

# Review of Wildcare's Tasmanian Nature Conservation Fund Issues Paper

## Purpose

The purpose of this paper is to seek your input into possible changes to the way Wildcare's Tasmanian Nature Conservation Fund (TNCF)<sup>1</sup> works. In giving feedback you may wish to consider the following questions:

- *What projects should be eligible for funding from the TNCF and who should be able to seek that funding?*
- *Should donors to the TNCF be able to direct how their donations are used?*
- *Who should decide what money from the TNCF is spent on?*
- *How often should decisions be made on funding from the TNCF?*
- *What reporting should be required on projects funded from the TNCF?*

This is phase 1 of this review process. Phase 2 will provide another opportunity to comment on more specific proposals for change in mid-2024, with implementation in late 2024. In the meantime, the existing TNCF arrangements will continue to apply.

A TNCF Review Reference Group, with representatives from Wildcare branches, the Grants Assessment Committee (GAC)<sup>2</sup> and our office team, will also give input throughout this process.

## Background

Wildcare Tasmania Inc. (Wildcare) is a registered environmental organisation and a deductible gift recipient (DGR) because it operates a public fund called the TNCF. The fund is open to tax-deductible gifts from members of the public to be used for Wildcare's principal purpose (supporting communities and volunteers to contribute to conservation actions that ensure long-term protection of Tasmania's natural environment).

TNCF funds have enabled many Wildcare branches and other key partners to make highly valued contributions to Tasmania's nature conservation efforts. The Wildcare Board has initiated a review to ensure the TNCF continues to support these efforts.

The regulation of environmental DGR funds such as the TNCF is changing, from 1 January 2024. The requirement for Wildcare to maintain a 'public fund' will be replaced with a less onerous requirement to maintain a 'gift fund'. This provides the opportunity for us to consider broader changes or improvements.

There are also areas in our current TNCF administration where greater clarification and consistency would aid the grants process for everyone, including the GAC and our small office team.

This review aims to ensure the TNCF's governance, policy settings and administrative arrangements reflect the new regulatory context, are fit-for-purpose, clear yet flexible and provide our donors and partners with confidence that the TNCF continues to be a sound investment.

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<sup>1</sup> Previously known as the Wildcare Gift Fund. See also [Tasmanian Nature Conservation Fund Grants \(wildcaretas.org.au\)](https://wildcaretas.org.au).

<sup>2</sup> Under our constitution the GAC is responsible for administering the TNCF.

## Eligibility for grant applicants

Currently, applicants must be or partner with:

- a Wildcare Branch (group)
- an individual Wildcare member
- a not-for-profit organisation
- an ‘established partner’, or
- a ‘social enterprise’.

The first two criteria are clear. However, the current TNCF Guidelines are unclear as to what is a not-for-profit organisation, established partner or social enterprise. Some additional directions for considering the eligibility of applicants are in the TNCF Operating Procedures<sup>3</sup>:

*“The primary beneficiaries of the TNCF are Wildcare volunteer groups and organisations that manage conservation reserves and biodiversity in Tasmania [such as the Department of Natural Resources and Environment] ... Other land managers with conservation and biodiversity responsibilities aligned to Wildcare’s primary purpose may also be beneficiaries, e.g. local Councils.*

...

*Funds may be allocated to individuals, including private landholders, who are undertaking projects that contribute to the nature conservation objectives of the ... TNCF.”*

Increasingly, TNCF applications are submitted from individual members to support their roles in caring for injured wildlife. These applications are complex for the GAC to assess. A new Tasmanian wildlife carers’ network (Wildlife Network Tasmania) is expected to seek DGR status for a carers’ fund.

- *Should eligibility for TNCF applicants be directly linked to projects led/partnered with a Wildcare branch or member?*
- *Should private landholders who may apply independently of a branch or member be expected/required to become Wildcare members?*
- *Should eligibility for TNCF applicants exclude individual members?*

Options to consider:

a. Status quo	b. Amendments	c. New approach
As currently listed.	1. Restrict applicant eligibility to Wildcare branches and members, including where partnering with other aligned individuals/groups organisations. <i>Pro:</i> Would strengthen on-ground relationships between branches /members and land managers. <i>Con:</i> May exclude other meritorious partnerships.  2. As above, but also exclude individual members. <i>Pro:</i> As above and remove duplication with new network/scheme. <i>Con:</i> May exclude innovative partnerships.	Open applicant eligibility to all and focus on the suitability/eligibility of the proposed project. <i>Pro:</i> High flexibility, may encourage innovation. <i>Con:</i> Could create excessive demand for funding. Adds to GAC assessment complexity.

<sup>3</sup> See [TASMANIAN NATURE CONSERVATION FUND V4.0-TNCF-OPERATING-PROCEDURES \(wildcaretas.org.au\)](https://wildcaretas.org.au/TASMANIAN_NATURE_CONSERVATION_FUND_V4.0-TNCF-OPERATING-PROCEDURES).

## Eligibility for projects

The TNCF Grant Guidelines<sup>4</sup> (based on current Guidelines for the Register of Environmental Organisations) describe projects that are currently ‘in scope’ and those that are not. Some elements are based on current regulatory requirements which will change from 1 January 2024.

<b>TNCF Grant Guidelines</b>	
<i>Applications that relate to the care and conservation of Tasmania’s wild places, wildlife, and reserves, either directly or through fostering community interest or education in the care of the natural environment.</i>	
<b>REO Guidelines</b>	
<p><b>In scope:</b> “The natural environment and concern for it would include, for example:</p> <ul style="list-style-type: none"> <li>• significant natural areas such as rainforests;</li> <li>• wildlife and their habitats;</li> <li>• issues affecting the environment such as air and water quality, waste minimisation, soil conservation, and biodiversity; and</li> <li>• promotion of ecologically sustainable development principles.”</li> </ul>	<p><b>Not in scope:</b> “The natural environment would exclude, for example:</p> <ul style="list-style-type: none"> <li>• constructions such as the retaining walls of dams;</li> <li>• cultivated parks and gardens;</li> <li>• zoos and wildlife parks (except those parks and zoos principally carried on the purposes of species preservation); and</li> <li>• cultural sites and heritage properties.”</li> </ul>
<p>Additional GAC clarification on potential project eligibility:</p> <ul style="list-style-type: none"> <li>• Compliance with the objectives of any management plans and/or alliance with current research programs and research protocols;</li> <li>• Alignment with land managers’ goals and standards;</li> <li>• Whether appropriate permits have been obtained from relevant government authorities;</li> <li>• Involvement of Wildcare volunteers in meaningful on-ground activities; and</li> <li>• Raising community awareness about Wildcare’s purpose and activities.</li> </ul>	<p>Additional GAC clarification on potential projects that would not be eligible:</p> <ul style="list-style-type: none"> <li>• Applications that do not support the care of the natural environment;</li> <li>• Items that would otherwise be funded from the current budgets of state or local governments;</li> <li>• Applications to boost facilities operated by commercial, as opposed to not-for-profit or social, enterprises;</li> <li>• Purchase of consumables that would ordinarily be purchased by volunteers, e.g. food;</li> <li>• Assistance with transport costs for groups working in remote areas, where funding for transport is available through the relevant land manager; and</li> <li>• Speculative projects and/or explorative research, unless in exceptional circumstances such as where there is a funding partner.</li> </ul>

<sup>4</sup> See [TASMANIAN NATURE CONSERVATION FUND GRANT GUIDELINES \(wildcarea.org.au\)](https://wildcarea.org.au).

Wildcare branches operate in many national parks and reserves across Tasmania. Branches' objectives and activities are highly diverse and may also vary over time. It is therefore challenging to provide more definition while also providing enough flexibility to allow the GAC to consider a proposal and its alignment with the purpose of the TNCF.

A number of Wildcare branches are also aligned with other conservation groups such as Landcare and NRM that also offer grant programs for suitable conservation and rehabilitation projects. This could create some overlap and duplication with the TNCF.

The work of some Wildcare branches on cultural heritage is not aligned with the ongoing regulatory requirement for the TNCF to be used only for Wildcare's principal purpose (which relates to the natural environment). So that work will remain ineligible for TNCF funding.

- *Should the TNCF be redesigned to provide a unique grant program offering? In this way, the TNCF could be better targeted to specific objectives and group activities.*

Options to consider:

a. Status quo	b. Amendments	c. New approach
As currently listed.	1. Could consolidate. 2. Could expand. Views welcome.	Changes to position TNCF as a unique grant program. <i>Pro:</i> Would maximise value of TNCF and remove duplication. <i>Con:</i> May exclude those projects which require multiple funding sources to undertake.

## Donations

Donations to the TNCF come from many generous benefactors: individuals, organisations and not-for-profit groups. Currently, Wildcare has identified 11 'causes' that donors may choose to support.

Category	Causes
Wild places	Nature and World Heritage Coast conservation Wild bushwalking tracks Get into nature
Wildlife	Keep wildlife safe (preventing injury and maintaining habitat) Bonorong (rescuing injured wildlife) Wildlife rehab and release (rehabilitating wildlife for return to the wild)
Specific species	Raptors Orange-bellied parrots Penguins Tasmanian devils

The diversity of these 'causes' reflects our different branches' objectives and activities. However, these can be confusing for donors. It can also tend to favour more prominent causes in attracting donations over lower profile ones.

Wildcare keeps account of the donations to each separate cause. The GAC is also informed of the available funds in each cause when it assesses grant applications. However, there is no regulatory requirement for donations to be disaggregated in this way, and it may be more beneficial to pool funds for similar causes and donations.

From 1 January 2024, new law makes Wildcare the DGR. This may provide opportunities for greater flexibility, and potentially another source of funding for Wildcare’s core operations including member/branch support, fundraising, recruitment of members and volunteers, etc.

- *Should TNCF causes be reduced to three (reflecting the current categories): wild places, wildlife, specific species?*  
This would give applicants and the GAC more flexibility to make and approve applications addressing new/emerging priorities.
- *Should the TNCF include a new cause focused on community education and involvement, consistent with the Wildcare constitution?*  
This would acknowledge the need to attract and retain members and active volunteers.
- *Should the TNCF be more targeted towards Wildcare’s traditional emphasis on ‘wild places’ and ‘specific species’?*  
This would provide a clearer focus. Although this would reduce funding sources for a number of long-time wildlife caring branches who have contributed significantly to Wildlife’s purpose, there are other existing and expected DGRs that could provide funding for wildlife care.
- *Should all donations be held as a single pool i.e. as ‘Wildcare’ funds?*  
Wildcare’s Board could advise the GAC of the total available funds for any application process, and the GAC use its experience/expertise with flexibility to determine priorities for funding, based on quality /quantity of applications received.

Like many other DGRs, Wildcare could then use donations to the TNCF to offset some of its operating costs. Alternatively, a modest fraction of the TNCF could be allocated to cover Wildcare’s growing administration costs in supporting the GAC which are currently borne by the small office team.

Financial/governance controls would be needed to maintain donor confidence in use of these monies in this option.

Transitional arrangements to respect the wishes of previous donors would also need to be considered.

- *Should donors be enabled to donate directly to a particular Wildcare branch?*  
This would reflect some donors’ intentions and may allow branches to attract funds they could not obtain otherwise. To comply with regulatory requirements, there would need to be clear directions on use of these funds by branches or limits on branches to which donations may be directed.

Options to consider:

a. Status quo	b. Amendments	c. New approach
Existing categories and causes	1. Consolidate causes to reflect current categories. 2. Add new community education/involvement cause. 3. Remove some existing causes. 4. Enable donations to be directed to branches. <i>Pro:</i> Each option could bring funds/attention to specific areas. <i>Con:</i> Likely continue complexity of donor/GAC decision-making.	Remove ‘causes’ altogether, and operate as a single pool, allowing Wildcare Board and GAC to determine focus/use of donations, with controls to maintain donor confidence. <i>Pro:</i> Maximum flexibility to respond to priorities and areas of need. <i>Con:</i> Donors would have less explicit say on use of funds.

## Governance

The framework for the administration of the TNCF is primarily set out in Wildcare’s constitution (approved by members) plus the TNCF Operating Procedures and Grant Guidelines (approved by the Board) and reviewed annually. These governance arrangements establish that the TNCF has its own name, its own bank account, an independent management committee known as the GAC with special membership rules, and its own operating rules.

However, many relevant provisions in the constitution reflect regulatory requirements that will no longer apply from 1 January 2024. Removing the redundant provisions could provide greater flexibility in future; some changes to the constitution will also be needed because of changes to the regulatory regime.

The Board determines the policy for the amount of TNCF funds available annually for allocation and, through our CEO, calls for grant funding applications, generally twice a year. This policy seeks to balance the desire to support on-ground work as soon as possible with protecting the TNCF’s financial sustainability.

The GAC may develop their own guidelines for assessment/selection criteria, processes and any conditions that may apply to their funding decisions.

The Wildcare office team support the GAC by communicating with (potential/actual) applicants before and after GAC decisions, checking acquittal requirements are met and arranging related payments.

Donors may express a preference as to how donations are used, but have no influence over the decisions of the GAC.

Independent auditing of our TNCF governance and financial controls over recent years has identified no material gaps or risks in these arrangements.

- *Should these governance arrangements continue in their present form?*
- *Should the GAC provide advice to the Board on the annual reviews of the Operating Procedures and level of TNCF funding likely to be needed in any year or at each application round?*  
While there is no explicit requirement for this advice, there is nothing in our present governance arrangements that would prevent the Board from seeking such advice.
- *Should the Board take a more direct role in the administration/assessment of applications?*
- *Are there other options that could be considered?*

Options to consider:

a. Status quo	b. Amendments	c. New approach
As above. <i>Pro:</i> No identifiable gaps/risks.	1. As previous, plus GAC to advise Board on Operating Procedures and annual funding levels. 2. Other?	Board to take a more direct role in administration assessing applications. <i>Pro:</i> More direct accountability to members. <i>Con:</i> Increase Board workload so may reduce Board candidates and would need to recruit additional expertise.

## Operating arrangements and administration

As outlined above, administration of the TNCF is primarily guided by the Operating Procedures, the Grant Guidelines and the GAC's own decision-making arrangements. Most of these arrangements are maturing and regular (Board and GAC) reviews allow for changes to maintain their fitness-for-purpose. There are several areas where clarification or a different approach could be considered.

### Funding rounds

Currently, the TNCF is open to grant applications twice a year, generally in April and September. This predictability ensures the workload is largely manageable for all: applicants, the GAC and the Wildcare office. It could however reduce the flexibility for branches and their land manager/partners to respond to issues of concern in a more timely manner.

- *Should these regular funding windows be maintained, or should a more flexible/open application process be available all year?*

Options to consider:

a. Status quo	b. Amendments	c. New approach
Two grant application rounds per annum. <i>Pro:</i> Predictable workload. <i>Con:</i> Less flexible	As per A plus open to emergency matters, as they arise. <i>Pro:</i> Responsive to pressing issues. <i>Con:</i> Difficult to predict, may create unrealistic expectations of available funds, needs clear guidelines for access.	Open all year. <i>Pro:</i> High access. <i>Con:</i> Difficult to plan/ provide direction, high workloads for GAC/office.

### Acquittal and reporting requirements

The conditions of any grant, as set out in the Grant Guidelines, are:

- TNCF as the source of funding must be acknowledged in all media promotions.
- An acquittal report is required within 2 months of the project completion, including a financial report and a summary story.
- Funds should generally be spent within 12 months.
- Other conditions may be determined by the GAC.

Most TNCF grants are for relatively small-moderate amounts. However, some grants are awarded for significant funding, with no additional reporting requirements.

As part of a contemporary fundraising strategy, both qualitative and quantitative demonstrations of the impact/outcomes realised (i.e. return on investment) from donating to the TNCF are valuable.

- *Should we consider tiered reporting requirements depending on level of funding awarded? e.g. not only financial acquittal and a summary story but also quantitative ie. key performance indicator (KPI) reports based on the impacts / outcomes achieved?*  
Generally, large grant recipients have more capacity/resources available to plan, collect and report on a targeted/project-specific set of KPIs.
- *Should all grantees be required to provide KPI reports, with KPIs targeted to specific project purpose?*

Options to consider:

<b>a. Status quo</b>	<b>b. Amendments</b>	<b>c. New approach</b>
No change. <i>Pro:</i> Fit-for-purpose for small and large groups, not onerous. <i>Con:</i> May not always favourably influence potential large donors.	As per status quo, plus additional KPI requirements for larger grants. <i>Pro:</i> Builds evidence of Wildcare's impact <i>Con:</i> Diversity of groups' work can be very difficult to measure at times; need to build smaller groups' capacity to deal with KPIs.	All to provide financial, plus story + KPI reports, based on specific project purpose. <i>Pro:</i> Builds strong evidence of Wildcare's impact. <i>Con:</i> Diversity of groups' work can be very difficult to measure at times; onerous for small(er) groups and office.

## How to make a submission

Email [office@wildcaretas.org.au](mailto:office@wildcaretas.org.au)

Online [Complete this 5min Survey](#)

Contact 03 6165 4230

**By 9<sup>th</sup> February 2024.**

## Next steps

March/April 2024	When this initial consultation phase is complete, the Board will prepare more detailed proposals for change, where desirable.
Late April to late May	A second consultation phase will be conducted to canvass views on specific proposals for change. In this second phase, there may also be proposals for changes to our constitution, chiefly arising from the changed regulatory environment in which the TNCF will be operating.
Mid-late 2024	The Board will finalise and release revised TNCF documentation. Should constitutional changes be desirable, a special general meeting open to all members will also be held to vote on any proposals for related changes to our constitution.
Throughout the review	As noted earlier, we will also be seeking views from our Review Reference Group at key points throughout this review.