

Submissions to External Organisations Policy



te kaunihera ā-rohe o
matamata-piako
district council

Department	Policy, Partnerships and Governance
Policy Type	External
Approved by Executive Team	N/A
Approved by Council	24 September 2025
Review Frequency	Three Yearly
Next Review Date	24 September 2028
Policy Supersedes	Not Applicable
Policy Reference	CM 3097627

1. Purpose

The purpose of the Submissions to External Organisations Policy (Policy) is to ensure that:

- Council is looking at issues on the horizon, forward thinking and future ready in regards to proposed changes by external organisations.
- Submissions are strategic, transparent, and aligned with Council's statutory responsibilities and community priorities.
- Council has a framework to guide when and how Council makes submissions to external organisations.
- Council staff are taking a consistent approach, ensuring appropriate input and approval processes for all submissions made to external organisations.

2. Scope

This Policy applies to all submissions to external organisations whether approved by Council staff, Council or Committees.

External Organisations include but not limited to central government, regional or sector groups and regulatory bodies.

- Central government, agencies and regulators (e.g. Ministry for the Environment, Department of Internal Affairs, Taumata Arowai).
- Regional councils or other territorial authorities.
- Other relevant sector organisations.

This Policy excludes Council controlled organisations (CCOs) making submissions to other organisations, as the organisations will have their own submission processes. If the CCO requests Councils feedback on a submission that they are preparing, the review of the submission will follow the process highlighted in this Policy.

3. Why Council Makes Submissions

Council makes submissions to external organisations to:

- Represent and advocate for the interests of our communities and district.

- Ensure local voice, knowledge and subject matter expertise and experience inform national or regional decisions.
- Influence national, regional, or sector policy and legislation.
- Influence outcomes that impact Council’s ability to deliver on its responsibilities.

4. Principles

Council may make submissions where the subject matter:

- Affects the district or region.
- Impacts Council’s roles, functions or resources under the Local Government Act 2002, Resource Management Act 1991, or other relevant legislation.
- Affects Council’s strategic direction, vision and outcomes, Long Term Plan, or adopted policies.
- Presents an opportunity to advocate for better outcomes for our communities.

In deciding whether or not to make a submission:

- For Council submissions, staff will seek direction from Elected Members. If time allows this will be through formal workshops/meetings, if timing doesn’t allow this will be through email/Microsoft Teams. Council may opt not to make a submission on a particular issue.
- For technical submissions, staff will seek direction from the Chief Executive or relevant Group Manager under staff delegations as to whether or not it is appropriate to make a submission.

A considered approach will be taken, guided by an internal submission scoring system, taking into account staff capacity, any other sector submissions being made and any other factors that may be deemed appropriate at the time.

5. Types of Submissions

Submissions fall under two types, council submissions and technical submissions.

Type	Description	Examples	Approval Required
Council	A council submission focuses on high level strategic matters, examples include policy, reform and funding. It represents the official view of Council’s Elected Members.	Regulatory Systems (Internal Affairs) Amendment Bill – lifting the \$25k p.a. limit on Elected Members contracts with their local authority to \$100k. Resource Management Act – reform of housing growth programme. Building Act – structure of building consent authorities.	Approval required from Council or delegated Committee. Approval may be delegated to the Mayor or Deputy Mayor in time-sensitive cases (Elected Members will still have the opportunity to input). Each submission will clearly state who it is on behalf of and approved by.
Technical	A technical submission focuses on operational,	Local Government Act – amendments regarding placing of newspaper advertising.	Chief Executive or relevant Group Manager under staff delegations.

Type	Description	Examples	Approval Required
	technical, regulatory, service level or implementation matters. It represents staff views of technical/ operational matters.	Resource Management Act – technical specifications for small standalone dwellings (granny flats). Building Act – allowing of international products into New Zealand.	Each submission will clearly state who it is on behalf of and approved by.

Where a submission could fall under both a Council or a Technical submission or it is unclear the default should be Council submission as that requires a higher approval process.

6. Council Oversight

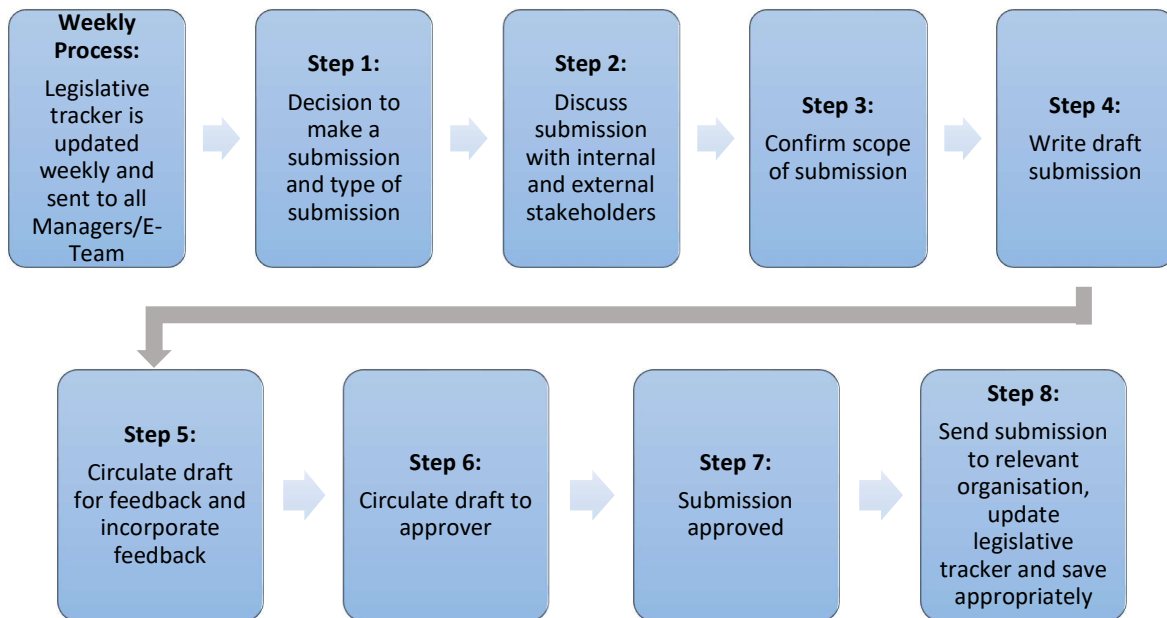
Council submissions will be reported for Elected Member approval, wherever possible.

A report of all Council and Technical submissions will be reported to Council's Executive Team and Council on a quarterly basis to ensure good process, transparency and Council are kept informed.

7. Related Documents and Legislation

- Legislative tracker and process
- Process to make submissions to external organisation

Submissions to External Organisations Process



Weekly Process

Legislative tracker is updated weekly and sent to all Managers/Executive Team – see separate Legislative Tracker process

Step 1: Decision to make a submission and type of submission

The main drivers for making a submission are when an external organisation is consulting on:

- Proposed new, or changes to existing, legislation/regulation that has the potential to affect and/or impact the work that Council undertakes, or;
- An issue or topic that has potential to affect and/or impact the work that Council undertakes, or;
- An issue that may affect the local community.

The submission can be in response to something that Council supports (in part or in full) or does not support.

Potential submissions on new legislation/regulation/issues must be discussed with the relevant Third Tier Manager/Group Manager/Executive Team or Council.

A decision then needs to be made whether the submission will be a Council or Technical submission.

A submission scoring system has been developed to help teams decide if a submission may be necessary, and what form of submission it will be: [Record 3084354: Excel Submission Scoring System](#). The scoring system rates the impact and potential risk that proposals are likely to have on the Council and/or the District, including regulatory, financial, legal and environmental.

- It is the responsibility of the relevant manager (or whoever they delegate the task of submission writing) to fill out the scoring system.

Step 2: Discuss submission with internal and external stakeholders

Changes to legislation often impact multiple internal teams, it's really important early on in the process to talk with other teams to understand what the impact on them might be and to work together on a single response from Council. There may also be external stakeholders to engage with at this point depending on the proposal.

Step 3: Confirm scope of submission

- The scope of the submission must be discussed with the relevant Third Tier Manager/s and Group Manager/s.
- This discussion may further refine the scope or identify key aspects of feedback Council needs to include in its response.
- It is important to identify key steps in the lead up to the submission closure date and allow relevant time for approval.
- If time permits, seek feedback from Council as to whether a submission should be written.

Step 4: Write draft submission

- The staff member with the most relevant technical expertise (for the legislation/regulation/topic/issue) will lead the writing of the submission, unless delegated elsewhere.
- Consult other relevant teams that may be affected.
- Community views will often be known from previous feedback, consultations etc, this can be used to inform submissions.
- The submission writer can seek advice from the Policy Team to discuss structure and content of the submission if relevant.
- Once a submission has been drafted, the submission lead may send it to the Policy Team for a peer review, if relevant.

Step 5: Circulate draft for feedback and incorporate feedback

Circulate to all internal and external stakeholders for feedback.

Seeking involvement and Input from Council and Committees:

Recognising that consultation timeframes frequently do not allow time for Council staff to consider, consult, prepare and report to Council/Committees formally on a draft submission, you should seek input by providing a copy to Council or Committees through Microsoft Teams via the Governance team, who operate a Teams channel.

On issues relating to iwi/Māori staff should consider seeking input from Te Mana Whenua Forum members, iwi groups directly, and/or Council's internal Iwi relationship staff.

On issues involving significant organisational risk or audit findings, staff should consider engaging with the Risk and Assurance Committee for guidance, and where appropriate, seek input from internal risk advisors and external audit representatives.

Step 6: Circulate draft to approver

- If the submission is a Technical submission it is to be circulated to the Group Manager and, if required and suggested by relevant manager/s, the Executive Team.

- If the submission is a Council submission it is to be circulated to Council either via a formal Council agenda (if time allows) or via email/Microsoft Teams for approval and delegation to the Mayor or Deputy Mayor to sign off.
- If it is a Resource Management Act (RMA) submission – consider whether it should be made using the Chief Executive’s delegated authority for RMA submissions.

Step 7: Submission approved

- Submission to be approved by the appropriate approver and a final submission circulated to all contributors and approvers.

Step 8: Send submission to relevant organisation, update legislative tracker and save appropriately

- Send the final approved submission to the relevant organisation prior to the submissions closing date.
- Upload the final copy into Content Manager.
- Place document in ‘alternative container’ in properties tag in Content Manager, the container number is either:
 - - for Council Submissions: 25/3953
 - - for Technical Submissions: 25/3951
- Add submission details into the legislative tracker.
- Publish Council submissions on Council website.
- Appropriate staff and Elected Members present Council’s submission at the hearings (if a hearing process is in place) if desired.