

Received by Treasury as an email on 23 February 2021

To whom it may concern,

Firstly, I would like to say that I am in principle a supporter of increasing thresholds for reducing regulatory burden on charities.

However, I feel the following needs to be addressed at the same time as implementation of increasing the thresholds.

1. The changes being implemented at AASB need to align with the proposed changes at ACNC concurrently;
2. Currently, there is no differentiation between charities with DGR status and those without DGR as the threshold determines the level of reporting and review/audit required. This should be reviewed in context with the change in thresholds. Should more audit or review be required on a small entity that has DGR status vs a small charity that doesn't have DGR?
3. Charitable Fundraising Act (in NSW and other states if applicable) should be aligned to ACNC or harmonised with the same reporting requirements (albeit that I am aware that Treasury has limited scope of state based jurisdictions)
4. Further guidance should be provided to boards as to the "tiebreaker" when a charity's governing documents explicitly say they require an audit even though they may be small under the ACNC legislation;
5. The threshold for a medium should be 500K to \$2m and 2m+ for large charities;
6. Discussion should be had to the impact on Aboriginal corporations that are registered for ACNC and ORIC specifically the threshold harmonisation/ reporting harmonisation. There is no mention of in the consultation workpaper.

Should you have any queries please do not hesitate to contact our office.

Regards,

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