21 August 2026

Andy Robertson
Chief Data Officer
Data, Technology and Security Division
Australian Prudential Regulation Authority
Via email: dataconsultations@apra.gov.au

Response to APRA's proposed updates to superannuation reporting standards

Dear Mr Robertson,

The FSC welcomes the opportunity to provide feedback on APRA's proposed updates to superannuation reporting standards to support the transition to APRA Connect. We also welcome APRA's broader efforts to simplify existing reporting requirements and reduce unnecessary duplication.

Overall, the FSC is supportive of the proposed changes to SRS 610.2 and SRS 101.0, and the revocation of SRS 001.0. However, we have identified a couple of areas where further simplification or clarification would reduce regulatory burden and improve the operation of the proposed reporting requirements. In particular, we strongly support revoking SRS 533.0 in full and deriving the 'total investments' information required for the annual performance test for MySuper products from data reported through existing APRA collections.

These matters are explored in further detail below.

About the Financial Services Council

The FSC is a peak body which sets mandatory Standards and develops policy for more than 130 member companies in one of Australia's largest industry sectors, financial services. Our Full Members represent Australia's retail and wholesale funds management businesses, superannuation funds, and financial advice licensees. Our Supporting Members represent the professional services firms such as ICT, consulting, accounting, legal, recruitment, actuarial and research houses.

The financial services industry is responsible for investing more than $4 trillion on behalf of over 16.9 million Australians. The pool of funds under management is larger than Australia's GDP and the capitalisation of the Australian Securities Exchange and is one of the largest pools of managed funds in the world.

Summary of Recommendations

1. That APRA revoke SRS 533.0 in full and derive the 'total investments' information required for the annual performance test for MySuper products from data reported through existing APRA collections, to reduce regulatory burden and support cleaner reporting architecture.
2. That APRA remove items 1-4 Member Account Movement from SRS 610.2 (Membership Profile) and incorporate them into SRS 611.0 (Member Accounts) Table 2, with any necessary amendments to SRS 611.0 instructions to ensure APRA can continue to obtain the required opening, movement and closing member account information for publication and supervisory purposes.
3. That APRA remove Item 6, "Members without insurance", from SRS 610.2 (Membership Profile) and incorporate the relevant data items into SRS 251.0 (Insurance), while preserving APRA's ability to maintain and publish the existing historical time series.
4. That APRA clarify its reporting expectations regarding the treatment of MySuper interests under SRS 610.2, to prevent inconsistent reporting outcomes across RSE licensees.
5. That APRA consider whether equivalent clarification regarding the treatment of MySuper interests is required across other relevant reporting standards.

Proposed Amendments to SRS 533.0 (Asset Allocation)

Revocation of SRS 533.0

APRA proposes to remove all items from SRS 533.0, on the basis that the relevant information is already collected through other reporting standards, with the exception of Item 2.1 (Total Investments). APRA proposes to retain this item to continue collecting total investment amounts by lifecycle stages for use in the annual performance test for MySuper products. However, the consultation expressly invites industry feedback on practicable alternative reporting solutions to collect this data.

The FSC supports the complete revocation of SRS 533.0 and considers that the information required for the performance test can be derived from data already reported to APRA Connect (such as through SRS 606.0, SRS 550.0 and SRS 611.0). Two possible approaches have been nominated for how APRA could collect data around 'total investments' without needing to retain Item 2.1 in SRS 533.0. These are explored below:

Approach #1: Using SRF 606.0 and SRF 550.0.

Step 1 - Identify Member Assets for each lifecycle investment option	SRF 606.0 Table 4 Item 5 'Member Assets' captures aggregate member account balances allocated to each investment option under each product and menu combination. APRA could use this data to determine the proportion of Member Assets attributable to each lifecycle investment option.
Step 2 - Identify the aggregate Investment Option Value Amount	SRF 550.0 Table 2 Item 13 'Investment Option Value Amount' captures the aggregate investment value specific to each investment option.
Step 3 - Apply the lifecycle weights to the Investment Option Value Amount	APRA could then apply the lifecycle weights calculated under Step 1 to the Investment Option Value Amount reported under SRF 550.0 to produce the Total Investments of MySuper lifestage investment options for each product and menu combination.

The FSC acknowledges that Member Assets and Total Investments represent different accounting concepts: Member Assets reflects the liability side of the balance sheet, while Total Investments reflects the market value of investments on the asset side. However, this distinction should not materially affect the proposed methodology. The Member Assets data is used only to determine the relative proportion attributable to each lifecycle stage within a particular product and menu combination, rather than as a substitute for the value of Total Investments itself. For this purpose, we understand that the proportional weights derived from Member Assets would be virtually identical to those that would be derived from Total Investments.

Approach #2: Using SRS 611.0

Table 2 of SRS 611.0 requires RSE licensees to report, for each MySuper product, the number of member accounts and the value of members' benefits for each combination of product identifier, member age, sex, benefit bracket and inactive status. The relevant data points include the Superannuation Product Identifier, Member Age Number, Superannuation Product MySuper Demographic Member Accounts Count and Members Benefits MySuper Demographic Amount.

For a lifecycle MySuper product, the Members Benefits MySuper Demographic Amount could be aggregated by Superannuation Product Identifier and Member Age Number, or mapped to the applicable lifecycle stages, to determine the relative weighting of members' benefits across lifecycle cohorts. In our view, this existing quarterly dataset could be assessed as the primary source for calculating the lifecycle weighting required for the annual performance test, rather than continuing a separate SRS 533.0 collection.

Before implementing this approach, APRA should confirm whether the current performance-test methodology specifically requires total investments rather than members' benefits. If a reconciliation identifies a material conceptual or timing difference between these measures, APRA could collect only the minimum additional lifecycle-stage allocation data through an existing APRA Connect standard, rather than retaining SRS 533.0 as a standalone reporting standard.

Provided APRA leverages these existing APRA Connect data sources, retaining Item 2.1 in SRS 533.0 would be redundant. The complete revocation of SRS 533.0 would significantly reduce regulatory burden by eliminating the need to maintain legacy D2A-derived submission pipelines for a single data item/table and streamline data collection onto APRA Connect without materially reducing APRA's visibility for annual performance-test purposes.

Recommendation #1: That APRA revoke SRS 533.0 (Asset Allocation) in full and derive the 'total investments' information required for the annual performance test for MySuper products from data reported through existing APRA collections, to reduce regulatory burden and support cleaner reporting architecture.

Proposed Amendments to SRS 610.2 (Membership Profile)

Removal of Items 1-4

The FSC recommends that Items 1-4 'Member Account Movement' be removed from SRS 610.2 Membership Profile and incorporated into SRS 611.0 Table 2 Member Accounts. These items currently require reporting of:

- member accounts at the beginning of the reporting period;
- new member accounts;
- closed member accounts; and
- member accounts at the end of the reporting period.

APRA's proposal states that Items 1-4 are to be retained in SRS 610.2 because the data is used in existing annual APRA publications, with the form design and instructions updated to align with APRA Connect. However, given that SRS 611.0 is the more appropriate standard for member account information, we consider that these movement items would be better placed within SRS 611.0 Table 2, rather than retained in a separate membership profile collection.

Moving these items to SRS 611.0 Table 2 would create a more logical and streamlined reporting structure by keeping member account stock and flow information within a single standard. The opening balance, new accounts, closed accounts and closing balance are inherently connected to member account reporting and should be reported alongside other member account details in SRS 611.0. This would improve consistency, reduce duplication and minimise the need for RSE licensees to reconcile similar member account data across multiple reporting standards.

This approach would also be consistent with APRA's proposed treatment of other SRS 610.2 items where overlap exists with SRS 611.0. APRA has proposed removing Item 5 and Item 7 from SRS 610.2 on the basis that they overlap with the new Reporting Standard SRS 611.0 Member Accounts. On that basis, retaining Items 1-4 in SRS 610.2 appears inconsistent with the broader objective of reducing overlap and streamlining the superannuation reporting framework.

We acknowledge APRA's need to continue using member account movement data for annual publications. However, this requirement could still be met by collecting the data through SRS 611.0 Table 2, rather than maintaining a separate section in SRS 610.2. Consolidating these items into SRS 611.0 would better support a 'single source of truth' for member account data, improve data quality and reduce operational burden for reporting entities.

Recommendation #2: That APRA remove items 1-4 Member Account Movement from SRS 610.2 (Membership Profile) and incorporate them into SRS 611.0 (Member Accounts) Table 2, with any necessary amendments to SRS 611.0 instructions to ensure APRA can continue to obtain the required opening, movement and closing member account information for publication and supervisory purposes

Item 6: Members without insurance

The FSC recommends that Item 6, "Members without insurance", not be retained in SRS 610.2 (Membership Profile). Instead, the information relating to members without life insurance, total and permanent disability insurance and income protection insurance should be incorporated into SRS 251.0 (Insurance).

While we acknowledge that APRA uses the information currently reported under Item 6 in its annual publications, the subject matter is more appropriately aligned with the insurance reporting framework. SRS 251.0 is specifically designed to collect information relating to acquired insurance arrangements within an RSE and already includes reporting forms covering insurance arrangements, insurance coverage, insurance payments, insurance premiums and insurance table arrangements. By comparison, SRS 610.2 primarily relates to membership profiles and member account movements. Retaining insurance-status measures in SRS 610.2 creates an artificial separation between the number of members with insurance and the number of members without insurance.

Moving these data items to SRS 251.0 would provide a more coherent and complete view of insurance coverage. Information on members without insurance could be reported alongside the corresponding insured-member populations for life insurance, total and permanent disability insurance and income protection insurance. This would enable APRA and reporting entities to validate that insured and uninsured member populations reconcile to the relevant total membership population and would reduce the risk of differences arising from separate reporting standards, definitions, reporting instructions or data-production processes.

The relocation would also simplify reporting governance. Insurance-related data could be sourced, reviewed and attested through a single reporting framework, with consistent definitions, reference dates and validation requirements. This is likely to improve data quality by allowing RSE licensees to reconcile insurance coverage and non-coverage information within the same submission process, rather than preparing insurance data separately for SRS 610.2 and SRS 251.0.

Importantly, we are not proposing that APRA cease collecting or publishing information about members without insurance. The FSC suggests that APRA preserve the relevant data points and historical time series by transferring them to an appropriate table within SRS 251.0. APRA could continue using the relocated information for its annual publications while achieving a clearer alignment between the nature of the data and the purpose of the reporting standard.

Recommendation #3: That APRA remove Item 6, "Members without insurance", from SRS 610.2 (Membership Profile) and incorporate the relevant data items into SRS 251.0 (Insurance), while preserving APRA's ability to maintain and publish the existing historical time series.

<u>Treatment of MySuper Interests</u>

In order to support the proposed amendments to SRS 610.2, APRA proposes to incorporate definitions of a "MySuper interest as a result of member investment choice" and a "MySuper interest not as a result of member investment choice" into SRS 101.0. These definitions contemplate reporting based on whether a member holds **any portion of their interest** in a MySuper product (see overleaf).

MySuper interest as a result of member investment choice	Represents a MySuper interest where the member exercised choice of investment option to direct any portion of their interest into the MySuper product. A direction may be given as an express investment instruction, a completed application form or a completed member investment choice form. Reference: ***SIS Act***, s.10(1).
MySuper interest not as a result of member investment choice	Represents a MySuper interest where the member has not exercised choice of investment option to direct any portion of their interest into the MySuper product. Reference: ***SIS Act***, s. 10(1).

Applying these proposed SRS 101.0 definitions would mean that, for proposed data items 8, 9, 12 and 13 of SRS 610.2, funds would report the number of member accounts, or amount of members' interests, for members holding **any** MySuper interest, irrespective of whether 100 per cent of the member's balance is held in the MySuper product.

However, APRA's existing SDT reporting guidance adopts a different approach to product attribution. Under that guidance, members with 100 per cent of their balance in a MySuper product are reported under the MySuper product, while members who access a MySuper option through another superannuation product and hold less than 100 per cent of their balance in MySuper are reported under the relevant non-MySuper product (see below).

> APRA expects that members who have 100 per cent of their balance in the MySuper product are reported under the MySuper product on SRF 606.0. APRA expects that member totals that are reported under the MySuper product and investment menu combination in SRF 606.0 table 4 would align to member totals that are reported for the MySuper product on SRF 611.0 table 2.
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> Where the MySuper option is accessed through other superannuation products, APRA expects that members who have less than 100 per cent of their balance in the MySuper option are reported under the non-MySuper product in combination with the MySuper investment menu (using the same unique identifier as the investment menu which is linked to the MySuper product) and relevant investment option on SRF 606.0.
>
> Where members in the same investment option are not considered to have a MySuper interest, APRA expects that these members are reported under a non-MySuper investment menu reported in combination with that investment option.

This creates uncertainty as to how funds should complete the proposed SRS 610.2 data items relating to MySuper interests, particularly given the instruction that "only data for MySuper products is to be completed in this table." Depending on the approach adopted, a member with only part of their balance invested in MySuper may either be included or excluded from the relevant MySuper population. This lack of clarity regarding the appropriate approach to my MySuper interests may result in inconsistent reporting outcomes across RSE licensees.

The FSC therefore recommends that APRA clarify whether SRS 610.2 should be completed by reference to all members holding a MySuper interest, consistent with the proposed SRS 101.0 definitions, or by reference to the MySuper product population determined under APRA's existing SDT product attribution guidance.

APRA should also consider whether equivalent clarification is required for other relevant reporting standards that require reporting at the MySuper product level (including SRS 533.0, SRS 330.2 and SRS 540.0), to ensure a consistent approach across the reporting framework.

Recommendation #4a: That APRA clarify its reporting expectations regarding the treatment of MySuper interests under SRS 610.2, to prevent inconsistent reporting outcomes across RSE licensees.

Recommendation #4b: That APRA consider whether equivalent clarification regarding the treatment of MySuper interests is required across other relevant reporting standards.

If you would like to discuss anything contained in this submission, please contact Julia Hukka, at +61 432 482 155 or jhukka@fsc.org.au.

Yours sincerely,

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