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### **Tax Deductible Gift Recipient Reform Opportunities Discussion Paper Comments**

The Council of Nature Foundation SA supports the stated aims of the discussion paper to strengthen the DGR governance arrangements and to reduce administrative complexity.

The Foundation (NFSA) has been fortunate to hold DGR status for most of the time since its formation in 1981 and regards this status as absolutely critical to its continuing success as South Australia's leading wildlife charity focussed on nature conservation.

Details of the Foundation including its Strategic Plan, Annual Reports (including financial reports), newsletters ("*Nature Matters*") and major projects can be found at its web site: [www.naturefoundation.org.au](http://www.naturefoundation.org.au)

#### Background information on Nature Foundation SA

Nature Foundation SA is an apolitical, not-for-profit nature charity with a mission to work with all interests; governmental, business, professional and the broad community; to protect, restore and sustainably manage South Australia's wildlife and sites of natural and cultural significance. It is managed by a voluntary Council of 12 members, reported to by six standing committees involving Council members and leading experts from government, professions, business, academia and the community, all on a voluntary basis. The volunteers are supported by a CEO and small number of paid staff.

The Foundation works cooperatively with State and Federal Governments and business to achieve maximum on-the-ground benefit for nature conservation. As a non-political organisation, it works with a wide range of interests and tries to form partnerships for major projects. In particular, it partners with State and Federal Environment Departments on major projects.

#### Activities undertaken and extent of on-ground environmental works

The 2015-16 Annual Report of the Foundation (ref NFSA web site) provides a detailed account of the extraordinary range of environmental activities undertaken by the organisation. The great majority of activities (at least 90%) involve on-ground works and principally restoration of habitats. Detailed information is available in the Annual Report which could be forwarded to the Committee if necessary.

Other activities include raising awareness about the needs of nature conservation through public comment, events and publications and the funding of graduate and post graduate wildlife research through grants and scholarships. This research is applied research and requires extensive field work which could also be described as “on-ground”. Over a million dollars have been contributed to assist important applied wildlife research over the last 20 years and in the process advance the careers of young scientists in the field of nature conservation.

I have attached a page to this submission entitled “Our Footprint”. It shows the 6 properties owned and managed for restoration by the Foundation, the 53 *Water For Nature* watering sites along the River Murray operated in a joint program with the Commonwealth Water Holder, the 16 *Bushbank SA* properties acquired and resold as a revolving fund in a tripartite agreement with the Federal and SA Governments (protected areas on private land), and the 24 properties acquired with NFSA financial support and gifted as National Parks to the State Government.

This is a summary of the achievements of the Foundation over a 34 year period and reflects closely how the Foundation strives to make a difference “on-ground”. It also reflects the importance of fund raising, so significantly assisted by our DGR status, which has made this contribution to the State and Commonwealth possible. Further details are available in the Annual Report.

A further area of significant on-ground activity in recent years has been the provision of mining off-set (Significant Environmental Benefit or SEB) restoration programs by contract with major mining companies operating in South Australia. Under the SA Native Vegetation Act, mining programs need to meet certain off-set requirements for habitat restoration which the Foundation has been able to provide on its own properties. This has resulted in very productive relationships with mining companies who contract the Foundation to conduct their off-set programs and generally support the Foundation.

#### The Importance of Fund Raising to the Foundation

*Fund raising is a vital and constant part of the Foundation's activities. It is here that the DGR status is of key importance, enabling us to attract gifts and donations to support the work of the Foundation. Without this status it is doubtful that the Foundation would be able to function as a key support for nature conservation projects in South Australia.*

The Foundation has a supporter base of members and non-member donors of approximately 1000 people who regularly contribute to three annual appeals for financial support. The State Government provides a financial grant to support the CEO position. A number of corporate business interests provide sponsorship for Foundation activities.

Should further details be required or any other information we would be pleased to assist. Please contact the CEO at the above address by email or phone.

#### The Urgent need for enhanced Nature Conservation funding in Australia

There can be no doubt that Australia faces major challenges to address the extensive issues threatening its remaining wildlife. Our sister organisation, the Tasmanian Land Conservancy (TLC), has discussed at length in its submission to the Discussion Paper the current issues facing the Environment in Australia. We wish to

thoroughly endorse those views and the major role that not-for-profit organisations can play in supporting government programmes to address these issues.

In attempting to reform DGR arrangements, it is important to maintain maximum incentives to attract funding to the work of organisations such as Nature Foundation SA and the TLC and not to inadvertently place over demanding reporting requirements and administration hurdles which use time and resources for those organisations.

#### Our Major Concern with the Paper

Consultation question #12 refers to a possible DGR requirement for environmental NGOs to commit between 25% - 50% of annual expenditure to environmental remediation or on-ground work. The key question is to define the meaning of these terms.

NFSA has an absolute commitment to achieving improvements to the conservation of nature in very practical terms. It does not engage in public political debate or define its work in ideological terms. It works closely with State and Federal Governments to decide the most important and achievable restoration and conservation projects and works with a range of business, university and community interests to implement those programs on the ground.

*No other major nature conservation organisation body in Australia would have a better record in this respect but we are still very concerned that a requirement to spend a fixed percentage of our public funds in any one year, especially if was over 25%, would seriously hamstring our operations and result in unintended consequences.*

To get up a major on-ground project requires years of planning, dedicated fund raising, communication to the public and other funding bodies, research into management options and monitoring arrangements before the actual on-ground work begins. The major expenditure will not be even in each year and may be well under or well over any fixed percentage in a single year. It is essential that the definition of "remediation expenditure" or "on-ground works" allows for the full practical circumstances discussed above. We also refer you to a full discussion of this matter and related concerns in the TLC submission.

The position of NFSA on other reform suggestions follows the submission of the TLC and will not be discussed further here.

We thank you for this opportunity to discuss issues central to our organisation and would be pleased to discuss any aspect further. Please address further contact to the Chief Executive, Mr Hugo Hopton, at [Hugo.hopton@nfsa.org.au](mailto:Hugo.hopton@nfsa.org.au) or ring 0418 817 664