific reference to the types of vehicles that are self-contained as if they are sleeping in the van and not able to use the toilet, this should not meet the needs to be defined as fully self-contained.

Those who should certify to the Standard, are those who could be held to account i.e., a step/tier process for certification e.g., WOF for a vehicle, plumbing required, all of who should be certified and should be registered with annual inspections to meet compliance requirements/regulations.

With regard to if any plumber registered under the Plumbers, Gasfitters and Drainlayers Act 2006 be able to certify to the Standard, or if certifiers be separately recognised and licensed, CCI believe plumbing/re certification should be carried out by a plumber or a qualified organisation, however believe Central Government should set these standards before moving forward.

- CCI believe this option will improve camper behaviour
- It should be mandatory for the cleaning cost for the waste disposal usage be incorporated into the charge of the hire of vehicles
- CCI believe this option will support and improve tourism outcomes and believe it will have a positive impact i.e., in The Catlins
- CCI believe this option will decrease pressure on the environment. However local government still require support from Central Government i.e., for infrastructure and policing of regulations e.g., the Freedom Camping Ranger/Ambassador, so the costs are not borne by local Councils and communities
- This option will increase the attractiveness of visiting other regions in New Zealand, as it offers transparency when travelling around regions
- In implementing this option Government should consider:

The effective policing and managing of camping to ensure the desired outcomes are achieved, along with funding this appropriately. Funding should not be a cost on locals.

Care is needed to ensure that any legislation allowing for the use of tents (for Hunters or the Great Outdoor experience for domestic visitors) does not create a loophole whereby if you have a tent, you can camp anywhere. The environment needs to be protected from all forms of intensive camping where adequate ablution facilities are not available. Freedom Campers must be Responsible Campers – those that take their waste and rubbish for disposal at appropriate facilities. The availability of appropriate facilities for human waste, rubbish (recycling and land fill) needs consideration as part of the impact of this proposal. Again, we reiterate this should not be a cost to locals.

- Ideas for how this proposal be implemented, could be consistency in the Government Land manager regulations and being able to work together.
- Transition arrangements should coincide with when new regulations come into place and become as part of the certification/regulations process of the freedom camping vehicle and meeting the standard
- This option should be considered alongside other options proposed in the discussion document

Other Considerations

- CCI support compliance and enforcement with a stronger infringement scheme i.e., penalties, fines, vehicle confiscation, a national register to monitor offender camping behaviour whilst travelling around NZ. Penalties need to be able to be consistently applied across all publicly owned land.
- NZ Motor Home Association and self-contained motor homes should be fully certified under the current legislation.
- Work towards the best interest of NZ in terms of protecting its environment and its sustainability. Areas of specific environmental, cultural or community significance need to be excluded/banned from Freedom Camping, to ensure the survival and protection of our precious flora and fauna
- Work towards ensuring visitors have a positive and memorable experience in NZ, maintaining our nation's values to all who wish to visit and travel within it
- Ensure sensitive environmental areas do not become overcrowded/can be excluded for camping. Overcrowding and the disruption it can bring, can result in traffic issues and put wildlife at risk. Communities should be able to continue in their everyday routines without being negatively impacted by overcrowding/traffic issues/having to clean up human waste and other rubbish. Many of these places are sacred and hold special significance to local tāngata whenua. While using these places as a dumping ground degrades and diminishes the mauri of the place. These pollutants travel to water and are then in our creeks and eventually make their way to the sea.
- Educating those that visit NZ in terms of "how to and where to" is vital and how that message is given needs to be clear, consistent and accessible to all.
- Visitors need to be respectful and operate within the Social licence granted by Communities for Freedom Camping in NZ. This in turn works towards maintaining and enhancing sustainable Freedom Camping in NZ, supports local businesses with the possibility of creating new businesses i.e., new camp site/s
- As part of the Freedom Camping process, CCI believe DoC need to share the work load and have consistent messages as part of Freedom Camping in NZ
- Freedom Camping transition arrangements, need to ensure consideration and due diligence is appropriate to work towards Freedom Camping robustness. Central Government need to present and consult the law before implementing it so we can test/eliminate undue consequences i.e., proposed law is drafted and due allocation of time is appropriate before being implemented.
- Central Government need to financially support local government with any new Freedom Camping initiatives/proposals which includes Freedom Camping rangers/Ambassadors
- Government needs to make allowances for Homeliness to close any loop hole. There are some people who make a lifestyle choice and live in a house bus for example. However, for those that are forced to live in i.e., cars due to their personal circumstances, Central Government need to address and ensure their health needs are met e.g., washing, rubbish, toilet facilities and the parking of the vehicle

Thank you and should you require any further information regarding this submission and/or about the Catlins Coast Inc. please feel free to contact me on [Privacy of natural persons](#)

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Yours sincerely

Dianne Miller (Mrs)
Chairperson Catlins Coast Incorporated