12 December 2018

Manager, Early release of superannuation
Retirement Income Policy Division
The Treasury
Langton Crescent
PARKES ACT 2600

By email to: superannuation@treasury.gov.au

Dear Sir/Madam

Re: Review of the early release of superannuation benefits

The Royal Australian and New Zealand College of Psychiatrists (RANZCP) welcomes the opportunity to provide feedback to The Treasury regarding the draft proposals for the early release of superannuation benefits.

The RANZCP is the principal organisation representing the medical specialty of psychiatry in Australia and New Zealand and is responsible for training, educating and representing psychiatrists on policy issues. The RANZCP represents more than 4000 qualified psychiatrists in Australia, and is guided on policy matters by a range of expert committees.

The RANZCP supports the findings of the review for continuing to allow early release of superannuation on compassionate and severe financial hardship grounds in certain circumstances. The RANZCP also supports the position that current regulatory controls are sufficient and there is no need for much stricter preservation rules.

The RANZCP strongly supports proposed changes to strengthen the integrity of the current arrangements, specifically:

- The eligibility criterion for release on mental health grounds should be tightened by replacing ‘alleviate an acute or chronic mental disturbance’ with ‘treat a diagnosed mental illness or behavioural disorder’. This will ensure consistency with medical terminology and provide a higher but appropriate threshold for release.

- To secure early release on medical grounds applicants should be required to obtain certification from a specialist in the field relating to the individual’s injury or illness (rather than a specialist in any field) and one of the two required medical practitioners must have an existing relationship with the applicant.
The RANZCP would also like to reiterate previous advice that the lack of publically funded mental health services and the large out-of-pocket expenses creates undue financial burden on people with mental illness that is likely to compound their mental health issue.

If you would like to discuss any of the issues raised in the submission, please contact Rosie Forster, Executive Manager, Practice, Policy and Partnerships via rosie.forster@ranzcp.org or by phone on (03) 9601 4943.

Yours faithfully

Dr Kym Jenkins
President

Ref: 1313o