



## Supporting Sustainable Freedom Camping in Aotearoa New Zealand – Submission Form

### How to provide us with feedback

The Ministry of Business, Innovation and Employment (MBIE) is collecting written submissions to gather a range of views on the Government's proposals to improve the management of freedom camping in New Zealand.

This submission form brings together all the questions asked throughout the discussion document *Supporting Sustainable Freedom Camping in Aotearoa New Zealand – Proposed changes to support effective management of freedom camping in New Zealand*.

Please feel free to answer as many or as few of these questions as you wish.

For more information and discussion about these topics please refer to the discussion document available at <https://www.mbie.govt.nz/have-your-say/supporting-sustainable-freedom-camping-in-aotearoa-new-zealand>.

Your submission can be returned by email to [responsiblecamping@mbie.govt.nz](mailto:responsiblecamping@mbie.govt.nz). Submissions are due by midnight on Sunday 16 May.

### Use and release of information

After the consultation period has closed, MBIE will publish a summary of submissions on our website at [www.mbie.govt.nz](http://www.mbie.govt.nz).

We will not be publishing any individual submissions or names of individuals who made a submission. We may wish to include part of your submission in the summary of submissions; in that case, MBIE will first ensure we have your permission to do so.

If you are submitting on behalf of a business or organisation, MBIE will consider that you have consented to the content being included in the summary of submissions unless you clearly state otherwise. If your submission contains any information that is confidential or that you do not want published, you can say this in your submission.

The Privacy Act 2020 applies to your submission. Any personal information you supply to MBIE through your submission will only be used by MBIE for the purpose of producing a summary of submissions. The summary will present themes and no personally identifiable information will be included. The summary will be reported to the Minister of Tourism and be published online.

Submissions may be subject to requests for information under the Official Information Act 1982 (OIA). If your submission, or part of it, comes within the scope of an OIA request, MBIE would normally release it (excluding any personal information) to the person who asks for it. If you consider there are reasons for MBIE to withhold any of the information you are providing, please indicate these reasons in your submission.

## Your details

**What is the name of the person making this submission?**

Alison Brown

**If you are submitting on behalf of an organisation, what is the name of that organisation?**

Guardians of Lake Hāwea

**Is it okay for your organisation's details to be published if we publish which organisations made a submission, or include part of your submission in the summary of submissions?**

- Yes, you can publish my organisation's details with information from my submission.  
 No, keep my organisation's details confidential.

**Can we use information in your submission as a case study in the summary of submissions?**

- Yes, you can include information from my submission as a case study in the summary of submissions.  
 No, keep my information confidential.

**Please provide us with your email address in case we need to contact you about your submission.**

Email

brown.hawe@actrix.co.nz

**What sector(s) does your submission most closely relate to, if applicable?**

For example, the sector in which you may work or operate, or which you represent.

- Accommodation provider  
 Rental vehicle business  
 Iwi, hapū or Māori organisation  
 Individual or camper  
 Other: Environmental \_\_\_\_\_ (please specify)  
 N/A
- Other tourism business  
 Non-tourism business  
 Local Government  
 Club or club representative (eg camping club)

## Context to Supporting Sustainable Freedom Camping in Aotearoa New Zealand

1.1 How much do you agree that certain types of vehicle-based freedom camping is a problem? Please write a (Y) next to the option which applies to you				
Strongly agree (Y)	Agree	Neutral	Disagree	Strongly disagree
<b>1.2 What are your views on freedom camping in vehicles?</b> When answering this question you may like to think about: <ul style="list-style-type: none"><li>• Is vehicle-based freedom camping an issue in your area?</li><li>• Have you observed any specific issues?</li><li>• Are there specific behaviours which impact on your use of local amenities/infrastructure?</li><li>• What benefits does vehicle-based freedom camping provide for your region?</li></ul>				
A significant proportion of freedom campers defecate around the shoreline of Lake Hāwea. There are a variety of reasons for this including: no toilet in their vehicle, reluctance to use their toilet, reluctance to walk to or use public toilet near their campsite, laziness.				

**How much do you support the proposal to make it mandatory for vehicle-based freedom campers to use a certified self-contained vehicle?**

2.1

Please write a (Y) next to the option which applies to you

Strongly agree (Y)	Agree	Neutral	Disagree	Strongly disagree
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**Do you support this proposal?**

When answering this question you may like to think about:

2.2

- Do you consider this option will improve camper behaviour?
- Will this option support or improve tourism outcomes in your region?
- Will this option decrease pressure on the environment and local government infrastructure?
- Are there impacts of this proposal that you are concerned about?

It should improve behaviour and tourism outcomes to some degree, and decrease pollution in our environment.

**How might this proposal impact you?**

When answering this question you may like to think about:

2.3

- Will this proposal increase or decrease the likelihood of you camping?
- Will this proposal have a direct financial impact on you or your business?
  - If yes, please indicate if this is a personal or business expense, and quantify how much you estimate it would impact you.
- Will this option increase or decrease the attractiveness of visiting other regions in New Zealand?

This option should help reduce the threat of pollution at our lake and make the area more pleasant for all users.

**What things should Government consider to implement this option?**

When answering this question you may like to think about:

2.4

- What exceptions should Government allow under this proposal?
- Do you have any ideas about how this proposal could be implemented?
- Should this option be considered alongside other options proposed in this discussion document?

No exceptions. Implemented by a national system like warrant of fitness for a vehicle. Trained camping inspectors required.

**How much do you support the proposal to make it mandatory for freedom campers to stay in vehicles which are certified self-contained, unless they are staying at a site with toilet facilities (excluding public conservation lands and regional parks)?**

3.1

Please write a (Y) next to the option which applies to you

Strongly agree	Agree	Neutral	Disagree (Y)	Strongly disagree
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**Do you support this proposal?**

When answering this question you may like to think about:

- Do you consider this option will improve camper behaviour?
- 3.2 • Will this option support or improve tourism outcomes in your region?
- Will this option decrease pressure on the environment and local government infrastructure?
- Are there impacts of this proposal that you are concerned about?

This is problematic: e.g. defining a site with toilet facilities is problematic in terms of distance from ones vehicle. A site could be 2km long and have a toilet at one end. Usage by campers 2km away is likely to be low, especially at night. Also it doesn't take the non-self-contained vehicles out of the environment and they may still choose not to camp near a toilet, resulting in no improvement to the present situation.

**How might this proposal impact you?**

When answering this question you may like to think about:

- Will this proposal increase or decrease the likelihood of you camping?
- 3.3 • Will this proposal have a direct financial impact on you or your business?
  - If yes, please indicate if this is a personal or business expense, and quantify how much you estimate it would impact you.
- Will this option increase or decrease the attractiveness of visiting other regions in New Zealand?

This proposal would probably not result in as much improvement as the first proposal.

**What things should Government consider to implement this option?**

When answering this question you may like to think about:

- What do you think is required to achieve this option?
- 3.4 • What exceptions should Government allow under this proposal?
- How far from toilet facilities should a person be able to freedom camp if not in a vehicle with a toilet? eg, 100 metres, 200 metres?
- Should this option be considered alongside other options proposed in this discussion document?

Any distance rules are bound to be problematic to apply and enforce. They potentially create another avenue for creative users to navigate their way around. They add extra administrative burden to enforcement.



**How much do you support the proposals to improve the regulatory tools for government land managers?**

4.1

Please write a (Y) next to the option which applies to you

Strongly agree (Y)	Agree	Neutral	Disagree	Strongly disagree
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**Do you support this proposal?**

When answering this question you may like to think about:

4.2

- Are there any specific parts of this proposal you support or propose?
- Do you consider this option will improve camper behaviour?
- Will this option support or improve tourism outcomes in your region?
- Will this option decrease pressure on the environment and local government infrastructure?
- Are there impacts of this proposal that you are concerned about?

This should improve camper behaviour and result in better environmental outcomes.

**How might this proposal impact you?**

When answering this question you may like to think about:

4.3

- Will this proposal increase or decrease the likelihood of you camping?
- Will this proposal have a direct financial impact on you or your business?
  - If yes, please indicate if this is a personal or business expense, and quantify how much you estimate it would impact you.
- Will this option increase or decrease the attractiveness of visiting other regions in New Zealand?

This should improve visitor and community experience at Lake Hawea

**What things should Government consider to implement this option?**

When answering this question you may like to think about:

4.4

- What would you like to see in practice?
- Should this option be considered alongside other options proposed in this discussion document?

### **What would be an appropriate penalty?**

When answering this question you may like to think about:

- Should non-compliant vehicles be confiscated? If so, under what conditions?
- 4.5 • If vehicles are confiscated, what conditions should be placed on returning the vehicle?
- Should fines be similar to those for not holding a valid Warrant of Fitness for a motor vehicle?
- What levels should fines be set at?
- Who should collect a fine?

Non-compliant vehicles should be confiscated after 2 warnings i.e. at the 3<sup>rd</sup> rule-breaking. Therefore a recording system will be needed to record when warnings have been given. Fines should be collected in the case of rental vehicles by the rental agency. Fines for privately owned vehicles should be collected by the local council



**Do you think that the requirements for self-containment should be strengthened?**

5.1 Please write a (Y) next to the option which applies to you

Yes (Y)	Neutral	No
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**Is the current standard fit for purpose?**

When answering this question you may like to think about:

- 5.2
- Should there be a requirement that self-contained vehicles have fixed toilets?
  - Should there be specific reference to the types of vehicles that can be self-contained?

It is ridiculous that one can get CSC for a station wagon. Toilets should be fixed and in an enclosed (vented) place that allows an adult user to stand up while using the toilet. Defining the types of vehicles is problematic - far better to have a specification as we have outlined since by definition, for example, a station wagon or sleeper van would never get CSC.

**Who should certify to the Standard?**

When answering this question you may like to think about:

- 5.3
- Should any Plumber registered under the Plumbers, Gasfitters and Drainlayers Act 1976 be able to certify to the Standard, or should certifiers be separately recognised and licensed?
  - Once a vehicle has passed its initial certification, should other entities be able to re-certify it?

The more plumbers the more variation in interpretation and unprofessional behaviour. Best to have a separately recognised and licensed entity.

### **What transition arrangements should be in place?**

When answering this question you may like to think about:

- 6.1
- How long should Government give people to upgrade or dispose of their vehicles?
  - Should currently certified self-contained vehicles be exempt from any new rules?
  - Are there any other transition arrangements we should consider?

Allow 12 months to upgrade or dispose of private vehicles. Rental vehicles should be given 6 months.

Currently certified self-contained vehicles should not be exempt since some may not actually comply with new standards.

### **How could Government ensure vulnerable groups are not further disadvantaged?**

- 6.2
- Could Government make homelessness exempt from any new regulatory system? What might this look like?

Camping wardens/inspectors must be trained to recognise the difference between the homeless and the deliberate rule-breakers. The intention must not be to punish the unfortunate but those who are intentionally evading regulations

**7.1 Is there anything else on the proposed changes or discussion document you would like to mention?**

We understand that some rental companies charge the renter a fee when the vehicle is returned and the toilet is found to have been used. This policy is a disincentive to use the toilet and as such should not be allowed. Since the company must in all cases ensure the toilet is empty and has appropriate chemicals in it for the next user - the charge for doing this should be incorporated into the hire fee.