
Submission to Treasury's Superannuation in Retirement Consultation Phase

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CONTEXT

This submission is based on an assessment of the benefits and costs of two retirement income options¹:

1. The current superannuation and Age Pension system
2. A system comprising a significantly modified superannuation model combined with a universal basic income (UBI) framework that includes a 'fixed pension' paid to all Australians aged 65 and over.

This analysis indicates that Option 2 is considerably more cost effective than Option 1. It is therefore proposed that Option 2 be adopted. In that option, the fixed pension is called a Seniors UBI, which is proposed to be established in conjunction with a Primary UBI (applying to all adults aged between 18 and 65 years) as well as a Child UBI.

Given that Option 2 includes three types of UBI payment, it is necessary to discuss the general nature of a UBI, as well as the benefits and concerns associated with it. And, in keeping with the subject matter of this consultation submission, particular attention is paid to aspects concerning superannuation, the Age Pension and the Seniors UBI.

WHAT IS A UBI?

A UBI is essentially a non-means-tested income that is paid to every citizen or permanent resident of a country — hence the term 'universal'. The income is intended to cover only the essentials of life — hence the term 'basic'.

BENEFITS OF A UBI

Many benefits would arise from the introduction of a UBI, including that it would²:

- Alleviate poverty
- Reduce the negative effect of technology on jobs
- Contribute to better health and education outcomes
- Supplement the minimum wage
- Contribute to greater social justice
- Provide greater financial security and certainty to recipients
- Provide greater options, freedom and other benefits to recipients
- Improve people's financial decision making ability
- Contribute to reduced crime and anti-social behaviour
- Overcome the complexities in the current system *
- Obviate the need for superannuation tax concessions *
- Complement the goods and services tax (GST) *

¹ The contents of this submission are adaptations of relevant passages from: Rory Ellison, [*Is Australia still the lucky country? Working together towards greater economic and social wellbeing*](#).

² These benefits have been confirmed by a large number of pilot studies carried out by many countries. These pilot studies are discussed in the above book. The benefits that are most relevant to this submission (marked with *) are discussed below.

- Contribute to greater macroeconomic outcomes *
- Overcome the problems inherent in the current means-tested system *
- Address the inadequacies of, and flaws in, the Age Pension system. *

A UBI would overcome the complexities in the current system

Treasury's Retirement Phase of Superannuation discussion paper (December 2023) states that *'Members face complex decisions to plan their retirement income. ... Planning in this complex environment is made harder when members don't have access to the information and guidance they need or struggle to understand it. ... Planning for retirement income requires retirees to solve a "risky, long-horizon, multi-dimensional problem" — a problem that any individual retiree cannot be expected to solve on their own.'* (p8) And, *'What basic information do members most need to ... simplify decision-making about retirement income? Where can government and industry reduce complexity in the retirement income system ... ?'* (p13).

I believe the considerable complexities inherent in the current system are largely avoidable.

The proposed retirement income model, based on a revised superannuation system coupled with a UBI, would eliminate most of these complexities.

A UBI would obviate the need for superannuation tax concessions

The taxation of superannuation is highly complex and convoluted. The tax concessions are used as a means of providing incentives to encourage people to save as much as possible for their retirement so that the cost to government of the Age Pension would be minimised. However, as is always the case when the tax system is distorted by incentives, a range of exceptions and exclusions become necessary. And investment decisions are disproportionately influenced by tax considerations rather than the merits of the investment itself.

In many respects, the system also benefits the wealthy more than lower income people. This is because the tax concessions applied to superannuation are of little or no benefit to lower income people, who pay little or no tax, and are of maximum benefit to higher income earners who pay significant amounts in tax.

As part of the proposed retirement income model, the various generous tax concessions associated with superannuation would be reduced progressively until they have been eliminated.

This is discussed in more detail in 'Rationalisation of the retirement income system' on p8.

A UBI would complement the GST

I believe that the GST should be broadened to cover every item, and that the GST rate should be increased. Any such increases in the GST payable should be accompanied by fair compensation paid to lower income people. This could be done by means of reduced income tax rates for lower and middle income individuals. However, as stated above, lower income tax rates are of no benefit to people whose income is so low that they pay little or no income tax; or whose income is zero because they are not part of the official workforce, such as stay-at-home parents.

A UBI, if implemented alongside an increase in, and broadening of, the GST, would be a highly cost-effective and equitable way of compensating lower income and zero income people.

A UBI would contribute to greater macroeconomic outcomes

The extra and reliable income under a UBI would generate increased consumption expenditure, particularly among lower income people who spend a higher proportion, if not all, of their income on goods and services. This increased demand would stimulate greater economic activity, resulting in greater income tax, company tax and GST revenue.

Guy Standing³:

[With regard to a UBI] economists ... point out the 'multiplier effect'. Every extra dollar going into the pockets of low-wage workers adds about \$1.20 to the national economy. Every extra dollar going into the pockets of a high-income American, by contrast, only adds about 39 cents to the GDP.

A UBI would overcome the problems inherent in the current means-tested system

Means testing of income support payments is extremely costly to administer and is a major disincentive for recipients to seek work, or find ways to increase their income — as they would lose half of any additional money they make. Effectively, this constitutes a very high marginal tax rate. This 'poverty trap' also encourages individuals to find creative ways of hiding or minimising the income or assets they report.

The current income-support system is complex, convoluted, intrusive, stigmatising and not cost-effective.

Introduction of a UBI would eliminate these problems and would mean that people would no longer need to advise the government whenever they lose their job, secure a job, become ill, become disabled, or experience an increase or decrease in their income or assets.

In the case of JobSeeker recipients, they would no longer be required to agree to a Job Plan, meet the requirements of the plan, go to appointments with their employment services provider, report on their job searches, provide details of all job interviews, etc. These 'mutual obligations' are a little less demanding in the case of older unemployed Australians who have not reached pension age. However, they are still very difficult and time consuming for older people to comply with given that the jobs they would be considered suitable for may be very limited in number.

In addition, employers would not feel obliged to use the Employer Reporting Line, to report jobseekers for various reasons, including declining a job offer and not showing up for an interview.

Guy Standing⁴:

Means-tested welfare often results in significantly deprived people not applying for assistance, out of pride, fear or ignorance.

As a result of Australia's extensive use of means testing, its income support payments are relatively low.

³ Guy Standing, *Basic Income: And How We Can Make It Happen*, Kindle Ed.

https://www.amazon.com.au/Basic-Income-Happen-Pelican-Books-ebook/dp/B01N9IM222/ref=sr_1_1

⁴ Guy Standing, op cit.

Peter Whiteford⁵:

The Australian system relies more heavily on income-testing than any other country in the OECD.

Ian McAuley and Miriam Lyons⁶:

Australia's income inequality has grown significantly faster than the average for OECD countries ... For access to many [government] benefits Australia relies much more on means-testing than European countries do ...

OECD⁷:

Australia ranks 27th out of the OECD countries in terms of public social spending as a percentage of GDP.

So, the current means-tested system of financial support is extremely complicated, unfair and inefficient.

Kate McFarland⁸:

In a British Parliamentary debate about UBI, Scottish Nationalist MP, Ronnie Cowan said: 'If we were all given a blank sheet of paper and asked to design a welfare system, nobody — but nobody — would come up with the system we have now. They would need thousands of sheets of paper and would end up with a mishmash of abandoned projects, badly implemented and half-hearted ideas and a system so complicated that it lets down those who need it most.'

Although the above quote relates to the UK welfare system, it is also an apt description of the Australian system.

A UBI would overcome the problems inherent in the current means-tested system.

Comments on the current means-tested Age Pension

A UBI would mean that the administratively burdensome Work Bonus applicable to Age Pensioners would no longer be required. Seniors would be able to work as many hours as they wish, or start a business, without losing any of the Seniors UBI. This would benefit the economy, particularly when there is a shortage of workers, as is currently the case.

The workforce participation rate of older New Zealanders, whose pensions are not means tested, is considerably higher than that of Australians, whose pensions are means tested. Hence, by making the pension universal, a greater proportion of older Australians would

⁵ Peter Whiteford, 'Zero Net Taxpayers: How Does Australia Compare?', *Austaxpolicy*, 14 November 2016.

<https://www.austaxpolicy.com/how-does-australia-compare/>

⁶ Ian McAuley and Miriam Lyons, *Governomics: Can we afford small government?*, Kindle Ed.

<https://www.amazon.com.au/Governomics-Can-afford-small-government-ebook/dp/B00XCHJX3S>

⁷ OECD, *Compare your country: Expenditure for social purposes*, 2019. (In this submission, quotes that have been summarised and/or paraphrased are shown in normal text, rather than italics.)

<https://www.compareyourcountry.org/social-expenditure>

⁸ Kate McFarland, 'UK: UBI Debate Held in House of Commons', *Basic Income Earth Network (BIEN)*, 22 September 2016.

<https://basicincome.org/news/2016/09/uk-ubi-debate-held-house-commons/>

remain in work longer, thereby creating additional demand. They would also pay more income tax and GST.

If Australia adopted a Seniors UBI, a considerable amount would be added to GDP, and by implication, to tax revenues.

Following is an example of the way means testing can have unintended and unfair consequences. Let's take the case of a couple of Age Pension age, who own their own home, and for whom the asset test applies (rather than the income test). Prior to 2017, if the value of the couple's assessable assets was less than the lower threshold, they would have received the full pension. For any assessable assets above the lower threshold, their pension would have been reduced by \$1.50 per fortnight for every \$1,000 of the excess. If their assets exceeded the upper threshold, they would not have been eligible for any pension. The same parameters, adjusted for inflation, had applied for decades. However, in 2017, these parameters changed considerably. The upper threshold was slashed, resulting in a halving of the gap between the upper and lower thresholds. This meant that many people who had previously been eligible for the pension, would no longer be. In addition, it meant that for any assets above the lower threshold, the pension taper rate was doubled to \$3.00 per fortnight, or \$78 per year, for every \$1,000 of the excess. This is equivalent to a wealth tax of 7.8 percent pa for assessable assets between the upper and lower thresholds.

Other weaknesses of the current means-tested Age Pension include:

- The means test and other requirements that control access to the Age Pension are bureaucratic and expensive to administer.
- The Age Pension means test distorts savings, investment and work behaviour.
- Many intending retirees spend a lot of their super quickly in order to shelter it in income-test-exempt assets, such as their home, in order to qualify for the Age Pension.
- Australia spends just 4 percent of GDP on pension benefits (including disability and other pensions) and is expected to spend just 3.7 percent by 2055. The OECD average is 9 percent. This is primarily due to Australia's Age Pension being more tightly means-tested than those elsewhere.

A UBI would address the inadequacies of, and flaws in, the Age Pension

The maximum Age Pension, including supplements, for a single person is currently approximately \$1,100 per fortnight, or around \$28,600 pa. This is below the poverty line of around \$34,000 pa.

The Age Pension rate is too low to enable those on a full pension, and who have little or no other income, to live a reasonable life and avoid poverty.

Starts at Sixty⁹:

It is time to modernise the Age Pension, which was introduced 110-years ago ... Advocates are now calling for the government to overhaul the way the Age Pension is calculated, after it was revealed that 26 percent of those over the age of 65 in Australia are living in poverty.

The pension is inadequate and fails to provide a decent standard of living for the 1.5 million older Aussies who rely on the Age Pension as their main source of income.

⁹ Starts at 60, *The Age Pension was introduced 110-years ago – 'it's time to modernise it'*, 29 June 2018. <https://startsat60.com/money/retirement/pension/age-pension-australia-110-year-anniversary-reform-modernise>

Rafal Chomik¹⁰:

Our pension expenditure is one of the lowest in the developed world and less than half the OECD average.

An appropriately indexed Seniors UBI would enable the abolition of the complex and inadequate Age Pension.

CONCERNS ABOUT THE UBI CONCEPT

The main concerns regarding the UBI are as follows¹¹:

- It would be wrong for people to be paid for doing nothing
- It might create a disincentive for people to work
- It might cause wages to fall
- It might be inflationary
- It might be unaffordable *

Affordability of a UBI

A concern that is significant and relevant to this submission is that a UBI might be unaffordable.

At a superficial level the perception may be that the gross dollar cost of paying every individual, including seniors, a sum of money on a regular basis, would be very high. However, we need to dig a little deeper in order to be able to properly assess the affordability question.

Before discussing these savings, we need to be clear about the nature of UBI payments.

The nature of UBI payments

Governments spend money in order to provide services and create capital assets. Most of the cost of providing services is made up of salaries and wages paid to government employees, amounts paid to contractors and purchases of goods and services. This expenditure constitutes a 'consumption of resources', or 'final demand'. Government consumption expenditure is normally funded directly from taxation revenue. Government capital expenditure is normally financed by loans, the servicing of which is also normally funded by taxation. Government consumption expenditure and capital expenditure are included in GDP.

Governments also spend money on transfer payments, which include all forms of income support. Importantly, transfers are completely different to the other types of government spending in that they do not represent government consumption, and are therefore not included in GDP. They are simply part of the income redistribution process.

A key point is that UBI payments are transfers, and are therefore not part of government consumption. It should be remembered that governments also provide considerable income support payments to the wealthy (including tax concessions) and to businesses (in the form of subsidies, tax concessions, bailouts and the like). These are also transfers — although they are not officially published as such.

¹⁰ Rafal Chomik, 'The Intergenerational Report and reforming the Age Pension', *The Conversation*, 5 March 2015.

<https://theconversation.com/the-intergenerational-report-and-reforming-the-age-pension-38056>

¹¹ These and other concerns are addressed in: Rory Ellison, op cit. The concern that is most relevant to this submission (marked with *) is discussed below.

So, UBI payments would be a redistribution of income to all members of society primarily from higher-income individuals and large companies. But it is not necessary to fund a UBI totally from increased taxes on higher-income people and businesses. In practice, a UBI can be funded by many compensating savings as well as reductions in lower priority or less cost-effective government expenditure items.

Savings that would result from adoption of Option 2

The benefits of a UBI outlined earlier would reduce government expenditure and increase government revenue, thereby contributing substantially to minimising the net cost of a UBI. In addition, considerable savings would be achievable by replacing the current system (Option 1) with Option 2.

Savings from the elimination of or reduction in existing support payments

A UBI would enable the elimination of existing income support payments by government to individuals, including:

- JobSeeker Payment
- Youth Allowance
- Austudy payment
- Parenting payment
- Partner allowance
- Sickness allowance
- Special benefit
- Widow allowance
- Farm household allowance
- ABSTUDY and other payments to or for Indigenous Australians
- Payment under the Veterans' Children Education Scheme
- Payment under the Military Rehabilitation and Compensation Act Education and Training Scheme 2004
- Other Commonwealth education or training payments
- The income support component from a Community Development Employment Project
- Paid parental leave pay
- Child care fee assistance payments.

A UBI should be implemented alongside significant reductions in certain other 'transfers' such as tax deductions for philanthropic activities, inefficient business subsidies, company tax concessions and other forms of corporate welfare, as well as tax concessions enjoyed primarily by affluent individuals.

The cost of administering these transfers would also be eliminated.

Impact on the tax system

A UBI would result in increased consumption expenditure, which would result in greater:

- Income tax receipts
- Company profits and hence company tax
- GST revenue.

Further clamping down on the massive amount of tax avoidance would also increase tax revenue.

Guy Standing¹²:

... the Panama Papers showed that the US could afford a basic income because they revealed the extent to which the rich were avoiding tax. The Tax Justice Network has estimated that the global elite has between \$21 trillion and \$32 trillion stashed in zero- or low-tax jurisdictions, depriving countries of \$190 billion to \$280 billion in revenues.

No income tax should be payable on incomes received under the UBI system. The UBI level in each category (Primary, Child and Seniors) should in effect become the new tax-free thresholds, replacing the existing threshold.

Reductions in ongoing costs incurred by government

The benefits of a UBI would result in reduced costs associated with a number of government services and programs, including those related to policing, prisons, other aspects associated with crime prevention, health and alleviation of the effects of poverty such as state housing.

Meaningful consultation and collaboration should take place between government and the community, business leaders, academics and relevant bodies to properly review the current suite of government services and programs that make up government consumption.

These reviews should balance cost effectiveness with community priorities and expectations. The rationalisation resulting from these reviews would enable significant savings to be made.

The considerable cost of administering the current inefficient means-tested system would also be eliminated.

Rationalisation of the retirement income system

This section contains a summary of information taken from a number of sources¹³:

The retirement income system in Australia is complex, costly and unfair. The superannuation system, which was established in 1993, has involved generous tax concessions to encourage people to 'save' for their retirement — thereby reducing reliance on, and the cost of, the Age Pension. However, after three decades, 79 percent of retirees still receive the full or part pension. Only 21 percent of retirees are fully self funded. These proportions are predicted to still apply in 2050.

The current superannuation system is flawed in many ways, including:

- Its tax concessions are very generous and highly regressive (i.e. they mainly benefit higher-income individuals).
- The top 20 percent of income earners receive 60 percent (almost \$18 billion) of superannuation tax concessions. The bottom 40 percent combined only get around 5 percent.
- Superannuation, with its generous tax concessions, is increasingly being used by high income earners as a way of minimising their tax.
- The top 20 percent of income earners receive 49 percent of employer contributions.
- According to Treasury, superannuation tax concessions are growing at 25 percent per year. In contrast, the cost of the Age Pension is growing at only 13 percent per annum.
- The employer superannuation contribution, or Superannuation Guarantee (SG), essentially comes out of employee pay. Had it not been for the SG, wages would have

¹² Guy Standing, op cit.

¹³ These sources are too numerous to include in this submission. They are fully referenced in: Rory Ellison, op cit.

been significantly higher, and this higher amount would have been taxed at marginal rates rather than at concessional rates applicable to superannuation. This would have resulted in greater income receipts by the government.

- The extent to which this tax revenue is foregone each year will increase if the SG continues to be lifted. The lost revenue will deprive the government of an extra \$2 to \$2.5 billion per year. And, wages will continue to be less than they should be.
- The super system cannot guarantee retirement incomes for people who are self-employed, who constitute nearly 10 percent of the labour force. Around 29 percent of self-employed people have no superannuation. In addition, the super system cannot guarantee retirement incomes for people who are not in the official workforce, but who nevertheless do valuable work, e.g. homemakers and volunteers.
- Also affected are individuals who because of disability or other factors beyond their control are only able to work limited hours and/or receive a low hourly rate of pay.
- Superannuation savings only account for about 15 percent of the wealth of most households. Even without counting the family home, the average Australian saves as much outside the super system as inside the system. For older people close to retirement, assets other than super are often even larger than the value of their homes.
- Those with vested interests in sustaining the superannuation system derive \$36 billion in fees from it each year.
- The costs of administering the current convoluted superannuation system are extremely high.
- Those in and entering retirement now, who worked hard, but for whom compulsory contributions came too late, face living on an inadequate means-tested Age Pension.

The bottom line is that the total cost of the superannuation system plus the current means-tested Age Pension amounts to some \$76 billion pa. This far exceeds the \$55 billion it would cost to simply pay the pension to everyone aged 65 and over.

Given the above, a Seniors UBI could in fact be implemented at zero cost.

The various generous, complex, regressive and ineffective superannuation tax concessions should be reduced progressively until they have been eliminated.

Employers should be required to continue contributing to their employees' superannuation, but the rate should be reduced progressively to 5 percent of all employee's gross pay.

This would be a substantial saving to employers, which would enable them to pay at least some of the saving to their employees in the form of increased wages. Any remaining savings would result in increased profit which would increase company/business taxes.

Employees should also be required to contribute 5 percent of their gross pay to their superannuation.

The combined 10 percent employer/employee contribution would ensure that individuals would save a reasonable amount towards their retirement.

In addition, a universal, non-means-tested Seniors UBI would:

- Deliver enormous benefits to retirees and households, as well as the economy
- Ensure financial decisions made by current and future retirees are not influenced by how to best maximise their access to the Age Pension
- Provide retirees with greater security of income, leading to a better quality of life
- Provide stronger incentives for seniors to downsize and move away from the family home, enabling younger families to find a home to live in.

All things considered, the net cost of a UBI can be minimal or zero. A UBI could even generate an overall net financial surplus.

Even if a broad UBI is not to be put in place in the foreseeable future, the Age Pension should be replaced by a Seniors UBI as a matter of urgency. This should be done in conjunction with abolishing the superannuation tax concessions and introducing a fixed 10 percent superannuation contribution shared equally by employers and employees.

Robert Jameson¹⁴:

So, is [a UBI] affordable? Overwhelmingly, yes. Indeed the more sensible question would be whether we can afford to continue with the bureaucratic, inefficient, complicated mess of a tax and benefits system that we currently endure.

PROPOSED UBI TYPES

Primary UBI

A Primary UBI should be paid to all adults, defined as individuals aged between 18 and less than 65 years.

Benefits that should be abolished include JobSeeker Payment, Austudy, Farm Household Allowance, Partner Allowance, Sickness Allowance, Special Benefit, Disability Support Pension and Widow Allowance.

Child UBI

A Child UBI should be paid for all children, defined as individuals who are less than 18 years of age. The Child UBI should be paid to the parent who is the child's primary carer, or to the parent nominated by both parents.

Benefits that should be abolished include the Parenting Payment and Youth Allowance.

Seniors UBI

A Seniors UBI should be paid to all seniors, defined as individuals aged 65 years and older.

The fact that it would not be means tested is not uncommon. Various OECD countries have non-means-tested pensions, including a number of Western European and Nordic countries as well as New Zealand.

As stated above, the current Age Pension should be abolished.

All tax concessions relating to superannuation should also be abolished (as discussed above).

PROPOSED LEVELS OF UBI PAYMENTS

Clearly the rate at which the UBI is to be paid, for each type of UBI, is a critical aspect and one which will need a great deal of consideration, analysis, debate and collaboration prior to a decision being made.

¹⁴ Robert Jameson, *The Case for a Basic Income*, Kindle Ed.

https://www.amazon.com.au/Case-Basic-Income-Robert-Jameson-ebook/dp/B01FOQ1MVA/ref=sr_1_1

If it is too low, people will not be able to exist on it, regardless of how frugal they are. This would defeat the fundamental purpose of the UBI. If it is too high, it would not be a 'basic' income, and that too would defeat the objective of the scheme.

The following dollar values are for illustrative purposes only.

Primary UBI

It could be argued that the level of the Primary UBI should be at least as high as the poverty line, which in Australia is currently around \$34,000 pa. However, in many families, there would be two or more adults living together, and the Primary UBI would be paid to each one. And two or more single adults or parents would be able to share accommodation, thus reducing their living costs. Therefore, an amount less than the poverty line could be considered reasonable.

The Primary UBI might be set at around \$25,000 pa. It should be indexed relative to average wages.

Child UBI

The Child UBI might be set at around 30 percent of the Primary UBI, i.e. \$7,500 pa. It should be indexed relative to average wages.

Seniors UBI

The Seniors UBI level should be higher than the Primary UBI in recognition of the fact that seniors have generally paid a considerable amount of income tax and GST over the course of their lives, and in most cases have made significant contributions to society. They should also be able to enjoy the last years of their lives without having to worry endlessly about how they are going to get by financially. It should also be borne in mind that many seniors find it difficult to get a job and there are many jobs they are not able to do due to their reduced physical or mental ability.

It should be noted that the Australian Age Pension is relatively low compared with other developed countries.

Association of Superannuation Funds of Australia (ASFA)¹⁵:

A modest budget for an individual aged around 65 is \$28,165. A comfortable budget for an individual aged around 65 is \$44,146.

OECD¹⁶:

In Australia, the old-age relative income poverty rate is high at 23% compared to 14% across the OECD in 2016.

The current Age Pension rate (single, including supplements) is around \$28,600 pa.

Based on the above information, the Seniors UBI might be set at around 30 percent above the Primary UBI, i.e. \$32,000 pa. It should be indexed relative to average wages, and should be

¹⁵ Association of Superannuation Funds of Australia (ASFA), *Retirees face an acceleration in the rise of living costs*, 18 February 2020.

<https://www.superannuation.asn.au/media/media-releases/2020/media-release-18-february-2020>

¹⁶ OECD, *Pensions at a Glance 2019: How does Australia compare?*, 27 November 2019.

<https://www.oecd.org/australia/PAG2019-AUS.pdf>

paid to all individuals aged 65 years and older regardless of whether or not they are part of a couple.

Given that this would be in addition to any other income a senior might earn, consideration should be given to abolishing the current Pension Supplement and Energy Supplement. Similarly, depending on the level of the Seniors UBI, consideration should be given to abolishing the current subsidies applying to prescription medications. (State governments may also be able to reduce or abolish the subsidies they provide to seniors.)

Consideration should be given to retaining Rent Assistance.

In summary, a UBI could be implemented at minimal or zero net cost to government. And it should be borne in mind that a UBI would also generate a range of significant non-financial benefits to individuals, communities and government. A great deal of research shows that these social benefits would be considerable.

It goes without saying that a UBI — including a Seniors UBI — would only be implemented once a rigorous evaluation of the concept has been carried out.¹⁷

¹⁷ The evaluation, consultation, planning and implementation phases are outlined further in: Rory Ellison, *op cit*.