



The South Australian Ornithological Association Inc

Founded 1899
ABN: 76 339 976 789

Postal Address:

C/o South Australian Museum
North Terrace
ADELAIDE SA 5000
August 2, 2017

Senior Adviser
Individual and Indirect Tax Division
The Treasury
Langton Crescent
PARKES ACT 2600

Re: Discussion paper on Tax Deductible Gift Recipients

Dear Sir/Madam,

I write to you on behalf of our 765 members, and as President of the South Australian Ornithological Association Incorporated (Birds SA), which was founded in Adelaide in March 1899 and is the oldest birding association in Australasia. It is a non-profit organisation dedicated to the conservation and study of Australian birds.

The association controls a fund ("Birds SA Conservation Fund") that holds deductible gift recipient status. It is in relation to this fund that we wish to comment upon Recommendation 5 of the ***Discussion paper on Tax Deductible Gift Recipients***. This recommends that the value of each environmental DGR's annual expenditure on environmental remediation work be no less than 25 per cent of the organisation's annual expenditure from its public fund. The consultation question that accompanies this recommendation indeed asks whether a higher limit, such as 50 per cent, should be considered.

We wish to record that we are totally opposed to these restrictions on the activities of our fund for the reasons set out below:

- The Birds SA Conservation Fund raises money by seeking donations from members and uses those funds to support research into bird life and bird habitats within Australia. We do not use fund monies to support lobbying, advocacy, administration or any other purpose.
- Monies collected from membership subscriptions, investments, donations and sale of various items are collected into a general fund and used to support our other activities, which include on ground conservation and administration. None of the monies collected in these ways is claimable as a tax deduction.

- Many of our members volunteer their time to carry out on-ground conservation work with organisations such as Trees for Life Inc. which specialise in such activities. All positions within our association are filled by volunteers.
- The Birds SA Conservation Fund supports post-graduate students working on projects which are of benefit to birds. Each project is evaluated by the committee overseeing the fund and the students are supervised by an Australian University. Some of the students are from overseas and we note the importance of this sector to the Australian economy. The other use of the fund is to support research into bird life and bird habitats within Australia by suitably qualified people. A recent project of this type was a survey of the endangered coastal raptors in South Australia. The knowledge gained from such studies is of vital importance in the effective conservation of birds. We have determined that using the funds in the way we do is the best use of member's donations.
- Our fund is very small. We only receive between AUD 4,000 and AUD 16,000 per year and the amount we have invested at any one time varies between \$45,000 and \$50,000 per annum. There is therefore very little drain on the public purse by allowing people to claim a deduction. Our disbursements are targeted and are of value to the recipients and the research which they conduct. However, if used for general conservation remediation the sums are too small to be of significance.

We are concerned that the restrictions placed on our fund if recommendation 5 is accepted would reduce the amounts we have available for supporting these activities by diverting them into less important areas, and is completely unwarranted. We submit further that tax relief to our donors is a worthy use of public funds.

Yours sincerely,



John Gitsham,
President, Birds SA