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

I am an Australian citizen, and I find these recommendations disturbing.

I donate to Australian Conservation Foundation, Medicines Frontiers, Environmental Justice Australia, and Environment Victoria.

Q1 What are stakeholders' views on a requirement for a DGR (other than government entity DGR) to be a registered charity in order for it to be eligible for DGR status. What issues could arise?

Charities address symptoms, some DGR groups address the causes. Addressing symptoms is mostly harmless unless it makes the issue worse. Addressing symptoms does not offend powerful stakeholders. Addressing the causes involves speaking truth to powerfully stakeholders.

Q2. Are there likely to be DGRs (other than government entity DGRs) that could not meet this requirement and, if so, why?

There is an existing requirement that DGR recipients not be a political party or support or oppose a candidate. Donations to GetUp! are not tax deductible for this reason.

Issue 2: Ensuring that DGRs understand their obligations, for example in respect of advocacy.

4. Should the ACNC require additional information from all registered charities about their advocacy activities?

These clauses would be more appropriate in Russia, Syria or China where the media is tightly controlled by the government.

9. What are stakeholders' views on the introduction of a formal rolling review program and the proposals to require DGRs to make annual certifications? Are there other approaches that could be considered?

Charities are supported by donations. Now the government wants to divert their limited funds to reporting with the threat of losing their DGR status every year.

This will lead to a timid advocacy environment in Australia. Is that what the government wants?

10. What are stakeholders' views on who should be reviewed in the first instance? What should be considered when determining this?

11. What are stakeholders' views on the idea of having a general sunset rule of no more than five years for specifically listed DGRs? What about existing listings,

should they be reviewed at least once every, say, five years to ensure they continue to meet the 'exceptional circumstances' policy requirement for listing?

The idea that a Government officer can remove DGR status unilaterally is not appealing. This would have a major impact on the operations of the charity since DGR is critical.

What is the appeal process? Probably expensive and slow.

12 . 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?

This should be strongly opposed.

Not every charity is a Landcare branch. Remediation is great, but only addresses the symptoms. This would restrict an organisation from specialising on addressing the causes of the degradation. The Tax Office is not qualified in environmental science. The Organisations need to win the support of their donors that they are doing something worthwhile - this is better governance feedback than the ATO can provide.

Some conservatives think that Landcare is good but advocating against climate change or disposable plastic is bad.

Why the focus on environmental organisations? What about important work being done by animal rights advocates?

13. 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?

I have not seen evidence of unlawful activity. An organisation should not have to be a charity to have DGR, but accept that reporting and transparency is important to their donors.

If Australian political parties did not accept donations from powerful stakeholders there would be less need for advocacy. Advocacy is a critical part of Australia's legislative and economic system. It has improved Australia in so many ways.

Climate Change in particular is an area of concern where advocacy is more important than remediation - because there is no remediation.

The government will not silence advocates, nor reduce climate change though these tactics. Its not environmental groups that need to be reformed.

Sincerely,

Chris Goodman



