

6 June 2013

Manager  
Contributions and Accumulation Unit  
Personal and Retirement Income Division  
The Treasury  
Langton Crescent  
PARKES ACT 2600

Email: [superannuation2013bill@treasury.gov.au](mailto:superannuation2013bill@treasury.gov.au)

Dear Sir/Madam,

**Re: Regulations to support Sustaining the Superannuation Contribution Concession**

The Australian Institute of Superannuation Trustees (AIST) is an independent, not-for-profit professional body whose mission is to protect the interests of Australia's \$500 billion not-for-profit superannuation sector. AIST's members are the trustee directors and staff of industry, corporate and public-sector superannuation funds, who manage the superannuation accounts of two-thirds of the Australian workforce.

AIST welcomes these draft regulations. We noted in a previous submission to Treasury that we are supportive of this measure and see it as complementary to the low income superannuation contribution (LISC).

We note that the definition of a defined benefit contribution contained at proposed regulation 293-115.01 is the same as surchargeable contributions for the purposes of the *Superannuation Contributions Tax (Assessment and Collection) Act 1997*. We believe that these draft regulations provide certainty, however we note that as this is due to apply to members from this financial year, the costs to funds of implementing this change so close to the end of the financial year could be substantial.

If you have any further questions regarding this submission, please contact Richard Webb, Policy & Regulatory Analyst on 03 8677 3835 or at [rwebb@aist.asn.au](mailto:rwebb@aist.asn.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tom Garcia', is written over a light blue horizontal line.

Tom Garcia  
**Chief Executive Officer**