#98

COMPLETE

Web Link 1 (Web Link)
Thursday, October 06, 2022 7:54:44 AM
Thursday, October 06, 2022 8:12:33 AM
00:17:49
Privacy of natural persons

Page 3: Submitter information

Q1

Name

Peter Grylls

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 To what extent do you agree with Option 1: 'light-touch' performance-based requirements?	Agree
Q9 If you would like to say something more about your answer to Question 8, please do so here:	Respondent skipped this question
Q10 To what extent do you agree with Option 2: prescriptive approach to setting technical requirements?	Strongly disagree
Q11 If you would like to say something more about your answer to Question 10, please do so here:	Respondent skipped this question
Page 5: Chapter Two: Certification authority criteria an Q12 To what extent do you agree with Option 1: Multiple- pathway approval criteria and competency requirements?	nd competency requirements for vehicle inspectors Agree
Q13 If you would like to say something more about your answer to Question 12, please do so here:	Respondent skipped this question
Q14 To what extent do you agree with Option 2: more rigorous and prescriptive certification approval criteria?	Strongly disagree
Q15 If you would like to say something more about your answer to Question 14, please do so here:	Respondent skipped this question
Q16 To what extent do you agree with Option 3: Third-party review of certification authority systems?	Strongly disagree
Q17 If you would like to say something more about your answer to Question 16, please do so here:	Respondent skipped this question

Page 6: Competency requirements for vehicle inspectors

Q18	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	Strongly disagree
To what extent do you agree with Option 2: requiring vehicle inspectors to have a relevant trade qualification?	
Q21	Respondent skipped this question
If you would like to say something more about your answer to Question 20, please do so here:	
Q22	Disagree
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	Strongly 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:

Self contained vehicles have very simple plumbing systems and it is unnecessary for a certified plumber to perform this type of inspection. It should be noted that failure of the plumbing on a vehicle is very unlikely to cause any environmental damage and is rather more likely to cause a mess inside the private motor vehicle. I see it completely overkill to require plumbers for this, a very basic knowledge of fluid dynamics, pipework and seals should be sufficient.

Page 8: Chapter Three: Self-containment documentation

Q26 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?	Strongly disagree
Q27 If you would like to say something more about your answer to Question 26, please do so here:	Respondent skipped this question
Q28 To what extent do you agree with Option 2: a simplified	Agree
self-containment certificate?Q29If you would like to say something more about your answer to Question 28, please do so here:	Respondent skipped this question
Page 9: Self-containment warrant Q30 To what extent do you agree with the option for the self- containment warrant?	Agree
Q31 If you would like to say something more about your answer to Question 30, please do so here:	Respondent skipped this question
Q32 Please list any additional information that you think should be collected on the warrant.	Respondent skipped this question
Q33 Please list any information you think is proposed to be collected on the warrant that does not need to be.	Respondent skipped this question
Page 10: Generic Identifiers Q34 To what extent do you agree with Option 1: not having a generic identifier?	Strongly agree

Q35

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

It should not be necessary to have a generic identifier as they are easily forged or obtained without having proper certification. Additionally vehicles easily identified as "campers" are often the target of thieves. It should be up to the individual if they would like to display such identifier on their vehicle

Q36	Strongly 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	Disagree
To what extent do you agree with Option 1: a tiered approach infringement fee to a maximum of \$800?	

Q39

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

\$800 fines are excessive. Compare this to fines for speeding which is a major hazard to road users and can cause death. \$800 is out of proportion.

Q40	Strongly 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

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

Strongly disagree

Q43 If you would like to say something more about your answer to Question 42, please do so here:	Respondent skipped this question
Q44 To what extent do you agree with Option 2: excluding smaller freedom-camping vehicles from the requirement to have a fixed toilet?	Strongly agree
Q45 If you would like to say something more about your answer to Question 44, please do so here:	Respondent skipped this question
Q46 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)	Strongly agree
Q47 If you would like to say something more about your answer to Question 46, please do so here:	Respondent skipped this question
Q48 Are there other types of vehicles that should be excluded?	Don't know
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?):	Respondent skipped this question
Page 13: Chapter Six: Fees and levies Q50 To what extent do you agree with Option 1: levy of \$91.40?	Agree
Q51 If you would like to say something more about your answer to Question 50, please do so here:	Respondent skipped this question

Q52 To what extent do you agree with Option 2: levy of \$101?	Strongly disagree
Q53 If you would like to say something more about your answer to Question 52, please do so here:	Respondent skipped this question
Q54 To what extent do you agree with Option 3: levy of \$120?	Strongly disagree
Q55 If you would like to say something more about your answer to Question 54, please do so here:	Respondent skipped this question
Page 14: Certification Authority Application Fee Q56 To what extent do you agree with Option 1: a set fee of \$431.25?	Strongly disagree
Q57 If you would like to say something more about your answer It should be no where near 5 hours to process this. It should be a	
Q58 To what extent do you agree with Option 2: a scalable fee?	Agree
Q59 If you would like to say something more about your answer to Question 58, please do so here:	Respondent skipped this question
Page 15: Waivers and refunds Q60 To what extent do you agree with the proposal for granting waivers and refunds?	Strongly agree

Page 16: General comments

Q62

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

I fully support a proper national register of the vehicles

I do not support high penalties and fines being proposed

I do not support the need for ceritifed plumbers to perform inspections

I do not support or see any rationale for requiring "fixed" toilets in these vehicles. No evidence of the benefits of fixed vs portable toilets have been provided by MBIE. Portable toilets perform the same functions as fixed toilets

Page 17: Confidential information

Q63

Please tick the box below if you would like any of your answers to be kept confidential

Q64

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. Respondent skipped this question

Respondent skipped this question