



The All Points Camping Club of New Zealand

Ph or text 022 328 0973 32 Kennedy Avenue Feilding email: president@allpointscampingnz.org

Attention: Responsible camping submissions
Submission

On the Freedom Camping Regulations discussion document.

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Freedom Camping Regulations discussion document

- [the technical requirements for self-contained vehicles](#)
- [the criteria for approval as a self-containment certification authority](#)
- [the format of the self-containment certificate and warrant](#)
- [the fees and fines attached to each infringement offence](#)
- [exemptions from the need to be certified as self-contained](#)
- [levies and fees to cover the costs of providing regulatory oversight](#)
- [The Timeline for regulatory changes](#)

Chapter 1: Self-containment technical requirements

From the Freedom Camping Regulations
DISCUSSION DOCUMENT | SEPTEMBER 2022

- Option 1: 'light-touch' performance-based requirements.
- Option 2: prescriptive approach to setting technical requirements

Option One is our preferred option in this section as it will hopefully keep costs to the end user down and provide flexibility and innovation within the requirements of the standard.

Chapter 2: Self-containment certification authorities and vehicle inspectors

From the Freedom Camping Regulations
DISCUSSION DOCUMENT | SEPTEMBER 2022

Certification authority approval criteria

- Option 1: a robust approach to approvals with multiple pathways.
- Option 2: a more rigorous and prescriptive certification approval criteria.
- Option 3: requiring a third-party review of certification authority systems.

Of the three options available, option one is the preferred option as it will keep the cost to the end user as low as possible and lower than either option 2 or 3.

There is a discrepancy in the Assessment of options, "Costs – the costs on participants in the regulatory system" states,

'There will be small new costs for those issuing authorities (IAs) who transition to the new regulatory regime associated with demonstrating how they meet criteria.

There will be increased costs to the Issuing Authorities. The costs will vary depending on work required to meet the requirements as an IA. These requirements will not be known until the regulations and legislation are finalised.

No direct costs for owners of self-contained vehicles."

This is a fallacy and incorrect statement. The PDGB are expected to levy owners of self-contained vehicles to recover their annual cost of administration of the regime (Chapter 6: Levies and fees) The IA's will do the same to recover their new increased costs by passing those costs on to the end user, the owners of self-contained vehicles. The increase to owners of Certified vehicles could be in the vicinity of 25% in the Certification Fee alone before taking the PGDB levy into account. The IA NZLC's current fee of \$45 would increase to approx \$60 that would be passed on to the end user.

Vehicle inspector competency requirements

- Option 1: requiring vehicle inspectors to be knowledgeable.
- Option 2: requiring vehicle inspectors to have a relevant trade qualification.

- Option 3: requiring vehicle inspectors to be assessed as “fit and proper”.

Option One, basically the status quo, **is our generally preferred option**. The majority of current Vehicle inspectors come from a trade or related camping background. Having knowledge of the self-containment standard relating to caravans and motorhomes.

Option 2, Knowledge, and experience in this field is imperative. Vehicles used in the camping industry are not the norm for most Tradesmen to deal with. The plumbing is confined and often uses specific fittings only used in this industry. The Electricians are also different as an example, with different batteries used along with solar and shore power, a mistake here can be devastating. The knowledge required in this field is not gained through a trade qualification.

Option 3, A large number of current vehicle inspectors are retired persons. In the case of NZMCA inspectors, they provide this service on a voluntary basis. Other Vehicle inspectors may charge a small fee for their time. All vehicle inspectors will offer guidance and assistance to vehicle owners who may require help to meet the Standard. The vast majority of these vehicle inspectors provide their time and knowledge for the love of camping. These people have already proven to be “fit and proper”.

Deeming plumbers as certification authorities and vehicle inspectors

As mentioned above, the certification of motor vehicles is unique and requires experience and knowledge in that field. Plumbers, like most tradesmen, tend to specialise in certain fields of their trade. A plumber that does not have experience in this area could be as unqualified as the layman.

- To allow ALL plumbers regardless of experience to become **Issuing Authorities** would undermine integrity in the regulatory regime.
- To allow ALL plumbers regardless of experience to become **Vehicle Inspectors** is a different matter. Due to the trade background the inspection of a vehicle to meet the standard would be straightforward for the majority of plumbers. The installation of self-contained systems would require experience in that field. It is easier to inspect a correct installation than to install correctly with limited knowledge and experience.

Chapter 3: Self-containment documentation

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Options for the format of the self-containment certificate and warrant card

Self-containment certificate options:

- Option 1: continue to record the details of a vehicle's self-containment facilities on the self-containment certificate.
- Option 2: a simplified self-containment certificate.

A simplified self-containment certificate that still records the facilities on the vehicle that meet the requirements of the standard. For example, the fresh and waste tank capacity could be listed as at present. The connecting pipes currently listed by length and diameter could be listed as "fit for purpose" Vehicle inspectors know that pipe diameter requirements change with length. The question on tank supports could become a "check box" stating fit for purpose or adequately supported.

A simplified self-containment certificate and check-sheet was discussed and drafted in a meeting between the NZMCZ, NZ Lifestyle Camping and All Points Camping. This suggested format provided all required information in a simplified and easy to read document.

Self-containment warrant

The current warrant card with a colour change is fit for purpose with no additions or exclusions.

Generic identifiers

The existing generic identifier, the blue sticker, appears to be the main cause of public mistrust in the self-containment system at present. The Minister's initial concerns were with vehicles that had a sleeping platform and no toilet but displayed a blue self-containment identifier. (Blue sticker)

The identifier was not a requirement of the existing standard as its purpose was solely to aid inspection authorities in initially identifying self-contained vehicles. Further inspection of the warrant card would prove or disprove validity of the "blue sticker".

The removal of the identifier would require inspection authorities to actually check vehicles for the warrant card. Many already do this to confirm validity of the identifier, number of occupants and expiry dates etc. The removal of the identifier would also increase public faith in the system as the warrant card is less likely to be fraudulently copied.

The validity of a generic identifier would aid inspection authorities and can be easily checked with the aid of the national database of certified vehicles.

Chapter 4: Infringement fees and fines

The range of infringements and related fines is a contentious issue among responsible campers and as a club we are unable to arrive at a consensus to provide a united statement on this section.

Chapter Five: Exclusions from regulatory requirements

From the Freedom Camping Regulations
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REGULATORY EXEMPTIONS

- Option 1: no exclusions from new regulatory requirements.
- Option 2: excluding smaller freedom camping vehicles from the requirement to have a fixed toilet.
- Option 3: excluding vintage vehicles from the requirement to be certified as self-contained.

I must state that the All Points Camping Club of New Zealand being an inclusive organisation is opposed to the exclusion of non-fixed toilets from the Standard. That being outside the scope of this discussion document we are replying to the options available in this document. Note; If the exclusion of portable toilets is not passed into law in the Self-contained Motor Vehicles Legislation Bill, this entire section of the discussion document is a waste of time and funds that could be better utilised by actually addressing the issues.

In the event that the portable toilets are excluded from the Self-contained Vehicle standard, option's 2 and 3 combined are our preferred options. The statement used in the Assessment of options, regulatory outcomes, that option 2 and 3 are "more likely to see inappropriate disposal of waste as portable toilets are less likely to be used."

This again goes back to the unfounded and anecdotal evidence that portable toilets are a contributing factor to bad behaviour by a section of the camping community.

The only difference between a portable toilet waste tank and a cassette tank is the physical shape and capacity, with the portable toilet's tank generally having a larger capacity. Both units employ the same technique for filling and emptying the tank.

The statement used in the Assessment of options, regulatory outcomes, that option 2 and 3 both "Undermine integrity regulatory regime, as it creates two (or three) tiers of vehicles."

This is a contradiction in the document as previously stated the regulatory regime, with new oversight and Self-containment documentation would improve integrity and public trust in the system. Therefore, if a vehicle has the "new" warrant card and Documents, it MUST be Certified Self-contained irrespective of the vehicle type. An additional check can be made by authorities through the New Self-contained vehicle database to easily prove or disprove authenticity of certification.

Both option 2 and 3 state that the exclusion of certain vehicles would "add on-the-ground difficulties for enforcement officers in terms of identifying an excluded vehicle". This is incorrect as the identification of excluded vehicles would be made at the time of certification. No further work is required of the enforcement officers than with any other certified vehicle, i.e., if the vehicle has the warrant card and documents and is listed in the database it must meet the requirements of the standard and be certified. The identification of a vehicle to meet the requirements of either option 1 or 2 falls on the vehicle inspector and the issuing authority at the time of certification, not the local body inspection officer.

Other types of vehicles that should be excluded

All vehicles that meet the current standard with a non-fixed toilet should be excluded from the fixed toilet requirement. These vehicles are practically unable to have a fixed toilet inserted into them, given the amount of space required to put in a cassette toilet. Such vehicles could continue to have a portable toilet. Other than this requirement, these vehicles would still need to meet other self-containment regulatory requirements and pay the self-containment monitoring levy.

Chapter 6: Levies and fees

Levies and fees of issuing authorities is outside the scope of this club submission apart from the end user costs. Our associated issuing authority, NZ Lifestyle Camping is better placed to comment here.

Any new imposed levies and fees will impact the end user with the increased cost of self-containment certification. The proposed new PDGB levy along with increased issuing authority fees may put certification out of financial reach for some, particularly considering the increased cost of meeting the requirements of the standard with a fixed toilet.

Chapter 7: The Timeline for regulatory changes

The two year timeframe for this legislation to be fully enacted appears to be sufficient as the PDGB has already been granted funds to make it happen, even before the bill has been passed into law. Our main concern with this timeline is that after 2 years, any existing certifications will be null invoid irrespective of expiry date. I understand that under the Legislation Act 2019 section 12, Retrospective legislation cannot be implemented.

If required, I am more than willing to speak on this submission.

Submitted on (06-10-2022)
by The All Points camping club of New Zealand
Wayne Ravelich Club President

W. R Ravelich