

From: [REDACTED]
To: [DGR Inbox](#)
Subject: Tax Deductible Gift Recipient - Discussion Paper 15 June 2017
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The submission I would like to make is focused on what I feel is a totally skewed approach to this discussion paper.

The paper is divided up into 3 different areas.

The first area being the discussion itself, looking at DGR in general regarding all 600,000 charities that are spread over a variety of areas that are of community concern and are for the purpose of supporting the community in general.

The second area being the consultation questions, these questions also appear to be very generic asking about the whole DGR status of all charities. Of the 13 consultation questions, there are 2 that focus on the environmental register. This is a ratio of 15.4%

The third area being the recommendations which are highly skewed towards the environmental register. Out of the 9 recommendations, all 9 are focusing on the environmental register making this ratio 100%.

This to me is very concerning that the discussion and the consultation questions do not match the recommendations being put forward. My understanding is that the discussion paper is asking for submission focused on the consultation questions.

Since the consultation questions are focusing on a much more broader area than the recommendations. How is this going to strengthen the DGR governance arrangements for charities in general?

I have heard many a rumour that these recommendations are a direct attack on environmental organisations and the advocacy work that they do. After reading this discussion paper I would have to agree that there is a hidden agenda within these recommendations is to reduce the resources available to these organisations. With out justification of any proof that the outcomes these organisation are not for the benefit of the public.

Since the recommendations are all about the charities that come in under the environmental register the following comments will focus on the 2 consultation questions that are about environmental register.

Stakeholders' views are sought on requiring environmental organisations to commit no less than 25 per cent of their annual expenditure from their public fund to environmental

remediation, and whether a higher limit, such as 50 per cent, should be considered? In particular, what are the potential benefits and the potential regulatory burden? How could the proposal be implemented to minimise the regulatory burden? How do we know, as a community, that forcing environmental organisation to focus expenditure to environmental remediation is actually in the best interest of the community? It is up to the community to decide what is important to them and what concern them most, not a regulatory process. What is the point of planting trees when it could be better to advocate saving a forest that is already in place. If we take away the right of the community to direct environmental organisations, who then makes these decisions? as for regulatory burden, it seems that there is already enough in place for environmental organisation to be transparent regarding their operations. The requirement of audit and reporting to Community, local council, state or territory and commonwealth organisations are already in place. If anything it would be more beneficial to reduce the amount of regulatory burden as per one of the original goals of the ACAN. Stakeholders' views are sought on the need for sanctions. Would the proposal to require DGRs to be ACNC registered charities and therefore subject to ACNC's governance standards and supervision ensure that environmental DGRs are operating lawfully? All registered charities including ones listed on the environmental register have the responsibility, just as any other organising, no matter if it is a sole trader, partnership, association, company (listed or not), trust, co-op, or any other form of business is already regulated and required by law to operate in a lawful manner. All business have to operate with in local, state or territory and commonwealth laws. I am unsure how by adding any more this would actually benefit the community?

Kind Regards

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