

Submission to Treasury regarding proposed DGR reforms

I write in the capacity as Treasurer for two organisations with DGR status that are predominantly involved in wildlife care and wildlife protection advocacy. I also write in the capacity as a donor to environmental organisations for many years.

I am startled to see that specifically environmental type organisations are targeted for these reforms. Why? This seems shockingly discriminatory. I have been a donator for years to such organisations *specifically* because of their advocacy work. I find that whilst I do as much as I can toward environment protection etc like many people I am time poor and don't feel I have the right words or knowledge to advocate. I feel comforted that there are organisations who will fight on my behalf for the environment. These proposals are assuming that donators are unaware of such work. It implies that advocacy such as peaceful protests are wrong. Personally I will increase my donation level when I can see that protest activity is needed as I feel it is a way to let my voice be heard.

I don't understand why a target of 25% to 50% of donated monies need to be spent on "environmental remediation works" or a charity may lose its tax deductibility status. It seems bizarre that charities will have to spend money fixing up environmental damage or putting funds toward areas that are not publicly funded rather than trying to potentially stop such damage or raise awareness about issues before they happen in the first place.

In the organisations I am Treasurer for (wildlife protection and rehabilitation) we receive little government assistance. We already spend a lot of funding on training for taking care of injured wildlife including burnt animals (both via bushfire and government planned burns where many wildlife are injured). Unless you've dealt with the burned animals from such fires, or dealt with a koala felled from a Vic Forest coupe it is hard to explain how dreadful it is so, yes, we do spend time advocating that DELWP reduce planned burns or alternatively alter them where endangered species are concerned. We have found that when we do such advocacy work is where we get the most appreciation from members of the public who agree with our action but do not know how to undertake it themselves.

Also as Treasurer I find the paperwork (end of year) presently quite onerous as I report to Department of Justice, Victoria, The Register of Environmental Organisations, The ACNC, and of course we have our accounts sent to an independent auditor each year. For a small organisation this is already a lot of compliance work. These checkpoints should be sufficient. Our auditor for example has to ensure that the monies spent from our public fund are solely for our stated objectives as per our constitution. As an auditor myself (in my paid work) I am concerned about the proposed changes whereby it may be subjective for an auditor to decide that an organisation has failed to meet its DGR requirements if there has been advocacy or protest work done. How will they know? How will they judge it?

In order for all areas of the Australian environment to be considered, protected and awareness raised on issues it is vital that these groups are able to undertake a wide range of activities such as advocacy, research, public education, community engagement, and, if necessary, protests.

Often such groups are the "voice" for when the environment they are speaking for has none (such as our wildlife).

I would like to close in expressing my very strong concern at how the proposals specifically single out Environmental type organisations. This seems discriminatory and I question the motivation. Why

also does the Treasury Discussion paper ignore the dissenting reports from some of the REO enquire members.?

Finally, for me personally, rather than in my role as Treasurer of DGR's I re-iterate that I wholeheartedly donate to environmental organisations that I can see doing strong advocacy and protest work for that specific reason. Their voice.

I respectfully request that these bizarre requirements on groups with specifically an environmental focus be reconsidered.

Yours sincerely

Vicki Hams

Treasurer of groups - Wildlife Rescue & Protection Inc, Southern Ash Wildlife Shelter Inc and long time supporter of environmental advocacy groups.

Certified Practising Accountant in my paid job!

[REDACTED]

[REDACTED]

[REDACTED]