

s 22

From: s 22
Sent: Tuesday, 21 July 2026 4:47 PM
To: s 22 @pmc.gov.au
Cc: s 22
s 22 Hope, Angela; s 22
Subject: RE: Minister for Women's Office Request - Treasury Input on Superannuation Exclusions for Under-18 Workers [SEC=OFFICIAL]
Attachments: 260721 Under 18s PMC Request Points.docx

OFFICIAL

Hi s 22

Please find our response attached.

We've largely borrowed from analysis that we've done in the past, given timeframes. Happy to chat through any of the responses.

Kind regards,

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s 22 — **Assistant Director**
Retirement Income Frameworks Unit
Retirement Income and Tax Administration Branch
Individuals and Indirect Tax and Superannuation Division
P s 22

treasury.gov.au

Langton Crescent, Parkes ACT 2600

[Twitter](#) | [LinkedIn](#) | [Facebook](#)

The Treasury acknowledges the traditional owners of country throughout Australia, and their continuing connection to land, water and community. We pay our respects to them and their cultures and to elders both past and present.

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From: s 22 @pmc.gov.au>
Sent: Thursday, 16 July 2026 12:03 PM
To: s 22 @TREASURY.GOV.AU>
Cc: s 22 @pmc.gov.au>; Hope, Angela <Angela.Hope@pmc.gov.au>; s 22 @pmc.gov.au>; s 22 @pmc.gov.au>
Subject: Minister for Women's Office Request - Treasury Input on Superannuation Exclusions for Under-18 Workers [SEC=OFFICIAL]

You don't often get email from s 22 @pmc.gov.au. [Learn why this is important](#)

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Hi s 22

Thank you for the call earlier this morning!

As discussed, the Minister for Women's Office has received a letter from the Working with Women Alliance (WwWA) regarding the **gendered implications of the superannuation exemption for employees under 18 years of age who work fewer than 30 hours per week** for a single employer. The WwWA shared its recent policy brief [which recommends removing this exemption: Superannuation for Under 18s: A Gendered Lens.](#)

The Minister's Office has asked us to engage with Treasury to gather information to support their/the Minister's engagement on this topic with the WwWA. To support briefing, we would appreciate Treasury's advice on the following:

1. **Treasury's views on the policy brief, including the data and modelling**
 - In particular, on the Super Members Council estimates regarding the projected increases in superannuation balances for women and men at retirement, and reduction in the gender superannuation gap, if the 30-hour exemption were removed.
2. **Treasury's own data and modelling**
 - Any available modelling Treasury has that compares the current under-30-hours exemption with a no-exemption scenario (particularly any gender breakdowns).
 - The Minister's Office is particularly interested in the extent to which **fees** may affect superannuation balances if there was no exemption.
3. **Rationale for retaining the under-30-hours exemption**
 - Including any cost-benefit analysis or other considerations that have informed Treasury's/the Government's position.
4. **Broader economic considerations**
 - Any wider economic impacts associated with removing the exemption, such as potential effects on youth employment or workforce participation.

We would be grateful if Treasury could provide its input by **COB Tuesday, 21 July**, to enable us to brief the Minister's Office as soon as possible.

Apologies for the short timeframe, and very happy to discuss further. 😊

Many thanks,

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Adviser | Employment and Social Services

Women's Economic Policy Branch | Office for Women

Department of the Prime Minister and Cabinet

e s 22 @pmc.gov.au p. s 22 w. [pmc.gov.au](#)



The Department of the Prime Minister and Cabinet (PM&C) would like to acknowledge the Traditional Custodians of Country throughout Australia and their continuing spiritual, social and cultural relationship with the land, waters, skies and community. We pay our respects to their Elders past and present, and to their community leaders, and extend that respect to all Aboriginal and Torres Strait Islander peoples.



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1. Treasury's views on the policy brief, including the data and modelling

- In particular, on the Super Members Council estimates regarding the projected increases in superannuation balances for women and men at retirement, and reduction in the gender superannuation gap, if the 30-hour exemption were removed.
- Treasury cannot verify SMC's estimates of projected increases in superannuation balances at retirement in these timeframes. s 47C

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2. Treasury's own data and modelling

- Any available modelling Treasury has that compares the current under-30-hours exemption with a no-exemption scenario (particularly any gender breakdowns).
- Treasury is unable to provide up to date modelling on the proposed policy's impact on superannuation balances at retirement under the current timeframes.

- **The Minister's Office is particularly interested in the extent to which fees may affect superannuation balances if there was no exemption.**

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- Previous reforms to superannuation have also reduced the potential for low balance accounts to be eroded through fees. Since 2019, superannuation funds have been prevented from charging certain fees and costs in excess of 3 per cent of the balance for accounts below \$6,000.

3. Rationale for retaining the under-30-hours exemption

- **Including any cost-benefit analysis or other considerations that have informed Treasury's/the Government's position.**

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- The Senate Standing Committee on economics, in its report on the *Treasury Laws Amendment (Payday Superannuation) Regulations 2026*, noted it supports in principle paying superannuation to workers under 18 from the first hour worked. However, doing so would require careful consultation and further analysis of potential impacts.

4. Broader economic considerations

- Any wider economic impacts associated with removing the exemption, such as potential effects on youth employment or workforce participation.

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Australian Government
The Treasury



Meeting Brief

MB26-000273

FOR INFORMATION - Meeting Brief - Shop, Distributive & Allied Employees' Association (SDA) & Young Workers Delegation - Monday 22 June 2026

TO: Treasurer - The Hon Jim Chalmers MP

PURPOSE OF MEETING

- You are meeting with the National Assistant Secretary of the Shop, Distributive & Allied Employee's Association (SDA), along with a delegation of young workers. SDA would like to discuss the issue of superannuation for under 18s.
- SDA are likely to advocate for extending the superannuation guarantee (SG) to include all young workers under the age of 18. SDA represent retail, warehousing and fast food workers and many of these workers start working before 18 and work less than 30 hours a week.
- SDA have a "Super on Every Dollar" campaign which emphasises the inconsistency of superannuation paid to under 18s. They have claimed that this inconsistency sets workers up to be disengaged with and to distrust the superannuation system.

KEY MESSAGES

- SG is payable to employees under the age of 18 only if they work more than 30 hours in a week. This is a longstanding feature of the SG system.
- SG law imposes a minimum legal obligation on employers however, employers may voluntarily pay SG to employees under 18 who do not meet the 30 hour per week requirement.

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BACKGROUND

Payday Super and superannuation for under 18s

- Payday Super changes have consolidated existing exclusions from SG coverage into the regulations. On 23 March 2026, the Senate referred the Treasury Laws Amendment (Payday Superannuation) Regulations 2026 to the Senate Economics Legislation Committee.
- The Committee Final Report expressed in principle support to pay SG on ever dollar earned, including extending the SG to workers under 18 from the first hour of work.
- However, the Final Report highlighted the importance of appropriately sequencing this change in light of Payday Super. The Payday Super changes are a significant change to the superannuation system and embedding these should be a priority, before considering any further changes.

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SDA's Super on Every Dollar campaign

- SDA has a campaign for SG for all workers under 18. They claim that paying super only where an under 18 worker works over 30 hours creates inconsistencies that set them up for lack of engagement and distrust of the superannuation system.
- SDA claims that the 30 hour requirement is a relic that is associated with the cost of administering cheques in the 1990s. They raise that the exemption made sense when the SG started, as junior pay rates were much lower and the SG rate was also only 3 per cent. However, there is less justification for this exclusion now that the SG rate is at 12 per cent.

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SENSITIVITIES

- Other stakeholders including the Super Members Council (SMC) and Australian Council of Trade Unions have strongly advocated for super for under 18s. SMC analysis of HILDA survey data found that over 90 per cent of under 18 workers work less than 30 hours per week, and thus are not entitled to SG.
- Rest Super submitted to the Committee an example of a ‘typical’ 15-year-old fund member who would have an extra \$3,400 in super by their 18th birthday, and \$18,100 additional in super at retirement.
- On 13 May 2026 the Greens gave notice of motion for partial disallowance of the Payday Super regulations to be moved on 30 June 2026, regarding the section of the regulations which replicate the current settings for workers under 18.

Clearance Officer

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A/g Assistant Secretary

Retirement Income and Superannuation Division

18 June 2026

Contact Officer

s 22

Director

Ph: s 22

CONSULTATION

Labour Market, Environment, Industry and Infrastructure Division

ATTACHMENTS

A: Attendees

ATTACHMENT A: ATTENDEES

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From: s 22
Sent: Mondav. 11 May 2026 1:35 PM
To: s 22
Cc:
Subject: SG under 18's talking points [SEC=OFFICIAL]
Attachments: Payday Super Regulations disallowance TPs.docx

OFFICIAL

Hi s 22

Please find **attached** some talking points on the potential disallowance motion for the Payday Super regulations concerning the calls to remove the exclusion for under 18's. s 22

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Please let us know if you want anything further on this or had any issues.

Kind regards,

s 22 — **Director, MELB**

Superannuation Preservation, Adequacy, Regulatory Compliance Unit
Retirement Income and Superannuation Division

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The Treasury acknowledges the traditional owners of country throughout Australia, and their continuing connection to land, water and community. We pay our respects to them and their cultures and to elders both past and present.

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From: s 22
Sent: Thursday, 7 May 2026 4:39 PM
To: s 22
Cc:
Subject: RE: Private Senator's Bill [SEC=OFFICIAL]

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Hi s 22

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Also, I know we discussed this on Friday but if we could also get some talking points on re extending the SG to under 18s, ahead of a potential Greens disallowance motion of those the regs which I expect them to give notice of on Tuesday, that would be appreciated. It is likely that the disallowance may be debated on Wednesday or Thursday, so by midday Tuesday for those lines would be appreciated.

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Warm regards,

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– Adviser

Office of the Hon Dr Daniel Mulino MP
Assistant Treasurer and Minister for Financial Services
Parliament House, Canberra, ACT 2600

M s 22 E s 22 [@treasury.gov.au](mailto:s22@treasury.gov.au)

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Treasury Laws Amendment (Payday Superannuation) Regulations 2026

Talking points – potential disallowance motion

SG coverage for under 18's

General background on the under 18's exclusion

- The SG is only mandated for employers of under 18-year-old workers if they work more than 30 hours in a week. This is a longstanding feature of the SG system.
- SG legislation aims to achieve a minimum standard of superannuation support with broad coverage across the workforce. Some employers already voluntarily pay super for under 18-year-old employees regardless of hours worked.

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From: Pai, Neena
Sent: Wednesday, 3 June 2026 3:27 PM
To: s 22
Subject: FW: SG for under 18s SE brief [SEC=OFFICIAL]
Attachments: DC_Super for under 18s_June 2026.docx

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Neena Pai

Division Head, Retirement Income and Superannuation Division
The Treasury, Langton Crescent, Parkes ACT 2600

Ph: s 22 | M: s 22
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EA: s 22 @treasury.gov.au Ph: s 22

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From: Ben Kelly <Ben.Kelly@ato.gov.au>
Sent: Friday, 29 May 2026 11:26 AM
To: Pai, Neena <Neena.Pai@TREASURY.GOV.AU>
Cc: Emma Rosenzweig <Emma.Rosenzweig@ato.gov.au>; Paul Beohm <Paul.Beohm@ato.gov.au>; s 22
s 22 @ato.gov.au; Justin Micale <Justin.Micale@ato.gov.au>
Subject: SG for under 18s SE brief [SEC=OFFICIAL]

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Hi Neena,

As discussed.

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I've got my office working on time for us next week.

Cheers,
Ben

Ben Kelly

Deputy Commissioner
Superannuation and Employer Obligations
Australian Taxation Office

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We acknowledge the Traditional Owners and Custodians of Country throughout Australia and their continuing connection to land, waters and community. We pay our respects to them, their cultures, and Elders past and present.

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Super for under 18 year olds

Budget Estimates | Deputy Commissioner Brief | June 2026

- As at 31 March 2026, **32%** of employed individuals aged under 18 have SG contributions reported for the current (2025-26) financial year, in line with the same period last year, and slightly below the full year figure of **35%** in 2024-25.
- As at 31 March 2026, approximately **\$83m** of SG contributions has been reported for individuals aged under 18 for the current (2025-26) financial year, in line with the same period last year, compared with the full year total of approximately **\$130m** in 2024-25.

Potential questions and answers

SG amounts reported for employees under 18

- As at 31 March 2026, approximately **373,000** employees under the age of 18 have had at least one job reported through Single Touch Payroll (STP) for the 2025-26 financial year.
 - Of these employees, approximately **121,000 (32%)** have SG contributions reported.
 - Approximately **\$83m** of SG has been reported in total with an average of approximately **\$680** per employee.
- In the previous financial year (2024-25), approximately **454,000** employees under the age of 18 had at least one job reported through STP.
 - Of these employees, approximately **157,000 (35%)** have SG contributions reported.
 - Approximately **\$130m** of SG was reported in total with an average of approximately **\$840** per employee.
- As at 31 March 2025, approximately **412,000** employees under the age of 18 have had at least one job reported through STP for the 2024-25 financial year.
 - Of these employees, approximately **132,000 (32%)** have SG contributions reported.
 - Approximately **\$83m** of SG has been reported in total with an average of approximately **\$630** per employee.

Table 1: SG amounts reported for employees under 18

FY	2021-22	2022-23	2023-24	2024-25	2024-25 (As at 31 Mar 2025)	2025-26 (As at 31 Mar 2026)
Employees Under 18	503,000	536,000	502,000	454,000	412,000	373,000

FY	2021-22	2022-23	2023-24	2024-25	2024-25 (As at 31 Mar 2025)	2025-26 (As at 31 Mar 2026)
SG Contributions reported	\$103 M	\$128 M	\$130 M	\$130 M	\$83 M	\$83 M
Employees under 18 w/ SG reported	179,000 (36%)	202,000 (38%)	173,000 (34%)	157,000 (35%)	132,000 (32%)	121,000 (32%)
Average SG Cont. per employee	\$580	\$630	\$750	\$840	\$630	\$680

Background

SG Law Change

- Before 1 July 2022, employers did not have to pay super guarantee (SG) for a worker earning less than \$450 a month.
- Employers now have to pay SG for those workers under the age of 18 if they work for them more than 30 hours in a week regardless of their earnings.
- The ATO does not currently have any data which advises the number of hours an employee works.
- Accordingly, compliance action on behalf of employees who are under 18 needs to be undertaken via manual review/audit processes, where suspected unpaid super is reported to the ATO by the individual or where ATO data otherwise identifies potential underpayments.

Additional information in relation to STP data analysis

- For financial year comparisons, under 18 years is defined based on the employee's age at 30 June of the relevant financial year. Noting, some individuals will have turned 18 years old during the financial year, so the same individuals are not always being compared in the analysis. When available, verified data is utilised to confirm individual's age.
- Figures used in this brief are based on high confidence matched individuals for employees under 18 years old.
- Some limitations and/or data gaps exist:
 - Gender and employment industry are not reported in STP data.
 - Employment type reporting (e.g. permanent, casual, etc.) is optional in STP data hence limited accuracy.

- STP data shows that an SG liability has been reported – it does not guarantee the amount has been paid by the employer.
- We don't have visibility of hours worked, so we are unable to determine the number of employees above/below the 30 hour threshold.
- Some employees do not receive consistent income across the year. This is likely to be more prevalent with under 18s who may work more hours during school holidays.
- Other factors also impact the analysis, including changes that impact income, such as increases to the minimum wage, and progressive increases in the SG rate over the last several years, with the final increase to 12% effective from 1 July 2025.

Question on Notice

- During the 2023-23 Supplementary Budget estimates process, Senator McKim asked a series of questions regarding superannuation for under 18-year-olds. Below is the tabled response.



A0129_Economics_2
022-23Supplementa

Approval

Data Assurance Statement	
Approval	Date
Data in this brief was provided by RAB	7 April 2026
The data contained in this brief is endorsed by AC	30 April 2026