



**Actuaries
Institute.**

20th September 2023

Director, Superannuation Insurance and Governance Unit

Member Outcomes and Governance Branch

Retirement, Advice and Investment Division

The Treasury

Langton Crescent

PARKES ACT 2600

Email: superannuationobjective@treasury.gov.au

Dear Sir/Madam,

Consultation: Legislating the objective of superannuation – August 2023

The Actuaries Institute ('the Institute') welcomes the opportunity to provide stakeholder feedback on the draft material supporting legislating the objective of superannuation. This includes the legislation, consequential and transitional provisions, and explanatory materials.

The Institute is the peak professional body for actuaries in Australia. Our members have had significant involvement in the development and management of superannuation in Australia, and work across APRA regulated funds, SMSFs and public sector funds, as well as the life insurers who support insurance in superannuation benefits.

The Institute is supportive of the proposed Bill and draft material.

We welcome that:

- There is a clear objective of superannuation, framed in the context of the retirement income system.
- The objective of superannuation remains unchanged from that proposed in the February 2023 Treasury consultation paper *Legislating the objective of superannuation*.
- The objective is to be included in a separate Act and not included as part of the Superannuation Industry (Supervision) Act.

Actuaries Institute
Level 2, 50 Carrington Street, Sydney NSW 2000
P +61 (0) 2 9239 6100 | actuaries.asn.au
ABN 69 000 423 656

- The supporting explanatory materials are comprehensive, allowing the effective interpretation of the proposed objective. We are pleased to see that they include:
 - reference to the retirement system;
 - context on the broader benefits of the superannuation system such as insurance in superannuation; and
 - detailed explanation of key concepts within the objective of superannuation.
- The strengthened accountability mechanisms proposed, given the new requirement for a statement of compatibility with the objective of superannuation for most Bills or regulations that relate to superannuation, and that any exceptions to this new requirement are proposed to be practical and limited.

If you would like us to provide further information, please contact me on (02) 9239 6100 or executive@actuaries.asn.au.

Yours sincerely

(Signed) Elayne Grace

Chief Executive Officer