

12 August 2016

Mr Baethan Mullen  
Acting General Manager, Adjudication  
Australian Competition and Consumer Commission  
GPO Box 3131  
CANBERRA ACT 2601

Email: [adjudication@accc.gov.au](mailto:adjudication@accc.gov.au)

Dear Mr Mullen,

**Re: A91548 & A91549 - The Association of Superannuation Funds of Australia – Submission**

I refer to the applications for authorisation made in relation to the Gateway Network Governance Body, and am writing in response to the letter from Gavin Jones of 3 August 2016, inviting AIST's comment on them.

The Australian Institute of Superannuation Trustees is a national not-for-profit organisation whose membership consists of the trustee directors and staff of industry, corporate and public-sector funds.

AIST supports both applications, including in relation to the *requirement* for interim authorisation. AIST submits that there is a public benefit from the proposed arrangements, and supports each of these identified in section 5 of the supporting submission.

The implementation of SuperStream is an integral part of the Federal Government's Stronger Super reforms introduced in response to the Superannuation System Review (the Cooper Review). AIST has actively participated in all elements of the design and implementation of these reforms, including SuperStream.

From an early stage, participants in this process recognised the need to protect the integrity of the Superannuation Transaction Network through appropriate governance arrangements. These arrangements had to be introduced in parallel with other elements of SuperStream implementation, and are fundamental to SuperStream's architecture. As the ATO's interim stewardship role for the STN draws to an end, it is imperative that transition to the GNGB arrangements to replace the ATO's stewardship take place in line with the detailed framework supported by all key stakeholders.

Superstream efficiency gains are translating into savings to industry. The Cooper Review estimated that savings up to \$1 billion per annum were likely to result from SuperStream

reforms. This would put further downward pressure on super fund member fees and increase their retirement savings and overall wealth and boost national savings.

Employers are benefiting from simplification and standardisation of the contributions process, and by the removal of complexity and variation. APRA funds in turn are likely to reduce their overall processing costs on contributions and rollovers, experience lower rework rates and faster processing of transactions. Members are already benefiting from faster allocation of contributions into their account, and faster actioning of their rollover directions, fewer lost accounts, less unnecessarily duplicated accounts, and improved data quality in relation to their account information.

The benefit to the community of the totality of these arrangements is being progressively quantified by the ATO. For example, estimated savings to employers have been estimated by the ATO at approx. \$390 million per annum.

AIST would welcome the opportunity to discuss our submission with respect to these applications with you. Please contact David Haynes, Executive Manager Policy & Research on 03 8677 3800 or at [dhaynes@aist.asn.au](mailto:dhaynes@aist.asn.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tom Garcia', is written over a white background.

Tom Garcia  
**Chief Executive Officer**

*The Australian Institute of Superannuation Trustees is a national not-for-profit organisation whose membership consists of the trustee directors and staff of industry, corporate and public-sector funds.*

*As the principal advocate and peak representative body for the \$650 billion not-for-profit superannuation sector, AIST plays a key role in policy development and is a leading provider of research.*

*AIST provides professional training and support for trustees and fund staff to help them meet the challenges of managing superannuation funds and advancing the interests of their fund members. Each year, AIST hosts the Conference of Major Superannuation Funds (CMSF), in addition to numerous other industry conferences and events.*