



Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

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

15 May 2015

Dear Sir / Madam

Re: Submission to the inquiry into the administration and transparency of the Register of Environmental Organisations and its effectiveness in supporting communities to take practical action to improve the environment.

Thank you for inviting us to make a submission to this inquiry.

The Blue Mountains Conservation Society Inc (“the Society”) is dedicated to the protection of the natural environment of the greater Blue Mountains, one of the most iconic areas of natural beauty and environmental significance in Australia. The area’s importance has been recognised by the United Nations which has granted it world heritage status. We are an incorporated association with around 900 members, most of who live in the greater Blue Mountains area of NSW.

The Society’s work encompasses a wide range of activities towards this protection including:

- The operation of a native plant nursery for over 20 years, currently in 2 locations. The nursery has grown and sold over 40,000 plants of local provenance in the last 4 years. These plants have been used in revegetation projects by the NSW Roads and Traffic Authority, Blue Mountains City Council and other corporate bodies and domestically by members of the public.
- The operation of a bushcare group at the Valley of the Waters in Wentworth Falls dedicated to controlling weeds and minimising erosion in this heavily visited area.
- Maintenance of water quality by participating in streamwatch programs in various areas and taking appropriate action on unsatisfactory results.
- Environmental education, particularly aimed at schoolchildren, including the printing and promotion of the Bush Tracker series of maps designed to increase schoolchildren’s interest in and knowledge of the natural environment. These maps are created using school input and distributed to local schools.
- Education of members and the local community through the Society’s monthly newsletter and public meetings.
- Promotion of the use of tap water rather than bottled water and educating the community on its environmental benefits.

- Working with Blue Mountains City Council and other stakeholders to develop detailed planning instruments under the new NSW planning regime.

The Society is listed on the Register of Environmental Organisations and so enjoys tax deductibility status for donors. In our last financial year, to 28 February 2105, the Society raised \$9,457 through tax deductible donations. These moneys are all spent on projects approved by the Society's Gift Committee as complying with the Society's objectives which in 2014/15 comprised predominantly printing and distribution of the Society's monthly newsletter to our 900 members. Without the availability of tax deductibility we would find it much harder to raise the money necessary to fund our work especially as the federal Grants to Voluntary Environmental and Heritage Organisations program has recently been withdrawn.

Comments on the items listed in the inquiry's terms of reference are as follows:

Definition of environmental organisation. In our view the definition included in sections 30.260 to 30.275 of the Income Tax Assessment Act 1997 is fine. The principal purpose definition is clear and there is a requirement that donations are used only for this principal purpose.

Requirements to be met to be listed on the Register. The Society is included on the Register of Environmental Organisations. The Registrar requires an annual statistical report on donations received and how these moneys are spent which is not onerous to produce. Other requirements such as maintaining at least 50 members do not represent any problem.

Activities undertaken. In the Society's case the native plant nursery, bushcare group and streamwatch activities involve on-ground environmental work. Our education activities encourage members and the community at large to undertake on-ground environmental work and / or cease or limit actions which are disadvantageous to the environment.

Reporting requirements. The reporting requirements of the Register of Environmental Organisations are covered above. The annual report to our members includes a statement on our public gift fund which details the amount of donations received in the preceding financial year and describes in detail the expenditure. This reporting is not onerous for the Society.

Administration of the Register. We are not aware of any potential administration inefficiencies.

Compliance arrangements. We cannot contribute any comments here.

International jurisdictions. We understand that Canada has recently introduced an upper limit of 10% of organisational resources which may be spent on advocacy if an organisation is to retain its donor tax deductibility status. This does not affect us directly as we would be well under this limit. However Canada's experience shows that this restriction has had the effect of reducing funding for the environment which is clearly disadvantageous for the environment generally.

We would be very concerned if the Committee proposes withdrawing or limiting the availability of tax deductibility of donations to environmental organisations or making the administration of the Register more complex.

Yours faithfully

Bart Beech
Treasurer