**From:** Ron Doig [mailto:rdoig@munrodoig.com.au]
**Sent:** Thursday, 27 April 2017 7:09 PM
**To:** Superannuation
**Subject:** Submission on LRBA Integrity measures released 27 April 2017

Dear Sir/Madam,

I have worked as a superannuation lawyer for over 25 years and a scan of the EM confirms what appeared to be on the horizon, and which I could not at all undertand

On the second measure I comment as follows:

1. The addition of the loan amount in the total  super balance means problems.
2. By borrowing (with no increase in fund net assets)  a member can go over the balance.
3. This means the member may be unable to contribute.
4. But he/she could contribute under exactly the same net asset (and so account balance) position.
5. But with borrowing he/she cannot, and yet the account balance remains as is.
6. This is borne out by Example 1.2.
7. Nothing changes but some money borrowed and an asset bought.
8. The members have the same amount invested in the Fund, unmoved account balances but miraculously have higher “total superannuation  balances”.
9. Peter moves from $1m to $1.8m.
10. He could have made non-concessional contributions.
11. Now he cannot, and in circumstances where his amount saved in super remains unaltered.
12. It is illogical, unworkable and unfair.

I trust it will be reviewed and deleted.

I have not really looked at the first measure re transfer balance debits and credits to pension accounts when paying off loans, but the intent seems reasonable and a quick read of the EM seems to make sense.

Regards,



**Ron Doig
Director**

**Munro Doig                       LAWYERS**



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