

#85

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 **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:

Cost effective and infrequent updates needed.

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:

Not as cost effective, may require more frequent changes/updates

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:

Approach must be robust. If not then would support other options. Cost effectiveness is an important consideration for all parties but not mutually exclusive from "robust/fit for purpose"

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:

If option 1 isn't sufficiently robust then we would support option 2 despite increased compliance and other costs

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:

But only if either option 1 or 2 can't be guaranteed to be sufficiently robust/fit for purpose

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

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

This would be non-negotiable whichever of option 1 - 3 was chosen.

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:

Don't think this is necessary provided appropriate training and knowledge is confirmed

Q22

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:

This would add certainty (and costs) to the process.

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:

Plumbers are probably better qualified than any other trade to fulfill this role.

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:

But in an ideal world, if a trustworthy, simplified system could be built, that would be preferential.

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:

Provided it is sufficiently robust, this would have our support

Page 9: Self-containment warrant

Q30

Strongly 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:

Something for inspectors/enforcement officers to easily identify a self-contained vehicle is essential. Also helps members of the public with any "community policing" that is always going to be in the mix. Don't care what colour it is provided it is consistent and the warrants can't be purchased for \$5 on K Road!

Q32

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

Nothing to add

Q33

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

Good as proposed

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:

We believe this has value provided access to it is controlled and not something that can be purchased on K Road together with a fake Rolex!

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:

As above, would need to be something that isn't easily forged etc.

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:

In the context of the damage a small group of freedom campers do, this isn't sufficient disincentive to that antisocial behaviour nor is it sufficient punishment for those who do transgress

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:

Starting to get there in terms of "the punishment fitting the crime".

Page 12: Chapter Five: Exclusions from regulatory requirements

Q42

Strongly 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:

As soon as you allow grey, many will work to exist in the grey with nefarious intentions. Also becomes a much more complex enforcement/compliance environment when there is grey in the mix

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:

The smaller vans are often the key offenders under the current regime. We don't want any exclusions as it creates grey areas which can and will be taken advantage of.

Q46

Strongly 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:

Creates complexity and offers a window to wriggle through. We believe a blanket approach is a much better one to adopt in this case. Retrofitting a toilet is going to be necessary to attain a fully self-contained status in many cases and vehicles of 40 years old should not be exempt from having to do this or only camp where allowed to do so given their not fully self-contained status

Q48

No

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?):

None should be excluded.

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:

We don't believe this will create sufficient funds for the regulator/to cover the oversight costs

Q52

Strongly 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 is getting closer to workable financially and would be supported.

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:

We would have no problem with this being \$120 if the added funds were used appropriately and ensured the necessary rigor and efficacy of the process.

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:

We have no strong feelings on how this is treated. It is important that enough time is built in to allow a thorough and rigorous process to be used for each assessment. This option allows for 5 hrs at \$75/hr. I would imagine it would take longer to assess a large vehicle than a small one and if that is the case, then perhaps a flat fee isn't appropriate/fair. I don't know what a fair/reasonable hourly rate would be either but if \$75/hr is reasonable for a plumbers rate, then I guess it would be appropriate here too. I might have to become an assessor!

Q58

Strongly agree

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:

See Q57 comments. If the time taken to assess a vehicle varies based on size, then we think a scalable fee with a 3 hr minimum charge would be more appropriate

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:

A fair and reasonable approach

Page 16: General comments

Q62

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

You are getting there, well done. We have been involved in the caravan, campervan and camping sector for 40 years and this is become a well thought through, pragmatic piece of legislation where you have allowed interested parties to have robust and value adding input and are to be congratulated for your efforts. We are hoping the end result reflects sector and interested party contribution and resolves this blight on our tourism and communities permanently.

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.
