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Ministry of Business, Innovation and Employment
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RE: Submission on the Exposure Draft: Incorporated Societies Bill

1. Community Housing Aotearoa (CHA) is the peak body for the community housing sector that provides social and affordable housing throughout New Zealand. We represent the interests of our 90+ members on issues that impact their ability to fulfil their organisational missions. The proposed amendments to the Incorporated Societies Act are of great interest to our members and they are broadly supportive of Government's efforts to modernise the 1908 Act.
2. CHA attended the Consultative Seminar presented jointly by Hui E!, MBIE, and Internal Affairs. In addition, we have reviewed the Exposure Draft and received input from our members regarding the proposed changes to the Act.
3. CHA supports the submission by Hui E! regarding both the areas of agreement and concern with the Exposure Draft.
4. Based on feedback from our membership, we wish to emphasise concern with two areas.
 - a. The first concern regards the reduction from 15 to 10 in the number of members a society must have to register, and the requirement to maintain at least that number. *We recommend that the minimum number should be 5 to register and to maintain at least that number.* This number is sufficient to demonstrate the proposed society represents a community interest.
 - b. The second concern regards the proposed 15 days to appeal decisions of the Registrar to the High Court. This is simply too burdensome and expensive. *We recommend that the minimum number should be 90 days to appeal a decision of the Registrar and that a lower level appeal process be included prior to requiring an appeal to High Court.* This provides a more realistic and cost effective process for volunteer-based community organisations.
5. Community Housing Aotearoa appreciates the opportunity to express our views in advance of the introduction of a bill. We are available to respond to any questions regarding our submission.

Kind Regards,

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