



*The Voice of Super*

File Number: 200523

7 November 2005

Secretary  
Senate Legal and Constitutional Committee  
Department of the Senate  
Parliament House  
Canberra ACT 2600  
Email: [legcon.sen@aph.gov.au](mailto:legcon.sen@aph.gov.au)

Dear Secretary,

**ASFA Submission on *Anti-Terrorism (No. 2) Bill 2005***

The Association of Superannuation Funds of Australia Ltd (ASFA) is pleased to be able to make this brief submission to the Senate Legal and Constitutional Committee on the *Anti-Terrorism (No. 2) Bill 2005* ("the Bill").

ASFA is a non-profit, non-political national organisation whose mission is to protect, promote and advance the interests of Australia's superannuation funds, their trustees and their members. Our members, which include corporate, public sector, industry and retail superannuation funds, account for more than 5.7 million member accounts and over 80% of superannuation savings.

ASFA comments concern the changes to the Criminal Code in respect of financing terrorism as introduced by Schedule 3 of the Bill. The Bill introduces provisions making it an offence to intentionally accept or distribute funds in a reckless manner and those funds are used to facilitate or engage in a terrorist act.

ASFA has been heavily involved in the recent discussion with the Government on the soon-to-be-released reforms to Australia's Anti-Money Laundering and Counter Terrorist Financing (AML/CTF) systems. We wish to draw attention to the fact that any counter-terrorism financing requirements introduced by the *Anti-Terrorism (No. 2) Bill 2005* should be consistent with any measures introduced by the AML/CTF system reforms.

If you have any questions or comments on this, please feel free to contact me at the ASFA Secretariat on 02 9264 9300.

Yours sincerely,

Dr Michaela Anderson  
Director Policy and Research

Federal Secretariat

Level 19  
Piccadilly Tower  
133 Castlereagh St  
Sydney NSW 2000

PO Box 1485  
Sydney NSW 2001  
Tel: (02) 9264 9300  
Fax: (02) 9264 8824