



SSAA National Submission Paper

Standing Committee on the Environment

**Inquiry into the Register of
Environmental Organisations**

May 2015

Inquiry into the Register of Environmental Organisations

TERMS OF REFERENCE

The House of Representatives Standing Committee on the Environment will inquire into 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, with particular regard to:

- the definition of ‘environmental organisation’ under the *Income Tax Assessment Act 1997*, including under Subdivision 30-E;
- the requirements to be met by an organisation to be listed on the Register and maintain its listing;
- activities undertaken by organisations currently listed on the Register and the extent to which these activities involve on-ground environmental works;
- reporting requirements for organisations to disclose donations and activities funded by donations;
- the administration of the Register and potential efficiency improvements;
- compliance arrangements and the measures available to the Department of the Environment and the Australian Taxation Office to investigate breaches of the Act and Ministerial Guidelines by listed organisations; and
- relevant governance arrangements in international jurisdictions, and exploring methods to adopt best practice in Australia.

SSAA Summary Statement

The Sporting Shooters' Association of Australia (SSAA National) accepts the opportunity to provide a submission to the inquiry into the administration, transparency and effectiveness of the Register of Environmental Organisations (the Register) in supporting communities to improve the environment.

SSAA National has in excess of 170,000 members and we care deeply for the environment in which many of us spend time undertaking our recreational pursuits, as well as participating in voluntary conservation activities.

SSAA National and its state and territory branches have been involved in many environmental projects. For 20 years we have been a key stakeholder in Operation Bouncebank in South Australia's Flinders Ranges. We have assisted in the recovery of yellow-footed rock wallaby populations and most recently, the reintroduction of western quolls to the region. We have committed \$60,000 to the Foundation for Australia's Most Endangered Species (FAME) to further assist its quoll reintroduction program.

In Queensland, we are developing one of the largest private koala sanctuaries in the country, as well as continuing environmental work to conserve one of the state's remaining bridled nail-tail wallaby populations. Other states conduct projects that achieve positive environmental outcomes and as an Association, we will continue to look for opportunities to provide assistance to on-ground environmental work projects.

We would like to make the following comments in regards to the following two specific Terms of Reference:

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

SSAA National believes that it should be a requirement that an organisation can only be approved if the purpose/s of the organisation displays evidence to suggest that it will primarily be involved in or support practical 'on-ground' environmental work projects in Australia.

We suggest that an 80/20 rule be established to ensure that 80 per cent of donations be used for and to support on-ground environmental work projects.

Any shift by an organisation from the above requirement should trigger the Register to consider removing that organisation from the REO.

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

SSAA National believes that on-ground environmental work should be the priority and the primary focus of listed organisations. On-ground environmental work should include activities that:

- a) protect, restore and conserve the natural environment that supports wildlife;
- b) conserve and manage habitat and wildlife in ecologically sustainable ways; and
- c) engage with academic institutions and researchers to fill knowledge gaps in wildlife ecology and management.

Organisations that are primarily set up as political advocacy groups should not be on the Register. Organisations that use only a small percentage of donated funds for on-ground works and primarily engage in ideological political campaigns, instead of real hands-on environmental work, should be removed.

We and the general public would expect donations to any so-called 'environmental organisation' on the Register to be predominately used for and the support of on-ground environmental projects.

Some so-called environmental organisations appear to be in the business of environmental advocacy and activism. Such organisations are more about creating employment opportunities for environmental activists to participate in political campaigning (often in regards to animal rights and extreme green ideologies) than to focus funding towards on-ground environmental works to achieve positive conservation benefits.

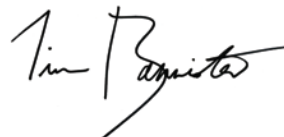
We therefore believe organisations that are primarily animal rights and political advocacy groups should be excluded from the Register.

As an organisation that cares for the environment and participates in environmental work, we hope that our submission will be received with the goodwill in which it is intended.

Faithfully,



Geoff Jones
SSAA National President



Tim Bannister
SSAA National CEO