

#20

COMPLETE

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Page 3: Submitter information

Q1

Name

Ian W Thomas

Q2

Email address

Privacy of natural persons

Q3

Yes

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

Q4

No

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

Q5

Individual

The best way/s to describe your role is:

Q6

Yes

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

Q7

Respondent skipped this question

Privacy information

Page 4: Chapter One: Self-containment technical requirements

Q8

Agree

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

Q9

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

The desired outcome is easily achievable by option 1 and does not require a tortuous specification, which will become expensive as providers capitalise on the economic opportunity

A detailed specification does not guarantee compliance in terms of users behaviour and negates innovation.

Make it too difficult to comply and the incentive to comply will go for many leading to worse outcomes and denying everyday citizens the experience unless they are of more secure means

Q10

Strongly disagree

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

Q11

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

It is not necessary and imposes inequitable outcomes, it will become more expensive as time goes by ... Look at the WOF/COF providers if an example of exploitation affecting campers is needed... ironically the people who might best benefit from camping as a quality of life outcome (ie the lower socioeconomic) will be the first to be denied access to the activity (look at the hash local Government has made of the building regulatory process for an example of unnecessarily bureaucracy)

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

Q12

Agree

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

Q13

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

the option should be " here is a standard meet it " . "certification " of this is simple and time effective, many vehicles on the market meet the current standard easily, others can easily be adapted to meet the standard with efficacy and economy

Q14

Strongly disagree

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

Q15

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

Optio2 approach will only make life more difficult for those who already are complying with pack it in pack it out principles....it will not prevent the environmental abusers from doing anything?

Q16

Strongly disagree

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

Q17

Respondent skipped this question

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

Page 6: Competency requirements for vehicle inspectors

Q18

Agree

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

Q19

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

There is no need to over complicate this issue.The principle should be not to grossly impact the lives of the many (compliant) campers just to deal with the non compliance of a few .

Q20

Strongly disagree

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

Q21

Respondent skipped this question

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

Q22

Strongly disagree

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

Q23

Respondent skipped this question

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

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?

Q25

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

The systems required are NOT rocket science and potentially brings with it unnecessary cost and frustration if over cooked. Option 2 and 3 both will incur escalating costs as providers seek to maximise the economic returns from a legislated monopoly .Once the requirements are established RV suppliers will source compliant vehicles with any necessary conversions to comply as they now do with their exist products.This in itself is a powerful force for user compliance

Page 8: Chapter Three: Self-containment documentation

Q26

Neither agree nor disagree

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?

Q27

Respondent skipped this question

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

Q28

Neither agree nor disagree

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

Q29

Respondent skipped this question

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

Page 9: Self-containment warrant

Q30

Strongly disagree

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

Q31

Respondent skipped this question

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

Q32

Respondent skipped this question

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

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.

Page 10: Generic Identifiers

Q34

Strongly agree

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

Q35

Respondent skipped this question

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

Q36

Neither agree nor disagree

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

Q37

Respondent skipped this question

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

Page 11: Chapter Four: Infringement fees

Q38

Strongly disagree

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

Q39

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

Far too punitive, potentially far too subjective and for doing what? There is a presumption of having caused environmental damage which under other relevant legislation is subject to de minimus considerations

Q40

Strongly disagree

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

Q41

Respondent skipped this question

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

Page 12: Chapter Five: Exclusions from regulatory requirements

Q42

Neither agree nor disagree

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

Q43

Respondent skipped this question

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

Q44

Agree

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

Q45

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

Allowing portable toilets would be sufficient...exemptions are unnecessary where these are legal

Q46

Neither agree nor 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)

Q47

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

“Grandfathering “ is a technique used to oil the passage of unpopular regulations?

Q48

Don't know

Are there other types of vehicles that should be excluded?

Q49

Respondent skipped this question

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?):

Page 13: Chapter Six: Fees and levies

Q50 **Disagree**

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

Q51

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

Far too expensive for what is really required. There is a strong argument for the government funding this under its environmental vote instead of the presumption that there is a need for campers to prove their compliance...a presumption of guilt. Camping is a right not a privilege

Q52 **Strongly disagree**

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

Q53 **Respondent skipped this question**

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

Q54 **Strongly disagree**

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

Q55

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

The star of a growing administrative bureaucracy with no insensitive for efficiency

Page 14: Certification Authority Application Fee

Q56 **Strongly disagree**

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

Q57

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

For what

Q58 **Strongly disagree**

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

Q59

Respondent skipped this question

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

Page 15: Waivers and refunds

Q60

Neither agree nor disagree

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

Q61

Respondent skipped this question

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

Page 16: General comments

Q62

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

This legislation is the wrong solution to the perceived problem unfortunately. There is no evidence to prove that the existing camping fraternity is guilty of environmental abuse. The NZMCA which has been a vocal participant in discussions has standards which I support in this regard but it does not represent all freedom campers and this should be recognised in the decision making process. Overall, this is an overkill solution with some very worrying extremes. Education with non-compliance fines for actual environmental offending along with better local facilities (aka Australia) would go a long way. The choice of a heavy handed solution will disadvantage lower socioeconomic groups and their quality of life

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

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.
