

Regulatory Impact Statement

Freedom Camping Bill

Agency Disclosure Statement

- a) This Regulatory Impact Statement has been prepared by the Department of Internal Affairs (DIA) and the Department of Conservation (DOC). It provides analysis of options that will assist local authorities and DOC conservancies to effectively deter the negative behaviour associated with freedom camping. Freedom camping can include camping in a caravan, bus, car, tent or campervan. Freedom camping takes place in unsuitable locations such as rest areas, reserves, beaches, car-parks, roadsides, and lay-bys.
- b) The behaviour of some freedom campers creates problems for local residents and imposes costs for local authorities and DOC. The main problems are the human waste and litter being left behind by some freedom campers. This is offensive to local residents and visitors to the region, and creates a public health risk and undermines New Zealand's image as a 'clean green' tourist destination. Local authorities and DOC are faced with ongoing costs for routine patrols, clean-up and maintenance of non-designated campsites.
- c) Numerous local authorities have requested assistance in deterring people from camping outside of designated campsites or in unsuitable locations. DOC has also identified a significant problem in some locations from people fouling public conservation land and camping in inappropriate places. Approximately 90 per cent of local authorities have bylaws that regulate camping in some way on council owned or operated land, such as parks, domains, reserves and public places. DOC and local authorities can only pursue offenders through the courts. This is not a cost effective response to the problem and consequently rarely used by local authorities or DOC. There are concerns that the increase in overseas tourists for the Rugby World Cup 2011, due to begin on 9 September 2011, will exacerbate the problems associated with freedom camping in local authority and DOC locations.
- d) The preferred option is to create an infringement regime to enable local authorities and DOC to issue infringement notices for inappropriate freedom camping behaviour on either DOC or local authority controlled lands. Private land, and other Crown land, would not be covered under the proposed bill as neither are subject to significant freedom camping problems, and other enforcement mechanisms (such as issuing trespass orders) exist. The proposed bill would enable infringement notices to be issued for breaches of local authority freedom camping-related bylaws, or for breaches of DOC freedom camping restrictions. An infringement regime represents a low-cost, simple way of addressing minor offending and will in itself provide a deterrent to problem camping behaviour in unauthorised campsites. For more serious, high-end offending, DOC and local authorities will still have recourse to seek summary convictions through the courts.
- e) We do not expect the preferred option will impose costs on businesses, impair market competition, or impair incentives on businesses to innovate or invest. However, the preferred option will have some impact on the Ministry of Justice and courts in terms of collecting any unpaid fines that are passed on by local authorities and DOC.
- f) Introducing freedom camping offences requires the development of an infringement regime, which will include an appropriate infringement fee amount. The maximum infringement fine provided for in the LGA02 is \$1,000, while the maximum penalty through summary conviction is \$20,000. To provide a consistent, nationwide approach,

and to encourage payment, a \$150 fee per offence is proposed. A fee lower than \$150 is not considered to be in proportion to the scale of offence. A higher fee is likely to result in a greater level of default fines.

- g) The Rugby World Cup 2011 deadline provides urgency to this work. However, the proposed freedom camping bill would also provide an enduring solution for ongoing, and increasing problems associated with freedom camping.
- h) The Department of Internal Affairs and the Department of Conservation confirm that this Regulatory Impact Statement is adequate according to the criteria agreed by Cabinet.

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Department of Internal Affairs

/ /2011

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/ /2011

Status quo and problem definition

1. The behaviour of some freedom campers creates problems for local residents and significant costs for local authorities and DOC. Freedom camping can include camping in a caravan, bus, car, tent or campervan. Freedom camping takes place in unsuitable locations such as rest areas, reserves, beaches, car-parks, roadsides, and lay-bys. The main problems associated with freedom camping are the human waste and litter being left behind by some freedom campers. This is offensive to local residents and visitors to the region, and creates a public health risk and undermines New Zealand's image as a 'clean green' tourist destination. Local authorities and DOC are faced with ongoing costs for routine patrols, clean-up and maintenance of sites of free campsites.
2. This Regulatory Impact Statement outlines options that will assist local authorities and the Department of Conservation (DOC) to deter camping in unsuitable locations, and address problems associated with freedom camping.

Extent of the problem

3. Freedom camping occurs on both council controlled and public conservation land. The problems are the same in nature and of a similar magnitude for similar types of land (e.g. for roadside reserves on popular tourist routes).
4. The Ministry for the Environment randomly selected ten local authorities and asked about the impact of freedom camping in their districts. The responses indicated varying levels of freedom camping activity and damage to the environment. Several local authorities reported increasing activity and complaints¹. For example:
 - Christchurch City Council (CCC) undertook a study of freedom camping in its district in March and April 2010. CCC found that there were 451 freedom camping vehicles in popular spots around Christchurch and Banks Peninsula. The ratio of non-self-contained to self-contained vehicles was 5:1. CCC also found most freedom campers were overseas tourists.
 - Marlborough District Council (MDC) freedom camping statistics show that the incidence of offending behaviour has been increasing from 80 reported incidences in 2006, to 132 in 2007, to 319 in 2008 and to 432 in 2009. MDC reports that approximately 80 per cent of illegal camping activity is in small, non-self-contained camper vans ('Jucy Rentals', 'Wicked Vans' etc) used mainly by overseas tourists.
 - Westland District Council (WDC) undertook a survey of 73 sites during the winter (low season) of 2004. WDC found rubbish in 15 per cent of the sites and evidence of human waste in 21 per cent of the sites.
 - The Grey District Council receives 30 to 40 complaints each year about freedom camping, with the majority about vehicles without self-contained toilet facilities.
 - The Thames-Coromandel District Council issued 366 warnings in January 2010 to people found freedom camping, nearly all issued to visitors to the district.
 - The Queenstown-Lakes District Council (QLDC) identified approximately 50 to 100 vehicles per night camping in rural areas during the summer months. Many of these vehicles were without self-contained toilets or were not parked near public toilet facilities. QLDC also found that up to 200 vehicles would park in streets, carparks and reserves in built up areas such as Queenstown and Wanaka town centres. During February 2009, QLDC found evidence of overnight camping in 50 spots. At these 50 spots, 98 per cent had rubbish left behind, 16 per cent had human waste and 24 per

¹ Christchurch City Council, Marlborough, Westland, Grey and Thames-Coromandel District Council information provided by the Ministry for the Environment

cent had no nearby toilet facilities. The estimated annual cost to ratepayers is \$35,000 for routine patrols and clean-up.²

5. DOC managers have observed similar problems. During the summer of 2009/10 DOC staff in Queenstown undertook eight freedom camping monitoring visits to eight known "freedom camping" sites between February and April. Most of these sites had 'No Camping' signs installed. Freedom camping was observed at all sites varying between one and four vans at each site per visit. Toilet waste in the form of toilet paper was common and widespread at each site. Human waste was also obvious.
6. The problems are particularly acute in regions with high tourist numbers, for example in Fiordland, Otago, Southland, West Coast, Nelson-Marlborough, Coromandel and Bay of Islands. DOC notes, however, that most camping on conservation lands is by backcountry users who follow accepted practice and do not create problems.

Current management and enforcement

7. Freedom camping is generally permitted and 90 per cent of local authorities have camping bylaws that regulate this activity on council owned or operated land. For example, camping bylaws will limit the length of time you can camp in reserves or how many nights you can stay in a vehicle. However, any breaches of local authority camping bylaws, which are made under the Local Government Act 2002 (LGA02), can only be proceeded against through the courts. Pursuing offenders through the courts is not a cost effective response to the problems experienced, and is rarely used by local authorities. The inefficiencies of this approach mean it is unlikely to deter the problematic behaviour.
8. DOC may also proceed against offenders summarily, but as with local authorities, rarely do so for low level offending behaviour due to the cost of prosecuting. Camping is generally permitted on public conservation land and DOC is committed to increasing recreational opportunities and participation. Currently DOC manages 208 vehicle accessible campsites and over 1,000 car parks where toilets are provided. Camping is currently managed within legislative parameters and planning frameworks at regional and local level. The current options available to DOC are bylaws, signage, and DOC officers requesting people to move-on. The effectiveness of these measures would be increased by the provision of an enforcement tool such as an infringement regime.

Rugby World Cup – expected increase in freedom camping

9. Some local authorities are concerned that freedom camping problems may be exacerbated by the increase in visitors during the Rugby World Cup (RWC), due to begin on 9 September 2011. An estimated 85,000 visitors are expected over the six week period of the RWC. While the estimated total number of visitors for the RWC is well below the summer peak visitor numbers of 130,000, there will be peaks in visitor numbers for the big games and travel to the big games. This will place pressure on local infrastructure and services.³
10. It is expected that half the RWC visitors plan to arrive before 9 September 2011, and will stay an average of 23 days. Some visitors intend to travel all around New Zealand but the bulk of the visitors (36,500) are expected to visit Auckland, 11,000 intend to travel down the West Coast of the South Island, and 18,000 to Otago and Southland.⁴

Recent development

11. Cabinet agreed that a coordinated cross-government and private sector response should be developed to address the negative effects of freedom camping. It was also

² QLDC draft freedom camping bylaw

³ Covec survey conducted on behalf of Rugby NZ 2011 in November 2010.

⁴ Covec survey conducted on behalf of Rugby NZ 2011 in November 2010.

agreed that any solutions should provide effective enforcement tools for local authorities to undertake instant enforcement, improve enforcement against a vehicle, and retain flexibility for local government to rule where people can and cannot freedom camp [CBC Min (11) 5/3 refers]

12. A number of initiatives have been undertaken by the Ministry of Transport (MoT) and the New Zealand Transport Agency (NZTA). Recent changes to transport legislation now require rental vehicle companies to collect more comprehensive contact and identifying information from hirers. This is intended to assist the Ministry of Justice in pursuing fine defaulters if the hire vehicle has incurred fines, which includes parking and speed camera fines as well as local parking bylaws that cover camping. NZTA has developed, in liaison with the private sector, a clear standardised 'no camping' sign that is legally enforceable under transport regulations and can be used for enforcement of camping bylaws.
13. Private sector responses include the development of a dedicated freedom camping website, www.camping.org.nz, which has both freedom camping and general camping information. Rental vehicle companies link to this website and provide information packs in their rental vehicles. GPS navigational systems and other handheld devices that campers can view where they can and cannot freedom camp have also been developed and will be in place for the RWC.

Objective

14. The objective is to provide local authorities and DOC with a practical and nationally consistent enforcement option to deter inappropriate freedom camping behaviour and thereby limit the negative effects of freedom camping. The option needs to include the ability to undertake instant enforcement while retaining the flexibility for local authorities and DOC to decide where people can or cannot camp. It is important for the policy to be implemented before the RWC.

Regulatory impact analysis

Regulatory options

15. Three regulatory options were considered.

Option 1 – Use existing local authority bylaws to manage freedom camping (status quo).

Option 2 – Use section 259 of the Local Government Act 2002 to designate specific bylaw breaches as infringement offences.

Option 3 – Freedom Camping Bill (preferred option).

Option 1 - Use existing local authority bylaws and conservation legislation to manage freedom camping (status quo)

16. This option considered the effectiveness of local authorities continuing to use bylaws to manage camping in non-designated campsites, and the litter and waste left behind by freedom campers. Some of the relevant local authority bylaws are:
 - Parking and transport bylaws (made under the Transport Act 1962 and Land Transport Act 1998) regulates a range of activities, such as length of stay in a time limited carpark (for which signage is required every 100m), and the allowed distance from an intersection or pedestrian crossing. Relevant parking bylaw offences that could apply to freedom camping include provisions related to inconsiderate parking (maximum penalty of \$60), and illegally parked vehicles (maximum penalty of \$40). Infringement notices can be issued for these offences but local authorities consider the fees are too low to be an effective deterrent.
 - Litter bylaws (made under the Litter Act 1979) allow local authorities to issue infringement notices for littering. The maximum fee for a breach is \$400.00.

However, local authorities can only take action if the offender is caught in the act or if they can be identified by the litter left behind.

- Bylaws Act 1910 section 20 states that bylaws may provide for a fine (the maximum penalty is \$500) for breaches of the bylaw where the Act, under which the bylaw is made, does not contain penalty provisions, or authorises local authorities to impose penalties for breaches. The penalty provisions under the Bylaws Act are not available for bylaws made under the Local Government Act 2002 (LGA02) because the LGA02 contains penalty provisions and allows penalties to be imposed.
 - Bylaws made under the LGA02. Under the LGA02, bylaws may be made to: protect the public from nuisance; to protect, promote and maintain public health and safety; and minimise the potential for offensive behaviour in a public place; and to control the use of liquor in a public place. However, any breaches of bylaws made under the LGA02 can only be proceeded against summarily, unless specified as infringement offences in separate regulations (see below). Pursuing freedom campers through the courts is a disproportionate, and uneconomic, response to low level offending.
17. The Conservation Act 1987, the Reserves Act 1977 and the National Parks Act 1980 enable public access and recreation on public conservation land including camping. The offence provisions differ across the Acts but generally relate to the management of adverse effects of camping rather than prohibiting freedom camping itself, for example the lighting of fires, or causing damage to natural features or biodiversity. Freedom camping is regulated at particular sites by bylaws or signage in accordance with the recreational planning framework, but the existing enforcement tools (prosecution) are ineffective.
 18. Current bylaws and conservation legislation cannot provide local authorities or DOC with an effective enforcement tool to deter people from camping in unsuitable locations or from other unacceptable camping behaviour. As such, this option is not favoured.

Option 2 - Use the LGA02 to designate bylaw breaches as infringement offences

19. This option considered making regulations under section 259 of the LGA02 to designate specific bylaw breaches as infringement offences.
20. Section 259 of the LGA02 provides that regulations can be made to designate specific bylaw breaches as infringement offences. Regulations would prescribe the level of infringement fee (not exceeding \$1,000), and the form of the prescribed infringement notice. Local authority bylaws would need to meet the legislative requirements.
21. There are three drawbacks to this approach. First, regulations made under section 259 would require ongoing maintenance to allow for the inclusion of new and amended council bylaws. Sections 158 and 159 of the LGA02 require bylaws to be reviewed five years after they are made and then every ten years. The infringement offence would not be available during any time-lag between a new bylaw taking effect and amending the regulation.
22. Second, infringement notices issued under regulations made under section 259 of the LGA02 cannot be issued to a vehicle. Instead, infringement notices must be issued to the offender in person. This will hamper the ability to issue infringement notices where vehicles are not attended and the offenders are not present.
23. Finally, regulations made under section 259 would only apply to local authority land, and not to conservation land. Therefore, this option does not offer national consistency.

Option 3 – Freedom camping bill (preferred option)

24. A bill would create an infringement regime in relation to freedom camping on council and public conservation land to protect the environment, health and safety and access to public places and sites of significance for public enjoyment. From a local government

point of view, the main advantage of a new bill is that once it is enacted local authorities will be able to develop and maintain their own freedom camping bylaws without further central government involvement. This is in contrast to making regulations under the LGA02 which would capture existing bylaws, but any subsequently made bylaws would not be able to take advantage of the infringement provisions in the regulation, without the regulation being amended.

25. Under this option, a specific infringement regime for freedom camping on council and public conservation land would be created. This would only apply if freedom camping was prohibited by decisions made by local land managers acting in accordance with the legislation under which the relevant land is administered.
26. For DOC, this option is less desirable than having infringement provisions embedded in its own legislation (as will be achieved by the passage of the Conservation (Authorisations, Compliance and Enforcement) Bill (C(ACE Bill)). It does, however, ensure that the provisions will be in place in time for the RWC, which would not be possible by relying on that legislation. It is therefore the preferable approach at this time. It will also ensure a consistent level of fines regardless of land status.
27. This option is preferred because it meets the objective, which is to provide local authorities and DOC with practical and nationally consistent enforcement option to deter negative behaviour associated with freedom camping. It allows offences to be responded to through an instant fine system, which is a proportionate response to low level offending and will reduce costs of enforcement. It gives local authorities and DOC the flexibility to decide where people can or cannot camp. It provides an enduring solution for ongoing, and increasing problems associated with freedom camping. In addition, the proposed freedom camping bill has a priority 2 on the 2011 Legislative Programme (to be passed in 2011) and can be in place before the start of the RWC.

Non-regulatory measures

28. Non-regulatory options considered included educational campaigns, increased signage or a permit system. Gisborne District Council uses a permit system to manage freedom camping in its district. Its statistics show that as at "24 February 2010, 1,317 permits were issued covering 4,884 people and \$30,622 was collected in revenue".⁵ However, 447 warning notices were issued to those camping in non-designated areas. A permit system could be adopted by other local authorities but without the ability to issue infringement notices people will continue to camp in non-designated campsites.
29. Educational campaigns, signage and camping information currently exist. Extensive camping information can be found on local authority, tourism, rental vehicle companies and dedicated camping websites. Leaflets, posters and a national 'no camping' sign have been developed so as to avoid confusion about where camping is not permitted. Councils are being urged to use the sign in places of particular value where a strong message of 'no camping' needs to be made.
30. The tourism industry also acknowledges that some freedom campers are undermining New Zealand's image as a "clean green" tourist destination. In response to this it has, through its Freedom Camping Forum⁶, also developed education resources and approaches to manage the negative affects of freedom camping. These include:
 - the development of a dedicated freedom camping website, www.camping.org.nz that rental vehicle companies and the RWC websites link to;
 - educational material for i-SITES, backpackers, campgrounds and inter-island ferries promoting and encouraging responsible camping behaviour; and

⁵ Gisborne District Council report to Operations Committee meeting on 11 March 2011

⁶ Formed by the Tourism Industry Association of New Zealand with representatives from local and central government agencies, and tourism operators

- the improvement of camping information, such as campsites, waste disposal sites and toilets, available through GPS navigation systems and other handheld devices.

31. While the non-regulatory measures will assist with the problems they do not give local authorities or DOC officers the ability to effectively deter and enforce breaches in an immediate and proportionate way. These measures, therefore can only complement the preferred option.

Conclusions and Recommendations

32. The preferred option is to have a freedom camping bill passed before the start of the RWC. This will give local authorities and DOC the ability to issue infringement notices for inappropriate freedom camping behaviour. This is a proportionate response to low level offending.

33. The preferred option also retains flexibility for local authorities and DOC land managers to decide where people can or cannot camp, and complements the non-regulatory measures being developed by other government agencies and the tourism industry. The table below summarises the analysis of options

Options	Objectives			
	Ability to issue infringement notices	Applies to local authority and public conservation land	Nationally consistent with local flexibility	Meets RWC deadline
Regulatory options				
Option 1: ▪ use existing bylaws and conservation legislation to manage freedom camping (status quo)	x	x	x	✓
Option 2: ▪ use s259 LGA02 to designate bylaw breaches as infringement offences	✓	x	x/✓	x
Option 3: ▪ Freedom camping bill (preferred option)	✓	✓	✓	✓
Non-regulatory measures				
Permit system	x	x	x/✓	✓
Education campaigns, signage, websites	x	✓	✓	✓

Costs

34. Between the 78 local authorities in New Zealand (city, district, regional and unitary councils) there are approximately 80 camping related bylaws (some local authorities have camping provisions under public places bylaws, freedom camping bylaws and/or other bylaws). As noted above, the LGA02 requires that all bylaws are reviewed five years after they are made and then every ten years. If a bylaw requires amendment, revocation or replacement the local authority must follow the Special Consultative Procedure (SCP) that is set out in section 156 of the LGA02, which entails costs for the local authority. The cost of a SCP is dependent on the type of policy being consulted on, and the district size. The majority of current local authority camping related bylaws can be included by way of a transitional provision in the freedom camping bill (the preferred option), thus avoiding the need for local authorities to undertake reviews, or SCPs outside the normal requirements.

35. DOC will need to develop and implement a new infringement system which will involve some administrative costs to set up. The scale of costs on an ongoing basis will depend on the scale of enforcement. DOC is proposing to seek additional funding to cover these costs, as the income from infringement fees cannot be retained for that purpose.

36. If the Bill is enacted, the ongoing costs (after set up of the system) for local authorities and DOC are dependent on the extent to which they advertise and enforce the provisions. Enforcement costs where local authority or DOC officers already respond to problems with freedom camping activity will be neutral. Issuing infringement notices would not necessarily entail additional action when that is part of existing work programmes, however additional costs would result if targeted enforcement operations over and above routine work programmes were conducted. This would particularly be the case if DOC was to respond to complaints outside normal working hours.
37. No additional costs are entailed in the issuing of infringement notices, however, there may be some costs associated with recovery of infringement fees. In the first instance, issuing agencies are required to send out a reminder notice. If the infringement notice remains unpaid the agency has six months to lodge it with the Ministry of Justice Collections Unit. Issuing agencies are charged \$30.00 for every unpaid infringement notice lodged. The fee is refunded only if the fine is paid.
38. Recent changes to the Transport Rule: Operator Licensing 2007, which came into force on 1 April 2011, add to the current list of information that must be recorded on a vehicle rental service agreement. The intention is to improve the ability of the courts to collect infringement fines incurred by hirers of rental vehicles (e.g. camper vans) by requiring more comprehensive contact and identification details. This will enable reminder notices may to be sent to fine defaulters. The Ministry of Justice notes that there is still some difficulty in enforcement of overseas visitors' infringements due to the lack of jurisdiction to enforce collection once they have left the country.

Infringement fee

39. The creation of an infringement offence necessitates specification of an appropriate infringement fee. Penalty levels for similar offending provide a guide for an appropriate fee level in relation to freedom camping offences. For example, under the Summary Offences Act 1981 a \$200.00 fine can be imposed for excreting in a public place. Under the Litter Act 1979, the maximum fee for infringement offences, such as depositing waste that is of a noxious nature, or litter that is likely to cause harm or injury is \$400.00. At the lower end of the scale, fees set in the Land Transport (Offences and Penalties) Regulations 1999 related to stationary vehicle offences range between \$12.00 and \$150.00.
40. The actual fee in relation to infringement notices issued under the Freedom Camping Bill would be \$150.00 until such time as regulations are made to amend the fee level.
41. It is considered an infringement fee of \$150.00 for freedom camping related offending to be proportionate to both the offending behaviour, and similar offences. A fee level of either more or less severity would diminish the likelihood of compliance and recovery.

Benefits

42. A significant expected benefit to the community of using an infringement regime is the deterrent effect to modify freedom campers' behaviour. It is anticipated that once freedom campers become aware that local authorities and DOC can issue infringement notices for freedom camping-related offences the problems associated with freedom camping will reduce. A reduction in negative behaviour associated with freedom camping will also mean a reduction in rubbish removal and cleaning costs for local authorities and DOC. Infringement regimes can achieve compliance with the law and hold people accountable for their actions. Issuing infringement notices is low-cost, simple way of addressing minor offending without, in most cases, recourse to the courts.
43. The ability to issue infringement notices on both DOC and local authority administered land, and to attach notices to vehicles, are significant benefits entailed in the development of the Freedom Camping Bill (the preferred option).

Risks

44. Addressing problems associated with freedom camping by way of specific legislation may raise the expectation in the local government sector that other issues may be able to be addressed in a similar fashion. Local authorities' inability to issue infringement notices without specific regulations being made and maintained by central government may need to be addressed through further policy work in relation to section 259 of the LGA02.
45. The development of a bill within such a short timeframe entails risks in terms of its passage through all Parliamentary stages before the RWC deadline. We have mitigated these risks to as much an extent as possible by limiting the scope of the Bill to freedom camping related activity only.
46. The short timeframe also does not leave much room for implementation of the Bill's provisions. The mitigation strategy for this risk is described below.

Implementation

47. DIA, DOC and the Ministry for the Environment will develop a programme to ensure that affected parties (e.g. backcountry users groups), the freedom camping forum and tourism industry representatives are aware of the Bill's development and likely passage.
48. The camping public and visitors will be made aware of the new infringement regime by way of industry websites, DOC and i-site information centres and local authority information channels (websites, newspapers, brochures etc).
49. DOC and local authorities will set up systems to implement the infringement regime. This will include the level of discretion enforcement officers can use in regard to issuing infringement notices.
50. DOC and local authorities will make decisions on where freedom camping will be restricted. For DOC, this may include consultation with interested parties. Local authorities will need to undertake a SCP if making new or amending existing bylaws.

Consultation

51. The options in this Regulatory Impact Statement have been developed jointly by DIA and DOC in consultation with the Ministry for the Environment, and the Ministries of Transport, Justice, and Economic Development. Local Government New Zealand has provided advice and information on behalf of the local government sector.
52. The Treasury, the Ministry of Health, the Department of Labour, and the Parliamentary Counsel Office were also consulted. The Department of the Prime Minister and Cabinet has been informed of the proposals.

Monitoring, evaluation and review

53. The LGA02 requires that bylaws are reviewed five years after they are made and then every ten years. Local authorities will be responsible for evaluating the continuing or developing need for a freedom camping bylaw and the ability to issue infringement notices.
54. DOC will apply normal monitoring and review procedures to these new restrictions. This would include consideration of controls on freedom camping as part of management planning processes, and as part of other reviews of visitor services for the affected land. The operation of the infringement procedures itself would be managed through the systems used for managing all enforcement procedures.