

NSW FIRE BRIGADES SUPERANNUATION PTY LIMITED

ABN (71 108 677 854)

23 March 2023

Director
Superannuation Insurance and Governance Unit
Member Outcomes and Governance Branch
Retirement, Advice and Investment Division
The Treasury
Langton Crescent
PARKES ACT 2600

Sent by email only: superannuationobjective@treasury.gov.au

Re: Consultation paper re legislating the objective of superannuation

I refer to the consultation paper regarding legislating the objective of superannuation and provide feedback from the perspective of the trustee of the Crown Employees (NSW Fire Brigades Firefighting Staff Death and Disability) Superannuation Fund (the Fund).

The Fund provides insured death and disability benefits to firefighting staff of Fire and Rescue NSW as defined in the Crown Employees (Fire & Rescue NSW Firefighting Staff Death and Disability) Award 2022. This Award defines death and total and permanent incapacity benefits to be provided to firefighters via this Fund.

The Fund does not provide retirement benefits but meets the sole purpose test of the SIS Act as benefits are provided on the death of a member to their legal personal representative or dependants and the Fund meets the ancillary purpose of providing benefits in the event that a member ceases work on account of ill-health.

Regarding the first consultation question we see a risk that new legislation will not account for funds such as this that do not provide retirement benefits. This is only a concern for us if requirements were introduced that we do not comply with. We would therefore like to remind policy makers that insurance only funds such as this fund exist for consideration when such legislation is drafted. We have no comment on the remainder of the questions.

Please contact me at Secretary@nswfiresuper.com.au if I can provide further information.

Yours faithfully



Chris Matthews
Fund Secretary

PO Box 602 CHATSWOOD NSW 2057

Phone 1300 836 869

NSW Fire Brigades Superannuation Pty Ltd - ABN 71 108 677 854

Crown Employees (NSW Fire Brigades Firefighting Staff Death and Disability) Superannuation Fund – ABN 60 532 453 567