



10 October 2023

Retirement, Advice and Investment Division  
Treasury  
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Dear Sir or Madam

**Re: Payday Super**

I make the following comments on this topic.

I pay my employees superannuation on the same day that I pay wages.  
I use the ATO Small Business Superannuation Clearing House to pay the superannuation.

Last month when I paid the superannuation the following occurred.

29 September 2023	Paid superannuation to SBSCH
3 October 2023	Notified by ATO that superannuation had been paid to employee superannuation fund.
5 October 2023	Received by employee superannuation fund.

In any model you choose to implement you must take into account that timing differences do occur and it would be unreasonable to expect employers to be tied to a system that could put them in default through no fault of their own.

The proposed model that requires superannuation to be paid on the same date as wages are paid is the preferred option.

Yours faithfully

**Gerard Bourke CA CTA**