



AUSTRALIAN CHAMBER OF
COMMERCE AND INDUSTRY

ACCI SUBMISSION

“Better regulation and
governance, enhanced
transparency and improved
competition in superannuation”

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1. ABOUT ACCI

1.1 Who we are

The Australian Chamber of Commerce and Industry (**ACCI**) speaks on behalf of Australian business at a national and international level.

As Australia's largest and most representative business advocate, ACCI develops and advocates policies that are in the best interests of Australian business, economy and community.

We achieve this through the collaborative action of our national member network which comprises:

- all state and territory chambers of commerce;
- 30 national industry associations; and
- bilateral and multilateral business organisations.

In this way, ACCI provides leadership for more than 300,000 businesses which:

- operate in all industry sectors;
- includes small, medium and large businesses; and
- are located throughout metropolitan and regional Australia.

1.2 What we do

ACCI takes a leading role in advocating the views of Australian business to public policy decision makers and influencers including:

- federal government ministers and shadow ministers;
- federal parliamentarians;
- policy advisers;
- federal government public servants;
- regulatory authorities; and
- federal government agencies.

Our objective is to ensure that the voice of Australian businesses is heard, whether they are one of the top 100 Australian companies or a small sole trader.

Our specific activities include:

- Representation and advocacy to governments, parliaments, tribunals and policy makers both domestically and internationally;
- Representing business on a range of statutory and business boards and committees;
- Representing business in national forums including the Fair Work Commission, Safe Work Australia and many other bodies associated with economics, taxation, sustainability, small business, superannuation, employment, education and training, migration, trade, workplace relations and occupational health and safety;
- Representing business in international and global forums including the International Labour Organisation, International Organisation of Employers, International Chamber of Commerce, Business and Industry Advisory Committee to the Organisation for Economic Co-operation and Development, Confederation of Asia-Pacific Chambers of Commerce and Industry and Confederation of Asia-Pacific Employers;
- Research and developing policies relating to issues that concern Australian business;
- Publishing lead business surveys and other information products; and
- Providing forums for collective discussion amongst business on matters of law and policy.

2. INTRODUCTION

On 28 November the Government released “Better regulation and governance, enhanced transparency and improved competition in superannuation” (“Discussion Paper”) and invited comment on it and a number of focus questions. ACCI thanks the Government for providing this opportunity and it supports the objects implicit in the Discussion Paper’s title.

ACCI’s interest in the superannuation system primarily arises from its role as the peak voice of employers in Australia. Its concern is the interaction between employers, in their role as employers, and the superannuation system and its regulation.

ACCI members, and employers within the ACCI network, have a variety of superannuation arrangements and other interests in funds. ACCI does not itself nominate to the board of any fund.

Employers have an interest in transactional efficiency and also in clarity of obligations and responsibilities. Indirectly, employers have an interest in system efficiency and transparency. A superannuation system which yields the best accessible retirement balances for members, and to the extent possible, engages members’ attention, is in all employers’ interest and not just in the interest of those employers who strive to make superannuation part of their distinctive employment offering.

The level of, and indeed the fact of, member understanding is significantly affected by the level of system transparency and simplicity as well as other factors such as age and life cycle circumstances. Employer engagement with the superannuation system, and compliance, is dependent on the transparency, consistency and simplicity of system regulation and operation and accessibility of available information.

3. KEY ISSUES

3.1 ACCI' s direct involvement in superannuation system reform

3.1.1 ACCI was represented on the Cooper Committee.

3.1.2 Since the Cooper Committee reported ACCI was represented on the Stronger Super Peak Consultative Group and proposed a nominee to the SuperStream Advisory Council.

3.1.3 ACCI is also represented on the Superannuation Industry Advisory Group and the Contributions Implementation Working Group.

3.2 The Discussion Paper

3.2.1 The Discussion Paper is in four parts:

1. A Better Approach to Regulation
2. Better Governance
3. Enhanced Transparency
4. Enhancing Competition in the Default Superannuation Market

Consistent with the nature of ACCI's interest, it will confine itself primarily to part 4. Before turning to that there are two brief observations which ACCI wishes to make concerning the regulation of superannuation and governance.

3.3 Part 1 – A Better Approach to Regulation

3.3.1 The Discussion Paper states:

To improve the quality of regulation, the Government is committed to ensuring all regulatory measures undergo a Regulatory Impact Statement, to establish the precise impact of regulation on businesses, not-for-profit organisations and individuals. This assessment includes the quantification of compliance costs associated with regulation. To inform this analysis, the Government welcomes information from interested parties.

3.3.2 ACCI notes and endorses the Government's commitment to the improved transparency of its regulation consideration process and an evidence-based approach.

3.3.3 For employers the regulation of superannuation and the obligations imposed, including obligations over which they may not have direct control, are onerous. They are not equally well understood by all employers.

3.3.4 The superannuation system has been and is changing. Change, even change for the better, is difficult and adds to the administrative burden. Change itself can conduce to a lack of understanding. Where something is not well understood change becomes more of a challenge because the nature and administrative implications of what's needed are not clear.

3.3.5 This does not mean that the Government should rule out change which can be clearly demonstrated to reduce complexity or enhance transparency, or which facilitates beneficial competition, but it does mean that proposals for change should be properly considered and assessed and approached with caution.

3.4 Part 2 – Better Governance

- 3.4.1 The main issue addressed in Part 2 arises from the Cooper Committee’s recommendation concerning independent directors on trustee boards. The trustees of the large majority of the accumulation funds which can be expected to continue are obliged to comply with the new duties and standards which are required under MySuper. These new obligations significantly increase the statutory level of care as well as the extent of trustees’ and directors’ responsibilities.
- 3.4.2 By implication the new rules impose a duty on a board to assess whether it holds the range and level of competencies required to properly discharge its statutory obligations. That is, boards should regularly review and audit their skill sets against their statutory responsibilities and move to remediate the deficiencies.
- 3.4.3 To the extent that this is the case it would suggest that legislation requiring mandating independent directors may not be sufficiently necessary to justify enactment. (By implication this also raises the question of whether there should be mandated equal representation.)
- 3.4.4 The Discussion Paper also draws attention to prescribed policy committees which are generally required for public offer funds where the trustee does not have equal representation. It’s not quantified, but in ACCI’s experience, advisory policy committees do not generally operate effectively, do little to engage members and are not always set up where required by the *Superannuation Industry (Supervision) Act 1993*.
- 3.4.5 Consideration could be given to excising these requirements from the Act.

3.5 Part 4 – Enhancing Competition in the Default Superannuation Market

- 3.5.1 As outlined in the Discussion Paper the award prescription of superannuation is of long standing – it has been a widespread fact of employment since the late 1980s. In fact the general legislative prescription of superannuation, particularly in respect of employers’ obligations, generally followed the initial spread of award prescription.
- 3.5.2 It was in this context, where typically state and federal award clauses required the employer to become a “participating employer” (a standard employer sponsor) with a (or the) fund specified in the award, that the contractual arrangements between many funds and employers were established, and the nature of these contractual relationships were shaped by the relative bargaining capacities underpinned by this regulatory framework.
- 3.5.3 The award specification of funds also affected the competitive position of different funds and also the nature of competition between funds. It may also have been a factor affecting levels of member and employer engagement with and understanding of superannuation.
- 3.5.4 ACCI’s general policy position is that employers’ superannuation obligations should be provided by the superannuation legislation and not supplemented by award prescription. Dual general regulation gives rise to exceptions and technicalities and also to inconsistencies and arbitrary outcomes.
- 3.5.5 A simple example is the requirement in the standard award superannuation clause, which, following award amendments required by s 155A of the *Fair Work Act 2009* (now technically repealed to give way to the Act’s four yearly review of superannuation provisions) is included in all modern awards. The clause requires the employer to avoid incurring a superannuation guarantee charge. Whilst this requirement supports the primacy of choice it also creates an award breach in addition to the tax and charges and potential penalties under the *Superannuation Guarantee Charge Act 1992* and the *Superannuation Guarantee (Administration) Act 1992*.

- 3.5.6 The amendments made by the *Fair Work Amendment Act 2012* to the *Fair Work Act 2009* require that, following the four yearly review of default fund terms, modern awards are to contain a term prohibiting employers from incurring a guarantee charge.
- 3.5.7 Supplementary breaches under the award system are arbitrary because the potential for award breach is confined to those to whom the award applies. This excludes those covered by an operating agreement which contains no superannuation provisions, those who are award free and those who are not covered by the national industrial system.
- 3.5.8 As is also reported in the Discussion Paper, the legislation which gave effect to the Government's response to the Productivity Commission's recommendations went beyond the Productivity Commission's proposals.
- 3.5.9 The Productivity Commission's recommendations were intended to improve the level of transparency around the award specification of funds and to better ensure that the specified funds best meet the interests of those default fund members to whom the award applies.
- 3.5.10 They were made in the circumstances of an existing system of award supplementation of superannuation regulation and an established system of fund specification in awards. In this context where the award system regulated the superannuation market, the Productivity Commission's recommendations also sought to support competitive behaviour which benefitted members' account holdings.
- 3.5.11 Briefly, the scheme of the *Fair Work Act 2009* for reviewing award default fund terms is much as described in the Discussion Paper. Funds apply to have their standard MySuper product considered for inclusion on the Default Superannuation List in the best interests of the members to whom modern awards apply. Members' best interests are assessed against statutory criteria, not all of which were those proposed by the Productivity Commission, and they are assessed by a bench including members of the Expert Panel.
- 3.5.12 In the second stage of the review the Commission, now differently constituted, considers which funds on the Default Superannuation List should be specified in a particular modern award.

- 3.5.13 It is clearly intended that in the second stage that the Commission hear from industrial parties directly covered by the particular award and their representatives, but, despite the second stage being directed to making decisions which are in the best interests of those to whom the award applies, the basis upon which the Commission determines which funds (in relation to their standard MySuper product on the Default Superannuation List) should be specified in an award is less clear. The process is clearly reliant on fund sourced information, and whilst funds do not appear excluded from second stage proceedings, nor do they appear as of right.
- 3.5.14 Apart from the particular lack of transparency of the second stage, there appears to be an overlap of decision making between the two stages and the two benches.
- 3.5.15 The first stage bench is required to determine the Default Superannuation List so that the products included are in the best interests of employees to whom awards apply, or to a class of such employees. The first stage bench must therefore take account of the diversity of default fund members' superannuation needs such as insurance needs when determining the List. That is, when it is compiling the Default Superannuation List the first stage bench must itself have some regard to the coverage of the 122 awards making up the modern award system so that there is a spread of funds appropriate to be specified in each of the awards in the system.
- 3.5.16 The process for assessing Employer MySuper Products so that contributions into the funds offering an Employer MySuper Product would be permissible under the award is related to the two stage process for specifying funds offering general MySuper products. It differs for the Default Superannuation List process in that the same bench presides over both stages (and also in that the employer is able to make an application).
- 3.5.17 The two stage process seems redundant for compiling the Schedule of Approved Employer MySuper products, since the assessment of the first stage criteria is to determine whether inclusion on the list is in the best interests of the members who are the employees of the particular employer. The real purpose of the second stage seems only to give access to the industrial parties, which is not precluded from the first stage, and which does not conduce to greater procedural nor outcome transparency.

- 3.5.18 **Question 27** asks whether the existing model for reviewing default fund terms in awards meets the objectives for a fully transparent and contestable default superannuation system for awards.
- 3.5.19 ACCI submits that it demonstrably does not.
- 3.5.20 **Question 28** asks if the Productivity Commission’s recommended model is the most appropriate to achieve the objectives identified in Q27, or should MySuper authorisation itself be sufficient?
- 3.5.21 The question of whether a process of selecting funds or relying on MySuper authorisation clearly raises the question of whether awards should specify funds. Arguments in favour of continuing with the principle of narrowing the available choice of default funds for selection sometimes focus on reducing the complexity facing employers to make the best decision. This is particularly seen to be an issue for new employers.
- 3.5.22 It is ACCI’s view that this argument is overstated. Experience shows that it is not typical for employers to alter defaults. Changing defaults creates additional work for employers. Changing defaults also leaves default fund employees with accounts in two funds and, arguably needing to initiate a roll over. Given these are default fund members the possibility of two accounts is relatively high and the system costs of effecting a roll over higher than where a chosen fund is involved.
- 3.5.23 In fact default fund decisions are relatively sticky, and in the same way that a major motivation for chosen funds is where a new employee wishes to bring their current fund with them, new employers, the great majority of which are very small businesses, bring their superannuation history with them in default fund selection.
- 3.5.24 The principle of narrowed choice for default selection because of the difficulties of comparison also seems less persuasive in the context of the new dashboard requirements, although ACCI accepts that the introduction of dashboards for MySuper products is not likely to impact overnight.
- 3.5.25 If fund specification in awards is to be retained, ACCI would prefer adoption of the Productivity Commission’s recommended model for the

assessment of standard MySuper products to that provided under the current legislation. This would include adopting the Productivity Commission's proposed assessment criteria and the abandonment of the current first stage criteria under s 156F of the *Fair Work Act 2009* and adopting those proposed by the Productivity Commission.

- 3.5.26 **Question 29** asks whether, if the Productivity Commission's model is appropriate what body is best placed to assess funds for inclusion. The current two stage test with differently constituted benches cannot be the best way, but because the ultimate outcome is variations to awards there is some justification for Commission involvement.
- 3.5.27 However another difference between the current provisions in the *Fair Work Act 2009* and the Productivity Commission's model is that the Commission currently reviews the default fund term of each modern award, not merely the list of funds to be specified, and an award's default fund term covers more than fund specification.
- 3.5.28 Were award specification in awards to be retained these two aspects of the current default fund term review provisions are distinguishable. The question of whether awards should specify funds and the question of whether awards should otherwise supplement obligations under superannuation guarantee legislation do not have to be answered in the same way. Distinguishing these two aspects of the current default fund term could mean that the assessment of products for fund specification might not need to be vested in the Commission, but if it were to be, relevant expertise should be more weighted than is currently the case.
- 3.5.29 **Question 30** asks whether, rather than specifying funds in an award and requiring employers to contribute for default fund employees into one of them, there should advisory information available identifying better funds with better performing MySuper products.
- 3.5.30 Part of the answer to this question depends on the criteria which would be used to assess funds' relative performance, and also the costs of developing and collating the information upon which the assessment is made.
- 3.5.31 The MySuper product dashboard will allow product comparison but it does not seek to rank or advise, and therefore even moving to broadly rank products (perhaps by quartile) or highlight higher performing

products on the basis of dashboard information would require careful assessment as to weighting.

- 3.5.32 The question of access to, or the availability of, information would also influence what might be the most appropriate body were this proposal to be proceeded with.
- 3.5.33 **Question 31** asks that if there were to be changes to the selection and assessment of default superannuation funds, how should corporate funds be treated? Any specific answer will depend on what finally is done with respect to funds offering standard MySuper products: are they to be specified in awards or not?
- 3.5.34 It is ACCI's view that awards should not prevent, or make impermissible, default fund employee contributions into a corporate fund which has been authorised to offer a MySuper product. Corporate funds should not be subject to assessment beyond what has been required to obtain APRA authorisation to offer a MySuper product and the continuing statutory obligations on their trustees arising from the authorisation.

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