

Submission on the Consultation Paper:

Draft Incorporated Societies Regulations 2023 and proposed fees under the Incorporated Societies Act 2022.

23 July 2023

From: Diana Yukich
Organisation: Titirangi Residents & Ratepayers Association Incorporated
(TRRA) 2634313

Contact details: Diana Yukich, Treasurer. Privacy of natural persons

Thank you for the opportunity for TRRA to submit on the Draft Incorporated Societies Regulations 2023 and proposed fees under the Incorporated Societies ACT 2022.

We do not wish to speak to our submission.

Our key point relates to 3. Proposed Initial Fees:

- **Titirangi Residents & Ratepayers Association believe that it is not appropriate to charge Associations to reapply for registration when the changes necessitating reregistration are outside their control. That is, we believe that Associations not bear the cost of updating the Incorporated Societies ACT, and that the Government should rightly absorb the cost; and**
- **If the Government continues to choose to make Associations pay to reapply for registration, then fees should be proportional to the finances of the organisation. TRRA believes charging Associations that have limited financial resources the amount of \$88.89 (GST exclusive) to reregister places an unequal financial burden on smaller associations. Organisations with smaller bank balances work just as hard in their communities often without having access to funds, grants or fundraising. That is, they operate successfully on the smell of an oily rag and shouldn't have to pay a disproportionate amount of the overall cash they have on hand to reregister. We believe it either needs to be 1. A sliding scale so that fees do not disproportionately penalise smaller associations with less cash on hand, or 2. That Associations with less than a given amount of financial resources be exempt from the reregistration fee.**