

# #101

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, October 06, 2022 9:46:04 AM  
**Last Modified:** Thursday, October 06, 2022 11:05:25 AM  
**Time Spent:** 01:19:21  
**IP Address:** Privacy of natural persons

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Page 3: Submitter information

## Q1

Name

Gary Stoneley

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## Q2

Email address

Privacy of natural persons

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## Q3

**Yes**

Are you happy for MBIE to contact you if we have questions about your submission?

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## Q4

**No**

Are you making this submission on behalf of a business or organisation?

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## Q5

**Individual**

The best way/s to describe your role is:

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## Q6

**Yes**

Do you own a vehicle that you use for camping? (Either for freedom camping or other sorts of vehicle-based camping)

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## Q7

**Respondent skipped this question**

Privacy information

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Page 4: Chapter One: Self-containment technical requirements

**Q8**

**Strongly agree**

To what extent do you agree with Option 1: 'light-touch' performance-based requirements?

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**Q9**

If you would like to say something more about your answer to Question 8, please do so here:

The current voluntary self containment standard has generally worked very well for the past 30 years and has encouraged many NZ campers to carry and use portable toilets. A heavy handed approach is not needed and voluntary compliance always has a greater public acceptance than mandates and restrictive regulations. NZ'ers are already rebelling about having freedoms taken away. There is no documented evidence of the degree of harm caused by freedom campers over any other recreation group. A light touch reduces the costs, industry stress (on an already damaged industry) and compliance actions.

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**Q10**

**Strongly disagree**

To what extent do you agree with Option 2: prescriptive approach to setting technical requirements?

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**Q11**

**Respondent skipped this question**

If you would like to say something more about your answer to Question 10, please do so here:

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Page 5: Chapter Two: Certification authority criteria and competency requirements for vehicle inspectors

**Q12**

**Strongly Agree**

To what extent do you agree with Option 1: Multiple-pathway approval criteria and competency requirements?

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**Q13**

If you would like to say something more about your answer to Question 12, please do so here:

Self containment certification is not rocket science, It's about checking off that a vehicle has sufficient potable water, waste capacity and toileting facilities for the occupants for three days. This takes less knowledge than getting a NZ drivers license. Why would we want to make it hard to get self-containment testing officers who want to support the industry. Having a trade qualification is just a little over the top. Who will test 73000 vehicles over 2 years if existing testing officers with out trade qualification and certifying authorites say 'stuff this'?

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**Q14**

**Strongly disagree**

To what extent do you agree with Option 2: more rigorous and prescriptive certification approval criteria?

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**Q15**

If you would like to say something more about your answer to Question 14, please do so here:

The regulations are getting kinda anal if we go down this pathway with an unjustifiable high administrative cost. Remember these proposals have a low to moderate chance of achieving the proposed outcomes anyway. source MBIE

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**Q16**

**Don't know**

To what extent do you agree with Option 3: Third-party review of certification authority systems?

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**Q17**

If you would like to say something more about your answer to Question 16, please do so here:

Is this another unbudgeted cost? \$8+ million to pdgb for the first two years of administering the system.

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Page 6: Competency requirements for vehicle inspectors

**Q18**

**Strongly agree**

To what extent do you agree with Option 1: requiring vehicle inspectors to be knowledgeable?

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**Q19**

If you would like to say something more about your answer to Question 18, please do so here:

Previously answered in earlier question

(survey system does not allow back paging)

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**Q20**

**Strongly disagree**

To what extent do you agree with Option 2: requiring vehicle inspectors to have a relevant trade qualification?

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**Q21**

If you would like to say something more about your answer to Question 20, please do so here:

Many current self-containment testing officers are non qualified and / or work as volunteers. having a trade qualification requirement would exclude many existing testing officers and necessitate many new appointments. training / mentoring at cost and a inability to meet the demand in the 1st 2 years. This has not been included in MBIE's cost calculations.

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**Q22**

**Agree**

To what extent do you agree with Option 3: requiring vehicle inspectors to be assessed as "fit and proper"?

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**Q23**

If you would like to say something more about your answer to Question 22, please do so here:

This is a great idea but may have to be gradually introduced due to NZ Police's delays in processing applications and at a estimated business cost including processing time of \$50 per application.

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Page 7: Deeming plumbers as certification authorities and vehicle inspectors

**Q24**

**Strongly disagree**

To what extent do you agree that certifying plumbers should be deemed as certification authorities and vehicle inspectors under the new regulations?

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**Q25**

If you would like to say something more about your answer to Question 24, please do so here:

The average plumber has no knowledge of self containment systems and just having a qualification does not ensure practicality and competency.

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Page 8: Chapter Three: Self-containment documentation

**Q26**

**Strongly agree**

To what extent do you agree with Option 1: continue to record the details of a vehicle's self-containment facilities the on the self-containment certificate?

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**Q27**

**Respondent skipped this question**

If you would like to say something more about your answer to Question 26, please do so here:

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**Q28**

**Strongly disagree**

To what extent do you agree with Option 2: a simplified self-containment certificate?

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**Q29**

**Respondent skipped this question**

If you would like to say something more about your answer to Question 28, please do so here:

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Page 9: Self-containment warrant

**Q30**

**Agree**

To what extent do you agree with the option for the self-containment warrant?

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**Q31**

Respondent skipped this question

If you would like to say something more about your answer to Question 30, please do so here:

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**Q32**

Respondent skipped this question

Please list any additional information that you think should be collected on the warrant.

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**Q33**

Respondent skipped this question

Please list any information you think is proposed to be collected on the warrant that does not need to be.

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Page 10: Generic Identifiers

**Q34**

Strongly disagree

To what extent do you agree with Option 1: not having a generic identifier?

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**Q35**

If you would like to say something more about your answer to Question 34, please do so here:

No documented evidence has been supplied to support MBIE's and Hon Stuart Nash's claims that there is a widespread practice of fake self containment stickers. Such statements have been promoted in the NZ media without evidence and often relate to comments from NZMCA members in premium motorhomes and caravans and do-gooders.

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**Q36**

Disagree

To what extent do you agree with Option 2: having another generic identifier?

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**Q37**

Respondent skipped this question

If you would like to say something more about your answer to Question 36, please do so here:

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Page 11: Chapter Four: Infringement fees

**Q38**

Agree

To what extent do you agree with Option 1: a tiered approach infringement fee to a maximum of \$800?

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**Q39**

Respondent skipped this question

If you would like to say something more about your answer to Question 38, please do so here:

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**Q40**

**Strongly disagree**

To what extent do you agree with Option 2: a tiered approach infringement fee to a maximum of \$1000?

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**Q41**

**Respondent skipped this question**

If you would like to say something more about your answer to Question 40, please do so here:

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Page 12: Chapter Five: Exclusions from regulatory requirements

**Q42**

**Strongly disagree**

To what extent do you agree with Option 1: no exclusions from regulatory requirements?

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**Q43**

If you would like to say something more about your answer to Question 42, please do so here:

This option further encourages and promotes segregation and Nimbyism which has grown in the industry over the past 2 decades. This treats all NZ campers who sensibly and responsibly camp in a self-contained vehicle with a portable toilet (note: its safer to camp in a vehicle than a tent) as 3rd rate citizens. 1st class - Premium with fixed toilet, 2nd class - tenters, 3rd class - persons camping with a portable toilet and setup for 3 days (Great for emergency management preparedness and should be encouraged - let's do it!) Emergency strikes - head to the campervan, food, water, shelter.

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**Q44**

**Strongly agree**

To what extent do you agree with Option 2: excluding smaller freedom-camping vehicles from the requirement to have a fixed toilet?

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**Q45**

If you would like to say something more about your answer to Question 44, please do so here:

Including a portable toilet in self containment certification encourages campers to have one by allowing them access to areas they would otherwise be excluded from camping in. If we take away the benefits of having a portable toilet we take away the incentive for vehicle campers to do so.

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**Q46**

**Disagree**

To what extent do you agree with Option 3: excluding vintage vehicles from the requirement to be certified as self-contained?(A vintage vehicle is one that is at least 40 years old)

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**Q47**

If you would like to say something more about your answer to Question 46, please do so here:

Has MBIE researched the number of motorhomes and caravans in NZ constructed between 1982 and 2002 with portable toilets that were built with portable toilets? using 40 years is not practical or realistic.

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**Q48**

**No**

Are there other types of vehicles that should be excluded?

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**Q49**

Please explain your answer to Question 48: (for example, what other types of vehicles? What regulatory requirements do you suggest the vehicles be excluded from? Why should these vehicles be excluded from the identified regulatory requirements?):

Truckies should have the same requirements - What evidence has been collected that low footprint freedom campers cause more harm when sleeping / camping than truck drivers?

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Page 13: Chapter Six: Fees and levies

**Q50**

**Strongly disagree**

To what extent do you agree with Option 1: levy of \$91.40?

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**Q51**

If you would like to say something more about your answer to Question 50, please do so here:

Too much money for a 2 man regulatory administration

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**Q52**

**Strongly disagree**

To what extent do you agree with Option 2: levy of \$101?

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**Q53**

If you would like to say something more about your answer to Question 52, please do so here:

PDGB creaming campers.

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**Q54**

**Strongly disagree**

To what extent do you agree with Option 3: levy of \$120?

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**Q55**

If you would like to say something more about your answer to Question 54, please do so here:

Over 8 million dollars to be collected by PDGB over the first 2 years. This reeks of overcharging, and building up reserves - e.g ACC debacle on levies.

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Page 14: Certification Authority Application Fee

**Q56**

**Agree**

To what extent do you agree with Option 1: a set fee of \$431.25?

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**Q57**

**Respondent skipped this question**

If you would like to say something more about your answer to Question 56, please do so here:

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**Q58**

**Disagree**

To what extent do you agree with Option 2: a scalable fee?

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**Q59**

**Respondent skipped this question**

If you would like to say something more about your answer to Question 58, please do so here:

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Page 15: Waivers and refunds

**Q60**

**Agree**

To what extent do you agree with the proposal for granting waivers and refunds?

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**Q61**

**Respondent skipped this question**

If you would like to say something more about your answer to Question 60, please do so here:

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Page 16: General comments



**Q62**

Are there any other comments you would like to make about the proposed freedom camping regulations?

Should these proposed changes go through they will cause greater harm to NZ's leisure camping industry than Muldoon's sales taxes of caravans which killed the industry for 2 decades. The total costs on fleet operators on top of Covid-19 restructuring have not been calculated. There is no evidence produced by MBIE or Hon Stuart Nash MP that removing portable toilets from self containment will have a positive result. The concept of creating a national solution to what is primarily a regional issue penalises those regions that do not have a freedom camping issue, or bylaw and will reduce economic revenue. The fallacy that travellers should stay in commercial campgrounds ignores the fact that NZ travellers (retired/ young / families) only have so much disposable income and may prefer to spend it at restaurants, stores and activities. For emergency management we should be encouraging home built campers with basic facilities and portable toilets. Legislation and regulations are required to be proportionate to the problem which requires evidence. To have a sustainable leisure camping industry for NZ we must look holistically at the whole industry not just a toilet issue.

Note: The proposed regulations will be funded by the premium camping vehicles which are no considered to be an issue? We have an omnibus bill that is a total oxymoron. Surely if we work with the wider industry and campers we can achieve so much more.

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Page 17: Confidential information

**Q63**

Respondent skipped this question

Please tick the box below if you would like any of your answers to be kept confidential

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**Q64**

Respondent skipped this question

If you have ticked yes to Question 63, please tell us which specific questions are to be kept confidential. Please clearly indicate which questions you consider should be withheld, together with the reasons for withholding the information and the grounds under the Official Information Act 1982 you believe apply. We will take such objections into account and will consult with submitters when responding to requests under the Official Information Act 1982.

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