

25 May 2015

Committee Secretary
House of Representatives Standing Committee on the Environment
PO Box 6021
Parliament House
Canberra ACT 2600

Via email at: environment.reps@aph.gov.au

Dear Sir/Madam,

The Queensland Resources Council (QRC) welcomes the opportunity to provide this submission to the House of Representatives Standing Committee on the Environment Inquiry into the Register of Environmental Organisations.

We are the peak representative organisation of the Queensland minerals and energy sector, which in 2013-14, was worth one in every four dollars and one in every five jobs to the Queensland economy.

It is because of the sector's critical importance to both the Queensland and Australian economies that QRC is presenting this submission.

Crucial to the sector maintaining its substantial contribution is that those operating in the sector adhere to the strict laws and regulations that govern it, and we would expect that NGOs opposed to the resources sector would do the same.

QRC's submission contains evidence of misleading anti-resources campaigns by NGOs with deductible gift recipient (DGR) status.

We believe that many NGOs do not meet the overarching requirement of undertaking practical environmental work, and submit that organisations who are listed on the register and do not fulfil that fundamental requirement, should either be disqualified from the register, or have their funding restricted.

QRC also calls on the federal government to tighten section 30-E of the Income Tax Assessment Act 1997 to ensure that organisations on the environmental register are more accountable for taxpayer subsidies and for the government to include governance of these organisations under the Charities Act 2013.

QRC thanks the standing committee for the opportunity to provide this submission to the inquiry and for its consideration of the matters we raise.

Yours sincerely

Michael Roche
Chief Executive

QRC Submission

Submission to the House of Representatives Standing Committee on the Environment: Inquiry into the Register of Environmental Organisations

25 May 2015

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Introduction

The Queensland Resources Council (QRC) is the peak representative organisation for Queensland minerals and energy sector companies. QRC's membership encompasses minerals and energy exploration, production, and processing companies and associated service companies.

In 2013-14, the sector was calculated as being responsible directly and indirectly for one in every four dollars and one in every five jobs to the Queensland economy – or \$77.6 billion and 442,000 jobs.¹

Minerals and energy are the primary source of export income for Queensland. The QRC works on behalf of its members with governments and other stakeholders to ensure those resources are developed profitably and competitively, in a socially and environmentally sustainable way.

Despite the global price downturn in a number of resources commodities, the sector continues to play a fundamental role in shaping Queensland's regional future by contributing to economic growth, creating high-paying jobs, and supporting research and development, regional infrastructure, new services and investment.

It is because of the sector's critical importance to both the Queensland and Australian economies that the QRC is making this submission to the House of Representatives Environment Committee Inquiry into the Register of Environmental Organisations.

Crucial to the sector maintaining its substantial contribution is that those operating in the sector adhere to the strict laws and regulations that govern it. Indeed, many resources companies take great pride in going beyond compliance in the interests of strengthening their 'social licence' to operate. The promotion of leading environmental management practices and outcomes is a key role of the QRC, confirming the Queensland resources sector as environmentally responsible and continuing to meet, if not exceed, community expectations.

It would therefore not seem to be too much to ask that those non-government organisations opposed to the resources sector at least meet their legislative obligations. QRC expects those who campaign against the sector also adhere to the laws and regulations that govern them, and in particular, those who hold taxpayer-funded Deductible Gift Recipient (DGR) status.

The QRC thanks the Standing Committee for the opportunity to provide this submission into the Inquiry and report on the administration and transparency of the Register of Environmental Organisations (the Register) and its effectiveness in supporting communities to take practical action to improve the environment.

¹ Economic Contribution of the Minerals and Energy Sector to the Queensland Economy 2013-14, Lawrence Consulting, November 2014:
https://www.qrc.org.au/_dbase_upl/Economic%20Impact%20of%20Resources%20Sector%20on%20Qld%20Economy%2013-14.pdf

Executive Summary

The Queensland Resources Council believes that the House of Representatives Environment Committee Inquiry into the Register of Environmental Organisations is long overdue. Not only does QRC believe that some organisations are not fulfilling their requirements to hold Deductible Gift Recipient (DGR) status, but also that those requirements should be tightened and more stringently enforced to ensure taxpayers' money is not funding activities that do not comply with the rules.

QRC's submission will provide evidence of a range of activities by some groups that hold DGR status and are listed on the Register of Environmental Organisations (organisations) that do not meet the overarching requirement of undertaking practical environmental work.

There are numerous examples in Queensland of protest actions by DGR-status environmental organisations that have not only been potentially dangerous but also costly to targeted companies and the state of Queensland in lost royalty revenues. Well-funded misinformation campaigns against the resources sector range from vexatious litigation to delay projects to campaigning globally against the integrity of Australia's management of the Great Barrier Reef World Heritage Area and active promotion of an in-danger listing by UNESCO. These campaigns are not only misrepresenting facts against one of Australia's economic pillars, but are also devoid of practical activities or public education in the interests of enhancing the environment.

QRC believes many organisations listed on the Register do not fulfil those fundamental requirements, and according to the excerpt from the Tax Act below, should either be disqualified from the register, or have their access to DGR status restricted.

According to the Tax Act:

Its [organisation/group] principal purpose must be protecting the environment

(1) Its principal purpose must be:

- a) the protection and enhancement of the natural environment or of a significant aspect of the natural environment;
- b) the provision of information or education, or the carrying on of research, about the natural environment or a significant aspect of the natural environment.

While understanding the wording of the Act, which was passed into law in 1997, would not have foreseen the way funds would be used in the 21st Century, QRC believes both communities and governments have the right to expect that an environmental organisation's primary objective would be to protect and enhance the environment through on-ground work or through the provision of scientifically valid public education.

This is also the basis for QRC's additional recommendation that all registered environmental organisations should be governed by the Charities Act². QRC believes the current legislative requirements are too broad and the rules should be changed to prevent further activities by the organisations who flout their guidelines while enjoying the benefits of DGR status.

QRC response to the Terms of Reference

The Parliament of Australia guidelines on making a submission state that the Terms of Reference should be used as a guide to structuring a submission, therefore QRC has selected only the statements relevant to the evidence and accounts provided in this submission.

a) The definition of 'environmental organisation' under the Income Tax Assessment Act 1997, including under Subdivision 30-E;

The Tax Act³ and the Environment Department ⁴detail specific requirements for registered environmental organisations and their purpose in order to be approved to be on the register and to maintain that approval.

QRC would like to highlight a part of the Act that details the overarching requirements of the organisations that are on the register below:

Its principal purpose must be protecting the environment

(1) Its principal purpose must be:

- c) the protection and enhancement of the natural environment or of a significant aspect of the natural environment;
- d) the provision of information or education, or the carrying on of research, about the natural environment or a significant aspect of the natural environment.

QRC would support a change in definition of what constitutes an environmental organisation and the DGR funding it receives to be based on more specific rules and regulations. While the statement from the Tax Act (above) has an environmental focus, it does not give specific objectives for organisations. Owing to the substantial financial benefits the organisations receive, QRC would support the implementation of specific measurable rules. In addition, those rules should be strictly enforced to prevent misuse of taxpayer dollars.

² Charities Act 2013

³ Income Tax Assessment Act 1997

⁴ The Register of Environmental Organisations – Guidelines, Commonwealth of Australia 2003

b) The requirements to be met by an organisation to be listed on the Register and maintain its listing.

QRC also questions whether funding for these organisations breaches the Conduit Policy⁵. For example, the budgets (Figure 1) set out in the activist strategy document 'Stopping the Australian Coal Export Boom' (2011) show The Australia Institute (TAI) to be part of the campaign in addition to identifying an individual representative of TAI as a key member of the Program Management team (Figure 2). While TAI is not on the register, we ask that the Inquiry consider whether the inclusion of TAI to be in receipt of the funds from DGR recipients breaches the Policy as set out below.

2.6 Conduit Policy [Section 30-270 (2) of the ITAA]

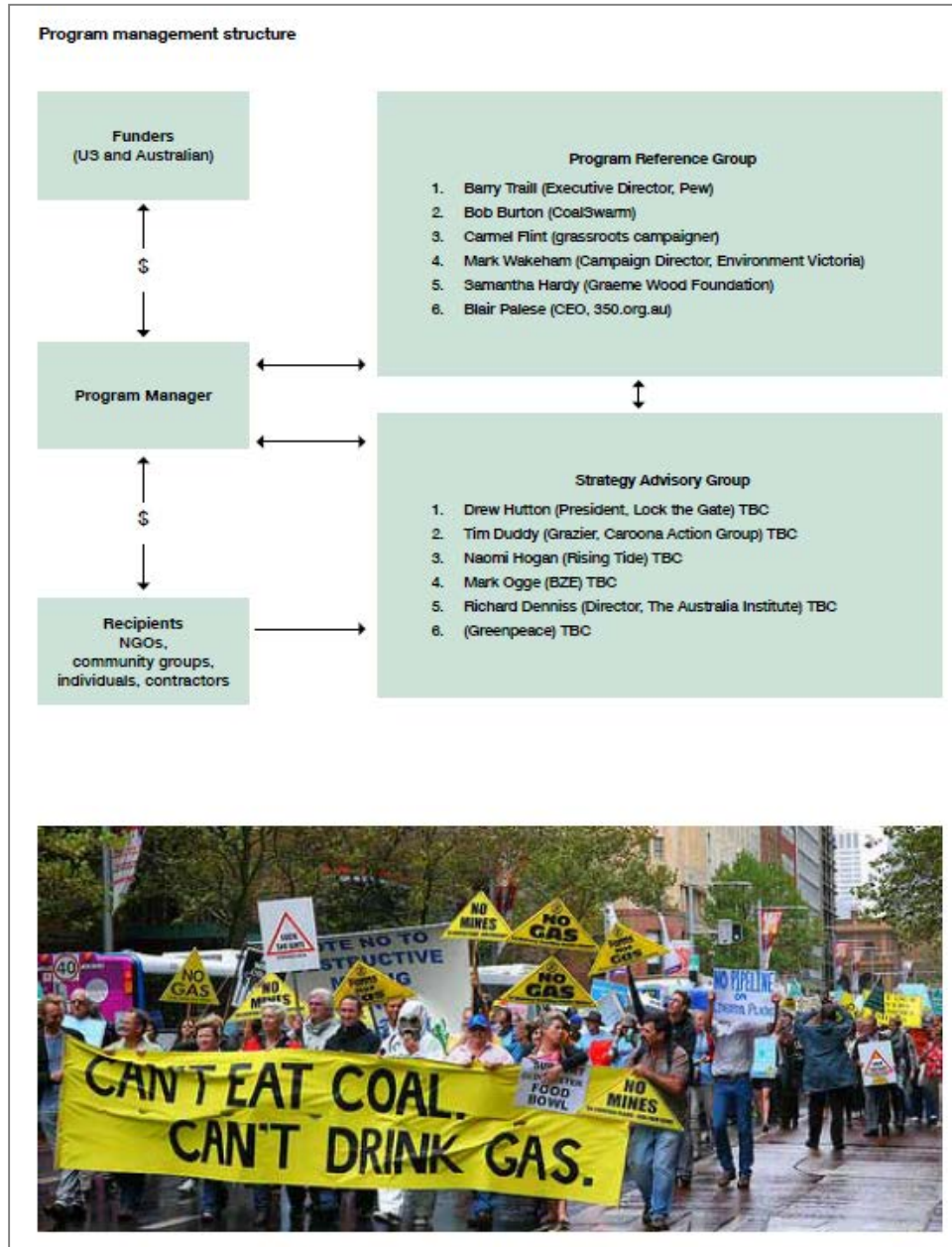
The conduit policy applies to the behaviour of a potential donor to an organisation and its public fund. An organisation must not be directed by a donor to act as a conduit by passing a donation of money or property to other organisations, bodies or persons. A registered organisation must not act as a collection agency for tax-deductible donations intended by a donor to be passed on to another organisation or person. The conduit policy does not apply to an organisation which, within its principal objective to conserve the natural environment, decides to pass funds to another entity to do environmental projects or other nature conservation work.

Figure 1 - Budgets

Funding proposal for the Australian anti-coal movement			November 2011
Changing the story of coal			
Level 1			
Communications strategy			
Communications research (polling, focus groups, analysis)	\$	25,000	To be determined
Media/communications adviser (Brisbane)	\$	90,000	To be determined
Documentation of stories (photos, video production, travel etc)	\$	30,000	Greenpeace
Investigations/research, staff + research budget			
Industry/scandals research & documentation - staff costs	\$	35,000	CoalSwarm
Research budget	\$	15,000	CoalSwarm
Challenging the economics of coal			
Economic analysis	\$	40,000	Contracts / The Australia Institute
Creative materials (videos, info graphics etc) & publications	\$	40,000	GetUp!, The Australia Institute
	Sub-total	\$	275,000
Level 2 (additional to Level 1)			
Communications strategy			
Additional, extensive communications research	\$	50,000	To be determined
Media/communications adviser (Sydney) + overhead	\$	95,000	To be determined
Investigations/research, staff + research budget			
Industry/scandals research & documentation - staff costs	\$	50,000	CoalSwarm
Additional research budget	\$	15,000	CoalSwarm
Challenging the economics of coal			
Economist/researcher (including on costs, travel, operating costs)	\$	130,000	The Australia Institute
Creative materials (videos, info graphics etc) & publications	\$	50,000	The Australia Institute, Getup!
	Sub-total	\$	390,000
	Total - changing the story of coal	\$	665,000
Existing committed funding			
Polling and communications research - pledged	\$	100,000	Private donor
Industry scandal research and documentation	\$	30,000	Private donor
Industry scandal research and documentation pledged	\$	10,000	Private donor
Research into economics of coal	\$	10,000	Private donor
Economist to research coal/csg - pledged	\$	312,000	Private donor
Creating investor uncertainty			
Level 1			
Financial analysis (contract expertise)	\$	40,000	Contracts/The Australia Institute
	Sub-total	\$	40,000
Level 2 (additional to Level 1)			
Finance analyst (including on-costs, travel and operating costs)	\$	130,000	The Australia Institute
Shareholder resolutions, AGM's, conferences, materials etc	\$	50,000	The Australia Institute, others
	Sub-total	\$	180,000
	Total - Creating investor uncertainty	\$	220,000

⁵ The Register of Environmental Organisations – Guidelines, Commonwealth of Australia 2003

Figure 2 – Program Management Structure



c) activities undertaken by organisations currently listed on the Register and the extent to which these activities involve on-ground environmental works;

The activities of a range of organisations, including those listed in this submission, reveal little practical work to enhance the environment. There is however, an enduring focus on media-appealing protests and activities that have put in jeopardy the safety of the protesters, resources company employees and emergency service personnel.

Part 2 Disqualifying purpose, Division 3 Section 11 of the Charities Act 2013 states:

5 (a) the purpose of engaging in, or promoting, activities that are 6 unlawful or contrary to public policy; or 7 Example: Public policy includes the rule of law, the constitutional system 8 of government of the Commonwealth, the safety of the general 9 public and national security.

In August 2009, Greenpeace's 72-metre vessel Esperanza ignored legal maritime directions and unloaded protesters at the Hay Point export coal terminal in central Queensland.

This was only days after a similar action at Abbot Point, which had shut down that terminal.

Activists suspended themselves by chains from the Hay Point terminal infrastructure⁶ necessitating an immediate shutdown of loading operations and calling in of Queensland emergency services personnel to monitor the activists' safety.

The illegal action stopped work at the terminal for 36 hours, costing the operator an estimated \$13 million a day and Queenslanders an estimated \$1 million a day in forgone royalties for delayed shipments of coking coal (ironically, not the subject of Greenpeace's focus - thermal coal exports).

Greenpeace was charged with offences related to one of its ships being in a navigational area without a pilot and the failure of the ship's captain to notify the harbour master of its movements.

The charges were withdrawn in the Mackay Magistrates court on 10 May 2010, but the Master was fined \$8,000.⁷

Greenpeace chief executive Linda Selvey welcomed the dropping of charges against Greenpeace with the following reported quote:

'There would have been potential implications for both our charitable status and our ability to use ships for our important campaigning work,' she said.

In April 2013, six Greenpeace activists boarded a coal ship bound for South Korea in the Coral Sea, not far from the Great Barrier Reef Marine Park.⁸

The boarding of a stationary coal ship at sea was 'as pointless as it was potentially dangerous.'⁹ Queensland Resources Council Chief Executive Michael Roche said.

Based on available information, the protestors' Rainbow Warrior 3 vessel was lying in wait for the coal ship, departing the Great Barrier Reef Marine Park after reportedly switching off its (REEFVTS) compulsory vessel tracking equipment.

To QRC's knowledge, there were no reported legal consequences to the protest, which was confirmed by Greenpeace's own video footage as hazardous and potentially dangerous to themselves and the ship's crew.

⁶ Greenpeace ends coal protest, Sydney Morning Herald, 7 August 2009. <http://www.smh.com.au/environment/climate-change/greenpeace-ends-coal-protest-20090806-ecoz.html>

⁷ Charges against Greenpeace withdrawn, ship's captain fined, ABC News, 10 May 2010: <http://www.abc.net.au/news/2010-05-10/charges-against-greenpeace-withdrawn-ships-captain/429398>

⁸ Greenpeace activists board Australian (sic) coal ship in reef protest: <http://www.reuters.com/article/2013/04/24/us-australia-greenpeace-coal-idUSBRE93N05W20130424>

⁹ Thanks for the photo-op and farewell, QRC media release, 24 April 2013: https://www.qrc.org.au/01_cms/details.asp?ID=3249

The latest evidence of a breach of safety rules that govern NGOs occurred on 20 May 2015, during a #RaisetheHeat (Twitter hashtag) protest.

An accident at a rally in Melbourne's CBD, resulted in a protester falling from the roof of a bank branch. See article below (Figure 3).

Figure 3 - #RaisetheHeat media

20 May 2015, Melbourne

A group of organisations staged a #RaisetheHeat protest at the Commonwealth Bank on Bourke Street, Melbourne, as part of a nation-wide week of rallies against the **Commonwealth Bank** and its involvement with **Adani** and **Galilee Basin projects**. The Melbourne protest attracted 25 activists. There was an accident at the rally in Melbourne's CBD; Colin, a protester fell from the roof of a **CBA** branch, leaving him with a sprained ankle.



Other attendees included representatives from Melbourne SMS (a branch of the Occupy movement) and the Australian Youth Climate Coalition. Representatives attended from Friends of the Earth affiliates Quit Coal and CounterAct. These affiliates are all beneficiaries of fiscal sponsorship from Friends of the Earth (who is on the Register). Figure 4 shows an example of social media posts from these attendees.

Figure 4 – Other attendees of #RaiseTheHeat protest



It is well documented that environmental activist organisations' campaigns, in particular those using social media, are usually laden with buttons to donate, or instructions about the next protest, but devoid of practical environmental initiatives.

A prime example of this fundraising focus is the 'Stopping the Australian Coal Export Boom' strategy document (the strategy) that was leaked to media in 2012. This document features a 'who's who' of environmental activists on page 2 (illustrated below – figures 5 and 6) and serves to demonstrate the time and money put into strategic campaigning as opposed to grassroots environmental activities. All the while, it capitalises on the support of the Australian taxpayer.

Figure 5 – Authors of Stopping the Coal Export Boom

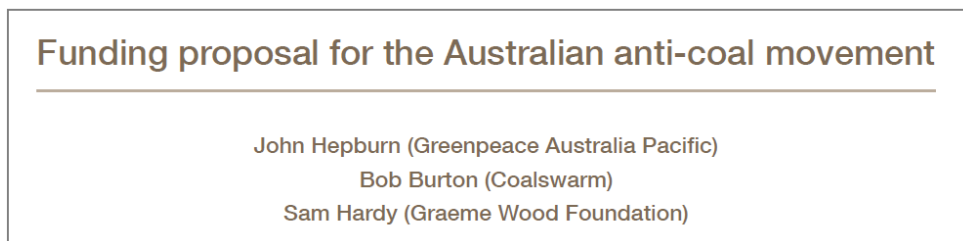


Figure 6 – Who's who of environmental activists



The strategy¹⁰ statement and flowchart below (figures 7 and 8) clearly show that the fundamental goal is to derail the resources sector and erode political support for industries that are one of the pillars of the Australian economy. There is a complete absence of any evidence in this document to suggest that the participants intend to undertake practical environmental initiatives or activities.

Figure 7 – The Strategy

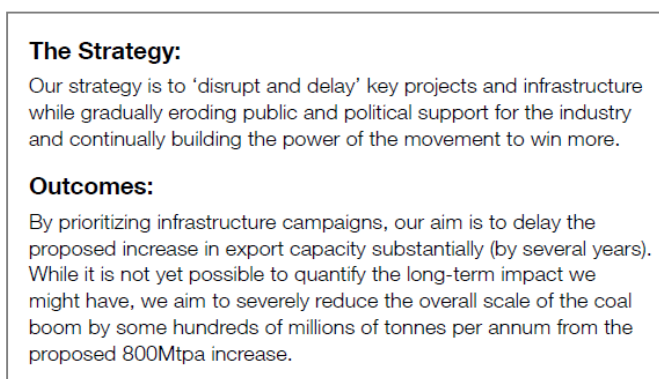
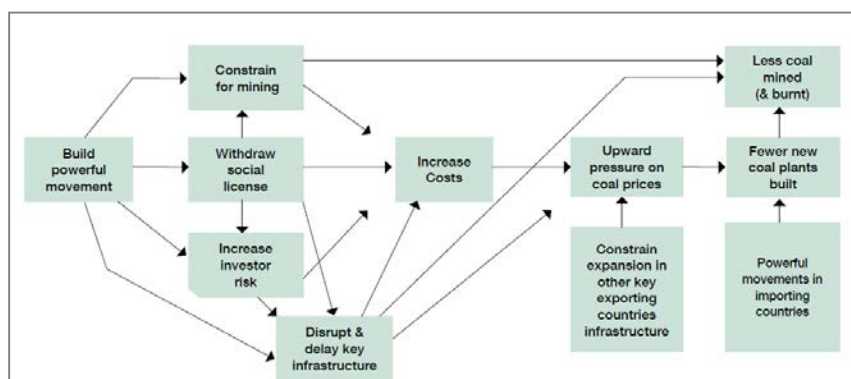


Figure 8 – Strategy Flowchart



¹⁰ Stopping the Australian Coal Export Boom

This excerpt (figure 9) further shows a well-funded campaign by many of those who are registered as environmental organisations, including the funding for vexatious litigation, but fails to list practical environmental activities that enhance the environment.

Figure 9 – The Proposal

The Proposal:		
<ul style="list-style-type: none"> We are seeking investment to help us build a nation-wide coal campaign that functions like an orchestra, with a large number of different voices combining together into a powerful symphony. The proposed campaign program has multiple projects that contribute to one another and overlap. Prospects are broken down into two levels. Level 1 is the base level of resourcing that is required to have an impact. Level 2 is where we need to take the program to in order to have maximum impact. 		
	Level 1	Level 2
1. Litigation	\$395,000	\$955,000
2. The Battle of Galilee	\$435,000	\$490,000
3. Hunter Valley – Enough is Enough!	\$354,000	\$260,000
4. Forward defence in W.A. and Victoria	\$160,000	\$120,000
5. Changing the Story of Coal	\$275,000	\$390,000
6. Creating Investor Uncertainty	\$40,000	\$180,000
7. Exposing the Health Impacts of coal	\$30,000	\$70,000
8. Field Organising Program	\$180,000	\$940,000
9. Movement Support	\$195,000	\$220,000
10. Program management	\$130,000	\$100,000
Total	\$2,194,000	\$3,725,000
Program Management:		
<ul style="list-style-type: none"> Two steering groups, made up of Australia's leading coal, campaign leadership and strategy experts, will advise the program manager regarding allocation of funds and the overall implementation, management and evaluation of the program. 		

d) reporting requirements for organisations to disclose donations and activities funded by donations; the administration of the Register and potential efficiency improvements;

QRC believes that this Term of Reference brings to light yet another way that certain organisations on the Register are failing to meet their obligations.

For example, the high-profile Lock the Gate Alliance Limited is failing to comply with the reporting requirements in *Section 30-270 (4) of the ITAA which is:*

An environmental organisation "must have agreed to give the Secretary of the Department of the Environment within a reasonable period after the end of each income year, statistical information about gifts made to the public fund during that income year".

Environmental organisations must provide the Department with statistical information about the donations and gifts made to the public fund for a financial year within four months of the end of that year.

The Minister and the Assistant Treasurer have approved a rule (refer to section 2.3) that requires registered organisations to include the following information in their annual statistical returns:

- to provide information on the expenditure of public fund monies and the management of public fund assets;
- to provide audited financial statements for the financial year for the environmental organisation; and
- to answer any questions about the public fund.

This will involve completing a statistical return form provided by the Department to organisations upon being admitted to the Register.

According to the rule, Figure 10 gives clear evidence that Lock the Gate Alliance is in breach of its above reporting requirements and did not submit by the required due date.

Figure 10

Legal Name	Lock The Gate Alliance Limited	Date Established	01/01/2012
Other Name(s)		Who the Charity Benefits	General community in Australia
Charity ABN	33156099080	Size of Charity	Large: Revenue of \$1 million or more
Charity Address for Service	finance@lockthegate.org.au	Financial Year End	30/06
Charity Street Address	Suite 301 Level 3 71-73 Archer Street CHATSWOOD NSW 2067 AUSTRALIA	Basic Religious Charity	No
Email	finance@lockthegate.org.au		
Phone			
Website			


Registration Details	
Entity Type	Charity
Entity Subtype	Awaiting selection of new subtype
Registration Status	Registered

Registration Status History	
03/12/2012	Registered

Subtype History	
03/12/2012	31/12/2013
Another purpose beneficial to the community	

Annual Reporting			
31/03/2014	AIS 2013	Received	06/08/2014
31/01/2015	AIS 2014	Received	13/03/2015
31/12/2015	AIS 2015		

Where the Charity Operates	
Operating State(s)	ACT NSW NT QLD SA TAS VIC WA
Operates in (Countries)	

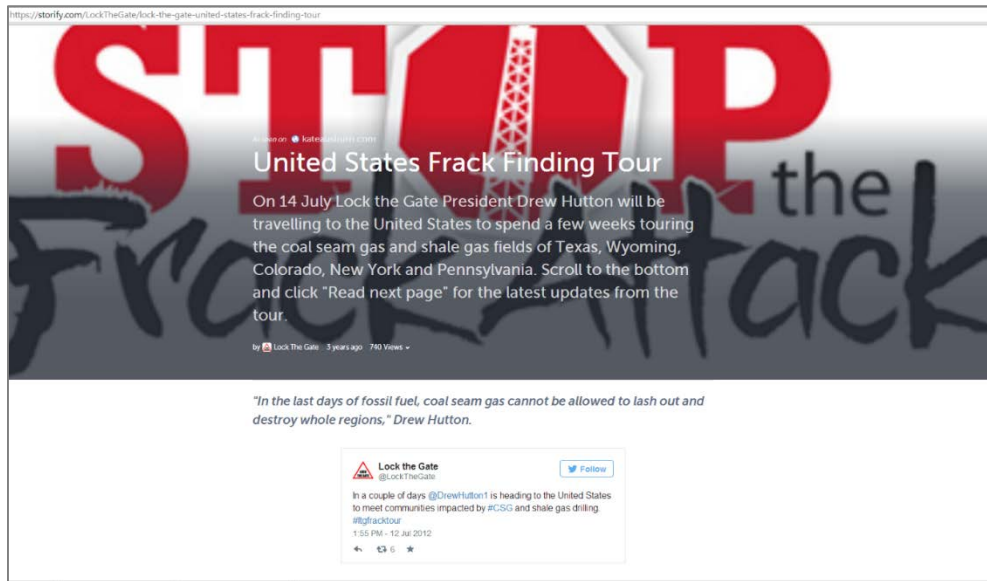
Map of operating states in Australia	
	

In addition, 2.5 Not-for-profit Organisation [Section 30-270(1) of the ITAA] states:

An environmental organisation must not pay any of its profits or financial surplus, or give any of its property, to its members, beneficiaries, controllers or owners (as appropriate). The organisation must insert in its constitutional document a clause providing evidence that it will not pay any of its profit or surplus to its members, executive, trustees etc. A statutory body will not be eligible for registration if its establishing legislation provides that one of its statutory functions is to transfer its property (its land) to the Crown; that is, where it is required that donated property be given or transferred to the Crown as the body's beneficiary or controller.

On 12 July 2012, prominent Queensland environmental campaigner Dr Libby Connors and her partner Mr Drew Hutton, (Lock the Gate Alliance founder and president) issued a media statement (no longer available online) detailing their trip to the USA that was part-funded by Lock the Gate donations. Dr Connors revealed this important information in the media release itself. QRC believes that the use of taxpayer-funded donations for overseas trips by any organisation must come under greater scrutiny to ensure the trip meets the rules under the Act. Figure 11 provides further evidence of the trip.

Figure 11



e) The administration of the register and potential efficiency improvements

The QRC believes the rules governing registered environmental organisations in section 30-E of the Tax Act should be refined and more detailed. Additionally, QRC would recommend that the registered organisations are also held accountable under the Charities Act 2013. The guidelines under the Charities Act are more detailed and make it easier to disqualify an organisation if they are not abiding by the legislation.

QRC believes there are a number of disqualification areas in the Charities Act where some environmental organisations could be particularly vulnerable:

Disqualifying purpose

1.102 *The purpose of engaging in, or promoting, activities which are unlawful or contrary to the public policy is not a charitable purpose under the common law and is a disqualifying purpose in the Bill.*

1.103 *The Bill clarifies that the reference to public policy refers to matters such the rule of law, the system of government of the Commonwealth, the safety of the general public and national security and that activities are not contrary to public policy merely because they are contrary to government policy. [Paragraph 11(a) and Note]*

1.104 *Political parties are not charitable and a purpose of promoting or opposing a political party or a candidate for political office is not a charitable purpose. [Paragraph 11(b)]*

As mentioned in the opening statement, given the Tax Act is dated in 1997, QRC understands the wording at the time would have not have foreseen the current uses of the funding. One standout example occurred in May 2014, when Greenpeace set off on an anti-coal campaign of the European banks dressed in Nemo suits. It is likely the trip utilised at least some tax-deductible donations, funded by the Australian taxpayer. Therefore QRC believes there should be enhanced clarity around operating rules and use of funds.

Donors

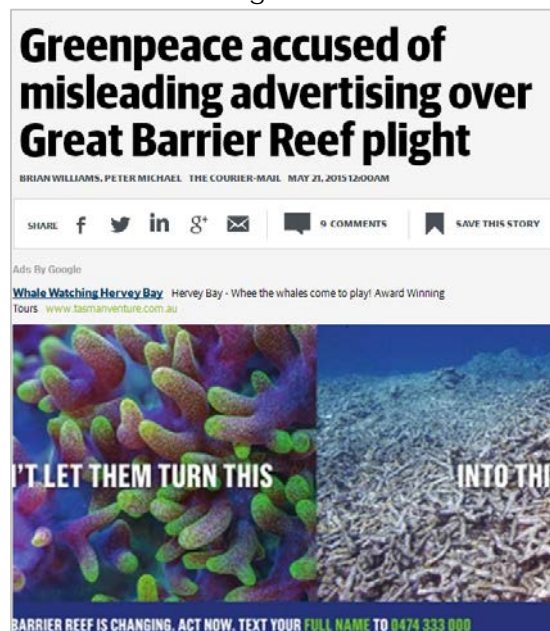
The QRC calls for transparency surrounding donations to organisations on the environmental register. Similar to political parties, there should be a mechanism in place where donations over a specific amount are declared. Recent media reports also reveal that policing is also required for the chain of donations. The *Australian Financial Review* obtained documents that revealed Wotif founder and multi-millionaire Graeme Wood is financially backing the actions involving an Indigenous group challenging Adani's proposed coal mine in Queensland's Galilee Basin. While QRC has no problem with donations to environmental groups per se, we question the passage of those donations through groups with and without DGR status.

Truth in messaging/media

The Australian Communications and Media Authority (ACMA) is a government agency responsible for the regulation of broadcasting, the internet, radio communications and telecommunications. QRC believes its powers should be increased to regulate truth in social media reporting and advertising. Some stories that organisations on the environmental register circulate on social media are outrageous exaggerations and not fact-based.

A recent example of this ran across News Limited publications on 21 May 2015 when it was revealed that Greenpeace passed off dead coral from the Philippines as the Great Barrier Reef as illustrated below (Figure 12).

Figure 12



Misinformation campaigns such as these are extremely damaging to the resources sector as the anti-coal activists use deceptive information to blame the sector for degradation of the reef.

Conclusion and Recommendations

In conclusion, the QRC believes that greater scrutiny of environmental organisations is required, and in particular for those that hold a DGR status. QRC welcomes this Inquiry and thanks the committee for the opportunity to put forward a submission.

QRC has provided examples of environmental organisations' activities that do not constitute practical enhancing of the environment – or as the committee states in its Terms of Reference – on-ground environmental works. QRC contends that there is no coincidence in the rise of activism since the revealing of the strategies contained in 'Stopping the Coal Export Boom.'

This document was made possible by the financial support of the US-based Rockefeller Family Trust which donated \$US50,000 to sponsor the 2011 'anti-coal convergence.'

The activist strategy of delaying and disrupting projects is playing out in front of our eyes domestically and globally. The most recent wave of anti-coal demonstrations and the fossil fuels divestment campaign, in particular against Indian companies Adani and GVK, could make international companies think twice about investing in Australia.

It is clear that those organisations that do not meet the legislative requirements should face a removal of their DGR status. Organisations that are merely using their place on the register as a means to damage industries, such as the resources sector, are fundamentally damaging the economic stability of the country and its reputation, while concurrently either destroying the jobs or denying employment of tens of thousands of individuals whose livelihoods and aspirations are being sacrificed as of no consequence.

Finally, QRC calls on the federal government to tighten section 30-E of the Income Tax Assessment Act 1997 to ensure that organisations on the environmental register are more accountable for taxpayer subsidies. QRC would also call on the government to include governance of these organisations under the Charities Act 2013.

Contact

If you have any questions about this submission, please contact Angela Harper, QRC's Director Communications – Operations on