

#84

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, on behalf of myself, one staff member and my clientele.

Q5

The best way/s to describe your role is:

Self-containment testing officer,

Other (please specify):

Camper repair and servicing business

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 **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:

Of the options rendered, this appears to be the most flexible option. Every camper is different and strict rules would just further hamper adoption.

Q10 **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:

Overbearing regulation, from discussions with clients, would likely lead to lack of cooperation.

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:

Given the way the certification network is currently put together, a more flexible pathway to competency will be required to avoid losing too many inspectors.

Q14 **Neither agree nor disagree**

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

Q15 **Respondent skipped this question**

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

Q16

Strongly 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:

Excess cost for no real additional benefit.

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:

This is something that is sorely lacking and the root cause of issues at this time - there's inspectors signing off things that clearly don't meet the current requirements or the spirit of the legislation as is.

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:

Define 'relevant trade qualification' - plenty of VIs have qualifications that are relevant but not specifically in the plumbing field.

Q22

Strongly 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:

Further barriers aren't what we need.

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:

This could be beneficial in giving additional CA options but I would foresee it being ultimately fruitless - plumbers have enough on their plate without dealing with the bureaucracy of being an authority for certifying things.

Page 8: Chapter Three: Self-containment documentation

Q26

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?

Q27

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

What we have is working with the exception of a lack of a general database for later reference.

Q28

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:

Might as well abolish the certificate part altogether if you go this route, gives absolutely no benefit beyond just providing the card.

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:

Seems a waste of resources frankly but to each their own.

Q32

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

The warrant itself already contains the essentials - maximum occupancy, date of expiry and a unique code are really the keys here.

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

Neither agree nor disagree

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

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

The identifiers aren't a perfect solution but have been known to help enforcement spot folks trying to cheat the system by using fraudulent documentation.

Page 11: Chapter Four: Infringement fees

Q38

Neither agree nor disagree

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

Agree

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:

A stronger fee for actual damages is certainly appropriate.

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:

That's an extremely draconian approach, there's no need for it.

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:

If there was no scope for flexibility with this requirement, responsible owners with older caravans will be knocked out even though they've been complying for the longest time already which is absolutely unfair.

Q46

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:

Essentially as above. There's so many times that fitting a fixed toilet to a vintage model would not be a practical measure due to design and heaven knows Kiwis love buying an old Kiwi made camper.

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?):

Let's be brutally clear here - this bill is targeting people using passenger vehicles as camping vehicles. There are certainly a lot around, but there's equally a strong number who follow the rules adequately. Stronger regulation of certification and stronger enforcement are a better option than blanket banning things.

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

Respondent skipped this question

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

Q52

Neither agree nor 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

Agree

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:

If we're going for the PGDB suddenly having this new workload foisted on them, they need to get a reasonable levy to hire the right number of staff to manage this and properly promote the rules.

Page 14: Certification Authority Application Fee

Q56

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:

This actually is the more fair option - I don't see any reason there will be a sudden flutter of organizations applying to be CAs and there's no need for there to be that many CAs anyway. Having them pay a scalable fee when the system is first organized is a recipe for overcharging.

Q58

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:

As above.

Page 15: Waivers and refunds

Q60

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:

Unless something is very wrong at the CA, there's no need for this.

Page 16: General comments

Q62

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

It's easy to understand why these changes are being made but it feels like a sledgehammer being used to hang a picture hook.

For every camper flouting regulations there's a dozen more following them - From the perspective of a VI who also works in the camper industry, most folks are more than happy to toe the line.

What IS missing is a central oversight to keep everyone doing the same thing - every CA at this time has their own records and some have VIs issuing certificates on things that have no business receiving them which further sullies the reputation of the scheme.

Further the repercussions aren't strong enough for folks breaking the rules and as it stands, this change in regulations won't deter them as even with the increased fines there isn't enough deterrent to put them off thumbing their nose at the regulations being imposed.

All that does seem to be pressed is this hell-bent plan to increase sales of fixed cassette toilets!

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.
