

Superannuation Task Force 2005

Discussion Paper
and
Call for Public Submissions

Closing Date for Submissions: 2nd September 2005

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1 Introduction

The *Superannuation (General Provisions) Act 2000* is the main legislation governing superannuation in PNG, and was certified on 29 November 2000 and gazetted in the National Gazette on 9 May 2002.

A number of transitional arrangements were included in the Act to provide time for entities to comply with the legislation. The transition period ended on the 8 May 2003 by which time all entities wishing to conduct superannuation business had to apply for authorisation to the Bank of Papua New Guinea (the 'Bank'). The Bank then had a further six months up to 8 November 2003 to process all applications.

On 8 November 2003, the process for licensing applications under the Act was completed by the Bank. This means that from 9 November 2003 the Act is fully effective. Any entity conducting superannuation business in PNG must be authorised and is subject to the full force of the Act.

A Superannuation Task Force was established in 2001 to consider the legislation and its application. The Task Force recommended in its Further Report to the Government dated April 2002 that a follow-up review should be conducted after a period of implementation of the Act to determine the effectiveness of the administration of the new legislation.

A Task Force by the Bank of PNG and Department of Treasury has therefore been established to give effect to this recommendation. The Task Force comprises Lady Mina Siaguru (Chairperson), Mr. Andrew Oaeko, Mr Greg Taylor and Mr. John Jeffery. Its Terms of Reference is set out in Attachment A of this Discussion Paper.

This Paper outlines issues specified within its terms of reference and invites submissions from interested party to the Superannuation Task Force for its inquiry.

The issues covered in this paper are not meant to include all the issues but to assist stakeholders.

This Review is not intended to reconsider the basic elements of the reformed system, nor indeed to revisit any policy issue. The Task Force is thus not in a position to consider such matters as the mandatory character of the superannuation system, the move to defined contribution accumulation funds, the shift back to the original retirement income objective, and regulation under unified legislation supervised by the Bank. However, as is common with extensive systemic change, various issues have arisen concerning some legislative provisions or guidelines developed under the Act, and the conduct of the regulators extensive new powers and responsibilities. It is desirable that these issues be reviewed in a consultative manner with all parties affected.

The Task Force is to make recommendation to both the Minister for Finance and Treasury and the Governor of the Bank of PNG.

A Secretariat is located at the Deloitte Tower, Port Moresby to support the Task Force. It may be contacted on telephone No. 321 0710 and facsimile No. 321 0778. **Two copies** of each submission should be delivered by 4pm on **2nd September 2005** to the Secretariat office on 1st floor Deloitte Tower or posted to P.O. Box 1566, Port Moresby, NCD or sent by fax on the above number or via email at stf@daltron.com.pg.

2 Review of the Implementation of the Superannuation Act

The Superannuation (General Provisions) Act 2000 extends coverage of superannuation to public sector employees, including the military, and private sector employees in entities with 20 or more employees. Section 2 of the Act states that the purpose of the Act is to promote compulsory savings for retirement through contributions to superannuation by employers and employees and to ensure member funds are prudently managed and protected within a viable and competitive superannuation industry.

The key intent of the Act is therefore to promote financial independence for retired people by increasing their level of savings up to the point of retirement.

The superannuation legislation to which this Paper makes reference is the *Superannuation (General Provisions) Act 2000* and the *Superannuation Regulation 2002*; together with amending Acts and Regulation, the *Superannuation (General Provisions) (Amendment) Act 2002*; *Superannuation (General Provisions) (Amendment) Act 2004*; and *Superannuation Regulation (Amendment) 2004*.

2.1 Bank of Papua New Guinea as a Regulator

Section 7 of the Act requires the Bank to promote the general stability, regulation and supervision of the superannuation industry for the protection of the rights and interests of members. Subsequent provisions of the Act extend very wide powers and obligations to the Bank in pursuit of these functions, including:

- the fit and proper requirements
- power to impose conditions on licences
- information and investigation powers
- prudential standards

Under the Act, the Bank is required to ensure that only approved superannuation funds accept and manage superannuation contributions in Papua New Guinea. It has applied objective tests under the Act including that:

- trustees have the capacity, experience and integrity to do the job;
- they can show that responsible officers have the integrity to meet the fit and proper persons test laid down in the Act; and
- they meet and demonstrate a capacity to continue to meet any prudential requirements placed on them by the Bank.

As part of its Terms of Reference, the Task Force is required to assess the Bank's capacity (in terms of manpower and technical expertise; and in terms of the effectiveness of the exercise of its powers) to fulfill its responsibilities under the Superannuation Act.

The Task Force will consider views from the stakeholders and interested public, on the performance of the Bank to date in carrying out its regulatory functions. In particular, the Task Force seeks advice on:

- whether the process of issuing licences conducted by the Bank was satisfactory;

- whether there has been any material problem in the execution of the Bank's other powers;
- whether the process of building capacity to supervise ASFs and other licence holders being conducted by the Bank is adequate; and
- whether there is any perceived shortcoming in the Bank's powers to regulate the industry effectively and prudently.

Some of the areas that the Task Force will consider include the performance of the Bank during the licensing process, on-site and off-site visits, and the effectiveness of enforcement of the Act, including any remedial and or punitive actions taken against those who breached the Act.

2.1.1 Fees of the Regulator

Under the current superannuation regime, trustees and service providers (fund administrators and investment managers) are required to apply for a licence and once a licence has been obtained, it has to be renewed annually before 1 January in any year, as per Section 19 of the Act.

The original Task Force in its Further Report of April 2002, recommended that the regulatory fees should be set in order to achieve partial, but not full, recovery of all direct and indirect costs incurred in the regulation of the industry.

Section 3C [as amended] of the Superannuation Regulation prescribes the application fee (K15, 000 non-refundable), annual renewal fee (K15, 000) for service providers and a supervision fee (equal to 0.143% of the value of the assets of the ASF at the end of the immediately previous year as disclosed in the most recent audited accounts) for a license of a trustee. The industry association, the Association of Superannuation Funds of PNG (ASFPNG), at its meeting of 11 June 2004 resolved to accept this level of supervision fee to apply to the years 2002 and 2003 (payable in 2004) with amount payable in 2005 to be determined in consultation with the Association. This matter of fees has been referred to the Task Force for its consideration.

Section 19 of the Act provides that a licence may be renewed on payment of the prescribed fee. That is, if the prescribed fee is not paid then a licence lapses. It is therefore vital that invoices to be despatched by the Bank so that each licensee can renew its licence. This despatch by the Bank must be timely, well in advance of the end of the year, to allow time for payment and to ensure sufficient notice is given of implications of non-payment of the fee.

The Task Force notes that if the level of the supervision fee is to be varied then an amendment is required to Regulation 3C.

In determining the appropriate level of supervision fee, the Task Force will consider a fair cost (direct and indirect) associated with the regulation of the superannuation industry and the public good element of superannuation.

2.1.2. Financial Requirements

Section 12 of the Act sets down certain minimum requirements for the issuing and renewal of licenses. This section refers to financial requirements. Regulation 3D specifies the level of these financial requirements for the purposes of this section. This regulation stipulates that the total net tangible assets of a trustee that itself holds assets of the ASF must be K250,000 while an ASF trustee holding no assets is nil. It also requires that a licensed fund administrator must hold total net tangible assets of K250,000 and a licensed investment manager must hold K500,000. The Act provides the option of approved guarantees to the up front provision of these amounts.

The general intent of the financial requirements is to ensure, as far as practicable, that the financial position of a licence holder reflects an appropriate capital commitment to the business of that holder. It asks new entries to the industry to put their ‘chips on the table’ in the sense that each licence holder responsible for superannuation members’ interests is committed to longer term operation and development of superannuation in PNG.

It is understood that some Trustee companies have not complied with these financial requirements. Some funds have formed the view that such requirement is neither necessary nor feasible in the case of not-for-profit trustees.

These matters have been referred to the Task Force. The Task Force will consider the current licensing regime, and advise the Bank accordingly in determining a minimum capital requirement for trustees.

2.1.3 Prudential Standards

The Central Bank as the Regulator has issued the following Prudential Standards:-

- Superannuation Prudential Standard No.1 of 2004 – Authorised Superannuation Fund Investments; and
- Superannuation Prudential Standard No.2 of 2004 – Management Expense Ratio’s, Trustee Fees and Entitlements

These prudential standards can be found on the Bank’s website at www.bankpng.gov.pg, than go to financial systems.

The Task Force will consider ways in which prudential standards can be enhanced to achieve the objective of sound prudential management of superannuation, particularly the need for a prudential standard on:

- return on fund assets and crediting rate policy;
- dealing with bad and doubtful debts; and
- treatment of unfunded liabilities.

The Task Force welcomes comments on the appropriateness of the Prudential Standard including, in particular, the industry’s compliance with the

calculation and reporting of management expense ratio's. And on Investment Guidelines, particularly in the light of relaxation and delegation of exchange controls to commercial banks and other stakeholders.

2.2 Industry Performance and Corporate Governance of the ASFs

The fundamental aim of the superannuation legislation is to ensure that the superannuation funds are operating in the members' interest and that member funds are being prudently managed.

The Task Force is, therefore, critically concerned to identify whether the ASFs have been operating effectively and achieving member and community satisfaction. From the growth in members and the level of funds under management, it seems clear that the general level of confidence in the superannuation system and in the governance of funds has greatly improved. However, the Task Force would like to test this directly with the parties involved.

The Act is designed to achieve greatly improved accuracy and efficiency in recording members' entitlements. To achieve this, employers need to work with the funds to enable accurate and timely collection and recording of contributions. The Task Force seeks comments on how effectively this is occurring in practice in both private and public sectors.

A related objective of the reformed system is to improve preservation – i.e. the extent to which member balances are retained in superannuation until retirement or other exit from the workforce. The reformed system seeks to discourage or prevent early withdrawal other than in prescribed circumstances. The Task Force will seek to establish the extent to which this objective is being accomplished and the reasonableness of the current withdrawal criteria.

The level of understanding of the importance of saving for the retirement years varies greatly in different sections of the community, but in general is acknowledged to be much too low. There is a responsibility on the Bank as regulator, the industry association and the individual funds to collaborate in education and communication with members in order to improve understanding of how the superannuation system operates, and how to provide adequately for retirement through the system. Trade Unions, in representing member interests, also have a responsibility in this regard. The Task Force has the impression that much remains to be done in this area.

The Task Force therefore invites comments on the issues such as:

- Is there evidence that the level of preservation in the industry has improved?
- Is there evidence of effective education of contributors by the responsible parties to improve understanding of the Superannuation System.
- To what extent are there voluntary contributions above mandatory level?
- Have the levels of investment returns on member funds been satisfactory?

Within the Administration framework of each ASF:

- Are the members satisfied with the level of service being provided to them by ASFs?
- Is the complaints mechanism required by Section 49 B working effectively?
- How promptly and accurately are members' records and essential member information such as date of birth, address and beneficiaries, now being collected and updated?
- Has the level of disclosure and reporting to members been regular, comprehensive, detailed and complete.
- Is the ASF meeting accounting standards and requirements for financial reporting?
- Is the ASF meeting their statutory requirements for reporting to the Bank?
- Does the ASF have in place, other corporate governance structures that satisfy member and community standards and expectations?

2.3 Duty to Remit Contributions Promptly

The superannuation legislation (Section 4) requires employers employing or engaging 20¹ or more employees to make mandatory superannuation contributions (both employee and employer shares) to an ASF. The Act (Section 78) also requires employers to promptly remit the employer and employee contributions to an ASF within 14 days of the end of each calendar month.

There might be instances in both public and private sectors where employers described under Section 4 are avoiding this requirement. The Task Force, therefore, will consider issues such as:

- What to do with employers who are employing 20 or more employees but are not making mandatory superannuation contributions?
- Who is responsible for ensuring that employers covered under this Act comply with this requirement?

The current legislation (Section 79 of the Superannuation Act [as amended]) allows ASFs to give written notices to defaulting employers to make payment of the outstanding contributions, together with the penal interest but Section 79 does not specifically refer to the recovery from the defaulting employers of the members' contributions and the penal interest thereon. It has been considered these monies would accrue to the Bank.

However by operation of the Act the contributions and interest, once due, vests in the Fund. The licensed trustees of the Fund, by law are entitled to act in the best interest of its beneficiaries, the contributing employees. It would appear that the recovery of outstanding contribution on behalf of its beneficiaries by the trustee is a right that is inherent in its appointment as the Trustee.

¹ Section 4 (as amended) states that prescribed number of employees will reduce to 15, by May 2007.

Therefore the right to sue and recover contributions does not depend on Section 79 or any other specific provision of the Act:- it is an inherent power vested in the Trustee by virtue of its appointment. Under this view, the Writ of Summons and or Default Summons in the civil proceedings for recovery of outstanding contributions can be drafted in a manner that clearly states that the licensee sues in its capacity as the Trustee of the Fund. A related issue is whether the assets of a company should be held while the court process is in progress.

The Task Force will consider whether amendment is necessary to deal with situations where defaulting employers fail to pay the outstanding contributions, together with the penal interest at the expiration of the date on which the payment was due.

2.4 Impact of the Act on Small ASFs

Inspections conducted by the Bank noted that a number of small ASFs (more than 10 members but less than K100 million under management) have encountered difficulty in meeting the basic regulatory requirements of the Act, including reporting requirements and separation of functions.

The Task Force will consider the impact of the Act on the small ASF, taking into account their ongoing ability to meet the licencing and supervision requirements and fees, as well as the arrangements for their operations and recommend appropriate action which will ensure the ongoing integrity of the industry as a whole.

3 Application of the Superannuation Act

The Task Force will also review the effectiveness of separation of functions required under the Act, particularly in regard to arms length transactions.

The Task Force is aware of the view that a number of inconsistencies in interpretation and administration may have arisen in the implementation of the Superannuation Act. The Task Force seeks specific advice of any such inconsistencies.

3.1 Payment of Entitlements

The interpretation and administration of Section 90 [as amended] of the Superannuation Act has posed some difficulty for some ASFs, particularly in areas of housing withdrawals, employment benefit and withdrawal of member entitlements including non-citizens departing permanently.

3.1.1 Guidelines for Housing Withdrawals

Section 90 H (as amended) of the Superannuation Act allows a member to withdraw up to a maximum of 60% of his/her entitlement (employer and employee contributions plus accumulated interest) as a housing advance, after contributing to an ASF for 5 years or more. The Act specifically requires the housing advance to be utilized for the purchase or construction of a member's principle place of residence.

The Act provides a general parameter in which the housing advance (up to 60%) is allowed, but does not provide specific guidelines as to how the housing advance can be utilized. However, the industry association, in

consultation with the Bank, has developed guidelines, including the allowable items (building materials, labour costs, white goods etc) that may be included.

The Task Force will consider comments on these guidelines and assess whether they should form the basis of a Prudential Standard to enable their enforcement.

3.1.2 Administration of Unemployment Benefit

Under the current legislation (Section 90[1][g] [as amended] of the Superannuation Act), member funds may be accessed on grounds of unemployment after a waiting period of 12 months.

The legislation (Section 90[5] [as amended] of the Superannuation Act) also provides an option for member funds to be accessed after three months, where the member has not been re-employed after three months of continuous unemployment, under the following rules:

- the member can withdraw the full amount of his/her entitlement, where the member's account has less than K1000.00 standing to his/her credit; and
- where the member's account has more than K1000.00 standing to his/her account, the member can withdraw on a monthly basis, - the larger of –
 - (i) K200; or
 - (j) up to 50% of the member's last monthly salary or wage:

until such time as the member is re-employed, or the member's account is exhausted, or the 12-months waiting period under Section 90[1][g] has lapsed to allow the member to withdraw the balance of his/her account.

The Task Force will consider any proposals (while maintaining the 12-month and 3-month waiting period) that are simpler to administer (and do not create substantial costs in administration) and ensure that the interpretation does not undermine preservation which is the objective of the Act.

3.1.3 Withdrawal of Member Entitlements – Permanent Departing and Non-Citizen Members

The current superannuation regime (Section 90(1)(f) & (2)) provides that where a member permanently emigrates from PNG his contributions will not be paid to him until after one year has lapsed since departing from PNG. In the case of a non-citizen member, all contributions made prior to 31st May 2002 can be paid to the member immediately upon departure, while the balance of the contributions made after 31st May 2002 will be paid to the member after one year has lapsed since departing from PNG.

It has been represented that the administration of these arrangements can be cumbersome and the costs associated with exchange rate risks and foreign exchange controls can be substantial.

3.1.4 Mandatory Non-Citizens Superannuation

The current exemption for non-citizens from making mandatory contributions will expire in May 2007. The Task Force will consider whether after the expiry of the exemption, the mandatory contributions for non-citizens should be either abolished or amended to voluntary contribution.

3.1.5 Payment of Entitlements – Procedure where there is No Nominee(s)

Section 94 [as amended] of the Superannuation Act requires a member to nominate a qualified person² to receive the member's entitlement at the time of the death of the member. The Trustee of an ASF is required to update and renew the records, at least annually, of the member's nominees as beneficiaries.

There are, however, situations where no nomination has been made at the time of the death of a member, or no nominee is still alive.

Section 95 outlines the procedure in which the amount standing to the credit of the member should be paid when no valid nomination has been made or no nominee is still alive, at the time of the death of a member. This section, while intended to be culturally sensitive, leaves a great deal of latitude to the courts in this regard and does not provide a specific criteria and procedure for determining and verifying the beneficiaries.

The Task Force will consider who should be responsible for determining who will receive the benefits where there is no beneficiary nominated or no nominee is still alive. The criteria and procedures for determining and verifying the beneficiaries should be clear and operable, minimising the chances of any dispute ending up in Court.

3.2 Provision of Life Insurance

The Act no longer enables an ASF to provide life insurance for its members from superannuation contributions. The Act provides for additional contributions on a contributor by contributor basis for the purpose of life insurance, [Section 90 (6)] but this arrangement appears impracticable. The Task force will consider whether a limited reintroduction of scope for group provision of life insurance would be warranted by those funds which consider their members have been disadvantaged by the Act in this regard.

3.3 Protection Against Attachment

Sections 96 and 97 of the Superannuation Act allow's absolute protection of a member's contributions held by an ASF. Those contributions cannot be assigned or charged or made liable to attachment under any decree or order of any Court in respect of any debt or liability incurred by the member. This

² Note that "qualified person" in relation to a member, means any one or more of the following: -

- (a) a member or members of his family; and
- (b) any other person or persons.

includes payments made to the nominees of the deceased member so that the entitlements paid to a nominee shall not be made subject to any set off, counterclaim, fee, cost, charge or other deduction. The protection also covers proceedings under the *Insolvency Act Ch.253* so that the official trustee shall not be entitled to any claim on the contributions of the member.

The Task Force will consider whether the absolute protection should be qualified so that in specific situations the contributions could be used to offset the members liability.

4 Repeal of POSF and DFRBF Acts

Schedules 6 and 7 [as amended] of the Superannuation Act foreshadow extensive repeal of sections of the *Public Officers Superannuation Act 1990* and *Defence Force Retirement Benefit Fund* (Chapter 76) and Regulation (Chapter 76).

By a gazettal notice No.G79 published on the 9th May 2002 the *Superannuation (General Provisions)(Amendment) Act No.4 of 2002* became effective, enabling the repeal of those sections as at the 31 December 2002. The Task Force consider whether with the elapse of time, further sections can be repealed, with the residual sections (mainly covering member entitlements) being saved as schedules to the Superannuation (General Provisions) Act.

The Task Force will also consider any outstanding issues relating to the two Acts for inclusion in the Superannuation Acts.

Other Issues

The Task Force will also consider views and comments from the stakeholders and interested public on other issues not covered by this Paper, but specified in its Terms of Reference.

Attachment A: Terms of Reference for the Joint Task Force: Review of the Regulation of the Superannuation Industry in PNG

Background

This statement sets out the terms of reference for the conduct of a review of the regulation of the superannuation industry in PNG. The Superannuation (General Provisions) Act 2000 (the ‘Act’) was implemented in 2002 following a review by a Superannuation Task Force. This Task Force recommended in its Further Report to the Government dated April 2002 that a follow-up review should be conducted after a period of implementation of the Act to determine the effectiveness of the new legislation.

The Superannuation (General Provisions) Act 2000 became effective on 9 May 2002. It had a transition period of one year (up to 8 May 2003) to allow existing funds to settle issues on the transfer to the new regime. The Bank of Papua New Guinea (“the Regulator”) processed licensing applications from trustee entities, fund administrators and investment managers during the transitional period, which was extended by six months (up to 8 November 2003) to complete processing of all applications. The legislation became fully effective on 9 November 2003.

As noted by the IMF, these reforms have seen a general restoration of confidence in superannuation and a significant growth in contributors’ funds. This Review is not intended to reconsider the basic elements of the reformed system, nor indeed to revisit any policy issue. The Task Force is thus not in a position to consider such matters as the mandatory character of the superannuation system, the move to defined contribution accumulation funds, the shift back to the original retirement income objective, and regulation under unified legislation supervised by the Bank. However, as is common with extensive systemic change, various issues have arisen concerning some legislative provisions or guidelines developed under the Act, and the conduct of the regulators extensive new powers and responsibilities. It is desirable that these issues be reviewed in a consultative manner with all parties affected.

A Task Force has therefore been established, to review the effectiveness of the administration and prudential management of regulatory regime established by the Act and associated regulation. This Task Force will provide a report to both the Minister for Finance and Treasury and the Governor of the Bank of PNG.

Membership of the Task Force

The Task Force is to be comprised of four (4) members to be chaired by Lady Mina Siaguru. The other members are Mr Greg Taylor, Mr John Jeffery and Andrew Oaeko.

Objective of Review

Consistent with maintaining and enhancing the reforms embodied in the Superannuation (General Provisions) Act 2000, the Superannuation Task Force will evaluate, report and recommend on eight specific terms of reference:

1. The effectiveness of the implementation of the Act and the ways in which its administration can be improved, in particular to:
 - (a) assess and determine a suitable licensing and regulatory (supervision) fee structure; and

- (b) assess and determine a suitable minimum financial requirement for each class of licence holders; and
 - (c) confirm the legality of transfer of fund assets and liabilities from the old trustee to the new trustee entity during the transitional period.
2. The effectiveness of the implementation of the requirements of the Act by superannuation funds and the licensees operating under the Act, drawing as appropriate from the inspections conducted by the Bank and the work undertaken by professional service providers and any other relevant advice from the Bank to:
- (a) assess and determine the impact of the Act and associated regulation on the financial sustainability of small ASFs (more than 10 members, less than K100m under management) and their ability to comply with the regulatory requirements and to advise on the way forward;
3. The effectiveness and capacity of the BPNG in fulfilling its central responsibilities under the Act including but not limited to:
- (a) its conduct of the licensing process;
 - (b) the assessment of technical expertise and manpower that the Bank requires to effectively enforce the requirements of the legislation and to advise on the way forward;
 - (c) its powers to prosecute breaches of the Act.
4. The awareness of employers, superannuation fund members and the other employees towards their rights and responsibilities under the legislation regarding, in particular:
- (a) their acceptance of the need for regular contribution and the rights of preservation of superannuation monies; and
 - (b) whether employers have met their duty to remit the contributions on a fortnightly basis those contributions deducted from employees, and also those remittances on behalf of the employees, on a regular basis within 14 days of the end of each calendar month; and
 - (c) the need for enforcement in the event of breach of those duties and which institution or agency is responsible for undertaking that enforcement.
5. The ways in which the administration of Acts and associated regulation can be enhanced to achieve the objective of sound prudential management of superannuation by reviewing in particular:
- (a) the unemployment withdrawal process;
 - (b) housing withdrawal rules;
 - (c) non-citizen superannuation;
 - (d) members insurance within the superannuation environment;
 - (e) protection against attachment;
 - (f) trustee governance;

- (g) transfer of benefits between ASF's;
 - (h) the desirability or otherwise of releasing benefits to members under compassionate grounds;
 - (i) review of any inconsistency in the Act in regards to investment in loans against arms length transactions – Section 72; and,
 - (j) payment of benefits to beneficiaries.
6. The ways in which prudential standards can be enhanced to achieve the objective of sound prudential management of superannuation including the need or otherwise for a prudential standard on:
- (a) return on fund assets and crediting rate policy;
 - (b) consistency in dealing with bad and doubtful debts; and
 - (c) treatment of unfunded liabilities.
7. Repeal of Public Officers Superannuation Fund Act 1990, Defence Forces Retirement Benefits Fund Act 1974 and any other residual Acts concerning superannuation;
8. The implications, if any for the administration of the Life Insurance Act 2000 of matters considered under the above terms of reference, in particular:
- (a) The way the BPNG administers both superannuation and life insurance;
 - (b) Any implications including matters related to group life cover and life insurance; and
 - (c) Implications of matters considered under Terms 5 (d) and term 5 (i).

The Task Force shall publish a paper identifying issues and inviting members of superannuation funds, other stakeholders, and interested parties to raise issues and to submit evidence and opinion to the Task Force. The Task Force shall report initially to the Minister of Finance and Treasury and the Governor of the Bank of Papua New Guinea by the end of September 2005. A Secretariat will be established by the Bank of PNG to facilitate the work of the Task Force.