

12 October 2022

Committee Chair  
Senate Economics Legislation Committee  
PO Box 6100  
Parliament House  
CANBERRA ACT 2600

Dear Committee Chair,


**Inquiry into the Treasury Laws Amendment (2022 Measures No. 3) Bill 2022**

Industry Super Australia (ISA) is a collective body for funds that carry the Industry SuperFund symbol. ISA manages research, advocacy and collective projects on behalf of those funds and their five million members. Our aim is to maximise the retirement savings of all our members.

On 6 October 2022, ISA made the attached submission to Treasury's consultation on the proposed regulations for the performance test treatment of faith-based products. The regulations support the legislation which is currently being considered by the Committee as part of this inquiry (as Schedule 5 to the Treasury Laws Amendment (2022 Measures No. 3) Bill 2020).

In the submission we provide support for robust performance testing as an important consumer protection measure that should be consistently applied to all superannuation products covered by the legislation. We also set out the lack of policy justification, the risk for consumers and the significant implementation difficulties with the proposed supplementary testing regime for faith-based products.

We further note that the Your Future Your Super (YFYS) review is currently underway. This review considers whether there have been any unintended consequences and implementation issues arising from the performance test regime (and other YFYS measures). As such, we consider that the application of the performance regime to faith-based products should be considered as part of this broader review.

If you wish to discuss the information contained in the submission, please contact Michèle Whittle at 

  
Michèle Whittle  
Senior Adviser, Policy & Regulatory Affairs