

16 February 2023

Personal and Indirect Tax, Charities and Housing Division
Treasury
Langton Cres
Parkes ACT 2600

Deductible Gift Recipient (DGR) Registers Reform

Community radio stations broadcast nationwide to an audience of over five million people per week. The CBAA is the peak body for 450+ not-for-profit community radio broadcasters across Australia delivering over 500 community radio services on AM, FM and DAB+. Roughly 50% of community broadcasters are charities registered with the ACNC and approximately 30% have DGR status.

Community broadcasting plays an important role in providing a voice for Australian communities that are underserved by commercial and public broadcasters – including First Nations Australians, communities in regional and remote Australia, culturally and linguistically diverse communities, faith-based communities, youth and seniors' communities, the LGBTQIA+ community, people with a disability, and diverse arts and music communities. In doing so it promotes the diverse identities of Australians that enriches the social and cultural fabric of Australian society.

Community broadcasters provide a critical point of connection and communication for communities. In the face of floods, bushfires and the COVID pandemic, community broadcasters have worked tirelessly to support and connect communities when they need it most. They have provided communities with up-to-date local information that is in-language and community appropriate. They have acted as a catalyst for community dialogue, linked people to critical services, coordinated fundraising and relief efforts and been vital points of connection for their communities both through the emergency and recovery phase.

The CBAA welcomes the opportunity to provide our views on the proposed Deductible Gift Recipient (DGR) Registers Reform. The CBAA supports the reform's objective to make all DGR categories consistent in administration, reduce red tape imposed on endorsed organisations, and simplify the application process for organisations seeking DGR status.

Community broadcasters are currently categorised as Cultural Organisations and administered by the Office for the Arts in the Department of Infrastructure, Transport, Regional Development, Communications and the Arts. We support the transfer of practical responsibility for assessing DGRs to the ATO.

Becoming a registered charity is beneficial for community broadcasters enabling them to take advantage of income tax exemptions, Fringe Benefit Tax rebates, GST concession and credits, and the option to apply for DGR status. Unfortunately, many community broadcasters lack the time and resources necessary to invest in becoming a registered charity. Our sector is powered by over 18,000 volunteer staff and many of our stations are entirely volunteer-run. The proposed law's streamlining of application and reporting requirements and reduction of wait-time for DGR approvals, may encourage these stations to register as charities.

The CBAA has long called for a harmonised charity regulatory framework and the standardisation of not-for-profit regulation. We appreciate this step towards the modernisation of charity legislation. Our sector would benefit from further work to align the *Broadcasting Services Act 1992* with ACNC and/or ATO understanding of not-for-profits. It would also reduce the regulatory burden on community broadcasters if charity information were shared with Australian Communications and Media Authority (ACMA) through the ACNC Charity Passport.

As local news producers, community broadcasters stand with other non-profit news providers in advocating for greater recognition of public interest journalism as a public good. The CBAA supports the Local & Independent News Association's submission to this consultation and their position that charitable status and DGR consideration be extended to include public interest journalism.

We would welcome any further opportunity to assist with this consultation. If you would like to discuss our submission, please do not hesitate to contact Reece Kinnane, CBAA's Head of Advocacy and Communications at reece.kinnane@cbaa.org.au or via (02) 9318 9621.

Best regards,

A handwritten signature in blue ink, appearing to read 'Jon Bisset', with a stylized flourish at the end.

Jon Bisset
Chief Executive Officer