

5 October 2022

Ministry of Business, Innovation and Employment
15 Stout Street
PO Box 1473
Wellington 6140

Attention: Responsible camping submissions

Thank you for the opportunity to submit on the Freedom Camping Regulations.

1 Self Containment

Question 1: We fully support the “light touch” performance-based option 1. Will keep costs for vehicle owners at a lower level. It would not require frequent updates. It will be important for the formal guidance provides vehicle inspectors with sufficient information to make informed decisions.

Question 2: We do not support option 2 to take a prescriptive approach. We agree with the comments in the discussion document regarding this option, especially regarding innovation in the motorhome technology.

2 Self-containment certification authorities and vehicle inspectors

Question 3: We support option 1 being a robust approach to approvals with multiple pathways. We support the rational shown for this option.

Question 4: We do not support option 2. There is a need to limit costs as much as possible for issuing authorities and vehicle owners.

Question 5: We do not support option 3. Although this would provide a very high level of certainty that the required processes were in place, the increased costs would be problematic.

Question 6: We support option 1 requiring vehicle inspectors to be knowledgeable. We agree with comments in the discussion paper regarding this option.

Question 7: We do not support option 2 requiring vehicle inspectors to have a trade qualification. As long as the inspectors are well trained, and their work is audited, then a trade qualification is not required.

Question 8: We do not support option 3 that vehicle inspectors should be assessed as fit and proper. Costs would be increased to all parties which when would then be passed on to vehicle owners.

Question 9: We support certifying plumbers as being certification authorities and vehicle inspectors.

3 Self-Containment documentation

Question 10: We do not support option 1 to continue to record the details of a vehicles self-containment facilities on the self-containment certificate.

Question 11: We support option 2 providing for a simplified self-containment certificate. If we have trust in the system and the process, then there is no need to replicate the details of the self-containment facilities

Question 12: We agree with the option to change the colour of the warrant to green. As there is a recommendation that the Generic Identifier be done away with, then an option is to provide two warrants with one to be displayed on the rear of the vehicle. Part of the original decision to go with a generic identifier was to make it easy for enforcement officers to identify self-contained vehicles. This may now have been overcome with the database, but it should still be considered.

Question 13: We do not think that there is any additional information that should be collected.

Question 14: The amount of information that is being collected is correct

Question 15: We agree that there is no reason to provide a generic identifier. This has proven problematic in the past with stickers being used in a fraudulent manner. We do believe that there may be benefit in issuing two warrants, with one being displayed on the rear of the vehicle.

Question 16: We do not support having a generic identifier.

4 Infringement fees and fines

Question 16: We do not support a tiered approach to the level of infringement fees to a maximum of \$800. We believe that the damage caused at the higher end of offending is worthy of a significant fine.

Question 17: We fully support a tiered approach to the level of infringement fees at a maximum of \$1,000. As stated in the discussion document this level is similar to the Department of Conservation levels. We do not believe that a \$1,000 fine for significant damage would be considered harsh nor would it discourage compliance.

5 Exclusions from regulatory requirements.

Question 19: We strongly support not permitting any exclusions from the new regulatory requirements. Allowing exclusions would put in jeopardy the whole process of passing new legislation and regulations to manage freedom camping. Past experience has shown that people will use any extraordinary means to get around existing bylaws and legislation. We do not want to risk the impact and intent of the new legislation. Any exception would prove very difficult for enforcement officers to manage.

Question 20: We strongly oppose allowing smaller freedom camping vehicles from the requirement to have a fixed toilet. Smaller vans and their toilet facilities, or lack of toilet facilities, has been a major issue over the bad years of freedom camping and it is essential that an exemption is not allowed.

Question 21: We strongly oppose excluding vintage vehicles from the requirement to be certified as self-contained. There is no reason for vintage vehicles be given an exemption.

Question 22: We do not believe that there should be exemptions from the self-contained regulations for any vehicles. The risk of allowing even a small number of vehicles exemptions is too great. By keeping the regulations simple and consistent we have a much better chance of them being effective.

6 Levies and Fees

Question 23: We do not support the levy of \$91.40.

Question 24 We support a levy of \$101. We believe that this amount is not unduly high and will provide the PGDB with sufficient funds to manage the scheme. Based on 18,250 self-contained vehicles per annum this would raise over \$1.8million. There should be sufficient funds available from this level of levy for the PGDB to undertake a targeted awareness campaign to ensure vehicle owners are fully aware of their certification obligations. With this amount of money being collected it would be good to have a good level of transparency to ensure that funds are being spent appropriately.

Question 25 We do not support a levy of \$120.

Question 26 We fully support the application fee being set at \$431.25. The set fee provides certainty for all applicants.

Question 27 We do not support the scalable application fee. The set fee is a fairer and more equitable option.

Question 28: We support the granting of a waiver or refund as stipulated in the discussion document.

A handwritten signature in black ink, appearing to read 'Fergus G Brown', written over a horizontal line.

Fergus G Brown
Chief Executive