

## **SUBMISSION RE TAX DEDUCTIBLE GIFT RECIPIENT REFORM OPPORTUNITIES – DISCUSSION PAPER**

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

Email: [DGR@Treasury.gov.au](mailto:DGR@Treasury.gov.au)

I support moves to simplify the application process for obtaining DGR status and to reduce the burden of compliance. But I question some of the assumptions and recommendations in the Treasury discussion paper.

It's in the public interest to encourage and facilitate philanthropic activity in Australia, not to limit its scope, particularly in the vital transition to sustainable environmental practice.

Under the heading ISSUES,15, the paper asserts that “there are concerns that some charities and DGRs undertake advocacy that may be out of step with the expectations of the broader community, particularly by environmental DGRs which must have a principal purpose of protecting the environment.”

Who is expressing these concerns? Who gauges what the broader community expects? Who genuinely believes it's possible to “protect the environment” without winning hearts and minds, without influencing public opinion and government policy – without advocacy?

### **Parliamentary Inquiry into the Register of Environmental Organisations Recommendation 5:**

I strongly oppose moves to mandate that environment charities/DGRs must spend 50% or even 25% of their money on direct on-ground environmental ‘remediation’, because this would hamper their ability to work towards more significant change.

Practical action such as planting trees, cleaning waterways, retro-fitting for energy efficiency, combatting invasive species, removing rubbish, etc, etc, is crucial, of course. But for remediation to be effective on a worthwhile scale, it needs to be backed by government policy and/or funding, which may only come as a result of advocacy.

Remediation, by very definition, is about fixing-up problems rather than preventing them. **It's much more important to prevent or at least reduce environmental problems than struggle to fix them.** And our biggest problems can only be tackled by nation-wide and world-wide action.

Remediation alone, on the scale that charities can achieve, will never meet our escalating environmental challenges. Remediation must go hand-in-hand with more sustainable activity in every sphere. We need to change attitudes and behaviours at all levels: individual, household, community, business, industry, nationally. This requires leading by example, educating and persuading others, promoting appropriate regulations and challenging harmful policies. You can't educate, persuade, or influence policy without advocacy in all its forms. The issues are not party political, but they are inescapably political in the broad sense.

Individual Australians care about our environment. Sure, we can make changes in our own small patch – at home, in our community, in our sphere of work. We can cast our vote to support certain policy directions. But beyond that **we rely on environmental charities/DGRs to pursue significant environmental outcomes on our behalf; we expect them to use the most effective means available to achieve broad, long-term gains.** If you limit the legitimate scope of this activity, you limit citizens' ability to take action for change.

It's self-evident that large organisations and industries have far greater resources than ordinary citizens have to influence public opinion and legislative outcomes. They also have far more scope to minimise their tax. So any proposal that reduces citizens' ability to direct tax-deductible donations towards influencing public opinion and legislative outcomes strikes me as highly unfair and undemocratic.

As an individual and as a director of a PAF I support many environmental charities/DGRs. I firmly believe it's in the public interest for them to have full discretion over how they allocate their resources (within the law) to achieve maximum benefit for us all.

Rosalind Price

