



Caldera Environment Centre Inc.

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Caldera Environment Centre (CEC) welcomes the opportunity to comment on the discussion paper with particular concern regarding the proposal to require environmental organisations to allocate 25% of donated funds to 'on ground works'. CEC note that half the committee disagreed with this recommendation and issued a dissenting report. This reinforces the obvious conclusion that this is driven by vested interests and singling out the environmental groups with DGR status is designed to constrain their activity.

The public has demonstrated with its donations that it wants an effective environmental sector to advocate for its protection. For an organisation like the EDO to guarantee 25% of its resources for remediation is not reasonable or rational. Its expertise in environmental law and community capacity building built up over decades has been invaluable to individuals and community groups challenging questionable government and corporate decisions that have profound effects on the environment. This is good for democracy and means that issues can be resolved by courts and justice served.

As well as mandating how funds can be spent the associated administrative costs will place a further burden on organisations that are often run by volunteers. There are currently sufficient reporting mechanisms and registering requirements to ensure compliance with DGR status. This makes a mockery of the committees desire to reduce administrative complexity and as this proposal is being championed by the resources industry their agenda is to hamper environmental advocacy.

There's no doubt that 'on ground works' are vital but considering the environmental degradation still needing rehabilitation and remediation we consider it more important that environment groups are able to be unconstrained to educate and advocate for the environment to try and prevent further damage. CEC also note the



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number of submissions to the committee opposing the proposal and hope the Treasury takes note that those advocating for the health of our environment see the difficulties that this requirement will impose.

Government should accept its responsibility to separately fund rehabilitation works. Remediation requires expertise and monitoring often for years so mandating environmental organisations include this activity in their remit is impractical, unfair and an inefficient use of resources. It will also affect philanthropy, confusing donors as to where their money is going.

Regards

Cynthia Brook
Secretary
Caldera Environment Centre