

**From:** [Gavin Bird](#)  
**To:** [Charities Consultation](#)  
**Subject:** Distribution Guidelines for Ancillary Funds  
**Date:** Wednesday, 6 April 2022 9:43:27 AM

---

Dear Director,

Thank you for the invitation to comment on contemplated policy changes.

For many years, our family discharged our social responsibility by direct donations to Deductible Gift Recipients. In recent years, we confronted the reality that the first generation was waning. We wanted to encourage ongoing adherence to Biblical principles, so in consultation with our children, we established a Private Ancillary Fund in 2020.

The exercise has not been without challenges. My perception is that some individuals within Treasury have a tainted bias about ancillary funds. Perhaps isolated instances of misappropriation have clouded their outlook. However, the notion that an ancillary fund is a device to rort the system disrespects the legislative framework governing funds, and disrespects those who utilize that framework. So we welcome any initiative to make the guidelines surrounding ancillary funds more user friendly.

For two decades, we have supported the Amani Foundation in Dodoma, Tanzania. Funds have been funnelled through Hearts for Africa. We did this because Hearts for Africa is a Deductible Gift Recipient that affords security for funds through a contract with Global Development Group. However, because Hearts for Africa is not a DGR covered by Item 1 of the table in Section 30 – 15 of the Income Tax Assessment Act, we are precluded from donating ancillary funds to it. We decry this restriction, because previous experience has taught us that direct donations to Africa without a conduit such as Global Development Group cannot be quarantined from corruption.

So we strongly urge that the limitation that prevents private ancillary funds contributing to the work of public ancillary funds be removed.

Yours faithfully,

**Gavin Bird AM**  
**Managing Director**



**Archerfield Airport Corporation**  
PO Box 747  
Archerfield Qld 4108

p (07) 3275 8000  
f (07) 3275 8001  
d (07) 3275 8016

<http://www.archerfieldairport.com.au/>