# #99

## COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, October 06, 2022 9:29:37 AM
Last Modified: Thursday, October 06, 2022 10:22:37 AM

**Time Spent:** 00:53:00

IP Address: Privacy of natural persons

## Page 3: Submitter information

Q1

Name

Ian Davison

Q2

**Email address** 

## Privacy of natural persons

Q3 Yes

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

Q4 No

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

Q5 Individual

The best way/s to describe your role is:

Q6 Yes

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

### Neither agree nor disagree

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

#### Q9

Respondent skipped this question

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

### Q10

Neither agree nor disagree

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

#### Q11

Respondent skipped this question

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

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

## Q12 Neither agree nor disagree

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

#### Q13

Respondent skipped this question

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

## Q14

Neither agree nor disagree

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

Neither agree nor disagree

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

#### Q17

Respondent skipped this question

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

### Page 6: Competency requirements for vehicle inspectors

Q18 Strongly agree

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

Q19 Respondent skipped this question

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

Q20 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:

It will be too big a challenge to ensure that there are sufficient inspectors across the country if you require them all to have trade qualifications. It is much more important that they have an understanding of the needs of freedom camping vehicles.

Q22 Don't know

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

Q23 Respondent skipped this question

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

Page 7: Deeming plumbers as certification authorities and vehicle inspectors

Q24 Disagree

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:

Not all certified plumbers understand the requirements of self contained vehicles. THe needs are very different from those of their normal work.

Page 8: Chapter Three: Self-containment documentation

## Q26

Neither agree nor 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** 

Respondent skipped this question

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

**Q28** 

Neither agree nor disagree

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

**Q29** 

Respondent skipped this question

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

Page 9: Self-containment warrant

Q30 Neither agree nor disagree

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

Q31

Respondent skipped this question

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

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 Neither agree nor disagree

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

Q35

Respondent skipped this question

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

**Q36** 

Neither agree nor 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** 

Neither agree nor disagree

To what extent do you agree with Option 1: a tiered approach infringement fee to a maximum of \$800?

Q39

Respondent skipped this question

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

Q40

Neither agree nor disagree

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

**Q41** 

Respondent skipped this question

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

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?

Q43

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

See comments in next question

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?

### Q45

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

Smaller vans, not cars, generally already comply with the needs for responsible camping. The need for a fixed toilet does not resolve any issues that some areas are having. Requiring small vehicles to have fixed toilets will prevent many responsible kiwis from experiencing remote peaceful campsites. In our small Hiace van we have a portable toilets that can be fully contains any spoil that can be taken to an official dump station. This is no different from a fixed toilet as used by larger vans and caravans. To provide an exemption for small vans would be welcome as it would continue to allow us to use our van responsibly. However, the exemption should still require the small vehicles to have toilets that fully contain the spoil with a secure lid to prevent any spillage.

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**

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

An exclusion on age does not make sense as it does not automatically ensure that they have an adequate toilet. Also if they are a large vintage vehicle then there is no practical reason why they cannot have a proper toilet fitted.

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 Agree

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

## Freedom Camping Regulations Discussion Document

**Q51** 

Respondent skipped this question

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

**Q52** 

Agree

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

Neither agree nor disagree

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** 

Strongly disagree

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

**Q57** 

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

This seems excessive. It should not take 5hrs per vehicle to approve the vehicle. I find it hard to see how more than one hour could be justified.

**Q58** 

Strongly disagree

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

**Q59** 

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

See comment above. I cannot see how it would take 3hrs to approve a vehicle.

Page 15: Waivers and refunds

Q60 Disagree

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

#### Q61

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

I cannot see any reason why the Registrar should allow a waiver or refund. This is likely to lead to lack of trust in the system similar to that already perceived by some.

## Page 16: General comments

#### Q62

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

The introduction of this bill seems excessive in relation to the problems occurring. In most areas of New Zealand there is not a problem with freedom camping. More resources should be provided to the local authorities to educate or control people in areas where there is a problem. It is the people who are causing the problem and not generally the quality of the vehicles.

#### 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.