

Committee Secretary  
Senate Standing Committee on Finance and Public Administration  
Canberra

Dear Sir/Madam

I am a Comsuper recipient under the Commonwealth Superannuation Scheme.  
I am concerned that the following areas of the Superannuation Schemes Bill 2010 are detrimental to the interests of members of the CSS and I request that your Committee recommend the changes I have outlined below.

- Clause 5 should be deleted in its current form and replaced by a clause requiring the CSC to notify the responsible Minister of significant events consistent with the provisions of Section 15 of the CAC Act. The reason for this change is that it is most important that the Minister should be aware of such significant events in organisations under his jurisdiction.
- Sub-clause 10(2) should be strengthened to specify that at least one of the Directors is from a relevant organisation which is “protecting beneficiaries of those schemes in matters concerning their entitlements as beneficiaries”.
- Sub-clause 10(4) should require the ACTU in making nominations to the Minister to confirm in writing that they have consulted with relevant organisations.
- Sub-clause 10(8) should also specify a maximum period for filling a vacancy e.g. say 2 months so that the balance between employer/employee representatives is maintained.
- Sub-clause 11(5) should be deleted as it is illogical and probably questionable legally that an appointment as a Director is not invalidated by defects or irregularities in the appointment process.
- Sub-clause 17(6) should be deleted for the same reasons as mentioned regarding sub-clause 11(5) above.
- Sub-clause 33(2) creates a cumbersome system to administer. It would be simpler to pay all Directors remuneration from the CRF or establish the approximate proportion of time spent by Directors on each fund and recover that proportion of the total administration costs from the respective funds.

I recommend that the above changes be included in your Committee’s report on this Bill.

Yours Faithfully

Maurie Rowe