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

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

To whom it may concern

**Exposure Draft – Intra-fund consolidation**

The Institute of Public Accountants (the Institute) takes this opportunity to respond to the **Exposure Draft – Intra-fund consolidation**. The Institute has over 22,000 members and students throughout Australia and internationally. Many of our members are involved in providing advice in relation to superannuation and will be impacted by the proposed measures.

The Institute supports the proposals to require trustees of superannuation funds to consolidate the interests of members who have multiple superannuation interests within the same fund. Multiple-interests in the same fund only add to the cost of administration and loss of member value. While the Institute appreciates there will be an initial increase in costs to funds of identifying and consolidating accounts, this will be offset in the longer run by reduced over servicing of those with multiple interests in the same fund.

The Institute supports an 'opt-out' approach where the fund informs the member of the multiple interests and the intention to consolidate. An 'opt out' approach assumes that the member would agree and would only require the member to do act if they disagreed. Given the low level of engagement with superannuation by most members, an opt-out mechanism is most appropriate.

Please contact our Senior Policy Adviser, Reece Agland, via e-mail at [reece.agland@publicaccountants.org.au](mailto:reece.agland@publicaccountants.org.au) should you wish to discuss the details of this submission further.

Kindest Regards



Andrew Conway FIPA  
Chief Executive Officer  
Institute of Public Accountants

**National Office**

Level 6, 555 Lonsdale Street, Melbourne VIC 3000 Australia | GPO Box 1637 Melbourne VIC 3001Australia

t +61 3 8665 3100 f +61 3 8665 3130 e [natoffice@publicaccountants.org.au](mailto:natoffice@publicaccountants.org.au) w [publicaccountants.org.au](http://publicaccountants.org.au) ABN 81 004 130 643