



Australian Government
Department of the Prime Minister and Cabinet
Office of Impact Analysis

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Mr Brenton Philp
Deputy Secretary
Markets Group
Department of the Treasury

Dear Mr Philp

Impact Analysis – Second Pass Final Assessment – Unpaid Superannuation Guarantee Package

Thank you for your letter submitting an Impact Analysis (IA) for formal Second Pass Final Assessment. I note the IA has been formally certified at the Deputy Secretary level consistent with the *Australian Government Guide to Policy Impact Analysis* (the Guide).

I appreciate the Department's constructive engagement on the IA. The Office of Impact Analysis' (OIA's) assessment is that the quality of the impact analysis in the IA is adequate.

The IA addresses the seven Impact Analysis questions and follows an appropriate policy development process commensurate with the significance of the problem and magnitude of the proposed intervention.

To be considered 'good practice' as per the Guide, the IA would have benefitted from additional detail on how the package will impact the superannuation clearing house sector.

OIA notes your certification letter identifies market sensitivity of the proposed change as limiting Treasury's ability to consult due to the risk of unacceptable market advantage, particularly with the superannuation clearing house sector. OIA further notes your letter confirms the Department will conduct post-decision consultation to inform the administrative and legislative design features of the package, with consideration for the potential impost and risks on superannuation clearing houses.

The IA may now be provided to the decision-maker to inform their decision.

Next steps

After a final decision has been announced, I ask that your agency work with OIA to finalise this material for public release. This includes providing a copy of the IA in Word and PDF format for web accessibility purposes. The IA must be included in any Explanatory Memorandum or Statement giving effect to the proposals in the IA.

If you have any further queries, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jason Lange'.

Jason Lange
Executive Director
Office of Impact Analysis
6 April 2023