

Ministry of Business, Innovation and Employment

Responsible Camping Submission

11/05/2021

Submission comments

1. Proposal 1 or 2

Spaceships support Option 2. This allows all non-self-contained vehicles (cars, vans, trucks, 4WDs..) to stay at camping areas with toilets. This is a practical solution.

Spaceships provide non-self-contained multipurpose vehicles that are used as a car or a camper. Via our original literature dating back 16 years and now via our own camping App for the last six years, Spaceships have only ever promoted and displayed campsites that have toilets (proposal 2). We effectively adopted proposal 2 on our own 16 years ago.

This mixed approach of using technology and education works very well. Spaceships' Travellers have time to plan and prepare and are therefore organized and generally very respectful towards our environment - more so than most kiwis. They can then use our camping app daily to plan and ensure they have the facilities and services they need accessible to them each day and night.

2. Proposal 3

The principle of improving the regulatory tools makes some sense so long as the options are well considered, discussed openly with all other stakeholders and the correct changes are made.

My concern is the varied interpretation of the rules, and fines being issued to people for cooking and taking a nap. This would have to change if the fine was increased as it is simply unjust.

Listening to Adrian Humphries from the Tasman District Council he expressed a number of concerns over the 20/21 season.

1. The majority of infringements issued to non SC vehicles in his district are for being in the wrong location NOT FOR THE WRONG BEHAVIOUR.
2. He issues fines to people in CSC vehicles for pooing outside their vehicles.
3. What will the end result be for the enforcement officer, the council, the vehicle owner, the off shore Travel Agent and brand NZ for issuing \$1000 fines to people for being in the wrong location, cooking, or taking a nap due to driver fatigue (seemingly all deemed as preparing to freedom camp).
4. How will the councils collect \$1000 fines from all the privately owned vehicles? These vehicles make up over 90% of the problem.

5. Clarity is needed around the ultimate liability of any fines received, especially when it is overturned by the card holders bank.

3. **Proposal 4**

Plumbed Toilets

- These are not required and are an unnecessary cost to retro fit to the majority of SC vehicles in NZ already.
- The extra holding tank will add further weight to the vehicle and in a lot of cases exceed the current 3500kg limit to be on a standard licence and WOF.
- A large % of people who use a SC vehicle would rather not use the toilet inside the vehicle. They prefer an external toilet. This leads to more people than you would think going in the bushes.
- The current CSC Standards are good and enable an inclusive environment that supports as many road users as possible to become self-contained. Don't make this any harder.
- The thinking that making SC vehicles have a plumbed toilet will help reduce the problem is completely flawed. It will make no difference at all.
- As a country with a growing population and more people on our roads we need more public toilets for all road users to support all forms of recreation during the day and the night.
- Fishermen, cyclists and surfers are particularly large contributors (must be 100,000 plus) in mainly privately owned vehicles who spend large amounts of time on our roads and in the countryside. Do they all need to have a self contained vehicle, a plumbed toilet or should we be saying lets ban them also?! It is simply ridiculous. Build some toilets where they are needed.

I would replace the current proposal 4 with the below

"Make it mandatory for international visitors who want to self-drive in a vehicle with a bed in it to hire a vehicle".

This proposal would eradicate the uncontrollable private vehicle market, the fake self-containment stickers, dodgy set ups, the lack of standards and education and make any fine collection more achievable for local councils directly via the commercial operators.

All commercial operators must be accredited via Qualmark. Non-self-contained vehicles must all use the Camper Mate app and educate their customers on where they can stay (campsites with toilets only).

Use Qualmark as the vehicle to ensure all commercial operators are operating a safe, compliant and sustainable business, are educating visitors around driver safety, where to camp and how to behave..

This solution would solve maybe 20-30% of the problem (international visitors) as well as make regulatory tools easier to successfully implement and manage. It would also support local businesses.

Commercial operators could add a vehicle buy back option like they do in Australia to help position the offering better for long stay visitors. The vehicle would always stay under the business name though.

General thoughts

The discussion is way too narrow in its focus. It doesn't capture all road users and misses some major specialist groups like cyclists, surfers and fisherman. Why are we not discussing these huge categories of road users that venture out and overnight? They massively exceed the commercial fleet numbers of non-self-contained vehicles and beef up the private vehicle numbers well past 100,000. They need to be acknowledged and discussed.

The beat up on the commercial sector is discriminatory and engineered to target just a few commercial self-drive operators and doesn't detail how it will address the majority of the issue, being privately owned vehicles.

Further to this it has the potential to do more harm than good for our values, local participation in outdoor recreation, our visitor experience, front line enforcement officers and ultimately brand NZ if the wrong regulatory changes are made.

Having council bylaws that supersede national standards creates a mess. It has been a mess for 15 years or so. Commercial operators have been targeted over and over when the real problem is ignored. On top of this mess a \$1000 fine could be added and issued to what in a lot of the cases sounds like people in the wrong location (complexity and lack of education), cooking a feed or taking a break vs bad behavior.

Further to this local enforcement officers have varied interpretation of the rules. For example; If you have a vehicle with a bed in the back and you pull over to have a power nap you can be issued a fine for freedom camping for being in the bed but you wouldn't get a fine if you were in the front seat. You could also be issued a fine for making a cup of coffee or cooking lunch in a rest area as you are deemed as getting prepared to freedom camp. Clearly this is just ridiculous.

A new marketing campaign

The term 'freedom camping' has been kicked around for a long time now and has a lot of negativity around it. Why not drop this and replace it with something like 'responsible traveler'. This enables a clean and positive start and supports a broad and inclusive educational approach to all road users in NZ to be a tidy kiwi and plan their days and nights on our roads appropriately, so they have the services and facilities they need each day and night to be a 'responsible traveler'. This content is all there already in the Camper Mate App that is available to everyone.

Let's stop the discriminatory thinking and take an honest look at what is happening and create a plan that supports all road users better and helps regional NZ. 'Responsible traveler' could be adopted, marketed nationwide to kiwis and at our airports to all arrivals and we all get behind a positive and supportive campaign to play our part to clean up NZ.

This campaign would help drive awareness of the regional differences too if these still apply in the future. The educational support has to be provided, particularly if regulatory tools are changed and higher fines are in place.

Kiwis that freedom camp

Will there be different rules for a kiwi vs a tourist?

Why are we not addressing the behavior of kiwis who freedom camp and other groups who fish, cycle and surf? Picking on the tourists is not addressing the real problem.

Most of the international visitors who hire a Spaceship and use it as a car or a camper are better behaved and more respectful to our environment than most kiwis are.

Around 100,000 Kiwis 'freedom camp' each year and make up around 50% of people freedom camping. A lot of them don't care for the rules and will camp where they like. Issuing them \$1000 fines will lead to threatening behavior, violence and assaults on enforcement officers plus add further negativity and resentment towards the Government by interfering in their birthright.

Fines

- Increasing the fine to \$1000 with so many variances in rules around the country could be a very bad political move.
- Will kiwis be issued the same increased fine?
- Tourists visiting will be left with a very sour taste if they receive a \$1000 fine for being in the wrong location, having a nap because they were tired or making breakfast. Our rules are so complicated and simply not practical. This will impact local business, international relationships with travel agents and ultimately brand NZ.
- In the Tasman District the majority of fines are for people in the wrong location (complexity of rules and lack of education?) not for the wrong behavior.
- Liability of the fine cannot ultimately sit with the rental company if a customer cancels their credit card or their bank overrides the charge. This happens a fair bit already with other charges so a \$1000 fine will get overturned more often than a \$200 fine meaning very limited revenue collection potential.

Offenders

Just focusing on people in non-self-contained vehicles is a political move and does not properly address the issue at all. By 2022 there could be as few as 1000 non-self-contained commercial vehicles on the road. There will be over 100,000 private vehicles. There will be tens of thousands of cyclists, surfers and fisherman. A large amount of fisherman overnight at the canals and other lakes and locations.

Some people use a non-self-contained commercial camper as an alternative to a car rental. You cannot assume they all poo everywhere because they don't have a toilet onboard. That is so far from the truth. A Spaceships customer stays for 17 days on average in the summer vs a small private vehicle owners 40-50 days. They are different people with different travel styles.

- The private vehicle market is the main culprit. By sheer volume they absolutely dominate vehicles on the road. These include Motorhomes, Caravans, tradie vans, station wagons / cars, vehicles with tents, 4WDs with roof tents. This sector also includes groups that surf, fish, cycle.. these three activities alone would have to equate to over 100,000 small to medium size private vehicles.
- Kiwis play a major role in polluting our environment in a number of ways. Why is this not being discussed and addressed?
- Adrian Humphries (Tasman District Council) confirmed he is issuing fines to people in self-contained vehicles that are pooing outside their vehicle. Of course they do!
- Adrian also confirmed 90% of fines issued to non SC vehicles are for being in the wrong location, not for the wrong behavior.
- Adrian also confirmed this has been his worst season yet. Local market only.
- Cyclists and fisherman have to be offending all over NZ in record numbers. Why are we not discussing that?

Infrastructure

All people on our roads get 'caught short' or are 'offenders' at some time. We have a growth trend in population and in people spending time in nature. Our infrastructure needs to support this trend and provide facilities to support people being out and about.

- Where is the vision for the future infrastructure needed to play catch up and sustainably support a high value visitor and local experience for all road users?
- How do we deliver on brand NZ without a long-term vision and plan to invest in infrastructure each year?
- How do we support all road users and people who choose to camp responsibly without building more facilities as our population grows?
- How do we protect and restore our environment without improved infrastructure as our population grows and demand grows to spend more time on our roads and in our nature?
- Why is this so negative. Where is the vision to create something really special, that we can be proud of as a country, that encourages more kiwis to get out and about and enjoy our amazing country.
- The opportunity to lift social, family and wellbeing gains are massive with the right support and investment by central government.
- Stop passing the buck to councils who cannot make it happen. Grab it centrally and lets create the greatest self-drive, cycle and touring destination on earth.

Education

Education to shape behaviour is the key ingredient along with sustained investment in infrastructure in the right locations. The number of people on our roads has grown significantly over the last 10 years and will continue to do so. The country needs more toilets to better cater to the growth for all people using our roads.

- Just because someone is travelling in a self-contained vehicle it doesn't mean they care about the environment and don't litter or poo in a bush.

- Having an education lead strategy helps shape a better attitude and influence behaviors that flow onto helping clean up NZ.
- Kiwis are a large part of the problem. They need to be educated more than our visitors.
- How many tourists throw nappies, broken appliances, fast food rubbish and bottles out their windows when driving around?
- Some honest truths on these issues are needed.

Problem areas I have experienced

The problem still exists with the boarders shut. I have seen it first-hand. Do we ban people fishing the Twizel canals unless they carry a toilet with them? Do we ban people cycling the canals and outside of a built-up area unless they tow a portable toilet?

The Canals

In November 2020 (boarders were closed) I visited the Twizel canals for four days fishing. There were hundreds of piles of human waste and toilet paper sitting on top of the ground in amongst the young pine trees 15m beside the road.

This fishing resource is used day and night. It is an amazing resource but desperately needs some toilets. There must be between 50,000-100,000 people fishing these canals each year.

The only vehicles I saw over the four days were Motorhomes, private vehicles and cyclists. These people are pooing in the woods right beside the road.

SOLUTION – Build some toilets like they did beside Lake Coleridge and solve the problem.

Lake Lyndon

I go here regularly over summer when the weather allows and so do hundreds of others. Some days there are 200+ people enjoying the lake at the far end and no public toilet. There is a human waste issue there too. There is DOC land at the head of the lake and an area ideal for a basic DOC camp. Build one!

SOLUTION – Build some toilets!

DOC

DOC needs to modify their network to be match fit for tomorrow and the future. To do this they need to create 25-50 new basic DOC camps in some more accessible locations to 'fill the gaps' and get their network match fit to support the increase in domestic and international camping, cycling and outdoor recreation.

The global trend

Covid, technology gains, flexible work from home options are driving a growing demand for people to spend more time in nature and on our roads. Infrastructure is needed to support these people and enable them to be tidy kiwis.

Just as a population grows in a city we need more schools, houses, hospitals.. as the numbers build on our roads and backcountry we need more toilets and rubbish collection.

Having a narrow focus and rushing policy through to target the minority of the problem never works well.

We need to stop being so third world, take an honest look at what is going on and get on with building more toilets for all people out and about, day tripping or staying over night. It is embarrassing that as a country we are not being honest and properly addressing this issue. All people on our roads get caught short from time to time and are therefore offenders. They would love to use a nice clean toilet so let's build some more.

I pulled over on a family holiday last Christmas as a friend's kid had to go. No toilet to be seen for ages so we pulled up to an area we could pull over safely in. There were nappies and all sorts of rubbish scattered around in the bush. This is pretty standard unfortunately throughout NZ. My oldest son and I picked it all up and loaded up a rubbish bag and disposed of it when we arrived at our destination.

Our population continues to grow, outdoor recreation continues to boom, flexible work arrangements enable further time out and about. All this equals yoy record growth on our roads and in our backcountry. We need a vision and a plan that supports this amazing way of life and encourages all people to get out and enjoy our incredible back yard.

The private sector

Some of the private sector does a great job in educating their customers. Spaceships has been bold from day 1 back in 2004 and told it's customer they cannot freedom camp, and here is where you can stay – DOC camps, Holiday parks and other camp facilities with toilets. This likely impacted our sales but we took the long-term view that we needed to educate our customers, so they looked after our country and helped to build better communities.

Our customers are not the problem. They are generally sophisticated humans that are well organised and environmentally savvy. They like our excellent customer service, our brand culture and excellent support and guidance and find our product a great alternative to a standard car rental. They stay for around 17 days in summer and 11 in winter and like to enjoy the services and facilities of campgrounds and other accommodation facilities.

I firmly believe Spaceships is part of the solution and not the problem. This is driven by our internal protocols around where we tell our customers to camp. We have successfully educated our customers since 2004 via multiple touch points pre arrival and via our Camping App that only shows them campgrounds with toilets. When they are travelling and using our App they cannot see any freedom camping sites, only serviced camping options.

Summary

Where is the vision? Where is the plan to make New Zealand the greatest touring, cycling, self-drive and outdoor recreation country on Earth? Where is the infrastructure plan to support this? Where is the positive dialogue on this?

Without a fully honest look at what is happening and a willingness to invest properly to build a world class-touring destination with first class infrastructure to support all road users we are missing a massive opportunity for brand NZ.

We have so many incredible locations that could very easily become wonderful camping areas that further support health and wellbeing, family time and wonderful adventures. If we can unite more to simplify our rules and invest under a national focus we could create the most incredible playground on earth that is sustainable, environmentally lead, innovative and great for regional economies and communities.

Instead, it looks like we are going down the road of complexity and penalties. This is a very negative path for kiwis and tourists alike.

It feels like we are wasting an incredible opportunity to create something very special. A touring destination that is linked and cohesive in all respects. That offers innovative, portable self-sufficient accommodation, e bike charging stations, smart toilets, recycling...

This needs to be driven from the top and would be a legacy strategy for those that took it on. Facilities that range from basic camping to 5 star huts, beautiful picnic areas, lots more toilet facilities, camping areas, bike trails ...

This would support all sorts of businesses like fishing and hunting guides, art, mediation, rafting, kayaking, photography, horse riding, cycling...

My personal background in tourism started 22 years ago in Eco Tourism in Australia. I drove 36,007km around Australia over 6 months and stayed in every Eco Resort they had. We have planted 25,000 native plants on our 200 hectare conservation park, we partner with places like Blue Duck Station via our coach touring businesses. We are gold and silver Qualmark rated.

We lead the way when it comes to giving a shit about NZ and have done so for a long time. We need a Government that can grab the opportunity, transform the narrative and allocate the infrastructure funding to turn NZ into the greatest touring network on earth.

James Rolleston
CEO Spaceships Limited (2004 to current)
Lover of NZ and our environment