

Submission on the Freedom Camping Discussion Document:

4 October 2022

Submission on the Discussion Document - Freedom Camping Regulations

BYATA again welcomes the opportunity to support the Ministry of Business, Innovation and Employment (MBIE) over its review of freedom camping and to comment on the Discussion Document – Freedom Camping Regulations.

I. Who are BYATA:

The Backpacker Youth Adventure Travel Association is a collective (120+) of tourism businesses, which rely heavily on 18-35yo youth travelers visiting New Zealand. Our group's pou's are to Advocate, Collaborate, and Communicate on behalf of members to ensure a healthy youth tourism sector. Our members include those from the vehicle and facility provider camping industry.

Our timu is to lead the next generation of traveler and our tirohanga is to be the independent voice for the youth travel industry. We are on a mission to define and advocate the true value of the sector, demonstrating that our customers for life are the poster child of the four capitals model.

Please contact Chris Sperring, BYATA Chair for further information with regards this submission on Privacy of natural persons or info@byata.org.nz

BYATA supports Responsible Camping where and when responsible campers support Aotearoa. The sector has been presented with an opportunity to position Aotearoa as the most regenerative self-drive destination on the planet by taking regulatory steps to enable and fast track us towards our climate change commitments of 2025.

In time the commercial rental sector must be allowed to build a connected, safe and CarbonZero rated trip around Aotearoa staying at sustainably produced and enhanced facilities in an EV fleet of self-contained campervans, using smart technology such as Ambassador or Campermate to plan and book your trip with. The discussion document regulations or bill does not build capacity for the future needs of visitors to this country in this space.

Ultimately, investment, education and the change in behavior is BYATA's strategy to improve the image of the sector. Responsible campers who share and embrace our love of local communities should be encouraged to visit the regions widely to spread tourism spending into small local communities while having a minimal impact on the environment.

BYATA would like to thank MBIE for listening to its initial feedback submission and making the following changes;

- Removing the requirement for rental companies to be liable for the collection of fines and infringements after a visitor has left our shores.
 - Recognising homelessness as a separate issue and for this group of society to remain unpenalized.
- We support actions that do not further dehumanize this group of people

- Recommending lighter touch options as part of this process which shows understanding around the complexities and cost that are associated with the adoption of such a large body of work as this.

BYATA supports actions within the regulations document which further enhances a return to financial prosperity for its membership following almost three years of next to no income. We support an approach that recognises the economic value of the commercial rental sector and the part they play in contributing to the overall success of the tourism eco system.

Identifying further ways to separate commercial rental operators from the private vehicle sector within the Bill and Regulations is vital for achieving a return to profit, so that the industry can attract high value visitors to Aotearoa. The current proposals laid out in the discussion document does not recognise the overall contribution that commercial rental companies deliver to the overall tourism eco system. Nor does it go far enough to uncouple commercial operation from private vehicle usage.

This is because the proposed changes within the regulations are impacting the entire industry when the reality is the majority of problems and negative public perception comes mainly from the private sector (privately traded and certified vehicles, often older and catering to low value individuals who have taken ownership with little to no education or ongoing support around responsible camping).

The vast majority of rental operators provide functional vehicles to engaged, high value visitors and also take the time to educate and guide them on the best way to explore NZ responsibly.

Therefore, BYATA is in support and generally favors the “lighter touch” suggested changes within the regulations discussion document as this will place the least financial burden on our members and other commercial rental operators which has followed three years of financial hardship due to the border closures and limited financial aid for this sector. We recognize the huge financial benefit provided by the economy campervan sector and believe targeted support of good operators in this space would vastly improve the perceived challenges the bill is attempting to manage.

Freedom camping is an integral part of NZ’s Tourism heritage. The focus should be on education and engaging our Freedom campers, rather than a blanket adjustment to the industry. The introduction of “fixed toilet” rules doesn’t necessarily mean that the additional cost and work required to install will result in these onboard toilets being used responsibly.

The Discussion Document:

1. Self-Containment Technical Requirements

- BYATA supports the “lightest touch” option as opposed to more prescriptive voluntary standards, that keep cost for operators to a minimum.

2. Self-Containment Certification requirements and authentication

- BYATA supports a light touch approach with minimal cost and realistic expectations around delivery associated with it.

3. Self-Containment Documentation

- BYATA does not support these options

4. Infringement Fees and Fines

- BYATA supports a tiered approach to fees and fines with a ceiling cap of \$500
- BYATA advocates for an electronic system to be incorporated into the bill which removes the need for manual transfer and processing from rental companies.

5. Exclusions from regulatory requirements

- BYATA does not support any of these options.

6. Levies and Fees

- BYATA supports the model which puts the least financial impact on commercial rental operators.

1. BYATA supports the approach that commercial rental companies would not be liable for fines once a visitor has exited the country. The current manual fines system has not been addressed within the regulations. The current manual system of transferring fine liability from hirer to hiree is untenable moving forward and provision must be made for a digital fines system to be installed.

The current manual system relies on a commercial operator to transfer fines over to the hirer which necessitates a visit to the Citizen's Advice Bureau or similar legal representative. This is profoundly frustrating and onerous, and delays incurred further reduce the opportunity to collect fines prior to a visitor leaving the country. This system must be made electronic moving forward. It is unfair in the current climate to expect operators to take time out of their businesses for a redundant practice such as the transfer of fines, in such a time heavy and labor intensive way.

2. Previously, BYATA have called for the need of Waka Kotahi to step up and manage a national database for regulatory purposes. This would have the added effect of removing vehicles not fit for purpose and stopping the keys to private sliders being handed over at airport terminals by exiting / entering low quality visitors. This is seen as a major step to help delineate the commercial rental fleet from private vehicle ownership and aligns with the Climate Change Goals 2025. This includes EV campervans and smart technology to monitor and reduce carbon emissions or offset with a viable scheme.

Ultimately, in the future this would enable TNZ to position Responsible Camping in NZ as the World Leader in sustainable and responsible travel and further support brand Aotearoa. To achieve this, Responsible Camping must feature in destination management plans encouraging unilateral support by community and tourism providers. And have necessary funding provision for the upgrades of fleet to use Sustainable or renewable energy sources.

3. BYATA advocates and supports greater collaboration between MBIE and commercial rental companies around the education of International and domestic manuhiri to our shores. All commercial operators

provide apps with detailed information on how and where to camp responsibly. The opportunity exists to weave the TIAKI promise into app-based info sites to fully engage with our international manuhiri.

4. Continued investment in Infrastructure improvements in high use areas such as with the provision of more rest stops and additional toilets is not addressed in the regulations. This is alarming as continued funding is vital. Successful initiatives put forward by Government such as the Tourism Infrastructure Fund must remain. This fund has invested \$60M into developing better roadside amenities such as toilets, showers, car parks and bus shelters. The responsible camping fund has invested \$25m into education, enforcement, and technology schemes like the ambassador app. But more funding is required. Funding mechanisms for mix use infrastructure requirements should be explored and discussed as part of the ITP Funding piece of work.
5. A regulatory system for the Self-Contained Vehicle Standard (SCVS) is required. One that can track where SCVS registered vehicles camp. It is our view that every commercial, and private vehicle which applies for a self-contained approval, needs to be part of a regulatory service, and be tracked using smart technology such as Campermate or the ambassador app. Only then will the system be able to empower local councils to act and arm them with executable data to understand the needs of responsible campers.
6. Tracking will enable enforcement and fines to be administered and collected. Fines can be issued to vehicles freedom camping in areas that they should not be in, or a location where their vehicle is not allowed for overnight stays.
7. Responsible camping visitors who utilise commercial fleet, small 1-2 berth campervans, often referred to as sliders, are high value visitors to Aotearoa. The data shows;
 - They stay longer, than your average visitor visa holder, on average 22 days,
 - They get further off the beaten track into regional destinations
 - They bring much needed financial relief to our regional destinations
 - They stay in a variety of accommodation types from hostels, holiday parks, hotels
 - They are engaged with the environment
 - Support cafes, bars and retail the length and breadth of Aotearoa
 - Travel spreads into shoulder seasons.

International manuhiri is one of Aotearoa's best marketing channels. Many return later in life with their families and also influence travel decisions of their peers.

If you seek further information, please contact us.

Nga mihi

Privacy of natural persons

Chris Sperring

Backpacker Youth Adventure Tourism Association (BYATA) Chair

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