



**Australian Government**

**ComSuper**

Senator Cory Bernardi  
Chair, Senate Finance and Public Administration Legislation Committee  
Parliament House  
Canberra ACT 2600

Attention: Ms Lyn Beverley, Secretary

Dear Senator Bernardi

**Senate Finance and Public Administration Legislation Committee - Inquiry into  
Governance of Australian Government Superannuation Schemes Legislation  
Amendment Bill 2015**

The Governance of Australian Government Superannuation Schemes Legislation Amendment Bill 2015 (the Bill) merges ComSuper, the administrator of the Australian Government's main Australian Public Service (APS) and military defined benefit superannuation schemes, with the Commonwealth Superannuation Corporation (CSC), the trustee of the Australian Government schemes. The merger of ComSuper with CSC was announced in the 2014-15 Budget as part of the Smaller Government agenda.

Under its current enabling legislation, the *ComSuper Act 2011*, ComSuper provides administration services to CSC in relation to the Australian Government's main APS and military defined benefit superannuation schemes.

ComSuper staff are engaged under the *Public Service Act 1999*. CSC staff are employed on terms and conditions set by the CSC Board. ComSuper staff who transfer to CSC as a result of the merger will cease to be APS employees engaged under the *Public Service Act 1999*. The transfer mechanism for staff movement, conditions of employment and portability of entitlements are set out in the Bill. ComSuper notes and supports the submission of the Department of Finance to the Finance and Public Administration Legislation Committee on this matter.

In relation to future employment opportunities within the APS for ComSuper staff affected by the provisions of the Bill, there are some ComSuper staff for whom opportunities to re-enter the APS are important. Amendment to enable APS re-entry would be likely to be viewed beneficially by these staff.

Yours sincerely

Dr Jill Charker  
Chief Executive Officer  
ComSuper  
April 2015