

30 April 2024



Minister of Business, Innovation & Employment  
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Wellington

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Kia ora

### **Proposed Amendments to the Plumbers, Gasfitters, and Drainlayers (Self-contained Vehicles) Regulations 2023.**

Tourism Industry Aotearoa welcomes the opportunity to submit on the proposed changes to the Regulations supporting the freedom camping regime.

We support making changes to these Regulations in the interests of ensuring the system is more workable and operates with reduced administration costs.

#### **Proposed Change to Direct Ventilation Requirement**

From the consultation document and our engagement across industry, it is apparent that the requirement in the current Regulations for all wastewater storage tanks in certified self-contained vehicles to be ventilated directly to the exterior of the vehicle is problematic, particularly for the many vehicles that use cassette-type toilet facilities.

The extent of the issues is extensive, with around 57,500 vehicles currently compliant to the New Zealand Standard for Self-containment of Motor Caravans (NZS 5465)<sup>1</sup> with their cassette-type toilets. To require ventilation for all these vehicles will impose a significant cost per vehicle and very large cost across the sector.

From the feedback TIA has received, there is little or no policy justification for the venting requirement with no safety issues identified in New Zealand, and with cassette-type systems being the standard approach used around that world.

To cite the example of Wilderness Motorhomes Ltd, they import high-end German campervans to New Zealand that typically use the cassette-type toilets.<sup>2</sup> These are high specification vehicles that applying best practice from Germany. The current regulations would require all the vehicles this company has brought to New Zealand (around 1500) to undergo unnecessary and expensive adaptations.

We are not aware of any adverse public health issues associated with non-vented cassette-type toilets in self-contained vehicles but rather see the wide use of these facilities globally as a strong indicator of their inherent safety over a long period of use.

TIA's preferred option:

**Option 2: Only fixed wastewater storage tanks are required to be directly ventilated.**

Also, in the interests of clarity, TIA also submits that the Regulations should be clear in its language that appropriate cassette-type toilets are permitted.

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<sup>1</sup> Refer submission of New Zealand Motor Caravan Association Inc.

<sup>2</sup> Refer submission of Wilderness Motorhomes Ltd.

## **Proposed Levy Refund Process**

TIA supports the most streamlined processes to ensure reduction of administrative burden.

TIA's preferred option:

**Option 2:** Delegate refund powers to self-containment certification authorities.

### **Timing**

Further to above, we note that these may have timing implications for the going implementation of the regulations. For instance, we anticipate that the process to develop and implement changes to the venting requirements may have held up people getting certified to the regulations as they stand. The implication is that it may be a struggle to meet the 7 December deadline when all rental vehicles must be certified. Consideration of this timing question would be appreciated to ensure equitable outcomes.

TIA welcomes the signal in the Discussion Document that a more comprehensive review of the freedom camping system from mid-2025 which will allow wider issues to be identified and addressed.

Please do not hesitate to get in contact if you have any queries. Bruce Bassett can be contacted on 021 609 674 or [bruce.bassett@tia.org.nz](mailto:bruce.bassett@tia.org.nz).

Ngā mihi,

A handwritten signature in blue ink, appearing to read 'R Ingram', followed by a period.

Rebecca Ingram  
Chief Executive