

# #10

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, September 09, 2022 12:17:06 AM  
**Last Modified:** Friday, September 09, 2022 1:51:56 AM  
**Time Spent:** 01:34:49  
**IP Address:** Privacy of natural persons

---

Page 3: Submitter information

## Q1

Name

M BOOT

---

## 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

**No**

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**

**Neither agree nor disagree**

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 language, although appearing interpretive, is all too vague and although that may be beneficial to the many variations in self contained vehicle design choices, it permits vague interpretation from regulators and enforcers so therefore doesn't much improve the overall standards/conduct from both sides.

---

**Q10**

**Neither agree nor 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:

This is poorly written and doesn't clearly convey the suggested points, however the main push here appears to be around fixed and portable toilets. Both have advantages to different users including consideration for users ability to operate, and both should be permitted.

---

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

**Q12**

**Neither agree nor disagree**

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:

It continues to concern me that the regulation and control measure statements are emphasising the need for testing and compliance by such an advanced level practitioner that costs for the end user may reach excesses beyond their capacity for affordability. Perhaps consider greater transparency around the competency requirements to include giving advice to freedom camping vehicle owners around 'what works' and short cut to solutions by avoiding a non-compliance in the first instance

---

**Q14**

**Neither agree nor 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:

Again here is an opportunity to improve outcomes and reduce costs for all. Use this opportunity by taking this so called prescriptive approach to introduce a range of complaint ready made kit set product options which would both standardise installations, these products could even be pre-consented.

---

**Q16**

**Agree**

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

---

**Q17**

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

Yes there should always be a third party involvement as long as it's aims are embedded in improving the process for all and improving the outcomes for all.

---

Page 6: Competency requirements for vehicle inspectors

**Q18**

**Neither agree nor disagree**

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:

Most people, although they may appear to be, are not fit and proper people. Surprisingly many so called determinants of what a fit and proper person should be are in fact over reaching in their roles and causing significant negative stigma upon people that may not be deserving of such treatment, but those administering these judgements are themselves entirely fallible also but choose to project their guilts onto other and subsequently deflecting attention away from themselves. There does however need to be a condition that persons assessing these vehicles take professional accountability for the certifications.

---

**Q20**

**Neither agree nor disagree**

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

---

**Q21**

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

What would the exact trade qualification be? There may well not be one that exists which is applicable.

---

**Q22**

**Neither agree nor disagree**

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

---

**Q23**

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

Whoops! Please see answer to question 20

I'm answering question 20 now, of course a person should be knowledgeable of what they are assessing but within the process of assessing, a person becomes increasingly knowledgeable. What would be the measure of a persons knowledge be based on? I would suggest the number of accurate and successful certifications should count as a contributing factor to answering this question. Let them certify and then audit their results. Perhaps photo images of certified work would assist in relocating responsibilities to either the certifier or the vehicle user or both.

---

Page 7: Deeming plumbers as certification authorities and vehicle inspectors

**Q24**

**Neither agree nor 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:

Plumbers are know to be extraordinarily expensive, to what extent are the certification regulators trained plumbers? Again a standard product which meets the requirements would assist in reducing the need for higher end trade services to be involved.

---

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**

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

Obviously streamlining the use and distribution of useful information is more ideal so I suggest another level of information for international freedom campers that is documented in their passports, showing intent to freedom camp and receipt of a levy paid upon entry to NZ for the privilege of all the locations, facilities and services provided.

---

Page 9: Self-containment warrant

**Q30**

**Neither agree nor disagree**

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

---

**Q31**

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

Why green? To make it appear nature friendly? The NZ resident freedom camping WOF should be black and the international visitors WOF should be whatever other colour, but just one. The reason for this is that international visitors should pay a levy upon arrival in NZ and as granted by the conditions of their passport, express their intent to freedom camp. The levy upon entry to NZ should reflect the length of their stay and intended use of freedom camping locations and facilities. I would estimate this might be in the range of \$900 for a 3 month stay.

---

**Q32**

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

Visa details for international visitors.

---

**Q33**

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

Haven't seen the entire document and therefore no comment

---

Page 10: Generic Identifiers

**Q34**

**Strongly disagree**

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

---

**Q35**

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

A generic identifier is a good starting point for residents who permanently live nearby freedom comparing locations as it indicates the intention of the unfamiliar vehicle and its occupants who are all of a sudden sleeping across the road from the house they and their family live in every day.

---

**Q36**

**Neither agree nor disagree**

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

---

**Q37**

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

Does this question me having two identifiers or just an alternative? Perhaps it would be beneficial to have a window sticker that has a statement of intent or code of conduct so that there are expectations set out regarding freedom campers conduct and respect for others in surroundings such as noise levels, times of day in which certain will and will not take place, acknowledgement of the environment they are in and appreciation for the opportunity to coexist there, appropriate language and behaviour... something like that.

---

Page 11: Chapter Four: Infringement fees

**Q38**

**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:

\$800 is a small amount in regards to the potential abuses of extreme infringement. That's not to say I support fines at all but realistically wouldn't it be better to seek that there are no infringements in the first instance. What if the fine were much higher but there was an option of tiered temporary financial assistance to bring offending vehicles up to compliance?

---

**Q40**

**Disagree**

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

---

**Q41**

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

Again I don't think that a fine or penalty is enough on its own. Many freedom camping people do so in order to afford other things in life such as eating and purchasing other necessary items, others consider freedom camping the option that afforded them a restaurant meal on their holiday or a gift for a friend back home. When the goal is to have complaint and cooperative freedom camping vehicles and users then why not promote that success rather than punish for failing.

---

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?

---

**Q43**

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

One size has never fitted all and never will

---

**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?

---

**Q45**

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

It makes sense practically and within the scope of the vehicles ultimate cost/value comparison

---

**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:

This is a great advantage to many vintage vehicle owners but doesn't support all of the other efforts being made in this bill. I would reword it to say that all pre 1980s vehicles could be considered exempt but still on certain conditions.

---

**Q48**

**Don't know**

Are there other types of vehicles that should be excluded?

---

**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?):

Without any suggested vehicles or circumstances it is difficult to answer this question with any meaning behind my views. The only time I would say an exemption should be considered is when a vehicle is within the process of improving the vehicle such as when taking corrective actions over a specified time period or is in the 28 day period of renewing a Freedom Camping WOF, if that is indeed how it is done.

---

---

Page 13: Chapter Six: Fees and levies

**Q50**

**Neither agree nor 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:

It is my view that NZ citizens should enjoy the benefits of freedom camping without any levies or additional charges beyond certification

---

**Q52**

**Neither agree nor disagree**

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

---

**Q53**

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

Again I see that the majority of freedom campers are international visitors and these costs can be captured in the fees the visitors pay when they are granted visitors visas and express their intent to freedom camp

---

**Q54**

**Neither agree nor 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:

Collect all necessary incomes from international visitors upon arrival and consolidate any outstanding amounts upon their departure.

---

Page 14: Certification Authority Application Fee

**Q56**

**Neither agree nor 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:

It seems highly unlikely that an approval would take 5 hours not would necessarily employ someone that would justify such an expense for their "expertise". Previously there had been mention of a plumber so therefore is the calculation based on this? Surely there is a more practicable way of approaching assessment where costs are comparable to standard vehicle WOF which obviously require much more specialised knowledge and skills over a broader range of arguably much more technical aspects of vehicle operating standards. The rate for a self containment certificate should be comparable to a standard vehicle WOF approximately \$65 or thereabouts

---

**Q58**

**Neither agree nor disagree**

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

---



**Q59**

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

Once again this is way off the mark. Empower the vehicle owner to take greater ownership of the quality of their installations by providing products and advice which bypasses the need for excessive inspector expertise and user expense.

---

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**

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

This consideration is increasingly irrelevant if planning moves away from this type of facilitation and towards an approach that is more user centred

---

Page 16: General comments

**Q62**

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

There should clearly be a code of conduct that is formally agreed to by all freedom campers and it should be dislocated on the vehicle along with the WOF and indicator sticker. This could prevent inappropriate and unlawful behaviour from going either unchecked or being unsuccessfully challenged by either regulatory services or members of the public.

I firmly believe that upon entry to NZ each visitor who intends to freedom camp should pay a levy of \$300 per month and have this go towards supporting the infrastructure of the regulatory freedom camping body, local councils and the future development, primarily streamlining of the certification processes.

---

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.

---