

From: [REDACTED]
To: [DGR Inbox](#)
Subject: Tax Deductible Gift Recipient Reform Opportunities Discussion Paper
Date: Thursday, 3 August 2017 10:44:35 PM

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Submission is below:

Senior Adviser

Individuals and Indirect Tax Division

I wish to make a submission regarding the consultation paper which proposes potential reforms to Deductible Gift Recipient (DGR) tax arrangements.

It is clear to me that there is a political motive in this review process. While ostensibly it relates to management arrangements for all not for profits, it singles out environmental organisations (ENGOS) for particular scrutiny.

I oppose the suggestion that DGR listed green groups be forced to allocate 'up to' 50% of their funds to "environmental remediation" – in other words, picking up litter or planting trees - instead of advocating for protection of the natural environment. There are literally thousands of fantastic organisations that already do this work. Equally, I believe it is essential we have organisations that can engage in community education, campaigns and advocacy to protect the environment.

There is also a dangerous recommendation that environmental groups should face administrative 'sanctions' for being in any way connected to 'unlawful' activity. This proposal would be unworkable (how can organisations be held responsible for the activity of people 'without formal connections to the organisation' who might be involved in 'illegal' activity?).

It is also exactly what the Minerals Council of Australia has been calling for – the government would be seen as following the lead of the fossil fuel and mining sectors if it placed specific sanctions against ENGOS.

Peaceful protest is a cornerstone of sustaining a healthy democracy. Being engaged in peaceful protests does not imply that an NGO is involved in 'illegal' activity.

I urge you to put aside the recommendations in the paper which are clearly politically motivated.

A legitimate and non political review of the governance arrangements for not for profits will be broadly welcomed, both by the community and the NFP sector, if they remove unnecessary duplication, inconsistencies in how different charities are managed, and reduce reporting burdens while ensuring transparency and rigor in the reporting process.

However, an attempt to limit or sanction environmental groups for working to protect the natural environment will be seen as being politically motivated.

Thank you