

#51

COMPLETE

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Page 3: Submitter information

Q1

Name

Withheld at request of submitter

Q2

Email address

Privacy of natural persons

Q3

Respondent skipped this question

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

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:

Fit for PURPOSE needs to be the self-containment standard to ensure that campers take responsibility for their individual needs when camping. Every camper, either group or individual is different, camps in diverse areas, has differing needs, spends a different amount of time camping - sometimes just overnight, sometimes for up to weeks at a time. If a professional authority is inspecting the purpose and performance based equipment on board, they can discuss with the USER how they safely contain their waste when camping, and what is most useful for them - within a set of HEALTH and SAFETY parameters. It should be solely based on SAFE waste containment to ensure that a responsible camper can LEAVE NO TRACE

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:

The prescriptive requirements based on the current NZStandard have not been successful for the majority of freedom campers in NZ, excepting the use of these for the NZMCA who make it a mandatory requirement to stay at their NO FACILITY park over properties. Every vehicle and camper is different, and should be afforded the opportunity to safely and functionally contain their waste to satisfy their basic health and safety needs.

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

Q12

Strongly 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:

If the Government is determined to introduce Certified Self Containment with stricter criteria, we need a very ROBUST system for the certification. If millions of dollars is being spent to implement this, and the PDGB is going to be the authority, then please ensure that ALL inspections are carefully monitored by this Board, and every inspector is properly trained. The Bill is designed to remove doubt, increase trust in a Certification system and ensure consistency. So it needs to then have a trustworthy system which cannot be abused, or randomly applied.

Q14

Strongly Agree

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:

This would ensure consistency of inspections and fix the issues the Bill continues to stress. All inspectors must have a basic training course, so that the PDGB can be assured they will not face any liability or legal action if any self-containment certificate is NOT up to a set standard.

Q16

Strongly 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:

There should at the very least be a basic EDUCATIONALLY assessed qualification and oversight from an independent third party for this process, for any inspector undertaking this work. This will ensure the public have confidence in the system, and inspections are consistent. Currently one of the major concerns expressed by the Minister and the public is the inconsistency, and un-trustworthy nature of the certificates given to vehicles. ONLY about 5% of PDGB MEMBERS currently do the vehicle certifications, and they will all need a basic training course to familiarise themselves with the unique nature of vehicle plumbing and waste capture. Make the Authority to Inspect as robust and clear as possible please.

Page 6: Competency requirements for vehicle inspectors

Q18

Strongly 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:

This is a specialised task, with new regulations, all officers must be assessed for their competence at the task, or the system fails.

Q20

Strongly agree

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:

A simple NZQA based certificate to fully understand and apply the new regulations should be required by vehicle inspectors. Otherwise the integrity of the system fails.

Q22

Strongly agree

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:

These people will be inspecting private property, usually on private property. They must be assessed for their proper fitness to do this task, without risk to anyone with an expensive vehicle.

Page 7: Deeming plumbers as certification authorities and vehicle inspectors

Q24

Strongly 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:

These trained personnel will have the necessary skills to ensure the system is robust and trusted.

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

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

I dont know if the recording of this on the certificate is particularly necessary or not. If there is a CERTIFICATE issued by a reputable trained person, that should be fine.

Q28

Strongly 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:

Keep it simple

Page 9: Self-containment warrant

Q30

Agree

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:

This would be a simple identifier for any inspector.

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:

How will infringement authorities easily identify a certified vehicle otherwise.
They cannot necessarily access the certificate whenever they are patrolling areas.

Q36

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:

You probably need a simple generic identifier

Page 11: Chapter Four: Infringement fees

Q38

Strongly agree

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:

There should ONLY be infringements for proven harm to the environment or local communities. NOT for a lack of display of any generic sticker. People should only be fined for being irresponsible.

Q40

Strongly 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:

Ensure any infringement is proportional to an ACTUAL OFFENCE.
Bill of Rights Act ensures people are innocent until proven guilty.

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:

There should definitely be exclusions for certain campers in their vehicles (medical or disability exemptions) and exemptions from smaller vehicles which can demonstrate that they can safely and responsibly secure their waste in order to LEAVE NO TRACE, using a fit for purpose model.

Q44

Strongly 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:

A fixed toilet DOES NOT ensure any more responsibility in camping. Smaller more eco friendly vehicles should be encouraged in our LOW CARBON EMISSIONS environment, and people with small vintage caravans, roof top tents, and small campers or vans, are NOT DIFFERENT from TENT CAMPERS , who have been excluded from these self-containment laws. People can be totally responsible with a portable toilet. They are functionally NO different from a fixed cassette toilet, but they definitely cannot fit into a smaller more sustainable vehicle. So as long as they demonstrate that they can safely CONTAIN all waste and LEAVE NO TRACE to be a responsible camper, they should not be discriminated against, or lose rights to freedom camp

Q46

Strongly agree

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:

For the same reasons as above.

The integrity of these vintage vehicles should not be disturbed, because it will definitely LOWER the capital value of the vehicle to alter the original interior to retro fit a toilet.

Q48

Yes

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?):

4WD with pop top roof tents

Horse truck transports with sleeping facilities.

All transport trucks

Smaller one person vans

All EV vehicles

Page 13: Chapter Six: Fees and levies

Q50

Strongly agree

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:

With no idea of the additional cost of a re-certification inspection the cost needs to be kept as low as possible

Particularly as the transition period is only 2 years, and some people will lose 2 years of their currently inspected CSC which they have paid for.

Q52

Strongly 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:

Costs to be kept at a minimum. If they system is not designed to be cost neutral, for the PDGB then it is NOT FIT FOR PURPOSE. It is already a huge extra layer of bureaucracy that tax-payers are funding. Do not make the responsible campers pay more for it again.

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:

Makes it unaffordable, added to high costs of retro fitting toilets, plus inspection fees

Page 14: Certification Authority Application Fee

Q56

Don't know

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:

Sounds reasonable, but until you know whats involved its impossible to answer this.

Q58

Don't know

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:

??? No idea what the process is going to be so cannot judge the fees

Page 15: Waivers and refunds

Q60

Strongly 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:

They should have this power

Page 16: General comments

Q62

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

In principal I don't believe these regulations for self-containment are necessary or useful, or purposeful.

There is NO proven evidence of problems which need this complex level of regulation, as all of your research over the years shows.

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.
