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To: [DGR Inbox](#)
Subject: Tax Deductible Gift Recipient (DGR) Reform Opportunities
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Submission

Tax Deductible Gift Recipient (DGR) Reform Opportunities

Submitted to:

Australian Government Treasury

DGR@treasury.gov.au

I object to the proposal to require all environmental DGRs to spend at least 25 per cent of public donations on 'environmental remediation' as well as proposals for additional reporting and supervision of environmental organisations over and above other charities in order not to lose tax concessions.

I disagree totally with the implied assertion behind this law that it is the task of environmental groups to be undertaking environmental remediation at any Government decreed level.

It is fundamentally unfair to try to force all environmental groups to do the remediation for the perpetrators through the requirement of 25 per cent of public donations on 'environmental remediation' to gain tax free status.

The proposal is seemingly based on an arbitrary and narrow suggestion that protection of the environment can only occur through the remediation of a (government approved) development's harmful impacts.

The proposal would essentially be taking sides with the mining and resources lobby, including the Queensland Resources Council and the Energy Resources Information Centre (funded by the gas industry).

Currently these tax concessions recognise the public benefits and services that Conservation groups and the EDOs provide across Australia – to farmers, Landcare and conservation groups, Aboriginal people, urban and rural communities.

I question why environmental research, community education, overseas environmental protection, and the free community legal services should be excluded from tax free status when all funds go to protecting and arresting the devastation wrought upon the natural world by developers and exploiters of the environment.

The consultation paper embodies a complete lack of concern for other valid environmental activities which should attract and be eligible for tax-deductible donations.

If you want to improve the effectiveness of expenditure on environmental

matters you would be better placed to limit the destruction of the environment by the resources lobby groups and greedy developers.

It is far preferable to prevent damage to the environment in the first place.

I support the submission made by the EDO NSW office and agree with its cogent arguments against your proposal.

It is important that Treasury does not adopt the proposed mandatory diversion of limited funding, or target environmental organisations, for the following five reasons:

1. Conservation work is vitally important, but the Australian community recognises that not all environmental problems can be solved reactively. That is why there is no such limitation in the existing tax rules.
2. A mandatory 25 per cent funding diversion would have adverse outcomes for environmental protection. It would force established charities, including EDOs, to divert money away from their recognised areas of expertise and public benefit – or remove their DGR status altogether. This would diminish EDOs' unique role in upholding the rule of law.
3. There is a clear recognition in Australian charity law that advocacy (read "environment advocacy") is "indispensable" to an informed democracy.

I repeat, I oppose the proposal arising from the 2017 Treasury consultation paper to effect changes to the administration of all Tax Deductible Gift Recipients (or DGRs). The Tax deductibility status for environmental groups should not be conditional upon them all spending at least 25 per cent of public donations on "environmental remediation".

There should never be a requirement that reporting by, and supervision of, environmental organisations be over and above that of other charities.

I submit that Australia needs a strong and diverse charitable and DGR sector to protect our natural and cultural heritage, and contend that this proposal will not achieve it.

The current tax free arrangement should be maintained.

Elizabeth Donley

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