



AUSTRALIAN INDUSTRY
GROUP

**SUPERANNUATION AND
STANDARDS OF LIVING IN RETIREMENT**

**SUBMISSION TO
SENATE SELECT COMMITTEE ON SUPERANNUATION**

MAY 2002

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SUMMARY OF RECOMMENDATIONS

- (1) Governments should maintain a **continuing commitment** to the Three Pillars System as the basis of a long-term superannuation and retirement incomes policy, **subject to implementing further improvements in the benefit adequacy, taxation and security of superannuation** (Section 3.1).
- (2) The **primary** supporting mechanisms for the generation of future retirement benefits to be based on **mandatory** funding of contributions with more limited support from **voluntary** savings through various concessionally taxed products (Section 3.2).
- (3) **Equitable and sustainable policies** need to be developed by government to suitably **address future inadequacies in the level of benefits** including:-
 - the introduction, over a reasonable period of time, of **compulsory employee contributions** which eventually will reach at least 3% of earnings (Section 3.3), and
 - strategies to **progressively reduce, if not remove, the taxation of superannuation contributions** (Section 3.4).
- (4) A public commitment by all political parties to the total **avoidance of any retrospectivity** in future changes to the taxation of superannuation (Section 3.4).
- (5) Government to maintain **effective competition** in the provision of superannuation in the private sector for the benefit of superannuation fund members generally (Section 1.5).

1. BACKGROUND

- 1.1 The Australian Industry Group (Ai Group) directly represents some 10,000 employers, large and small, in every State and Territory. Our members provide more than \$100 billion in output, employ more than 1 million people and produce exports worth some \$25 billion. In addition we have affiliated organisations in both South Australia and Western Australia also with significant membership.
- 1.2 Ai Group has had a long standing and influential role in the development of public policy including issues related to superannuation and retirement incomes policy. Our initiatives have included submissions and representations to government, opposition and the Senate Select Committee, advice and assistance to members on the management of their superannuation arrangements and participation in key superannuation industry bodies. Our role covers both the operation of corporate superannuation plans and industry superannuation funds in which large numbers of private sector employers and their employees participate.

Ai Group is, therefore, well aware of the **fundamental** role of occupational superannuation in positively contributing to the retirement aspirations of most Australians, as well as facilitating local investment, employment and economic development.

- 1.3 Our views on the general principles which should apply to the development and maintenance of Australia's retirement income system have been stated previously, including a **submission to the Senate Select Committee on Superannuation of 21 August 1991** - by Metal Trades Industry Association of Australia (now the Australian Industry Group) - refer Annexure 1.

The core **objective** of our 1991 policy was:-

“To provide a meaningful, equitable, secure and economically sustainable standard of minimum retirement income for Australians generally at a level acceptable to the community with limited reliance on government support” .

- 1.4 This was reinforced by a submission to the Prime Minister, the Hon J W Howard MP, on 30 October 2000 in conjunction with a number of other organisations and entitled *“Framework principles for Australia's retirement incomes system”*. This submission identified, inter-alia, the need for a policy framework which *“Adopts an integrated long term approach to ensuring adequate and sustainable retirement income for all Australians”*, *“Maintains the diversified sources of funding for retirement”* and *“Has the broadest possible coverage and participation”* ..
- 1.5 Similarly **other important principles** previously supported by Ai Group and now restated have included:-
- that benefits should be self funded and properly secured through government legislation and control,
 - the need for competitive choice in the provision of superannuation products and

services (a requirement that will intensify as the community becomes better informed and educated in this area),

- the need for **mandatory** funding from both employers **and** employees (as well as government support),
- that benefits should primarily be paid as a pension but with some provision to commute part of the occupational superannuation benefit to a lump sum, and
- the avoidance of any retrospectivity in tax changes.

1.6 **We firmly believe all these principles remain highly relevant** and, accordingly, Ai Group renewed some of these proposals in our most recent submission to the Federal Government in December 2001 in response to the Prime Minister's policy paper of November 2001 entitled "*A Better Superannuation System*".

1.7 In all these circumstances we welcome this timely initiative by the Senate Select Committee into "the adequacy of the tax arrangements for superannuation and related policy, to address the retirement income and aged and health care needs of Australians".

2. INTRODUCTION

The foregoing submissions are in our view particularly relevant to the important issues covered by the current inquiry of the Senate Select Committee on Superannuation into "*Superannuation and Standards of Living in Retirement*".

In particular we would emphasise the need for a structured, comprehensive and objective policy review into benefit adequacy and taxation to prevent future ad hoc changes and to facilitate improved public confidence in long term superannuation and retirement income policy settings. Relative simplicity and transparent security are also critical criteria in this context.

For the purposes of this submission, Ai Group addresses the proposals under the following headings:-

- System Design : The Three Pillars
- Improving the Adequacy of Existing Arrangements
- Funding of Improved Benefits
- Taxation Issues
- National Savings, Investment and Development

3. KEY ISSUES

3.1 System Design : The Three Pillars

3.1.1 Ai Group maintains its support for a meaningful, equitable, secure and economically sustainable standard of **minimum** retirement income for Australians generally. **This is essential to retirement living standards overall including accessing quality health care.**

These objectives are particularly important given demographic forecasts for Australia's ageing population and current immigration programs. In particular they focus attention on the primary issues of system design, adequacy, funding and security; and their suitability for the future where it has been projected that over the next 30 years the proportion of people in Australia over 65 years will almost double from 12% of the population in 1991 to 20% in 2031.

Obviously this development, if not properly planned and provided for, will place an unacceptable strain on our social security and health care resources, leading to a significant deterioration in retirement standards specifically and possibly community living standards generally. **Progressively enhancing our occupational superannuation system is a necessary and appropriate response to this challenge and ideally should be achieved in an essentially bi-partisan political environment.**

3.1.2 In relation to system design the **current arrangements** are funded by a **combination of:-**

- **A compulsory minimum** standard of superannuation contributions required to be paid by employers (for virtually all employees) and the self employed.
- **Voluntary supplementary** contributions presently paid for a **minority** of the workforce (both pre- and post-tax and paid by employers and/or individuals), together with private savings.
- **A universal means tested age pension.**

Jointly these comprise the so-called **Three Pillars System** which has previously been recognised by the World Bank as "International Best Practice" in retirements incomes systems.

3.1.3 Also on system design issues, the **Ai Group policy submission in 1991** stated, inter-alia:-

- "(1) That the minimum national retirement income standard would generally be provided through a combination of:-*
 - *a basic and conditional social security benefit; plus*
 - *an occupational superannuation retirement benefit.*
- (2) That government, employers, employees and self employed would all contribute to the retirement income package.*
- (3) That the benefit(s) would, as far as possible, be self funding and properly secured through government legislation and control.*
- (4) That planned contribution levels would be compatible with economic capacity .*
- (5) That the relative contribution of the occupational superannuation component would gradually increase through time with a lessening*

dependance on the social security benefit which would eventually only operate as a welfare safety net.

- (6) *That benefits would primarily be paid in the form of a pension but with some provision to commute part of the occupational superannuation component to a lump sum”.*

3.1.4 **This submission recommends a continuing commitment to the Three Pillars System subject to the need for improvements in the adequacy of benefits (refer Section 3.2 herein), taxation (Section 3.4) and security.** In considering these matters we believe **the foregoing principles in 3.1.3 also remain broadly applicable.**

3.2 Improving the Adequacy of Existing Arrangements

3.2.1 **Occupational superannuation** is presently funded by:-

- **compulsory** minimum contributions paid by **employers only** (currently 8% and peaking at 9% from 1 July 2002), and
- additional **voluntary** contributions paid by **some employers and some employees.**

3.2.2 In 1991, after a detailed **independent review** by a consultant, Ai Group proposed that:-

*“The **ultimate** target level of the minimum retirement income standard should be equivalent to 50% of average weekly ordinary time earnings to be funded at an average contribution rate of 12% over approximately 36 years”.*

Whilst no universally agreed benchmark exists, we understand **this target level remains reasonable** when compared to latest industry research which suggests possibly even higher levels of funding and benefits. For example, 1999 research indicated that a target of 60% of gross pre-retirement income with at least 12% super guarantee over 30 years could be supported and a later report recommended a savings target of 12-15% of salary.

Another recent survey also “has shown that almost 60% of Australians believe they are uncertain about their financial preparations for retirement”.

3.2.3 Clearly the current compulsory contributions regime falls short of that recommended both by Ai Group previously and other industry and community groups more recently. In these circumstances **we remain concerned that the existing funding arrangements will be insufficient** to provide the desired level of minimum retirement income for the **majority** of Australians in the future.

We recognise that various initiatives of the current Federal Government have placed considerable reliance on **voluntary savings** to address this shortfall, including the proposals in Part 1 of the December 2001 pre-election policy statement entitled “*A Better Superannuation System*”. However, whilst we are cognisant of the potential significance of these measures, we genuinely **doubt**

that an incentive strategy to increase voluntary savings will of itself redress the future funding inadequacies.

By way of example, the current proposal of a Government co-contribution of up to \$1,000 per annum for superannuation contributions made by low income earners is, we believe, likely to only have a limited impact.

3.2.4 Accordingly we request the policymakers to recognise the continuing inadequacies of current and projected policy settings and develop equitable and sustainable options to address this core issue (including our proposals in Sections 3.3 and 3.4).

3.3 Funding of Improved Benefits

3.3.1 Critical to setting a preferred contribution target consistent with providing a meaningful retirement income standard as stated in Section 3.2.2, is the related issue of funding. Theoretically this can be derived from:-

- employer contributions (compulsory and voluntary),
- employee contributions (voluntary and possibly compulsory), and
- government (via fiscal policy including taxation incentives).

3.3.2 With compulsory employer contributions already scheduled to reach 9% by 1 July 2002 and no minimum employee contributions presently mandated, there can be no justification, equitably or economically, for any further increase being imposed on employers. This position should be publicly confirmed by all political parties.

3.3.3 Alternatively, from an equity viewpoint, there are compelling reasons for the introduction of compulsory employee contributions over a reasonable period of time. In 1991 Ai Group argued for a minimum employee contribution of 4.5% but this has not yet eventuated. Whilst we recognise some difficulties in this area, we recommend that government should commit, over a reasonable time cycle, to the gradual introduction of compulsory employee contributions. These should reach at least 3% of earnings eventually. This would considerably enhance the medium to long term contributions of employees towards their own retirement income and relieve the anticipated pressures on social security payments and aged care expenditure generally.

3.4 Taxation Issues

3.4.1 In relation to the taxation of superannuation, Ai Group is concerned with two aspects, viz:-

- the current level of taxation on superannuation savings, and
- the complexity of the various taxation arrangements.

3.4.2 As to these matters, we support the need for a comprehensive, public enquiry into options for both reducing and simplifying the tax burden. In particular, we recommend examination of strategies to progressively reduce, if not remove, the taxation of contributions in order to achieve higher compounding of benefit levels.

3.4.3 At the same time all political parties should strengthen public confidence in superannuation and retirement savings by **stating unequivocally that, in the event of any future changes in the taxation of superannuation, there will be no element of retrospectivity.** Only in this way can the members of superannuation funds and their **sponsoring employers** be assured that **accrued benefits** will be properly and responsibly **protected.**

3.5 National Savings, Investment and Development

There are obvious and fundamentally important linkages between superannuation savings and domestic investment, jobs and growth.

In the 1991 submission, Ai Group argued that a principal objective of a national retirements incomes policy should be:-

“To expand Australian investment programs and reduce both government taxes and overseas borrowings thereby improving the efficiency and international competitiveness of industry”.

The critical nature of these linkages should be clearly recognised in determining policies for the achievement of a viable and effective superannuation and retirement incomes system, and in refuting unfair and misleading criticism of the alleged “cost” of superannuation tax concessions and other related incentives for savings.

MTIA

The national voice of engineering employers

21 August 1991

The Secretary
Senate Select Committee on
Superannuation
Parliament House
CANBERRA ACT 2600

Dear Sir/Madam

We enclose for consideration our submission to the Senate Select Committee on Superannuation, including an actuarial report from our consultant, Godwins Australia Pty Ltd.

This submission has been approved by the Association's National Executive Committee. In that regard would you also please note that aspects of the submission relating to MTLA's policy on the framework and implementation of a national retirement incomes system have already been published in various quarters. Further, given the current high profile of the subject and the Association's on-going role in social, economic and industrial relations issues it may be necessary for us to publicly comment on our policy at anytime in the future. We therefore request that our submission and the consultant's report be received by the Committee on this basis.

All enquiries relating to the submission should be referred to our Mr G R Willis.

Yours faithfully

A. C. Evans
(A C EVANS) *ps G/ps*
CHIEF EXECUTIVE

Encl

MTIA Est 1873

Metals Trades Industry Association of Australia

MTIA House 51 Walker Street North Sydney NSW 2060

☒ PO Box 289 North Sydney NSW 2059

☎ Telephone (02) 929 5566 ☎ Telex AA121257 ☎ Fax (02) 929 8758

**SENATE SELECT COMMITTEE
ON SUPERANNUATION**

**SUBMISSION TO THE COMMITTEE BY
METAL TRADES INDUSTRY ASSOCIATION OF AUSTRALIA**

AUGUST 1991

1. OVERVIEW - TOWARDS A NATIONAL RETIREMENT INCOMES POLICY

1.1 Background

1.1.1 As the representative organisation for Australia's metal and engineering industry the Association is acutely conscious of changing political, social and industrial relations patterns and their related economic implications.

1.1.2 In the context of occupational superannuation we are particularly conscious of the historical role of corporate funds in both the public and private sectors and the more recent growth of industry funds based on arbitrated or agreed award entitlements.

1.1.3 MTIA is also well aware of demographic projections over the next decade and beyond which point to a significant ageing of our population and rapidly increasing demands on existing social security benefits.

For example in 1989-90 some 8% of the population were receiving age pensions at a total cost of \$8,182m. or 2.2% of Gross Domestic Product (Annexure A). At that time 11% of the population were over age 65. However, by the year 2031 the proportion over 65 is projected to rise to 20% (and to continue rising further until 2041) whilst the workforce will have decreased from 67% to 63% of the total population (Annexure B).

The adverse impact of such trends on the cost of social security benefits is readily apparent eg. a consultant to the Association has calculated that the costs of the age pension could "soar from 4% of the taxable incomes today to more than 10% by the year 2031". Further should such changes be accompanied by a decline in our economic competitiveness the capacity to sustain our current social security system would be extremely doubtful.

1.1.4 Given these developments, and the already severe financial constraints on public expenditure, it appears essential that Australia formulate a new approach to our traditional reliance on a "non-contributory", flat rate, means tested age pension as the basic source of retirement income.

1.1.5 Significantly Australia remains as one of the few countries without a formal social insurance or national superannuation system.

1.1.6 Accordingly MTIA believe there is a pressing need to establish a new and universal national retirement incomes policy in a structured, efficient and financially responsible manner.

- 1.1.7 Fortunately, the rapid growth of occupational superannuation in the late 1980s (refer Section 2.1.2) has provided a timely opportunity to re-assess the optimum means of funding a new standard of minimum retirement income.
- 1.1.8 In that regard we also submit that the "CASS" report of August 1989 "Towards a National Retirement Incomes Policy" is extremely relevant to such consideration.
- 1.1.9 As this process will inevitably be complex and protracted the necessary policy framework and support systems obviously need to be determined at an early date. However, equally importantly, any new initiative also should ideally be endorsed by all major community groups and promoted on a strictly non political basis.
- 1.1.10 *In addressing this task, some of the relevant issues to consider in achieving a meaningful, equitable, secure and economically sustainable system of future national retirement incomes would include:-*
- . The social and economic implications of the projected demographic changes on Australia's population.
 - . The performance and expected future prospects of the Australian economy, including balance of payments constraints and the essential need to maintain an efficient and internationally competitive Australian industry.
 - . The desirable relationship between existing government social security benefits and current and potential occupational superannuation entitlements.
 - . The extent of government regulation, or other national standards, necessary to provide efficient funding for genuine retirement and corresponding protection of benefits, including measures to achieve long term consistency in political approaches.
 - . The need and potential for federal government assistance in the provision of retirement income, including the use of concessional tax arrangements and direct benefit payments.
 - . Funding of public sector superannuation.
 - . The responsibilities of both employers and employees in the provision of occupational superannuation or other forms of retirement income.
 - . The macro economic implications of private sector superannuation and the consequential role of government in influencing investment patterns for economic development in Australia.
- 1.1.11 Each of the foregoing have been examined in the retirement incomes policy proposal set out in Section 2 herein.

1.2 Scope of Submission

1.2.1 In presenting this submission we have concentrated on two major aspects, viz:-

- (1) an outline of the principal objectives and key characteristics of a recommended framework for a national retirement incomes policy together with comment on certain funding aspects; and
- (2) a response where appropriate on each of the specific terms of reference of the Committee.

1.2.2 As requested these matters can be further clarified and/or extended.

2. SUPERANNUATION AND A NATIONAL RETIREMENT INCOMES POLICY

2.1 General

2.1.1 In the overview herein (Section 1) we have outlined the underlying reasons as to why MTIA is of the view that:-

- . Australia needs to develop a comprehensive, planned national policy designed to achieve and sustain an effective minimum retirement income standard for retirees generally.
- . Such policy should evolve from a consensus involving, inter-alia, governments, opposition, industry and unions.
- . Implementation of such a policy is an urgent national priority.

2.1.2 In this context as we understand it the effective basic level of superannuation coverage has risen from around 40% of the workforce in 1983 to over 65% today. This growth has been dramatic, although universal coverage is clearly not yet a fact (refer Annexure C).

Further we believe that traditional superannuation is moving through 50% coverage with significant upgrading of vesting entitlements (ie. existing benefit accrual standards exceeding the 3% award contribution level).

2.1.3 *Accordingly within any new national minimum retirement incomes policy occupational superannuation should inevitably play an important, and ultimately dominant role.*

2.2 Principal Objectives and Conceptual Framework

2.2.1 The principal objectives of such a policy are broadly perceived to be:-

- (1) To provide a meaningful, equitable, secure and economically sustainable standard of minimum retirement income for Australians generally at a level acceptable to the community with limited reliance on government support in retirement.
- (2) *To positively encourage co-operation between employers and employees in jointly contributing to a planned long term savings program for retirement income.*
- (3) To facilitate continued government support for welfare recipients in cases of genuine hardship whilst minimising budget outlays and tax imposts on productive resources.

- (4) To expand Australian investment programs and reduce both government taxes and overseas borrowings thereby improving the efficiency and international competitiveness of industry.
- 2.2.2 It is envisaged that such a policy would be self funding to the maximum extent possible *with approved minimum contribution levels from employers, employees and self-employed* together with appropriate government encouragement and support through the tax system.
- 2.2.3 Policy design and administration should be as simple as possible, but within an effective system of government regulation based on suitable legislation.
- 2.2.4 *The new system should evolve from a gradual but developing integration of the existing old age pension and occupational superannuation arrangements, but with the latter eventually providing the primary, if not sole source of retirement income, after a suitable phasing-in period.*

2.3 Key Characteristics

- 2.3.1 MTIA submits that such a policy should have the following key characteristics, viz:-
- (1) That the *minimum national retirement income standard* would generally be provided through a combination of:-
- . a basic and conditional *social security benefit*; plus
 - . an *occupational superannuation retirement benefit*.
- (2) That *government, employers, employees and self-employed* would all contribute to the retirement income package.
- (3) That the benefit(s) would as far as possible be self funding and properly secured through government legislation and control.
- (4) That *planned contribution levels* would be compatible with economic capacity, form part of approved aggregate labour cost increases and not detract from industry competitiveness. This would include the need to ensure that resultant savings in government outlays were reflected in reduced taxes and charges to Australian industry.
- (5) That the relative contribution of the occupational superannuation component would gradually increase through time with a lessening dependence on the social security benefit which should eventually operate only as a welfare safety net.

- (6) That benefit(s) would primarily be paid in the form of a pension but with some provision to commute part of the occupational superannuation component to a lump sum.
- (7) That development of such a policy would avoid retrospective changes to either funding liabilities of employers and employees, or existing benefits.
- (8) That phasing-in arrangements should be based on actuarial advice and occur gradually over a medium to long term period.
- (9) That encouragement should continue to be provided to allow actual occupational superannuation retirement benefits above the mandatory minimum.
- (10) Greater simplification in the provision and administration of retirement incomes.

2.3.2 Non Contributory Means Tested Age Pension

The social security benefit component should be provided as a conditional, non contributory, means tested age pension.

This would be provided by government and progressively funded, as far as possible, rather than merely paid from consolidated revenue.

It would basically be available at age 65 to all eligible recipients (male and female) subject to both income and assets limits testing. These eligibility requirements would specifically take account of the related level of the occupational superannuation benefit actually received by retirees. However, suitable exemptions such as the principal place of residence would also need to be provided.

Preferably the benefit would be automatically indexed by being set as an appropriate percentage of Average Weekly Earnings.

Benefit payments would be made regularly (eg. weekly, fortnightly or monthly) and desirably via electronic funds transfer to an approved account or a cheque by mail.

2.3.3 Occupational Superannuation Retirement Benefit

To basically be available on normal retirement at age 65 years for males and females but with provision for a discounted benefit to be available at an earlier age in approved circumstances.

The primary benefit to be paid as a pension, also fixed as a percentage of Average Weekly Earnings, but with provision to commute part to a lump sum up to an approved maximum (eg. 50%) subject to taking account of amounts commuted in any means test assessment of the social security component.

Benefits to be paid from regular, tax deductible contributions by employers, employees and self employed to approved funds operating under authorised trustee guidelines including suitable investment, actuarial, reporting and accounting standards. The level of employer contributions should at least equal those of employees up to the minimum standard, with provision for additional voluntary contributions where required.

The actual level of contributions and related benefit standards to be based on actuarial advice including necessary transition arrangements for a gradual and controlled phasing-in period.

All accrued benefits should be completely portable as between approved funds. Future employer contributions up to the prescribed minimum standard shall be fully vested. Other benefits should be subject to vesting scales in accordance with community expectations in anticipation of legislative changes already foreshadowed as from 1 July 1995.

Preservation for contributions receiving concessional tax treatment should occur to at least age 55 in normal circumstances with a possible extension to age 60 within a predetermined period.

2.3.4 Taxation

(1) Non Contributory Means Tested Age Pension

The benefit payment to continue to be subject to income tax above a satisfactory threshold subject to automatic indexation of the pension.

(2) Occupational Superannuation Retirement Benefit

Benefit payments to continue to be subject to income tax but preferably within a more simplified system than at present.

The income tax system should also continue to be used as an incentive to encourage contributions through full deductibility for employers, employees and self employed to an approved level.

In the event that taxes continue to be applied to contributions and investment income these should not be increased above the current 15% level. Further through time they should be reduced and eventually abolished.

2.3.5 Management and Control

As far as possible employers and their employees should exercise freedom of choice in selecting an approved fund (eg. company, industry, pooled, personal).

Such approved funds to be closely regulated by government using at least the existing provisions of the Occupational Superannuation Standards Act as a base. This need also applies to financial institutions providing benefit entitlements during retirement (eg. annuities).

In addition, to further strengthen the security of benefits, consideration to be given to:

- (a) a total prohibition on investment by funds in their sponsoring company/organisation phased-in over a suitable period;
- (b) all trustee organisations to be approved and possibly guaranteed by the Federal Government, or mandatory qualifications for same to be introduced; and
- (c) the new accounting standard to be reviewed to avoid any potential negative effects on long term investment performance.

2.4 Funding Issues

2.4.1 As previously stated the establishment of a realistic and meaningful minimum benefit standard, and the related funding requirements (ie. contribution levels and phasing-in arrangements), must be based on sound actuarial principles and with due regard to economic capacity and the efficiency and international competitiveness of industry.

2.4.2 MTLA has sought independent professional advice in this regard which suggests that:-

- (1) The current old age pension for a single person is equivalent (for males and females) to 26.4% of average weekly ordinary time earnings (AWOTE). If paid as a superannuation pension at a rate equivalent to 30% of AWOTE this would require a funding rate of nearly 8% of AWOTE on average over 35 years. On current means test rules such a benefit would still allow access to 45% of the aged social security benefit resulting in a combined benefit of 40% of AWOTE. This would maintain a relatively high level of social security expenditure by government.
(Note: Details of AWOTE earnings rates and pensions are set out in Annexure D).
- (2) In order to lower the cost to government revenue of aged pensions it is necessary to either tighten the means test or increase the superannuation pension beyond 30% of AWOTE.
- (3) *The preferred method of achieving both an adequate retirement income standard and reduced government pension outlays could be met by the gradual introduction of an ultimate superannuation pension equivalent to 50% of AWOTE.*

- 2.4.3 *The advice available to the Association also indicates that the average contribution rate necessary to fund such a minimum retirement income standard through superannuation would equate to approximately 12% of AWOTE over 36 years for a single person.*

This analysis clearly reinforces the relatively long term nature of the proposal, the need for sound and consistent planning, the essential requirement for contributions to be paid by employers, employees and the self employed and provision for funds/employers with contribution rates above the minimum prescribed level to absorb future increases up to such levels.

- 2.4.4 *However, such advice also identifies a number of important issues that would require careful analysis including:-*

- . the relative position as between males and females related to generally differing life cycles, employment experience and earnings rates;*
- . the position of the lower paid, part time and casual employees;*
- . the role and application of the Means Test on residual social security benefits;*
- . the role and availability of existing social security fringe benefits including the health card;*
- . the position of the permanently unemployed;*
- . the position of older migrants;*
- . the position of early retirees; and*
- . compliance mechanisms.*

- 2.4.5 *Given the complexity of the subject it is not possible to address all of these issues in a submission of this kind. However, as previously stated in our policy outline (Sections 2.3.1(5) and 2.3.2) it is apparent that many of these issues would need to be provided for within the remaining social security benefit structure which is envisaged to continue to be provided by government on a welfare safety net basis. In particular careful attention is required to the vital role of the pensioner health card in the current system.*

- 2.4.6 *In these circumstances the Association supports the broad conclusions of the Consultant's analysis and recommends that:-*

- (1) *The ultimate target level of the minimum retirement income benefit standard should be equivalent to 50% of average weekly ordinary time earnings to be funded at an average contribution rate of 12% over approximately 36 years.*

- (2) *Implementation of this standard must be achieved in a gradual and controlled manner in which the following principles are essential:*
- (a) *there is an immediate need to effectively attain full compliance with the existing minimum contribution standard of 3% by all employers;*
 - (b) *any future increases above the existing basic 3% contribution provided by employers to be jointly shared between both employers and employees (resulting eventually in a minimum employee contribution of 4.5%);*
 - (c) *all such increases must be economically sustainable and capable of absorption (subject to suitable vesting and preservation) by employers already contributing at a rate equivalent to or in excess of the prescribed minimum;*
 - (d) *subject to economic capacity the next general increase in minimum contribution standards should occur within a reasonable period (eg. 2 years) and not exceed 1% respectively by employers and employees; and*
 - (e) *thereafter the potential for additional improvements in minimum contribution rates should be reviewed periodically consistent with general economic conditions and the overall requirements of this policy. In this context MTLA also believes that the objective should be to achieve significant progress in lifting minimum standards over the next decade.*
- (3) *Careful consideration should be given to the associated recommendations of this submission including those issues raised in the report of Godwins Australia Pty Ltd as summarised in 2.4.4 and 2.4.5 herein.*

2.4.7 *Further MTLA submits that as community dependence on social security benefits in retirement is reduced, consequential measures should also be taken to aid import replacement and export promotion programs, including the reduction and eventual abolition of payroll tax. As such reductions occur this should also enhance the ability of industry to improve minimum contribution standards-possibly across a shorter time period than that envisaged in 2.4.3 herein.*

NOTES:-

- (1) The policy outlined in the foregoing section of this submission was generally adopted in February 1990 and has subsequently been announced publicly.
- (2) The independent actuarial advice referred to was obtained from Godwins Australia Pty Limited on a professional consulting basis. Further details of the report can be made available on request.