



8 August 2011

Manager - Philanthropy and Exemptions Unit  
Personal and Retirement Income Division  
The Treasury  
Langton Crescent  
PARKES ACT 2600

**Re: Submission regarding  
Exposure Draft – ‘In Australia’ Special Conditions for Tax Concession Entities**

The proposed legislation as it stands removes tax exemption from institutions currently prescribed under sec 50-50(d) of the Income Tax Assessment Act 1997.

I write to petition for the reinstatement of this provision as both the National Director of FEBC Australia and as an ordained Minister of Religion in the Baptist Churches of NSW & ACT.

FEBC Australia (ABN 68 000 509 517) is an international mission organization with its primary focus in the south-east Asian region.. Working in partnership with its 22 other country FEBC membership organizations, we produce and broadcast community development programs in health, education, agriculture and relief, as well as spiritual and life programs. FEBC Australia works also in partnership with World Vision, TEAR and other global missions to provide emergency communications and aid during times of natural disasters and international emergencies. Having people on the ground in these locations provides accountability and feedback. These activities building international goodwill and relationship back to Australia are funded by donations made to FEBC Australia.

**Reason for Concern**

Professional advice indicates that the Exposure Draft will have the following impact on FEBC

- Loss of income tax exempt status under 50-50(d) of the Income Tax Assessment Act as a member of Australian Evangelical Alliance Inc (Missions Interlink) which is prescribed by law under regulation 50.50.02. This would put at danger many positive outcomes to Australia noted above; in particular our ability to provide emergency help to our immediate neighbours in times of natural disaster. We are able to be efficient now with minimal staff, however, tax requirements would necessitate administration costs that we now do not incur.
- Disincentive for our present donor organisations to give under fear that they will lose their income tax exempt status. Many of our present donors are churches who willingly and sacrificially give to help neighbouring countries across SE Asia. This impact on finances will stop us from carrying out the beneficial work that we presently carry out building goodwill.

Therefore I would call for the Exposure Draft to be adjusted by adding in the facility for Australian institutions to be prescribed in the regulations as is the case now in sec 50-50(d)). As well, for the current Regulation 50.50.02 (under which Missions Interlink and others are proscribed) to be carried over to the new tax regime. Thus any new law should retain exemptions for all prescribed institutions listed in the current regulations.

A handwritten signature in black ink, appearing to read 'Kevin Keegan', with a long vertical line extending downwards from the end of the signature.

Rev. Kevin Keegan  
National Director FEBC Australia/ FEBC International Chairman  
Minister of Region - Baptist Church of NSW & ACT  
E: [kevin.keegan@febc.org.au](mailto:kevin.keegan@febc.org.au) M: 0413 599 068