

Section 4: Impact Analysis

Marginal impact: How does each of the options identified in section 3.1 compare with taking no action under each of the criteria set out in section 3.2?

Criteria	No action	Option One package	Option Two package	Option Three package
Decrease in inappropriate disposal of waste/litter, breaches of freedom camping bylaws and notices	0	<p>+</p> <p>Self-contained vehicles will have adequate facilities.</p> <p>Stronger enforcement options will be strong incentive for better behaviour.</p>	<p>++</p> <p>Clear national expectation about freedom campers having a toilet available to use wherever staying, unless in wilderness area.</p> <p>Self-contained vehicles will have adequate facilities.</p> <p>Stronger enforcement options will be strong incentive for better behaviour.</p>	<p>++</p> <p>Clear national expectation about having a toilet on-board vehicle when freedom camping in a vehicle.</p> <p>But people can choose to camp in a tent away from facilities.</p> <p>Self-contained vehicles will have adequate facilities.</p> <p>Stronger enforcement options will be strong incentive for better behaviour.</p>
Increase in public confidence in system to manage freedom camping	0	<p>+</p> <p>Public will have confidence a certified self-contained vehicle has adequate facilities.</p>	<p>++</p> <p>Public will have confidence a certified self-contained vehicle has adequate facilities and that freedom campers using non-self-contained vehicle and tents are required to stay at a site with toilets, unless in wilderness area.</p>	<p>++</p> <p>Public will have confidence vehicle-based freedom campers all have adequate facilities on board.</p>
Compliance and administration costs are low	0	<p>++</p> <p>People can choose to camp in non-self-contained vehicle, provided they also abide by freedom camping bylaws and notices.</p> <p>Owners of self-contained vehicles face relatively low certification fee.</p>	<p>+</p> <p>People can choose to camp in non-self-contained vehicle, if they stay at sites with toilets.</p> <p>Owners of self-contained vehicles face relatively low certification fee.</p> <p>Some owners may opt to convert vehicles (basic conversion costs \$500-\$800).</p>	<p>-</p> <p>Some private owners and rental vehicle businesses will have to convert their vehicles to self-contained (basic conversion costs \$500-\$800).</p> <p>Owners of self-contained vehicles face relatively low certification fee.</p>

Criteria	No action	Option One package	Option Two package	Option Three package
New Zealanders' accessibility maintained for recreation or tourism through freedom camping	0	- Compliance costs will have moderate impact on low income New Zealanders.	- Compliance costs will have moderate impact on low income New Zealanders.	-- Compliance costs will have large impact on low income New Zealanders.
Overall assessment		+	++	+

Key:

- ++ much better than doing nothing/the status quo
- + better than doing nothing/the status quo
- 0 about the same as doing nothing/the status quo
- worse than doing nothing/the status quo
- much worse than doing nothing/the status quo

Section 5: Conclusions

5.1 What option, or combination of options is likely to best address the problem, meet the policy objectives and deliver the highest net benefits?

Feedback on the options from stakeholders is required to develop a firm conclusion.

Our preliminary assessment is that the Option Two package of measures is likely to be the most cost-effective.

- It is likely to have the same level of impact on freedom campers' behaviour as Option Three and to therefore reduce the incidence of freedom campers inappropriately disposing of waste and litter or breaching freedom camping bylaws and notices, with consequent benefits for communities.
- It can be implemented with low associated costs (Option One could be implemented at slightly lower costs, but does not deliver the scale of benefits).

We do not have sufficient information yet to be able to quantify expected net benefits and we anticipate that the public consultation process will provide information to further inform a cost-benefit analysis (qualitative data and quantification).

5.2 Summary table of costs and benefits of the preferred approach

Additional costs of proposed approach compared to taking no action

Affected parties (identify)	Comment: nature of cost or benefit (eg, ongoing, one-off), evidence and assumption (eg, compliance rates), risks	Impact \$m present value where appropriate, for monetised impacts; high, medium or low for non-monetised impacts	Evidence certainty (High, medium or low)
Regulated parties	Total annual recovered cost for regulatory regime	\$3 m (opex) (Perhaps about \$125 per vehicle if certified every four years)	Low
	Conversion costs	At least \$500 per vehicle for those vehicle owners opting to convert	Medium
Regulators	More local authorities may need to implement a freedom camping bylaw to address the 'urban area' and 'regional parks' exemptions	Unknown – possibly moderate	Low
	Crown capital and operational investment in establishing regulatory regime for self-containment requirements	\$1.43 m (capex) \$0.15 m (opex) (alternatively, this could be cost recovered from regulated parties, adding perhaps \$65 per vehicle)	Medium

Wider government	Costs to implement information programme for freedom campers (Crown and territorial authorities)	\$1 m	Low
Other parties	Rental vehicle companies are included as a regulated party above, but they will also have other costs, eg provision of updated information to their customers about new requirements	Unknown – probably low	Low
Total Monetised Cost		\$5.58 m	
Non-monetised costs		Possibly moderate	

Expected benefits of proposed approach compared to taking no action

Affected parties (identify)	Comment: nature of cost or benefit (eg, ongoing, one-off), evidence and assumption (eg, compliance rates), risks	Impact \$m present value where appropriate, for monetised impacts; high, medium or low for non-monetised impacts	Evidence certainty (High, medium or low)
Regulated parties	Increased public trust in the self-contained vehicles some use, and improved tourism experiences	Low	Medium
Regulators	Fewer offences to deal with and therefore lower management costs	Medium	Medium
Wider government		Low	Low
Other parties	Businesses may experience higher demand for more premium, self-contained vehicles The public will have increased confidence in the management of freedom camping and will experience less loss from harms generated by freedom campers	Low Medium	Low Medium
Total Monetised Benefit			
Non-monetised benefits		Low	Medium

5.3 What other impacts is this approach likely to have?

Increasing requirements for self-containment is likely to have some impacts on the vehicle market. There is uncertainty about the extent to which any of the options may lead to vehicle owners retiring vehicles from the fleet or converting them to other uses.

There may be localised environmental benefits from better management of sites (less pollution).

The impacts on homeless people should be minor if the Freedom Camping Act 2011 is amended to clarify it does not apply to people sleeping in vehicles because they are homeless. Further work is required to identify how to implement such an exclusion on the ground, ie what guidance and tools will enforcement officers need to be able to distinguish when to provide support to someone staying in a vehicle because they are homeless, and when to take enforcement action against freedom campers committing offences. MBIE will seek input on this issue from councils and social sector agencies during the public consultation.

Section 7: Monitoring, evaluation and review

7.1 How will the impact of the new arrangements be monitored?

The impacts will be monitored through regular contact with the regulators, stakeholder groups, and the Responsible Camping Working Group. In addition, MBIE runs an annual Responsible Camping investment round, from which we receive monitoring reports about freedom camping by region.

7.2 When and how will the new arrangements be reviewed?

There are no specific plans for review at this time.

Once the borders re-open it is expected that global tourism will take time to recover. We will need to wait until tourism numbers have recovered, and we have seen at least a few freedom camping seasons, before we are able to review the effectiveness of the new arrangements.

In the interim, we will use regular stakeholder meetings and the monitoring associated with Responsible Camping funding rounds to monitor whether there is a need for review.