

#48

COMPLETE

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Page 3: Submitter information

Q1

Name

Peter Johnstone

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

Strongly agree

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

Q9

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

This approach enables the development of novel solutions that would not be possible with a more prescriptive approach.

Q10

Strongly 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

Agree

To what extent do you agree with Option 1: Multiple-pathway 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

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

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

Agree

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

Q19

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

This option will enable a greater pool of vehicle inspectors than if restricted to registered tradespersons

Q20

Strongly 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:

Is likely to increase costs and/or result in a lack of qualified vehicle inspectors being available

Q22

Agree

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

Q23

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

Likely to help improve public and local body confidence in the validity of self contained vehicle certifications.

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:

As per previous, restricting SCVC to certifying authorities and vehicle inspectors is likely to increase costs and result in a lack of vehicle inspectors. It may also conflict with the preferred "light touch" performance based requirements approach, since certifying plumbers typically operate in a prescriptive regulatory environment normally.

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

Agree

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

Agree

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

Q35

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

The warrant should be all that is needed. A generic identifier is meaningless and easy to forge.

Q36

Disagree

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

Q37

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

As above

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?

Q39

Respondent skipped this question

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

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

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:

I believe there is a strong case for certain exclusions: Bicycles, Small Vehicles and Vintage Vehicles

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:

Many New Zealanders have smaller vehicles that comply with the current CSC standards and are used responsibly for freedom camping. Most of these vehicles have constrained space and use solutions such as convertible beds, portable toilets etc. but these vehicles are required under the standard to have sufficient room for a toilet that can be used at night with the vehicle in sleeping configuration. However most of them will not have the space for a fixed toilet. Not all New Zealanders have the financial means to be able to upgrade to a larger and almost certainly more expensive vehicle that has room for a fixed toilet.

Q46

Strongly agree

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:

Modifying a vintage camper or caravan such as a VW Kombi to accommodate a fixed toilet is a) probably not possible as they tend to be smaller vehicles, b) likely to significantly devalue the vehicle.

Q48

Yes

Are there other types of vehicles that should be excluded?

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?):

Bicycles should be excluded from the regulations completely:

- Bicycles cannot realistically meet any of the requirements proposed for motor vehicle self containment,
 - Bicycle tourists generally have a low environmental impact and are not generally associated with the negative perceptions of freedom camping,
 - Bicycle tourists have a slower speed and lesser daily range than motor vehicles and are therefore more likely to want or need to freedom camp in locations where formal camping options are not available.
-

Page 13: Chapter Six: Fees and levies

Q50

Agree

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

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

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

Neither agree nor disagree

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

Q57

Respondent skipped this question

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

Q58

Neither agree nor disagree

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

Q59

Respondent skipped this question

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

Page 15: Waivers and refunds

Q60

Strongly agree

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

Q61

Respondent skipped this question

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

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?

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.
