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Aileen Tse  
Lawyer  
Investment Managers and Superannuation  
Australian Securities and Investments Commission  
GPO Box 9827  
Sydney NSW 2001

Via email: [aileen.tse@asic.gov.au](mailto:aileen.tse@asic.gov.au)

Dear Aileen,

**Re: Charitable investment fundraisers – Consultation Paper 207**

Missions Interlink welcomes the opportunity to provide our comments in response to the above consultation paper which was released in May 2013.

Missions Interlink is a network of approximately 170 Australian organisations that are involved in cross-cultural mission. It is not a mission agency, but rather the peak body representing cross-cultural mission organisations within Australia and exists to link, support and provide training to its members and associates. The size and income of Missions Interlink members varies greatly with approximately 50 organisations at the lowest membership level (up to 2 personnel or donation income less than \$200,000), and 14 at the highest level (50 or more personnel or donation income in excess of \$5,000,000). All members are currently Tax Concession Charities and some are public benevolent institutions with DGR status.

Missions Interlink works with its members to facilitate good practice and compliance with applicable regulatory requirements. The organisation has been active in representing its members throughout the Not-for-profit reform agenda and the introduction of the Australian Charities and Not-for-profits Commission. Missions Interlink seeks to promote and maintain high standards of accountability and governance through its application processes, Standards Statement, compliance checks and education. Each constituent member must have a governing instrument and written policies that clearly define its organisational and accountability structures within Australia and demonstrate good accountability and governance principles.

**General Comments**

Missions Interlink supports the government in its commitment to reforming the NFP sector particularly where this leads to a reduction of red tape and unnecessary regulation. We are concerned that the fundraising activities of many of our members will inadvertently and adversely impact very small and simple schemes operated by small mission organisations.

### **Charitable Fundraisers**

Across the Missions Interlink network ten organisations hold funds from supporters for which the supporter is paid no interest or an interest rate below the market rate. The funds are then invested by the organisation with the interest differential providing additional income used towards the charitable purpose of the organisation. Collectively these ten organisations hold \$4.8 million dollars from approximately 500 supporters.

Supporters who provide funds at no or low interest do so because they are passionate supporters of the organisations involved. They provide their funds because they believe in the mission and values of the organisation concerned and not with the intent of maximising return on their 'investment'.

Missions Interlink would be concerned if the ability for organisations to promote this vehicle of raising income towards their charitable purpose was removed or if any current exemptions under which they operate were removed, as appears to be proposed in the consultation paper.

Mission organisations operate in the religious sector and supporters of missions interlink members do so out of a desire to share the gospel message of Jesus.

While we believe the intentions of ASIC are good in bringing this matter forward for public consultation, we believe that small mission organisations have not been the cause of recent high-profile collapses of retail-funded shadow banks in Australia.

We suggest that if ASIC is uncomfortable with the small-scale funding schemes that Missions Interlink members operate then some specific consultation regarding these should be undertaken with Missions Interlink directly.

We find it unfortunate that small organisations seeking additional income may be inadvertently caught in what would appear to be 'over-regulation' for the size of organisation and funds invested for charitable fundraising and would ask that ASIC consider small organisations such as our members as an exception to proposed new regulations.

Please contact me or the Missions Interlink office if you have any questions about the matters raised.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'T. Spicer', written in a cursive style.

Trevor Spicer  
Facilitator – Business Managers Network  
Missions Interlink



