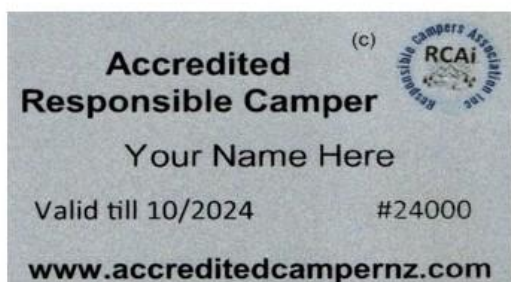


Self-contained Motor Vehicles Legislation Bill regulatory system submission

Submission from
Responsible Campers Association Inc



Web; www.accreditedcampernz.com
Email; responsiblecampersassoc@yahoo.com

Responsible Campers Association Inc (RCAi) are opposed to the passing of the complete Bill.

These submissions are made 'only' in the event the Bill passes.

TECHNICAL REGULATIONS.

RCAi supporters believe this Bill and any restrictions made under it, are an unjustified restriction on our right to access public land for the purposes of camping. RCAi totally supports that all campers should be self contained (the basic ability to retain / manage their waste) it is the certification or any set requirements that we have an issue with.

Currently less than 25% of RV based campers, believe the current voluntary self containment certification is suited to their needs and this is a likely problem when attempts are made to set 'requirements in law' of a very diverse group of campers.

As such and in recognition of those views, RCAi supports that any restriction has to be as 'light touch' as possible in order to avoid the potential issue of civil disobedience. RCAi has also noted that for many supporters even calling them "Regulatory Regulations", they are still viewed in the same light of the current Certified Self Containment Standard (NZS5465:2001), which has been misrepresented to responsible freedom campers for the past decade. Such misrepresentations have included SOE's, Govt Depts, DoC and other stakeholders and have now been clarified by the High Court.

RCAi would be totally opposed to any club being able to be an issuing authority or being able to appointing testers etc under any new or existing regulatory program.

The reasoning is:

**This is a regulatory requirement that is expected to be upheld in Law, with fines up to \$10,000. As such the public has to be 'CONFIDENT' that inspectors are consistent, accountable and professionally trained in what they do. Not left to some amateur inspectors (appointed by groups with a vested interest) with their own interpretations, of the requirements as we often see with current voluntary self containment testers.*

** If responsible campers are expected to spend thousands of dollars upgrading their RV's to meet new regulatory requirements, they are owed a professional Trade based certification to justify that expense.*

** Currently many private organizations are benefiting financially from issuing of Certifications. This means their approach is often one of money making, NOT stated mandatory requirements. Often their narratives do not align with responsible camping, but more on financial benefits to themselves. Estimates on Social media that one group makes over a million dollars pa, in one way or another. whether that be a perception only their members can be certified, or that only they can issue certificates (thus making \$140 joining fee and \$90pa subs)*

**ALL inspectors must be PDGB members or their employees. They must have completed a specific vehicle-self contained training course / qualification focused on all new regulations - overseen by PDGB, and need to PASS with 92+%.*

**Only PDGB can be an issuing authority, and have ultimate power over the regulations. If PDGB is going to hold liability for inspections / inspectors and handle complaints, they, and the public, need to know that testers all have a professional level of competency. Otherwise making the PDGB responsible, creating technical regulations and paying a big administrator for a Register, will be seen with skepticism and lack any credibility with the camping public.*

** Currently some issuing authorities (Clubs) are telling their testers they do not need to comply with **"MANDATORY"** requirements of the current CSC program. While other issuing authorities have failed to comply with requirements that testers be employed by, or members of the issuing authority - again leading to a lack of credibility.*

Costs

It is difficult to recommend costs for something which is far from being decided just what is going to be involved.

Are RV's going to need a 5 minute inspection that they have a fitted toilet?

A comprehensive inspection even more involved than the current CSC inspection?

Until these questions are determined one can not be expected to recommend costings with any credibility.

Like wise should PDGB members pay a cost to the board for becoming qualified as inspectors?

Should they be expected to pay for the training program they will need to undertake?

RCAi recommend only PDGB be the sole issuing authority, so no costs will be payable by an issuing authority to be registered.

More:

A clearer definition for 'fixed toilets' to include appropriate composting or any new technology, and incinerating toilets as options, needs to be included.

If Minister Nash is truly trying to effectively regulate the self-containment of vehicles then it needs to ensure the public is CONFIDENT that inspectors are consistent, accountable and trained to do what they do.. -otherwise the system collapses.

He also needs to address matters such as section 32(2) of the Summary Offenses Act in order to address roadside pooping, and pooping in waterways, as neither the Freedom Camping Act or technical regulations attached thereto, will solve them as they only apply when camping. Failure to do so demonstrates an inability to address real issues, with many feeling it is just another unjustified freedom camper beat-up, which will most likely lead to civil disobedience.

Subjective - wording like;

"if a resident is concerned" !

"If discharge of a substance is offensive" ?!

"If you 'incite' someone to swear at an enforcement officer" - \$5k fine.

MBIE say these charges go to Courts, so you have an opportunity to defend yourself