8 December 2011

Manager
Philanthropy and Exemptions Unit
The Treasury
Langton Crescent
Parkes
ACT 2600

Dear Chris

I write today to respond to the consultation paper entitled ‘A Definition of Charity’ which was released by The Treasury in October 2011.

Vision 2020 Australia is seeking to engage in this discussion both as a registered charity in our own right and on behalf of our members, most of whom are themselves charitable organisations. Vision 2020 Australia is the peak body for the eye health and vision care sector, representing over sixty (60) member organisations.

Vision 2020 Australia conducts a range of activities to engage with the Australian public in order to raise the profile of eye care issues and guide citizens to early detection and treatment. Many of these initiatives are in fact funded by the Australian Government. Further, almost all of the organisations that are members of Vision 2020 Australia are themselves registered charities to whom Vision 2020 Australia provides support by leading advocacy efforts and providing a platform for collaboration.

In relation to Section 2 Issues in Defining Charities, Vision 2020 Australia would like to take the opportunity to respond to two questions posed in relation to peak bodies (Item 57).

Response to Consultation question 2
Vision 2020 Australia notes that the decision by the New South Wales provides the necessary guidance on the conditions under which a peak body can be a charitable organisation.

Vision 2020 Australia submits that by formalising the scenario as per the NSW Administrative Tribunal position, the Board of Taxation would clarify and close this issue.

Yours sincerely

Jennifer Gersbeck
Chief Executive Officer