

Division Head Retirement Income Policy Division The Treasury Langton Crescent PARKES ACT 2600

Email: superannuationobjective@treasury.gov.au

Discussion Paper 253KB204KB

Objective of Superannuation

Discussion Paper

Thank you for the opportunity to offer comments on the Purposes and Objectives of Superannuation, and we also offer a totally new and greatly simplified structure to better achieve its objectives.

The FSI's primary and subsidiary objectives:

I generally agree but believe to provide a true and comprehensive solution to all the needs and 'objectives' of super requires a Totally New Approach and an 'all of life' involvement for all people. This would be much broader than the FSI recommendations on today's 'largely work based' system.

We believe it's not possible to achieve a solution by simply adjusting the present system with its myriad of complexities, confusions, inequalities and endless interference.

We offer for your consideration a new system, and for ease of identification, we'll call **Future Super**.

It provides levels of simplicity, security and understanding not previously seen in Superannuation.

It eliminates excesses, and helps reduce need for retirement welfare for this and future generations.

It is based on and therefore measurable for: Fairness; Equality; Adequacy; Sustainability

It answers all the Issues and Points to Consider in this Discussion Paper.

Retirement income or standard of living in Retirement

Amounts needed are to continue today's Lifestyle, as well as the Lump Sums and Incomes needed to provide a 'clean start', and for the extra goals, adventures, life events, etc

To successfully achieve...

'Retirement income and standard of living'; 'Adequacy'; 'Fiscal sustainability'; 'Increasing national savings'... requires a system with such simplicity, that understanding is immediate, and engagement to bring long term savings as a greater part of today's expenditure is (almost) automatic.

Future Super

Retirement Income

'To enable Australians to engagingly fund the Income and Lump Sums needed for themselves, future generations and others important to them to have the secure, adequate and enjoyable Retirement they desire.'

Unlike today's system **Future Super** doesn't place restrictions on funding an appropriate retirement income, other than there is a Maximum Amount available for any person.

Why a totally different approach is needed to fix the complexities and failures of today's system, while maintaining its successes.

24 years of building today's system, has produced many good results, but also created numerous rules, complexities, confusions, endless changes resulting in widespread dissatisfaction and distrust!!

Extensive research by many groups shows the levels of confusion, lack of awareness and misconceptions with today's super.

Surveys conducted by: ourselves; SunSuper; AustralianSuper; VicSuper; ASFA; Mercer; Deloitte; Cooper Review; Financial Planning Standards Board; REST; Club Plus Super; ISN; Media groups etc report concerning statistics...

97% of Australians don't know 'how much they are spending on the Living Necessities and Enjoyments' of today's lifestyle'... so they can't know 'how much they need to continue it in Retirement'... This means they don't know how much to fund for, or whether their present arrangements will provide excess, adequate or insufficient!

88% don't know Pension entitlement (if any)

84% are not confident to meet Retirement goals

55% expect lower a lifestyle in retirement

74% are not making additional contributions to achieve target

68% lack confidence and trust in ever changing system

'Comfortable' amount needed increased by \$130,000

"How advice is currently delivered, not how many Australians want it delivered"

To develop Future Super we started with questioning the many rules of the present system with 3 TESTS...

- 1 Why does this rule exist?
- **2** What positive benefit would this rule bring to a future fairer system?
- **3** Can an alternative method make retained rules easier and/or give a better result?

Any rules not meeting these tests, we abandoned, replaced or simplified.

Some examples are:

Contributions

Caps;

differences by age;

work need; 10% supported;

unsupported;

concessional; non concessional;

maximum but can bring forward,

reduces after 65, 75;

compulsory; non compulsory;

splitting;

working age; indexation;

Salary sacrifice, Self employed

difference

Education

Many calculators... ASFA, MoneySmart, Super Funds etc are complicated or give inappropriate results if not sure of assumptions;

How much income needed? 60%, 70%, 80%, 15 x, modest, comfortable? How much to fund income?

Complex or inadequately brief

budget offerings.

Taxes

Contributions;

earnings;

CGT;

accumulations;

pension;

receipts;

age distortions, especially for pre 55

disability;

tax free, taxable components;

restrictive deductibility;

salary sacrifice imbalance, no

deductions if not available, restrictions

if available;

self employed full amounts; compulsory cashing in at death;

unequal

Benefits

Inequalities in incomes; income security; longevity funding; when welfare added to lower accumulators.

To solve Structural Complexities, we recommend adopting 'what people already know'

Adopt what people already know, and do every day, when Saving and Investing for Life Events with foreseeable scheduled access... home, weddings, education, and holidays.

They know the rules, taxes, and always... how much will be needed!

They don't have to be working, merely need the income, or lump sum.

They can save and invest for themselves at any age, for any person of any age.

They can contribute any amount to achieve their funding goals.

Tax has usually been paid at Marginal Tax Rate (MTR).

There are no tax deductions on contributions.

Investment earnings are taxed at Company or Marginal Tax Rate for the whole term.

On maturity any tax is at MTR or CGT.

They can add insurance to ensure completion if health changes

If death occurs, assets are passed to Beneficiaries, usually tax free

Saving and investing for a '25 Year Retirement' is identical other than delayed access.

Incentives to make 'delayed access funding' a greater part of today's monetary allocation is achieved with tax deductions equal for all.

How Future Super adapts 'what people know about saving and investing'... for their Retirement

Contributions:

- **1.** Anyone can save and invest in Super for retirement... for themselves and any person, of any age... whether in Accumulation or Pension.
- 2. You can contribute to your or any person's Super Fund, in Accumulation, and Pension... Topping up in retirement from Home Equity, windfalls, etc is encouraged.
- **3. You can contribute any amount you or others will need** to achieve the chosen Retirement funding amounts, up to the Maximum Allowed.

Targeted education gives people their own amounts, not guesses.

4. Maximum Super amount per person of \$2.5 million (or \$3 mil)

Any excess can be transferred to another person's Super Fund tax free, or withdrawn at MTR plus a percentage to cover refund of deductions. Maximum amount is adjusted every 3 years at a declared Average Performance Rate rounded to the nearest \$10,000.

Fair and adequate for all but a small number of HNW people, and going forward rebuilds faith and trust that Australia's future Superannuation system is totally untouchable and free from future Government interference.

A maximum amount eliminates excesses

- **5. All 'Grandfathering' ceases...** The excess to be moved to other ownership structures within Government declared period. This removes all present excesses.
- **6.** Super monies left at Death pass to Beneficiaries' Super Fund(s) Tax Free! Monies accessed not passed to Super Funds retain today's Rules.

Amount passing to next generation's Super Funds are not to exceed the Maximum Super at their Retirement age, based on expected future contributions and earnings.

Monies passed to Super Funds create significant future Retirement Security, a major benefit for Family and Community Retirement security, and reduces future welfare impost.

- 7. Super Pension payments with Capital Drawdown are Tax free.
 Retaining today's Tax Free Pension Payments Rule is (mostly)
 mathematically correct and avoids numerous Tax Returns.
- **8. Insurances similar to today** however with adjustments for catastrophe medical conditions (para, quadriplegia, major burns etc,) and could be not taxed on Lump Sum Payments.

Taxes:

Future Super can adopt any chosen tax arrangements.

Deductions are claimable for ALL in Tax Returns...

Same as Self Employed today. Salary Sacrifice can continue but restrictive processes removed. Employers still claim deductions for Super Guarantee and additional contributions.

We are making 2 submissions

1) **All taxes are Half.** Half Marginal Tax Rate on contributions and Half Company Tax Rate on earnings.

Contributions up to HALF your Annual Income receive a Tax Deduction at HALF your MTR.

Investment earnings taxed at HALF Company Tax Rate for Accumulation, and Pension (if required) Taxing Pension earnings is easiest for Budget or Welfare purposes. 'Half' Investment tax already exists but the emotion and understanding of 'Half' instead of 15% is significant!

2) All Contributions and Retirement Income are Tax Free!

Our chosen method would be to increase earnings tax to the Company Tax Rate (CTR) which could then make All Contributions and Income from Super Tax Free (explained below)

However, in finalising any tax submissions we would prefer to ask the Government "How much do you need, and how much (if any) is to be funded from Super?" Then an appropriate Tax method could be chosen.

How Contributions Tax can be replaced by increasing investment tax to CTR...

APRA June 2015 for period 2014 to 2015:

Aggregate Contributions to Super were \$130.4 Billion.

So Contributions Tax @ 15% is c. \$19.5 Bn.

Total Funds in Super are \$2.046 Trillion.

If Earnings Tax was increased to Company Tax rates, (the same as every other Savings and Investment in the community)... the extra 15% (+/-Imputation Credits etc) on an assumed earnings rate of 7.5% pa would be c. \$23 Billion.

This immediately replaces Contributions Tax and because of the different structure, a flat tax to growth tax could provide the revenue required to comfortably fund Retirement Welfare... which may include more than just Age Pension, but perhaps some Age Health costs etc.

Summary

Objectives of Superannuation and 'Future Super'

We believe the simplicity, fairness and security of **Future Super** provides the necessary structure to more readily meet the Purposes and Objectives of Superannuation for all Australians.

- Immediately understandable because it adapts what people already know and do every day when saving for Life Purchases and Events
- Its processes and rules are seen as ... 'obvious'
- It is universally fair because everyone is equal, same rules apply to all
- Legislative changes become unnecessary... Its flexible 'same rule' structure automatically adjusts to changes in the economy, incomes, lifestyles, tax rates etc!!
- Only the Maximum Allowed Amount needs adjusting every 3 years by an Average Growth rate
- Its No Changes Structure will reintroduce Trust in Super
- Intergenerational Retirement Funding is facilitated and encouraged, reducing future welfare
- Targeted Education will help people to calculate Own Target Amounts so guesses by others are replaced, giving more control
- Easy to implement and administer
- Cost reductions come from simplified structures for industry members and Government
- New Retirement products, strategies and structures, including possible adjustments to the Age Pension to assist longevity risk can be developed
- The most appropriate Taxes and Tax Deductions and Processes can be determined when the Government stipulates the revenue they require from Super

Employee MTR 32.5%	т	Today		Assumption on MTR less 15%		Money Farms Pty ½ Contributions taxed at MTR		Ltd 'Future Super' All Contributions TAX FREE	
	Income	To Super	Income	To Super	Income	To Super	Income	To Super	
Gross Income Contribution Part Cl Full cla			60,000 - <u>10,000</u>		60,000 (10,000 ÷ 2) 5,000 □	5,000 <u>5,000</u>	60,000 - <u>10,000</u>	⇒ 10,000	
Net Taxable income to Employee	50,000		50,000		55,000		50,000		
Tax Medicare Budget Repair Levy Low Income Offset Super Contribution Tax	7,797 1,000 - (250)	- 1,500	7,797 1,000 - (250)	ı N/A	9,422 1,100 - (175)		7,747 1,000 - (250)	N/A	
Tax less Disco	unt	-	(32.5-15%= 17.5% 1,750 10,297) 19/4	10,347		 8,547	-	
Net in Super		8,500		10,000		10,000		10,000	
Add ½ contribution fully deducted		,		,	5,000	,		,	
Take Home	41,453		39,703		39,653		41,453		
Taxes Paid - Income - Super TOTAL TAX	8,547 1,500 10,047		8,547 <u>1,750</u> 10,297		10,347 		8,547 10,047	Contributions tax recovered from investment earnings	
				ared to today 1,750	T/H compared - \$1,80	•		Home as today vested in Super	

Employee MTR 37%	Tod	ay	Assumpt MTR les		Money l ½ Contrib taxed at	utions		e Super' tributions I FREE
	Income	To Super	Income	To Super	Income	To Super	Income	To Super
Gross Income Contribution Part Claim Full claim	100,000 □	10,000	100,000 □	10,000	100,000 (10,000 ÷ 2)	5,000 <u>5,000</u>	100,000	10,000
Net Taxable income to Employee	90,000		90,000		95,000		90,000	
Tax Medicare Budget Repair Levy Low Income Offset	21,247 1,800 -		21,247 1,800 -		23,097 1,900 -		21,247 1,800 -	
Super Contribution Tax Tax less Discount Total Tax	23,047	- 1,500 -	(37-15%= 2%) <u>2,200</u> 25,247	N/A	- - - 24,997		23,047	N/A -
Net in Super Add ½ contribution fully		8,500		10,000		10,000		10,000
deducted					5,000			
Take Home	66,953		64,753		65,003		66,953	
Taxes Paid - Income - Super TOTAL TAX	23,047 <u>1,500</u> 24,547		23,047 		24,997 		23,047 23,047	Contributions tax recovered from investment earnings
	·		T/H compared - \$2,2	-	T/H compared -\$1,95	•	Same Take I	Home as today vested in Super

Employee MTR 45%	Toda	ıy	Assump MTR le		Money I ½ Contributaxed at	utions		e Super' ributions FREE
	Income	To Super	Income	To Super	Income	To Super	Income	To Super
Gross Income Contribution Part Claim Full claim	250,000 <u>10,000</u> ⇒	10,000	250,000 - <u>10,000</u>	⇒ 10,000	250,000 (10,000 ÷ 2) <u>-5,000</u> ⇒	5,000 <u>5,000</u>	250,000 -10,000	⇒ 10,000
Net Taxable income to Employee	240,000		240,000		245,000		240,000	
Tax Medicare Budget Repair Levy Low Income Offset	81,547 4,800 1,200		81,447 4,800 1,200		83,797 4,900 1,300		81,547 4,800 1,200	
Super Contribution Tax Tax less Discount Total Tax	- - 87,547	- 1,500 -	(45-15%= 30%) 3,000 90,547	N/A	- - 89,997		- - 87,547	N/A -
Net in Super		8,500		10,000		10,000		10,000
Add ½ contribution fully deducted Take Home	 152,453	ŕ	149,453	ŕ	5,000 150,003	,	 152,453	
Taxes Paid - Income - Super TOTAL TAX	87,547 <u>1,500</u> 89,047		87,547 3,000 90,547		89,997 89,997		87,547 87,547	Contributions tax recovered from investment earnings
			T/H compare - \$3,	•	T/H compared -\$2,45	•		Home as today vested in Super

Employee MTR 19%	Toda	зу	Assumpt MTR less		Money I ½ Contrib taxed at	utions		Super' tributions
	Income	To Super	Income	To Super	Income	To Super	Income	To Super
Gross Income Contribution Part Claim Full claim	37,000 10,000 □	10,000	37,000 - <u>10,000</u> ⇒	10,000	37,000 (10,000 ÷ 2) <u>- 5,000</u>	5,000 <u>5,000</u>	37,000	10,000
Net Taxable income to Employee	27,000		27,000		32,000		37,000	
Tax Medicare Budget Repair Levy Low Income Offset	1,672 540 -		1,672 540 -		2,622 640 -		1,672 640 -	
Super Contribution Tax Tax less Discount Total Tax	(445) - - 1,767	- 1,500 -	(445) (19-15%= 4%) 	N/A	(445) - - 2,817		(445) - - 1,767	N/A -
Net in Super		8,500	·	10,000		10,000		10,000
Add ½ contribution fully deducted		·		·	<u>5,000</u>	·		
Take Home	25,233		24,833		24,183		25,233	
Taxes Paid - Income - Super TOTAL TAX	1,767 <u>1,500</u> 3,267		23,047 2,200 2,167		24,997 —		1,767 	Contributions tax recovered from investment earnings
			T/H compared - \$40	•	T/H compared -\$1,05	•		Home as today vested in Super

HALF Taxes gives equality while helping lower earners

Today			e Super f Tax	Likely Pension Entitlement
Income Groups \$	MTR less Contribution Tax	Everyone's Tax Deduction (or tax) is Half their MTR	Benefits, or increased tax, compared to today + /	
> \$300,000	45c - 30 % = 15	22.50	Excess tax unnecessary unless required by Govt (see note below)	NIL
181,000 & above	45c - 15 % = 30	22.50	- 7.5	NIL
80,001 – 180,000	37c - 15 % = 22	18.50	- 3.5	Part to NIL
37,001 – 80,000	32.5c - 15 % = 17.5	16.25	- 1.25	FULL or Part
18,201 – 37,000	19c - 15 % = 4	9.25	+ 5.5	Will receive FULL Age Pension which pays many recipients more than ALL THE INCOME TAX they have (or would have) ever paid!! (see below)

Investment Income @ Company Tax Rate	Super Tax	Half Company Tax Rate
30c	15%	15% (Same as today)

^{*} Can also apply in Pension mode if required

Assume in year retiring you were earning Average Weekly Earnings of \$77,194. The Tax in Retirement year (after all working life) had grown to \$16,635. The Age Pension for a Single starts at \$22,542 and with 3% CPI in 11.25 yrs gives payments greater than All the Income Taxes ever paid!