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Charitable Fundraising Regulation Reform Discussion Paper
Infrastructure, Competition and Consumer Division
Treasury
Langton Crescent
PARKES ACT 2600

Re: Charitable fundraising regulation reform: Discussion paper

The Australian Christian Lobby (ACL) appreciates the opportunity to comment on the Treasury's discussion paper *Charitable fundraising regulation reform*.

ACL has strong relationships with churches, charities, and other not-for-profit entities (NFPs). Such organisations bring considerable public benefit, performing work which many government or for-profit organisations are unable or unwilling to perform, and helping some of the most vulnerable members of our community.

The contribution that charitable organisations, churches, and other NFPs make to society is invaluable. Charities and churches have benefited from tax exemptions for hundreds of years and have been presumed to bring public benefit unless otherwise shown. Freedom from tax burdens have enabled NFPs to make such a valuable contribution and can be the difference between an NFP being financially viable or not. Regulatory burden can be a significant threat to the efficiency and effectiveness of an NFP's operation.

The current review of the non-profit sector has caused some concern among charitable organisations and churches. These entities are anxious about the added burden that may result from an unrelated business activities tax, and there is concern that the proposed statutory definition of charity may add confusion and increase the burden on some organisations. Churches, which often support charitable work overseas, and charities that work internationally are also concerned by the proposed new "In Australia" test.

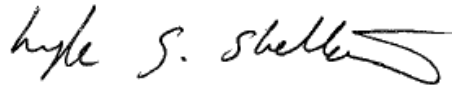
Thus, there is currently much uncertainty in the not-for-profit sector.

ACL commends the Treasury for their stated aims of reducing red tape and increasing transparency in the non-profit sector by reforming charitable fundraising regulation. However, ACL does not believe that case has been made that it is necessary to make such reforms, or that doing so will improve the situation for NFPs.

The reforms to charitable fundraising regulation would be welcome if they reduced the current burden on NFPs. ACL urges the Treasury to proceed with careful consideration that the proposed reforms will have and err on the side of reducing, rather than increasing, the burden on NFPs. This necessarily requires an adequate time period for extensive consultation with entities in the sector, as well as time for NFPs to make necessary adjustments once decisions have been reached.

ACL thanks the Treasury for considering its comments.

Sincerely,

A handwritten signature in black ink that reads "lyle s. shelton" followed by a stylized flourish.

Lyle Shelton

Chief-of-Staff