



Committee Secretary
House of Representatives Standing Committee on the Environment
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Dear Committee,

Submission to the Inquiry into the Register of Environmental Organisations

I have been directed by the Board of Directors of Wildlife Land Fund Limited to take this opportunity to make a submission to your committee.

The Wildlife Land Fund Limited (WLFL) is based in Queensland, Australia. WLFL's vision is to contribute to an ecologically sustainable future for people and wildlife by conserving Queensland's natural environment. The principal means of achieving WLFL's vision are:

- to acquire or bring about the acquisition of land with significant conservation and natural heritage values; and
- to protect and enhance those values through wise and ecologically sustainable management.

WLFL complements the work of other organisations by focussing on a network of smaller land parcels, generally of less than 2000 hectares. We believe that we need to act to protect land with important conservation values as Governments alone cannot do this.

WLFL is a not-for-profit, limited guarantee public company which is registered as an Environmental Organisation with the Commonwealth Government. This means that donations to WLFL's Public Fund (the Wildlife Nature Reserve Fund) are tax deductible.

Currently WLFL has about 1855ha under management. WLFL owns Witta Nature Refuge (7.3 ha), Neil Holloway Reesville Nature Refuge, Rosedale Conservation Reserve (18.9 ha) and is sole trustee for and manages Bukkulla Regional Park (1833 ha). Bukkulla Regional Park is owned by the Crown and was jointly purchased with the Queensland Government contributing \$84 000 and WLFL \$220 000. These holdings are home to a range of threatened regional ecosystems and species complementary work done by Governments and other private conservation organisations. WLFL relies on successful grant applications, rebates for works undertaken in accord with voluntary conservation agreements with local government authorities but most importantly donations from members and the public. While our works are primarily on ground works, education is also a component as well as some lobbying of Governments to ensure better conservation protection of nature refuges. One of the facts that drive donations is the donor is contributing to bettering the environment for the long term future and Governments must be lobbied to ensure this is the situation.

This is the background to why the Board of WLFL is of a view that donations should remain tax deductible for a very broad range of activities. Such activities

include but are not necessarily limited to on ground works, education, advice and law reform.

The WLFL submission will address only certain of the aspects of the Terms of Reference of which we have experience or comments to offer. There are other organisations far more qualified to comment particular aspects.

Definition of 'environmental organisation' under the *Income Tax Assessment Act 1997*

WLFL is of a view that the current definition of 'environmental organisation' under the *Income Tax Assessment Act 1997* should remain unchanged. From WLFL's experience the capacity to hold deductible gift recipient status is not given lightly. Organisations that have satisfied the 'principal purpose' test benefit deserve to retain the tax deductible status. Furthermore the environment and its wildlife more than likely would be the losers as without the current tax deductibility donations more than likely would diminish. Government funding of the environment - regardless of political persuasion- continues to diminish as a percentage of the budget over time. The current tax deductibility the public currently enjoy at least offsets this trend to some degree.

Requirements to be met by an organisation to be listed on the Register and maintain its listing, reporting requirements for organisations to disclose donations and activities funded by donations.

WLFL provides audited financial statements and reports on the operations of the company 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. WLFL recommends that the administrative burden on environmental organisations is not increased. Environmental charities are already subject to sufficient scrutiny by regulators and the public. If the public and members disagreed how funds were being spent, surely they would redirect their donations elsewhere.

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

WLFL has address this aspect to a large degree already. While WLFL major focus is on on-ground works, other aspects including education, lobbying and even court action to test the rigour of legislation may be required on occasions to fulfil our vision. There may even be need to object to inappropriate planning decisions that threaten to destroy the very achievements attained with public monies donated. Without the efforts of environmental organisations the biodiversity in Australia would be declining at even a more alarming rate than at present.

Conclusion

The Board of WLFL appreciates the opportunity to make a submission. WLFL and the writer has no concerns about the publishing of this submission.

WLFL is of a view that change to the current system 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. WLFL 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. WLFL would be opposed to change particularly if it limited the choice of people as to what aspects of or how the challenge to enhance our environment and its wildlife could be funded.

Yours sincerely

Des Boyland, Secretary, Wildlife Land Fund Limited
18th May 2015