

Sydney

Level 2, 5 Martin Place
Sydney NSW 2000 Australia
GPO Box 3698
Sydney NSW 2001
www.challenger.com.au

Telephone 02 9994 7000
Facsimile 02 9994 7777

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Committee Secretary
Economics Legislation Committee, Senate Standing Committees on Economics
Department of the Senate
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Committee Secretary

Re: Treasury Laws Amendment (2018 Measures No. 4) Bill 2018 [Provisions]

Thank you for the opportunity to make a submission to the Economics Legislation Committee's ("the Committee") review of the *Treasury Laws Amendment (2018 Measures No. 4) Bill 2018* ("the Bill").

Challenger Limited (Challenger) is an ASX-listed investment management firm with \$76.5 billion in assets (at 31 December 2017). Our purpose is to provide our customers with financial security for retirement. In the saving phase of superannuation, our investment products help build wealth and in the retirement phase we help retirees convert their savings into reliable income.

We write in support of the Miscellaneous amendments contained in Chapter 8, Part 6 Various amendments – Amendments ensuring consistent treatment between deferred annuities, which are described on page 106 of the Explanatory Memorandum at para 8.63.

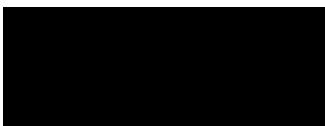
Parliament passed new design rules to encourage the development of innovative superannuation income streams, which came into effect from 1 July 2017. These new rules are not working as intended for superannuation funds.

Individuals purchasing a life insurance company deferred annuity via a superannuation fund during the accumulation phase of superannuation (pre-retirement) face double taxation, as both the super fund and life company pay tax. This is an unintended consequence and results in an inconsistency of treatment compared to deferred annuities purchased by an individual directly from the life company.

The amendments contained the Bill are the result of discussions with the Australian Taxation Office and Treasury, and correct the unintended situation outlined above.

We encourage the Committee to recommend these amendments be passed without delay.

Yours sincerely



Carla Hoorweg
National Manager, Government & Industry Relations

Melbourne Level 19, 31 Queen Street PO Box 297, Flinders Lane, Melbourne VIC 3000 Telephone 02 9994 7000 Facsimile 02 9994 7777
Brisbane Level 9, 241 Adelaide Street GPO Box 3234, Brisbane QLD 4001 Telephone 07 3136 5400 Facsimile 07 3136 5407
Perth Level 26, 140 St Georges Terrace, Perth WA 6000 Telephone 08 6466 9613
Adelaide Level 7, Suite 714, 147 Pirie Street, Adelaide SA 5000 Telephone 08 8427 9511

Challenger Limited ABN 85 106 842 371 Challenger Group Services Pty Limited ABN 91 085 657 307
Challenger Life Company Limited ABN 44 072 486 938 AFSL 234670
Challenger Investment Partners Limited ABN 29 092 382 842 AFSL 234 678
Challenger Retirement and Investment Services Limited ABN 80 115 534 453 AFSL295642 RSE Licence No. L0001304
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Challenger Investment Solutions Management Pty Ltd ABN 63 130 035 353 AFSL 487354