

#90

COMPLETE

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Page 3: Submitter information

Q1

Name

Victoria van der Spek

Q2

Email address

vvanderspek@waitaki.govt.nz

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.:
Waitaki District Council**Q5****Local Government (or related entity)**

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**Respondent skipped this question**

Privacy information

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:

WDC considers that the reduction cost to the vehicle owner would incentivise compliance with the requirements. The less prescriptive approach will allow development of solutions that work in different situations. Implementation will be an issue as inspectors will have different levels of understanding of the requirements and may not be applied consistently.

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:

WDC disagrees with this approach as there is no room for innovation. There is no one size fits all with the types of campers, and this approach will disincentivise owners.

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

Q12

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:

WDC considers that it is essential that there is a standardised system of certification to remove ambiguity and incorrect interpretation of the rules.

Q14

Agree

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

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:

WDC considers that an ability to audit the certification providers will incentivise compliance with the required standards and reduce the likelihood of poor practices.

Page 6: Competency requirements for vehicle inspectors

Q18

Neither agree nor 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:

WDC considers there is a need to be knowledgeable to find solutions that can often only be found with the ability to be flexible.

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:

WDC considers that there are often people with transferable skills who can demonstrate knowledge in the relevant areas who are just as capable as those with a trade qualification. There should be scope to accommodate these scenarios.

Q22

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:

WDC considers that this option would create a process that is too prescriptive and does not allow for the options above.

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:

WDC considers that this would allow more options for owners to ensure they have access to a certifier.

Page 8: Chapter Three: Self-containment documentation

Q26

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:

WDC considers that from an enforcement perspective, Council would only be concerned with the fact it is certified, by whom and when it expires.

Q28

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:

WDC considers that for enforcement purposes, the minimum amount of information required is sufficient.

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:

WDC considers that this amount of information assists with enforcement.

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

Agree

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:

WDC considers that the ability to display fraudulent stickers should be removed. Only the certificate is adequate for enforcement purposes.

Q36

Disagree

To what extent do you agree with Option 2: having another generic identifier?

Q37

Respondent skipped this question

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

Page 11: Chapter Four: Infringement fees

Q38

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:

WDC considers that a significant deterrent exists for the more serious offending. Current fines are out of proportion for the costs of enforcement.

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:

WDC considers there is a significant deterrent exist for the more serious offending. Current fines are out of proportion for the costs of enforcement. Although \$1000 has been described as too harsh, WDC considers that this amount is still appropriate and is a significant deterrent.

Page 12: Chapter Five: Exclusions from regulatory requirements

Q42

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:

WDC considers that having certain older or small vehicles exempted may encourage those wishing to circumvent the regulations to purchase and use only those classes of camper. It may see a disproportionate number of those types of vehicles in use and subsequently having a negative impact on freedom camping areas where self-containment is required. This could also impact on the ability to enforce the same requirement to be certified on other vehicles, as some would see it as unfair (why do I have too when, when they don't).

Q44

Disagree

To what extent do you agree with Option 2: excluding smaller freedom-camping vehicles from the requirement to have a fixed toilet?

Q45

Respondent skipped this question

If you would like to say something more about your answer to Question 44, please do so here:

Q46

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

Respondent skipped this question

If you would like to say something more about your answer to Question 46, please do so here:

Q48

Don't know

Are there other types of vehicles that should be excluded?

Q49

Respondent skipped this question

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?):

Page 13: Chapter Six: Fees and levies

Q50

Don't know

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

Don't know

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

Don't know

To what extent do you agree with Option 3: levy of \$120?

Q55

Respondent skipped this question

If you would like to say something more about your answer to Question 54, please do so here:

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

Respondent skipped this question

If you would like to say something more about your answer to Question 56, please do so here:

Q58

Don't know

To what extent do you agree with Option 2: a scalable fee?

Q59

Respondent skipped this question

If you would like to say something more about your answer to Question 58, please do so here:

Page 15: Waivers and refunds

Q60

Don't know

To what extent do you agree with the proposal for granting waivers and refunds?

Q61

Respondent skipped this question

If you would like to say something more about your answer to Question 60, please do so here:

Page 16: General comments

Q62

Respondent skipped this question

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

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.
