

# #45

**COMPLETE**

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Page 3: Submitter information

## Q1

Name

Alan Morton

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## Q2

Email address

Privacy of natural persons

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## Q3

**Yes**

Are you happy for MBIE to contact you if we have questions about your submission?

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## Q4

**No**

Are you making this submission on behalf of a business or organisation?

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## Q5

**Individual**

The best way/s to describe your role is:

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## Q6

**Yes**

Do you own a vehicle that you use for camping? (Either for freedom camping or other sorts of vehicle-based camping)

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## Q7

**Respondent skipped this question**

Privacy information

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Page 4: Chapter One: Self-containment technical requirements

**Q8**

**Agree**

To what extent do you agree with Option 1: 'light-touch' performance-based requirements?

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**Q9**

If you would like to say something more about your answer to Question 8, please do so here:

Enables innovative solutions to setting a vehicle up for CSC.

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**Q10**

**Disagree**

To what extent do you agree with Option 2: prescriptive approach to setting technical requirements?

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**Q11**

If you would like to say something more about your answer to Question 10, please do so here:

Often, following 'the letter of the law' to an installation makes no difference to the outcome, when a simpler solution can achieve an acceptable outcome.

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

**Q12**

**Agree**

To what extent do you agree with Option 1: Multiple-pathway approval criteria and competency requirements?

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**Q13**

**Respondent skipped this question**

If you would like to say something more about your answer to Question 12, please do so here:

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**Q14**

**Disagree**

To what extent do you agree with Option 2: more rigorous and prescriptive certification approval criteria?

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**Q15**

**Respondent skipped this question**

If you would like to say something more about your answer to Question 14, please do so here:

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**Q16**

**Disagree**

To what extent do you agree with Option 3: Third-party review of certification authority systems?

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**Q17**

Respondent skipped this question

If you would like to say something more about your answer to Question 16, please do so here:

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Page 6: Competency requirements for vehicle inspectors

**Q18**

Agree

To what extent do you agree with Option 1: requiring vehicle inspectors to be knowledgeable?

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**Q19**

Respondent skipped this question

If you would like to say something more about your answer to Question 18, please do so here:

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**Q20**

Strongly disagree

To what extent do you agree with Option 2: requiring vehicle inspectors to have a relevant trade qualification?

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**Q21**

Respondent skipped this question

If you would like to say something more about your answer to Question 20, please do so here:

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**Q22**

Strongly disagree

To what extent do you agree with Option 3: requiring vehicle inspectors to be assessed as “fit and proper”?

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**Q23**

Respondent skipped this question

If you would like to say something more about your answer to Question 22, please do so here:

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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?

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**Q25**

Respondent skipped this question

If you would like to say something more about your answer to Question 24, please do so here:

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Page 8: Chapter Three: Self-containment documentation

**Q26**

**Strongly agree**

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?

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**Q27**

If you would like to say something more about your answer to Question 26, please do so here:

The Certificate should show all relevant detail so that future owners of the vehicle can see what the specifications were at the time of assessment.

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**Q28**

**Strongly disagree**

To what extent do you agree with Option 2: a simplified self-containment certificate?

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**Q29**

**Respondent skipped this question**

If you would like to say something more about your answer to Question 28, please do so here:

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Page 9: Self-containment warrant

**Q30**

**Strongly agree**

To what extent do you agree with the option for the self-containment warrant?

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**Q31**

If you would like to say something more about your answer to Question 30, please do so here:

Keep the same format as the old Warrant Card, but change the colour to white, as blue, red or green will fade quickly. Black text on white plastic is easier for Inspectors to read.

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**Q32**

Please list any additional information that you think should be collected on the warrant.

Maybe incorporate a QR code that Inspectors can scan to check on the database.

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**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.

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Page 10: Generic Identifiers

**Q34**

**Strongly agree**

To what extent do you agree with Option 1: not having a generic identifier?

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**Q35**

If you would like to say something more about your answer to Question 34, please do so here:

A green sticker is not necessary - the old blue sticker was a total waste of time under the Standard. A new version of the warrant card and a paper copy of the Certification is all that is required.

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**Q36**

**Strongly disagree**

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

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**Q37**

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

Warrant Card and the paper Certificate is sufficient.

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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?

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**Q39**

**Respondent skipped this question**

If you would like to say something more about your answer to Question 38, please do so here:

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**Q40**

**Strongly disagree**

To what extent do you agree with Option 2: a tiered approach infringement fee to a maximum of \$1000?

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**Q41**

**Respondent skipped this question**

If you would like to say something more about your answer to Question 40, please do so here:

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Page 12: Chapter Five: Exclusions from regulatory requirements

**Q42**

**Strongly disagree**

To what extent do you agree with Option 1: no exclusions from regulatory requirements?

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**Q43**

Respondent skipped this question

If you would like to say something more about your answer to Question 42, please do so here:

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**Q44**

Strongly agree

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

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**Q45**

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

There are many well equipped small vans, tear-drops and caravans which can comply with the current Standard with a portable toilet - i.e. in a permanent location where it can be used at any time with the bed fully made up. These owners should not be penalised because of 'sleeper cars'. It would be simpler by far to get rid of the 'fixed toilet' idea completely and simply state that the vehicle must have 1.5m headroom (floor to ceiling) above the toilet, regardless of the type or model of toilet. This would be far simpler to administer for compliance than the whole 'fixed toilet' idea. Portable toilets are no different to cassette toilets.

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**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)

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**Q47**

Respondent skipped this question

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

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**Q48**

Yes

Are there other types of vehicles that should be excluded?

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**Q49**

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?):

Just exclude any vehicle which does not have 1.5m clear space (floor to ceiling) in the positioning of the toilet. That will automatically get rid of the 'sleeper cars' with the portable toilet in the boot.

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Page 13: Chapter Six: Fees and levies

**Q50**

Disagree

To what extent do you agree with Option 1: levy of \$91.40?

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**Q51**

If you would like to say something more about your answer to Question 50, please do so here:

The Board will need funds to be efficient in running the Certification Scheme.

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**Q52**

**Disagree**

To what extent do you agree with Option 2: levy of \$101?

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**Q53**

If you would like to say something more about your answer to Question 52, please do so here:

The Board will need funds to be efficient in running the Certification Scheme.

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**Q54**

**Agree**

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

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**Q55**

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

The scheme needs to be effective and efficient, and this requires adequate funding. \$30 per year over 4 years isn't onerous.

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Page 14: Certification Authority Application Fee

**Q56**

**Agree**

To what extent do you agree with Option 1: a set fee of \$431.25?

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**Q57**

**Respondent skipped this question**

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

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**Q58**

**Disagree**

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

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**Q59**

**Respondent skipped this question**

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

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Page 15: Waivers and refunds

**Q60**

**Agree**

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

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**Q61**

**Respondent skipped this question**

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

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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?

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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

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**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.

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