

# #25

**COMPLETE**

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Page 3: Submitter information

## Q1

Name

Leanne Edwards

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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

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

**Yes,**

If yes, please tell us the title of your company/organisation, and how many people you are submitting on behalf of.:  
Quirky Campers NZ

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## Q5

**Tourism business**

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**

**Strongly disagree**

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:

Neither option as I don't believe it's necessary to change the current requirements for self-contained vehicle certification.

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**Q10**

**Strongly 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:

Neither option as I don't believe it's necessary to change the current requirements for self-contained vehicle certification.

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

**Q12**

**Strongly Agree**

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

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**Q13**

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

I do agree that there needs to be centralised, consistently applied requirements for self-contained vehicle certification. But not the proposed definition of the requirements. This options seems the most pragmatic and cost-effective solution.

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**Q14**

**Strongly disagree**

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

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**Q15**

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

Unnecessary

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**Q16**

**Strongly disagree**

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

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**Q17**

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

Unnecessary

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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?

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**Q19**

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

Sounds sensible and pragmatic

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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**

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

Unnecessary

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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**

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

Unnecessary

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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?

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**Q25**

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

Unnecessary

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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:

Sensible

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**Q28**

**Disagree**

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

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**Q29**

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

Not sure why less information is better!

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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:

Current warrant is fine

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**Q32**

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

N/A

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**Q33**

Please list any information you think is proposed to be collected on the warrant that does not need to be.

N/A

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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:

Stickers are easy to reproduce/fake and are unnecessary if there is a windscreen card

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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:

As above

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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?

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**Q39**

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

If the self-containment requirements stayed as-is but were most consistently managed then infringements can be whatever you want!

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**Q40**

**Neither agree nor 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**

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

If the self-containment requirements stayed as-is but were most consistently managed then infringements can be whatever you want!

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Page 12: Chapter Five: Exclusions from regulatory requirements

**Q42**

**Strongly agree**

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

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**Q43**

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

If the self-containment requirements stayed as-is there would be no need for any exclusions - making them easier to manage!

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**Q44**

**Neither agree nor disagree**

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:

If the self-containment requirements stayed as-is there would be no need for any exclusions - making them easier to manage!

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**Q46**

**Neither agree nor 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**

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

If the self-containment requirements stayed as-is there would be no need for any exclusions - making them easier to manage!

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**Q48**

**No**

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?):

If the self-containment requirements stayed as-is there would be no need for any exclusions - making them easier to manage!

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Page 13: Chapter Six: Fees and levies

**Q50**

**Strongly agree**

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:

Minimum

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**Q52**

**Neither agree nor disagree**

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

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**Q53**

**Respondent skipped this question**

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

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**Q54**

**Neither agree nor disagree**

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

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**Q55**

**Respondent skipped this question**

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

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Page 14: Certification Authority Application Fee

**Q56**

**Don't know**

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

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**Q57**

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

Not really sure what that refers to!

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**Q58**

**Neither agree nor 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**

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

Sounds sensible

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Page 16: General comments



**Q62**

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

Since the initial Report of the Responsible Camping Working Group (31 July 2018) there have been surveys, discussions and collaborations – captured in hundreds of pages of documentation – all culminating in the recently announced policy changes. However, it seems abundantly clear – and the data validates it – that there is little relationship between the research findings and recommendations over the last few years and the legislation that the Minister of Tourism now wants to enact. The main focus is on the certification of vehicles for camping rather than the behaviour of campers themselves – which is actually what the research shows is the root cause of the issues – so in short, the proposed changes will not solve the problems. What WILL work, backed up by the Governments' own research and in order of priority is...

1. Investment in infrastructure – the most telling evidence being from DOC Rangers and Local/Regional Councils which shows that issues with littering and bush toileting have been significantly improved in the places where facilities have been added.  
2. Consistent national camping rules – creating an easily understandable and NZ-wide approach so it's clear what type of camping is allowed where. There was a suggestion by the Working Group for colour-coded camping zones – with good signage and maps – which sounds very sensible. And balances the tension between facilities available vs. discrimination based on mode of camping. It proposed the following zones:

- Camping is not allowed
- Camping is only allowed in self-contained vehicles
- Any camping is allowed (requires adequate provision to be made for waste disposal (i.e. nearby toilet, rubbish bins)
- Remote camping allowed, provided campers have an adequate plan for managing waste (i.e. by following acceptable waste burying practices, pack-in/pack-out or leave no trace for activities such as surfing, hunting, tramping, or fishing where there is not is designated campsite).

3. Education – ensuring that people understand what it means to be a responsible camper and remove the ignorance excuse. For example, through a test (and card to carry) for domestic and international travellers who intend to camp.

4. Consistent self-containment certification – in a perfect world we wouldn't need CSC but it's probably unrealistic (even if there is investment in infrastructure) that camping areas can cope with the load on them... so let's at least set a clear, irrefutable standard and manage it properly (central database etc.). The data shows that the current system is being abused but with centrally managed, consistent application, existing toilet options could still be considered self-contained:

- Fixed – permanently plumbed to a black tank
- Fixed – with a removable cassette
- Fixed – composting
- Fixed – incinerating
- Portable

Where ALL toilets have adequate room to use them... headroom, elbowroom, legroom etc. when the bed is in use. i.e. the current requirements!

Education and behaviour are so critical to the equation and yet have been completely overlooked in these proposed changes. And it seems that those with portable toilets are being singled out and wholly blamed for all identified issues.

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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

**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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