

#37

COMPLETE

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Page 3: Submitter information

Q1

Name

Withheld at request of submitter

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

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

Yes,

If yes, please tell us the title of your company/organisation, and how many people you are submitting on behalf of.:

Withheld at request of submitter

Q5

Tourism business

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

Privacy information

The Privacy Act 2020 applies to submissions. Please tick this box if you do not wish your name or other personal details to be included in any information about submissions that MBIE may publish.

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?

Q9

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

Performance-based requirements ensure that the regulations achieve the outcomes that are sought while retaining flexibility for innovation and development within the industry. The sector will be able to perform well under this regime.

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:

Prescriptive regulation is more expensive to maintain, more expensive for vehicle owners and removes opportunities for innovation.

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?

Q13

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

Withheld at request would seek to work with a partner certification authority that is able to perform the function to a high quality, or seek to be a certification authority ourselves. Multiple pathways gives us flexibility to be both robust and efficient.

Q14

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:

For thl, this would add an unnecessary compliance burden given our extensive expertise in vehicle design and manufacturing.

Q16

Neither agree nor disagree

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:

Given the audit and quality assurance processes that [redacted] already uses, this step is unnecessary [redacted] We have no view on whether it is necessary for other providers.

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?

Q19

Respondent skipped this question

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

Q20

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:

We do not think it will be necessary for an vehicle inspector to have a relevant trade qualification to be able to discharge their duties under the act competently.

Q22

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:

While not an issue [redacted] this would be additional compliance and unnecessarily exclude some from being Vis.

Page 7: Deeming plumbers as certification authorities and vehicle inspectors

Q24

Agree

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:

It will be helpful to overall system capacity if plumbers have a simple pathway to be CAs and Vis. It is important to have enough people who can perform the task of CA/VI.

Page 8: Chapter Three: Self-containment documentation

Q26

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

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

In our view this should no longer be necessary under the new regime with register, warrant and compulsory compliance.

Q28

Agree

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:

A simplified certificate should be sufficient.

Page 9: Self-containment warrant

Q30

Agree

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

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 green sticker helps to give everyone confidence in the operation of the regime.

Q36

Strongly agree

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:

A green sticker helps to give everyone confidence in the operation of the regime.

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?

Q39

Respondent skipped this question

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

Q40

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

Agree

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:

No exclusions creates the cleanest and most predictable regime.

Q44

Disagree

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:

Excluding smaller vehicles will add complexity and potentially loopholes to the regime.

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)

Q47

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

There are some genuinely vintage vehicles but not enough to justify exclusions that complicate the regime. People will still be able to camp in those vehicles in camp grounds.

Q48

No

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:

Implementation delays caused by lower levies are not desirable.

Q52

Agree

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:

This level of fee will suffice to support the implementation and oversight of the regime.

Q54

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:

This level of fee appears unnecessary. Levies should cover the true cost of implementing the regime.

Page 14: Certification Authority Application Fee

Q56

Strongly agree

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:

A set fee shares the cost fairly and provides certainty.

Q58

Strongly 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:

A scalable fee means we do not know how much this element will cost for our business.

Page 15: Waivers and refunds

Q60

Agree

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:

It is fair to have the option for waivers and refunds in certain limited cases.

Page 16: General comments

Q62

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

Pleased to see it has been dropped from the bill in relation to passing on the responsibility of paying fines to rental operators. We strongly disagreed with that proposal so happy to see it has been removed.

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.
