

BirdLife Southern Queensland PO Box 375 Annerley QLD 4103

1 August 2017

Senior Adviser Individuals and Indirect Tax Division The Treasury Langton Crescent PARKES ACT 2600 DGR@treasury.gov.au

Re: Treasury's Discussion Paper on Tax Deductible Gift Recipient Reform

On behalf of the 1200 members of BirdLife Southern Queensland, we would like to express our concerns in relation to some of the proposed reforms to the 'deductible gift recipient' (DGR) framework found within the Australian Treasury's recent discussion paper. BirdLife Southern Queensland is a regional branch of BirdLife Australia, our country's oldest research-based conservation organisation, dedicated to ensuring that the birds of Australia have a bright and secure future.

We are aware that BirdLife Australia has submitted a submission outlining its position on the proposed changes, which we fully support. We are not a legal entity in our own right. Instead we are a 'grass roots' voluntary organisation that relies on our national organisation's DGR status to allow us to carry out its' work at the local and regional level. Except for a single part time 2-day a week position, we are a committee of dedicated volunteers, contributing upwards of 4 Full Time Equivalent positions to a range of local and regional initiatives that align with BirdLife Australia's national bird conservation priorities.

Examples of our work includes:

- Delivering curriculum-based education modules to primary and secondary schools. This entails developing multimedia educational tools, as well as many hours of face to face work in classrooms in South East Queensland. By using funds raised from our book, The Birds of South East Queensland, we do this at no charge to schools;
- To inform BirdLife Australia's national conservation work, we coordinate and undertake systematic bird surveys utilizing standardized BirdLife Australia's Atlas techniques. This service includes data analysis and report writing. We use this information to engage with land holders, managers, planners and decision makers to assist them make informed to decisions that provide for better outcomes for birds in our region.

None of these activities are not recognised under the narrow definition of eligible activities in the proposed reforms. Nor do we have staff or volunteers who could participate in approved remediation activities. In addition, the annual reporting requirements would also place a huge burden on our already overstretched volunteer base as it is already fully committed to undertake the activities listed above.

We strongly urge a review of the proposed reforms to recognise that eligible activities must recognise and embrace the incredible contribution of voluntary community based organisations that work with their national organisations for the greater good.

Yours sincerely

India Hayle

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