

**From:** ToiletsNZ <admin@toiletsnz.co.nz>  
**Sent:** Sunday, 2 October 2022 3:45 pm  
**To:** Responsible Camping  
**Subject:** Submission for Responsible Camping

### **Submission from ToiletsNZ to MBIE**

2nd October, 2022

ref: Freedom Camping Regulations - Discussion Document September 2022

*My responses are referenced by page and Clause in the Discussion Document.*

### **Chapter Two: Self Containment Certification Authorities and Vehicle Inspectors.**

page 18 Option 1 - Agree

page 21 Option 1 - Agree

page 23 Certifying Plumbers as Inspectors - Agree

### **Chapter Three: S.C. Documentation.**

page 28/31 Option 1 - Agree

page 30 Warrant Card -

Keep the same format as the old Warrant Card, but change the colour to white, as it is proven blue, red or green will fade quickly in the sun in the windscreen. Black text on white plastic is easier for Inspectors to read in poor lighting conditions. Maybe incorporate a QR code that Inspectors can scan to check on the database and possibly a hologram to prevent cloning.

page 30 Generic Identifier -

Option 1 - Agree

A green sticker is not necessary - the old blue sticker was a total waste of time under the Standard. A new version of the warrant card and a paper copy of the Certification is all that is required should checking beyond accessing the database be necessary.

### **Chapter Four - Fees and Fines**

page 35 Option 1 - agree

Fees set too high will be likely lead to confrontations between vehicle owners and inspectors. I would prefer the fees to be lower combined with better education of the travelling public. Additionally, it will be essential for all Councils, DOC, Transport Dept. and other Authorities to adopt a standard format for signage, nationwide. At present many Council's signs are sadly lacking in clear detail about where and when Freedom Camping is permitted, or not. Continuing with non conforming poorly worded signage creating ambiguity is going to be an invitation to a punch-up in many areas where travellers are not able to decipher camping requirements.

Fines are a different matter as they will be handled by the Judicial system.

## **Chapter Five - Exclusions.**

page 39 Option 2 - agree

There are many small van, tear-drop and caravan owners who are going to be severely impacted financially by the requirement for a 'fixed toilet' and I will be submitting to the Select Committee on this.

I realise that exemptions create a whole new level of Regulations and potential headaches for MBIE and The Board and subsequently the Inspectors, but quite simply there is no valid reason why thousands of well behaved responsible New Zealand citizens, and tourists, should have their asset devalued because they cannot physically install a 'fixed toilet' because of poorly drafted Legislation trying to prevent 'sleeper cars' from parking in Freedom Camping locations.

These owners have successfully and hygienically used portable toilets in their vans and caravans for years and emptying their portable toilet cassette is no different whatsoever from the process of emptying a cassette from a 'fixed toilet'.

The need for exemptions would be negated if the requirement for CSC was that the portable toilet must be available for use at all times, with the bed made up - and that the space occupied by the toilet must have a minimum of 1.5m clearance from the floor to the ceiling. This will allow higher top vans and caravans to continue to be self contained, but will exclude cars from complying. A 1.5m clearance (or close to it) would allow the average person to sit comfortably on a portable toilet with 1.0m from seat to ceiling.

Problem solved overnight - small vans & caravans with portable toilets are happy and 'sleeper cars' cannot be certified. Simple for inspectors to measure and approve.

## **Chapter Six - Levies & Fees**

page 46 Option 3 - agree

The Board will need funds to be efficient in running the Certification Scheme. \$30 per year for your CSC isn't onerous.

page 50 Option 1 - agree

## **Appendix One - Proposed Technical Requirements.**

As I am the importer/retail outlet for both the Nature's Head and the OGO Waterless (Composting) Toilets I would like to make the following comments about the need for concisely written regulations, particularly if the "light touch" approach for approval is adopted.

This is because there are many current inspectors (and plumbers) who do not understand the principles involved with the installation and operation of a modern composting toilet unit which uses a high carbon composting medium like coconut coir or sphagnum peat moss.

page 56 - Tier Two: second para

I support the requirement for three days. This is because Statutory Holidays are typically of three days duration, but people frequently add an extra day onto a normal weekend before or after school holidays, and also add days in between Statutory Holidays such as between a weekend and Waitangi Day etc.

First Bullet Point - I will be addressing the "fixed toilet" definition issue with the Select Committee.

Fourth Bullet Point - ". . . ventilation systems . . ."

New Regulations need to accommodate waterless toilets, as the requirements in the current Standard refer to the Building Code - which was written specifically for the installation of full size domestic composting toilets in domestic dwellings. The current AS/NZ 1546.2:2008 requirement for ventilation is clearly not suitable for a vehicle.

Modern waterless toilets designed for vehicles, boats and tiny homes generally have a tiny fan which runs 24/7 to provide fresh air to the composting chamber which accelerates the aerobic breakdown of the solids. We now have new models being supplied from the USA which use an activated carbon filter. This allows air to be circulated without the need for external venting from the vehicle. New regulations need to accommodate these modern proven innovations.

page 57 - first para.

change wording to read *"Pipes and fittings, such as taps and valves, which reticulate **potable** water in a vehicle must be made of non-toxic materials suitable for contact with potable water."*

page 58 2: 2.1

delete *"... manufactured by a reputable manufacturer ..."*

(comment: who is going to determine who is in fact a "reputable manufacturer"? This is completely subjective and not in line with the 'light touch' principle.)

2: 2.2

delete the words *"... with the seat rigidly mounted in position and not required to be removed for the emptying of human waste"*

This needs some re-thinking as it has been written only with the mind-set of the installation of a factory fitted cassette toilet system.

Perhaps 2.2 can remain in the proposed format, but with the addition of:

*"Composting toilets which require separation of the seat/bowl section and the composting container when emptying, are exempted from this clause."*

examples:

The OGO waterless toilet is screwed to the floor, and both the urine bottle and the solids container can be emptied with the bowl section in place. I assume that this will be acceptable as a 'fixed toilet'.

The Nature's Head however has a system where the urine bottle can be removed with minimal displacement of the bowl.

To empty the solids bin however (which is the base unit), the seat/bowl section must be removed from a slip hinge and set aside temporarily. After emptying, the toilet is reassembled for use.

The Nature's Head toilet has been satisfactorily fitted to vehicles for 10 years and needs to be accommodated within any new regulations.

Both the Nature's Head and the OGO waterless toilets are affixed to the floor during installation.

2: 2.3

Once again, this needs further thinking and re-drafting. Perhaps a note that waterless composting toilets are exempted under this clause. Additionally, a clause added stating that urine diverted from a composting toilet can, after passing through an appropriate water trap, be stored in a grey waste tank prior to disposal.

3: 3.3

Change to:

*“All waste water must be stored appropriately. Wastewater containing faecal matter must be stored in a tank which has appropriately large discharge fittings. If this tank is fixed, it must have a quick acting valve”.*

*delete clause 3.4*

(comment: Contents of a grey waste tank are just as toxic as any other tank. Tank contamination by E. coli and campylobacter can occur during showering, hand washing and raw meat preparation. After three days in hot summer temperatures the grey tank must be regarded as potentially toxic and hazardous to human health. Differentiation between black water and grey water is a misnomer. If faecal contaminated water is stored/discharged from a waste tank, then the tank needs to have appropriately sized pipes, fittings and discharge hose.

Are these regulations going to be ‘light touch’ or ‘prescriptive’ - e.g. hose diameter, valve size etc?)

page 59

4: 4.1

amend to: “. . . . odours are not able to remain within the inside of the motor vehicle.”

(comment: ‘unhealthy odours’ are a subjective matter, not a scientific analysis. The most unhealthy odours are generally brought in from outside - carcinogens from the neighbour’s diesel space heating exhaust, the diesel engine running to charge batteries, or the smoking wood fire.

All cassette toilets are toxic time bombs which produce obnoxious smells from the anaerobic breakdown of faecal matter combined with urine and E. coli, but even the air escaping from these toilets probably hasn’t been proven to be harmful to human health. The waste tanks of cassette toilets often overflow after three days of use and this presents a much larger hazard to the occupants of a vehicle than the 'bathroom odour'.

In conclusion, I would like to offer my expertise to MBIE and The Board in the formulation of workable requirements for any Revised Standard insofar as they relate to Waterless (composting) Toilets.

Yours,

Alan Morton

ToiletsNZ  
213/91 Coleridge St  
Cambridge 3432  
New Zealand

Mob: 021-877 902



Toilets NZ  
Saving our Water  
For Tomorrow