Senior Advisor Not-For-Profit Unit, Not-for-profits and Tax Administration Branch Treasury Melbourne Level 16, 530 Collins St Melbourne VIC 3000

To the Senior Advisor

My understanding is that the new changes will prohibit organisations which don't fit under the definition of basic religious charities from:

- breaching *any* laws (even minor laws) relating to real property, personal property or persons under an Australian law; and

- allowing their resources to be used, or continue to be used, to promote or support any entity to engage in unlawful activities prohibited under the standard.

This would mean that if a charity occasionally advocates against exploitation of child labour by overseas manufacturers. Say the charity organises a protest at the office of an Australian company that uses suppliers which exploit child labour. This could involve a trespass on the company's land, resulting in a breach of the Standard.

This would also mean that if a volunteer for a charity wanted to rally support for a protest being organised by a third party and (unbeknown to the charity) accessed the charity's mailing list to send out an email to the list to invite them to the protest. If the charity had not taken "reasonable steps" to prevent the volunteer doing this, it could result in a breach of the Standard.

It's difficult enough for charities to survive with current rules, regulations and requirements, all in a climate where everyone is tightening their economic belts. Introducing rules which mean that a breach of the Standard could result in de-registration of the charity and loss of all tax benefits would be disastrous for charities and those in our society who benefit from them.

As an employee of and active supporter of multiple charities, I wish to express my serious concerns. Please prevent these changes from being introduced.

Yours sincerely

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