



The Committee Secretary
House of Representatives Standing Committee on the Environment
PO Box 6021
Parliament House
Canberra ACT 2600
By email: environment.reps@aph.gov.au

Dear Sir/Madam,

RE: Submission on Inquiry into the Register of Environmental Organisations

I have been directed by the State Council of the Wildlife Preservation Society of Queensland (Wildlife Queensland) to avail ourselves of the opportunity to forward comments for consideration by the Standing Committee on the Environment on the above inquiry.

Wildlife Queensland is one of the longest established and most respected wildlife-focused conservation groups in Queensland. With over 6500 supporters spread across branches throughout the State with supporters interstate and overseas, Wildlife Queensland is a strong voice for our wildlife and its habitat.

Wildlife Queensland is apolitical. Our aims include;

- Preserve the flora and fauna of Australia by all lawful means
- Educate the community in an understanding of the principles of conservation and preservation of the natural environment
- Discourage by all legal means, the possible destruction, exploitation and unnecessary development of any part of the natural environment.
- Encourage rational land use and proper land planning of existing and future development and the use of the natural environment and its management.

Wildlife Queensland is a not for profit organisation established in 1962 and is a Registered Environmental organisation enjoying DGR status. Funding is derived from a range of sources including grants from differing funding bodies, donations from members and the public and an established foundation. These principal sources of funding are complemented by membership fees, sale of limited merchandise and infrequently a small profit is gained from publishing the Wildlife Australia Magazine. On occasions the organisation is successful in attaining Government grants for specific on-ground projects. No Government funding is received for the management or administrative functions associated with our operations.

Wildlife Queensland conducts on ground projects for the betterment of our wildlife with a current focus on quolls and gliders. Raising funds for threatened species is a major activity with over \$160 000 raised during 2014-15. Wildlife Queensland where possible partners with other organisations including the Queensland Government to maximise the benefits to the various targeted species such as Mary River turtle, Richmond Birdwing butterfly and Bridled

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Nailtail wallaby. These partnerships make the dollar raised go further. Once costs of running the appeals are recouped well over 70% of the funds raised go to actual on-ground works. It is obvious from our aims that Wildlife Queensland campaigns for change in policies and inappropriate legislation that impact the environment and its wildlife negatively. A recent campaign brought about the mandated modification to opera house fishing traps so platypus no longer drown in them. Such action is mainly underpinned by funds from a foundation not from member or public donations. However our ongoing campaign against plastic waste particularly single use plastic shopping bags and drink containers has such huge community support this activity to prevent the death of turtles and birds is funded in part from public donations and a grant from the Endangered Species Trust.

Wildlife Queensland has clearly demonstrated its ongoing commitment to protecting and conserving our environment and its wildlife and habitat. A range of options including on-ground works, education of and advice to the community, lobbying of governments at all levels, seeking law changes and even the use of courts are essential so that Wildlife Queensland fulfils its constitutional obligations. Such activities are enhanced by donations that undoubtedly would diminish if tax deductible status was not maintained.

A brief review of the Commonwealth and State Government budgets will reveal that over time the percentage of the budgets allocated to the protection and conservation of the environment and its biodiversity, so essential for our current life styles, has diminished. Without the efforts of Wildlife Queensland and like organisations there would have been an increase in the rate of biodiversity decline. It makes economic sense to maintain the current system. Furthermore Wildlife Queensland would be opposed to any proposal to limit the tax deductibility status to only particular activities that benefit the environment. As evidenced above Wildlife Queensland, considered to be on the conservative side of the conservation movement, has had to access a broad range of activities to fulfil its constitutional obligations and deliver for its membership and supporters.

Wildlife Queensland's submission will address selected the aspects of the Terms of Reference of which in our view we have experience or comments to offer. Other organisations are more qualified and possess the appropriate knowledge and skills base to comment on the various aspects not addressed.

Definition of 'environmental organisation' under the *Income Tax Assessment Act 1997* including under subdivision 30-E

Wildlife Queensland is of a view that there is no need to change the current definition of 'environmental organisation' under the *Income Tax Assessment Act 1997*. Organisations that have satisfied the 'principal purpose' test benefit deserve to retain the tax deductible status. Unquestionably the current level of donations that currently flow to environmental organisations for the betterment of the environment and its wildlife would diminish if the definition of environmental organisation became restrictive.

Requirements to be met by an organisation to be listed on the Register and maintain its listing

The requirements are currently clear and transparent from our perspective. It is Wildlife Queensland's understanding that the Register of Environmental Organisations was established in 1992, revised in 2003 with very minor amendments triggered by machinery of government in 2013. The criteria for eligibility are clearly defined with the broad principal purpose protection of the natural environment. Examples are provided and include but not necessarily limited to protection of natural areas, wildlife, air and water quality and waste. The

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requirements are very specific in certain areas such as the number of financial members, the type of legal entity of the organisation, and other legal requirements. Eligibility is assessed by the Minister of the Environment and then referred to the Assistant Treasurer. The requirements are more than adequate. As for maintaining its listing provided the organisation continues to meet the mandated criteria such as number of financial members and maintains its principal purpose its listing should be maintained. Wildlife Queensland is of a view that an organisation may elect to broaden its range of activities and provided the primary purpose is the protection of the natural environment then there is no valid reason to delist the organisation.

Reporting requirements for organisations to disclose donations and activities funded by donations.

Wildlife Queensland provides audited financial statements and reports on its operations that are transparent listing the source of all funding and how such funds were expended on an annual basis to the relevant Commonwealth and Queensland Government Departments. Not only that, but members are advised of activities at the AGM and those not attending receive an annual report as well as a newsletter. Furthermore a report on the species specific appeals conducted throughout the year is forwarded to all donors advising how the funds are spent and outcome to date. Wildlife Queensland is at a loss to imagine what additional requirements could be imposed. Wildlife Queensland certainly does not hide behind the 'commercial in confidence banner'. It is strongly recommended that the administrative burden on environmental organisations is not increased. Environmental charities are already subject to sufficient scrutiny by regulators and the public. If members and supporters disagree with how an organisation is functioning or operating there are a range of options at their disposal including redirecting their donations elsewhere.

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

As outlined already Wildlife Queensland has a projects division that undertakes on-ground works and aspects of community education. However even campaigning at times involves on-ground works. The campaign to have the opera house traps at least modified in Queensland involved on –ground works in the form of survey and recording their distribution as well as attempting to determine the number of platypus drowning in traps. While Wildlife Queensland has a major focus on on-ground works, other aspects including education, lobbying and even court action to test the rigour of legislation has been used on occasions to fulfil our vision. There is need to lodge objections to inappropriate developments or planning decisions that threaten to destroy or at least further fragment threatened regional ecosystems and the wildlife that call them home. On-ground works alone will not afford the protection our natural environment warrants but unfortunately does not receive. Any attempt to limit tax deductibility to on-ground works would be opposed by Wildlife Queensland and the environment would undoubtedly be the big loser, funds would diminish and the rate of decline in biodiversity accelerate.

Conclusion

Wildlife Queensland appreciates the opportunity to make a submission. Wildlife Queensland has no concerns about the publishing of this submission.

Change to the current arrangements is not warranted unless such change provides more incentives for people to donate to environmental organisations of their choice undertaking work to benefit and enhance our environment and the wildlife it supports. Wildlife

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Queensland would not object to a reduction in reporting requirements that is an impost on volunteer organisations such as ours and consumes funds that could be better spent on our wildlife. The system is not broken and the environment is benefiting.

People must retain the right to fund organisations fighting to afford protection to our natural environment regardless of the approach used-be it on-ground works, education, lobbying, court action, lawful protests, submissions or whatever means they chose. Any incentives for donors to do this must be maintained.

Yours sincerely

Des Boyland, Secretary and Policies and Campaigns Manager

Wildlife Preservation Society of Queensland

19th May 2015