

6 October 2022

Ministry of Business, Innovation and Employment
15 Stout Street
PO Box 1473
Wellington 6140
Attention: Responsible Camping Submissions

Tēnā koutou,

**SUBMISSION ON THE MINISTRY OF BUSINESS INNOVATION AND EMPLOYMENT DISCUSSION
DOCUMENT: FREEDOM CAMPING REGULATIONS**

1. Dunedin City Council (DCC) welcomes the opportunity to submit on the Ministry of Business Innovation and Employment (MBIE) discussion document Freedom Camping Regulations.
2. DCC welcomes responsible campers to Dunedin. The Camping Control Bylaw 2015 provides opportunities for freedom camping in both certified self-contained and non-self-contained vehicles. DCC provides daily Bylaw monitoring and enforcement services each camping season between November and April.
3. DCC has been proactive in providing rubbish and temporary toilet facilities at freedom camping hotspots and has not experienced significant issues with campers illegally disposing of waste. However, DCC believes self-containment standards should be robust and there should be confidence that vehicles displaying self-containment certificates can perform their functions adequately.
4. DCC has concerns that pressure will be put on unrestricted Council-funded freedom camping facilities if it is too costly or difficult for vehicle owners to meet the requirements of a new self-containment standard. DCC supports a standard that is fair, outcomes-focussed, and performance-based.
5. DCC has seen a reduction in Bylaw infringement rates following the implementation of the Community Ranger programme; a joint initiative with the Department of Conservation. Community Rangers work in an educative role with a key focus on providing information to freedom campers. DCC believes educative initiatives perform better in improving compliance than punitive measures but supports a limited increase in infringement fees to contribute to Council enforcement costs.
6. DCC appreciates the support MBIE has contributed toward Responsible Camping initiatives and the positive effect these have had on visitors and residents of Dunedin.

CHAPTER 1: SELF CONTAINMENT REQUIREMENTS

7. DCC supports 'light touch' performance-based self-containment requirements.
8. DCC believes self-containment certification will be more accessible if regulations are performance-based, rather than prescriptive in their technical requirements.
9. DCC believes self-containment regulation should align with desired outcomes: that self-containment systems are fit-for purpose. DCC considers a performance-based regulation will avoid imposing unnecessary costs on vehicle owners or limit their ability to innovate or use new technologies.
10. If vehicle owners are dissuaded from self-containment certification due to regulations being unnecessarily prescriptive or costly, DCC anticipates an increase in demand for council-funded unrestricted freedom camping sites.

CHAPTER 3: SELF-CONTAINMENT DOCUMENTATION

11. DCC supports the proposal to discontinue use of a generic identifier. Under the current voluntary standard, generic identifiers have proven to be unreliable proof of a vehicle's self-containment status and have contributed to an erosion of trust in the self-containment standard. As display of self-containment certification will be a requirement, the DCC sees no additional value in issuing generic identifiers.

CHAPTER 4: INFRINGEMENT FEES AND FINES

12. DCC supports the proposal for a tiered approach to the level of infringement fees to a maximum of \$800.
13. DCC expects freedom camping enforcement costs to increase if the Self-contained Motor Vehicles Legislation Bill is enacted. The DCC anticipates an increase in revenue under the tiered infringement proposal which may help minimise additional enforcement costs.
14. DCC freedom camping enforcement officers rarely encounter fraudulent self-containment certificates or campers that are actively littering, dumping waste, or causing damage to Council property. DCC does not anticipate issuing large numbers of infringement notices at the higher tiers of the proposed fee structure.
15. DCC believes that educative initiatives are likely to be more effective in improving compliance with freedom camping legislation than an increase in infringement fees. DCC encourages MBIE to invest in campaigns that promote responsible freedom camping and continue to provide territorial authorities with funding for local initiatives.

CHAPTER 5: EXCLUSIONS FROM REGULATORY REQUIREMENTS

16. DCC does not support exclusions from new regulatory requirements.
17. DCC believes regulation with no exclusions aligns most closely with the desired outcome, that campers in certified self-contained vehicles will have access to adequate water and waste facilities. DCC has concerns that the proposed exclusions for small or vintage vehicles would undermine the integrity of the regulation if included.
18. DCC has concerns the proposed exclusions would add complexity to the issuance, administration, and enforcement of the new regulations.

CHAPTER 6: LEVIES AND FEES

19. DCC supports the option of a \$120 levy collected from vehicle owners by a certification authority prior to them receiving a self-containment certificate.
20. DCC supports the proposal for the Plumbers Gasfitters Drainlayers Board (PGDB) to have additional resource dedicated to self-containment vehicle certification and IT support of the new online vehicle register. DCC believes this will help minimise disruptions to these systems which will be relied on by vehicle owners and freedom camping enforcement officers.
21. DCC supports the proposal to run a 5-year targeted awareness campaign to ensure vehicle owner are fully aware of their obligations under the new regulatory system. DCC encourages MBIE to consider additional and ongoing awareness campaigns targeted to overseas visitors who have historically made up a significant proportion of freedom camping vehicle ownership.

Concluding remarks

22. Thank you for the opportunity to submit on these proposals.

Yours faithfully,



Sandy Graham
Chief Executive Officer
Dunedin City Council