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The Secretary  
Senate Economics Legislation Committee  
Parliament House  
Canberra ACT 2600

By e-mail: [Economics.Sen@aph.gov.au](mailto:Economics.Sen@aph.gov.au)

**Inquiry into Treasury Laws Amendment (Cyclone and Flood Management Reinsurance Pool) Bill  
2022**

Thank you for the opportunity to provide feedback on the legislation for the establishment of the reinsurance pool for cyclones and related flood damage.

The Property Council notes that under the legislation the reinsurance pool only covers commercial property policies with less than \$5million total sum insured across risks covered by the pool.

We believe that larger businesses should not be excluded from eligibility where they own and operate assets on which communities rely during disaster events like cyclones and related flooding, such as shopping centres, and recommend that the draft legislation be amended accordingly.

The Retirement Living Council (a national, specialist division of the Property Council of Australia) has engaged with Treasury on the complex insurance arrangements that exist for retirement villages.

We welcome that the draft factsheet, as published, has explicitly mentioned the inclusion of retirement villages in this reinsurance pool.

On behalf of members, the Retirement Living Council seeks assurance that retirement village insurance arrangements, as regulated by the Retirement Villages Act 1999 (QLD), will be appropriately accommodated in the administrative and legislative arrangements for the reinsurance pool. In this regard, it is noted that insurance policies in retirement villages are held in the name of the retirement village scheme operator.

While residents of a particular village fund insurance premiums and excesses relating to that property through regulated general services charges, the scheme operator may collectively insure a portfolio of villages, in order to reduce insurance costs for residents and better manage portfolio risks.

It is important to ensure the unique arrangements that exist for retirement village insurance do not exclude residents, who are often fixed income pensioners, from being able to access the benefit of inclusion within the reinsurance pool.

The Retirement Living Council is able to provide further information on this matter if required.

Please do not hesitate to contact Richard Lindsay, National Government Relations Manager, on [REDACTED] for further information.

Yours sincerely

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Mike Zorbas  
Group Executive Advocacy