

## Submission Coversheet

**Note:** This form is to be used for submissions sent via post only. Please use our online form to send your submission via email.

**Consultation Title:**

**Name:**

**Title:** Mr  Ms  Mrs  Miss  Dr  Prof  Other

**Given name:** Grant

**Surname:** Robinson

**Company/Organisation Details**

**Is your submission on behalf of a company or organisation?** Yes  No

**Company/Organisation Name (optional):** John Swire & Sons Pty, Ltd,

**Company/Organisation Scope (optional):** International  National  State  Local

**Contact Details**

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**Confidentiality**

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Respondents, who would like part of their submission to remain in confidence, should provide this information marked as such in a separate attachment.

Please do not place any personal details including addresses and phone numbers on or in your submission. The Treasury will not edit out these details prior to your submission being published onto the Treasury website (non-confidential submissions only).

**Do you want your submission to be confidential?** Yes  No



## JOHN SWIRE & SONS

10th September, 2014

The General Manager  
Deregulation Division  
The Treasury  
Langton Crescent  
PARKES ACT 2600

Dear Sir

### PROPOSED REPEAL OF PAYSLIP REPORTING PROVISIONS IN SIS ACT

John Swire & Sons Pty. Ltd. is the Australian head office of a group of companies operating Australia wide in the transport and logistics, cold storage, mining services, shipping and airline fields. The Swire group employs over 2,600 people in Australia and has two superannuation funds of its own, a closed defined benefits fund and an accumulation fund, both of which are part of the Russell SuperSolution Master Trust. In addition, statutory contributions are made to various other funds as instructed by employees.

We would like to state that we fully support the proposal to repeal the payslip reporting provisions as these are onerous, expensive to implement and, in some cases, impossible to observe. In particular, the requirement to provide a date when contributions will be paid would involve major changes to payroll programmes, even after which it would still not be possible to ensure accuracy. There are many factors, some beyond our control, affecting the date a contribution is deposited to member accounts, from minor things like availability of signatories to authorise transfer of funds to the efficiency of the clearing house and the various funds themselves in distributing and depositing contributions. The end result would be confusion for employees checking their payslips only to find that the contributions noted had not yet been deposited and time wasted by the employer having to check on what might be no more than a minor administrative delay.

On a more general note, we also strongly support the government's laudatory attempts to cut through the maze of often overlapping and even contradictory regulation in an attempt to reduce the compliance burden on business. Any progress in this area will increase competitiveness and flexibility, the lifeblood of business.

Yours faithfully  
for JOHN SWIRE & SONS PTY LTD

  
GRANT ROBINSON  
Finance Director