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Risky Business

The majority of Australia's largest super funds disclose no consideration of climate risk

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Executive Summary

Despite recent guidance from the Australian Prudential Regulation Authority[1] (APRA), which identifies climate risks as “distinctly financial in nature” and that “many of these risks are foreseeable, material and actionable now”, 82 of Australia’s 100 largest superannuation funds disclose inadequate or no tangible evidence that they have considered the impact of climate risk on their investment portfolios.

According to a recent legal opinion, “climate change risks can and should be considered by trustee directors to the extent that those risks intersect with the financial interests of a beneficiary of a registrable superannuation entity”[2]. Furthermore, according to Barker et al., “passive or inactive governance of climate change portfolio risks is unlikely to satisfy [trustees’] duties”[3]. Superannuation fund trustees who fail to consider and disclose climate risks are thereby putting themselves at risk of breaching their duties to members.

Market Forces’ analysis of Australia’s 100 largest superannuation funds, representing 99% of all large superannuation fund assets[4], found that:

- **60 funds disclose no tangible evidence that they have considered the impact of climate risk on their investment portfolios;** these funds are responsible for over $393 billion or 29.2% of all large superannuation fund assets and 8.8 million member accounts;

- **22 funds disclose inadequate evidence that they have considered climate risk** ($306 billion or 22.8% of large superannuation fund assets and 5.2 million member accounts);

- **18 funds disclose adequate evidence that they have considered climate risk** ($646 billion or 48% of large superannuation fund assets and 12.4 million member accounts);

- **Retail funds represent the largest proportion of assets under management of the group of funds that disclose no consideration of climate risk** (52%);

- **Funds that disclose no consideration of climate risk are typically smaller;**

- **Corporate funds do not seem to be influenced by their parent policies** – there is a significant disconnect between the lack of action in addressing climate risk between corporate funds and the policies of their ‘group’ or ‘parent’[5] companies;

- **Just nine funds provide regular updates or research to members on climate risk;** even those funds providing ‘Adequate’ disclosure publish limited regular updates or company/investment specific information.

This report does not seek to rank funds other than by which meet certain criteria for climate risk disclosure.

Defining climate risk in Australia

The Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD) defines 'climate-related risks' as consisting of various transition risks and physical risks[6]. The Task Force "believes climate-related risks are or could be material risks for many organisations" and that asset managers and asset owners, such as super funds, have an important role to play in influencing the companies in which they're invested. According to the TCFD, this will "improve pricing of climate-related risks, and lead to more informed capital allocation decisions"[7].

Transition risks
Transitional risks include those posed by changes in public policy, the disruption to the energy sector from technological change, changes in demand for certain commodities (coal, for example), the threat of litigation brought against organisations that have failed to address climate change, and reputational damage to organisations that inhibit the transition to a low-carbon economy.

Physical risks
Physical risks include the increased frequency and severity of extreme weather events, and the impacts of rising sea levels and sustained warmer temperatures.

The TCFD concluded that those industries that account for the largest proportion of greenhouse gas (GHG) emissions, and energy and water usage, are particularly vulnerable to climate risk. These include the Energy, Materials and Buildings, Transportation, and Agriculture, Food and Forestry sectors[8].

This is particularly relevant for Australia, "given the size of [its] superannuation sector and its heavy weighting towards carbon-intensive equities"[9]. According to the S&P Dow Jones Indices Carbon Scorecard, the S&P/ASX All Australian 50 index "had the highest level of embedded emissions in proven and probable fossil fuel reserves and the greatest percentage of revenues derived from coal-based activities, making it the most exposed index to potential stranded assets"[10]. This reflects the exposure of not just the companies directly involved in coal extraction, but companies indirectly involved, including lenders and support services.

Unsurprisingly, most Australian super funds have a significant allocation to Australian equities"[11]. According to the Association of Superannuation Funds of Australia (ASFA), as at 31 March 2017, $355 billion or 24% of all large superannuation fund assets were invested in Australian listed equities[12]. Given that the 50 largest listed companies account for approximately 80% of the benchmark S&P ASX300 index[13], nearly all super funds have significant exposure to potentially stranded assets in their Australian equities portfolios.

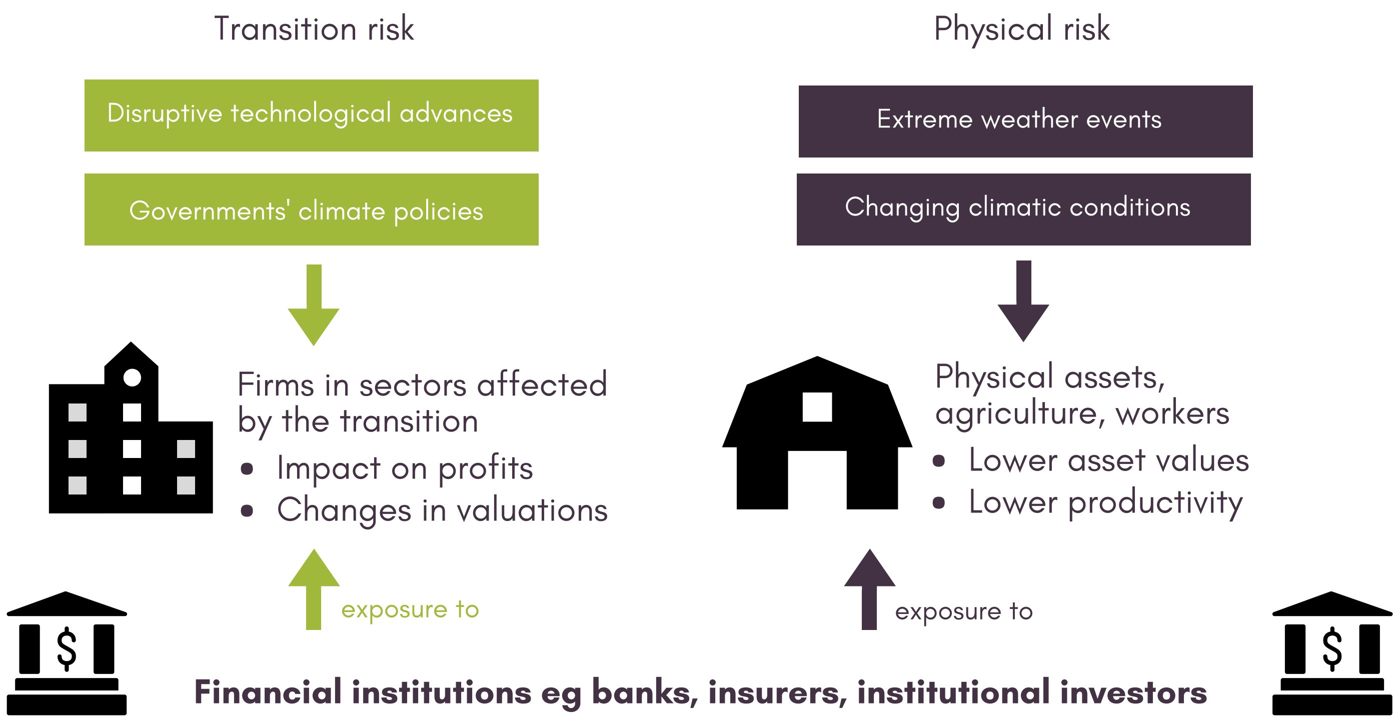
Climate risk is by no means limited to listed equities. According to the TCFD, "the development and use of emerging technologies such as renewable energy, battery storage and energy efficiency" represents a transition risk to some infrastructure assets[14]. Furthermore, both infrastructure and property assets are vulnerable to "event driven (acute) or longer-term shifts (chronic) in climate patterns"[15].

Climate Risk is No Longer a 'Future Problem'

Many funds, it seems, still consider climate risk to be a 'future problem', and not one that will impact their portfolio in the short or medium term. In a speech to the Insurance Council of Australia in February 2017, APRA Executive Board Member Geoff Summerhayes noted that climate risks "have often been seen as future or non-financial problems", but made it clear "that this is no longer the case"[16].

Recent developments in technology have huge implications for the Energy and Utilities sectors, with the potential to reduce coal, oil and gas demand in the short to medium term. Oil major Royal Dutch Shell plc forecasts demand for oil to peak in as little as five years[17]. APRA's Summerhayes stressed that "climate-related risks are likely to be relevant and important, not only for insurers but for all APRA-regulated entities", which includes super funds, and that "many of these risks are foreseeable, material and actionable now"[18].

In an opinion commissioned by The Centre for Policy Development and The Future Business Council in October 2016, Noel Hutley SC and Barrister Sebastian Hartford-Davies reasoned that "'climate change risks' are capable of representing risks of harm to the interests of Australian companies, which would be regarded by a court as being foreseeable at the present time"[19]. As large investors in Australian companies, both listed and unlisted, it is imperative that superannuation trustee directors understand the immediate implications of climate risk across the asset classes and economic sectors in which they're invested.



Adapted from *Bank of England Quarterly Bulletin, 2017 Q2*

Climate Risk is Not Just an 'Ethical Problem'

For many super funds, climate change is perceived as strictly an Environmental, Social or Governance (ESG) issue. Yet, according to APRA, "the days of viewing climate change within a purely ethical, environmental or long-term frame have passed"[20]. Unlike other ESG issues, climate change brings "potentially profound implications for insurers, financial stability and the economy"[21], and "system wide implications that APRA and other regulators here and abroad are paying much closer attention to"[22].

Yet one of the most common responses by super funds to member enquiries about climate risk is to pigeonhole their concerns as an ethical issue rather than a material, financial risk. To appease concerned members, dozens of funds have created or modified 'ethical' or 'socially responsible' investment options. These options restrict investment in carbon intensive companies, with screens varying greatly from one option to the next. All such investment options imply to members that climate change is strictly an ethical or social issue, rather than an economic one, as many funds confine action on climate risk to just the ethical option.

"It is the treatment of climate change as a financial risk (as distinct from the treatment of climate change as a environmental, social or governance issue) that trustee directors ought consider in an appropriate case when fulfilling the requirements imposed by the [Superannuation Industry Supervision] Act."
- Noel Hutley SC and Barrister James Mack

In a recent opinion commissioned by Market Forces, Noel Hutley SC and Barrister James Mack stated "climate change risks can and should be considered by trustee directors to the extent that those risks intersect with the financial interests of a beneficiary of a registrable superannuation entity"[23]. Those financial interests apply equally to all members of a superannuation fund, not simply those that consider ongoing investment in fossil fuels to be an ethical issue.

Of the funds that offer 'divested' ethical or socially responsible options, some appear to consider climate risk across the entire fund, others do not. It is incumbent upon funds that offer 'divested' investment options to also inform other members how climate risk is being managed in their portfolios as well. Referring members concerned about climate risk to ESG or sustainability policies is simply not an appropriate response to what is now widely considered a material, financial risk.

Trustees' Legal Duty to Consider Climate Risk

Noel Hutley SC and Barrister James Mack have opined that "climate change risks can and should be considered by [superannuation fund] trustee directors to the extent that those risks intersect with the financial interests of a beneficiary of a registrable superannuation entity"[24]. Hutley and Mack reasoned that "this situation is most likely to arise if a trustee director is making a significant decision related to investments that are exposed to climate change risk"[25].

It is incumbent upon trustee directors to ensure the consideration of climate risk at every step of the investment cycle. Barker et al determined that "trustee directors are duty-bound to proactively engage with the issue of climate change in the governance of the fund"[26]. This may include assessing exposures to vulnerable sectors; reviewing policies, processes and strategy; and implementing appropriate risk management responses.

Hutley and Mack found that existing standards provide a framework for "determining when the financial effect of climate change risks may warrant consideration"[27], particularly through APRA's prudential standard SPS 530 Investment Governance.

When formulating an investment strategy and determining an appropriate level of diversification, the financial effect of climate change risk factors may need to be identified." - Noel Hutley SC and Barrister James Mack.

Trustee directors should exercise caution when investing in those sectors most vulnerable to climate risk. According to Hutley and Mack, "if a trustee director were confronted with a significant investment decision that involved a substantial exposure to climate change risks, it would be prudent to seek out information in relation to the risk and obtain advice on the risk". In practice, trustee directors should be aware of their exposure to vulnerable sectors of the economy, and how such exposures should be managed. Furthermore, particularly for large individual investment decisions - unlisted infrastructure or property, for example - trustee directors should be "satisfied that any investment was in the best interests of beneficiaries notwithstanding the risks"[28].

Failure to consider climate risk will put trustee directors at risk of breaching their fiduciary duties. Barker et al acknowledged the possibility that "a material misstatement of a fund's management of the risks and opportunities associated with climate change would be actionable against its trustee directors as a failure to exercise due care, skill and diligence"[29]. This suggests that super funds should afford climate risk the same degree of concern as other material risks.

The Importance of Disclosure

A key recommendation of the TCFD was that super funds provide "climate-related financial information" to members "so that they may better understand the performance of their assets, consider the risks of their investments, and make more informed investment choices"[30]. Yet the level of disclosure within Australia's superannuation sector is grossly inadequate. Market Forces research in 2016 found that 84% of assets under management in Australia's 50 largest super funds is undisclosed, equating to over $1 trillion in assets[31]. If super fund members are largely uninformed about the assets their fund is invested in, then any explanation of climate risk is likely to be shallow at best.

Hutley and Mack recommend that trustee directors record their consideration of climate risk[32]. In order to satisfy the recommendations of the TCFD, this information should be communicated to members. Of course, it would be impractical to disclose the thinking behind every investment decision, but significant investments in those sectors most vulnerable to climate risk should be subject to greater disclosure. Hutley and Mack stressed that "it would be prudent to record why a trustee director was satisfied that any investment was in the best interests of beneficiaries notwithstanding the risks". A significant investment in an illiquid fossil fuel infrastructure asset, for example, should be the subject of detailed consideration and disclosure. Furthermore, as the assessment of climate risk should not be static, regular updates should also be provided to members.

Transition Risk: an example


Image credit: Greenpeace

In May 2014, seven super funds acquired a stake in the Port of Newcastle, the world's largest coal export port. Despite the uncertain future facing the coal industry, none of the seven funds have disclosed to members the risks involved. Of the seven funds - Australian Catholic Super and Retirement Fund, AustSafe Super, BUSSQ Super, Energy Super, Meat Industry Employees Super Fund, Queensland Independent Education and Care Super and Sunsuper - only Energy Super actually discloses the existence of the investment.

It is imperative for super fund trustees to not just acknowledge and consider climate risk, but communicate as much to members. It is now commonplace for super funds to identify the risks their investments are exposed to, for instance, market risk, credit risk and liquidity risk. The TCFD recognised that reporting by asset managers and asset owners - like super funds - generally occurs outside mainstream financial filings, such as annual reports, but it encouraged the disclosure of climate risk to beneficiaries via "existing channels of financial reporting"[33]. In the Australian context, this would include annual statements, regular investment updates or other member communications. Disclosure of climate risk to members is as much about education as it is about risk awareness.

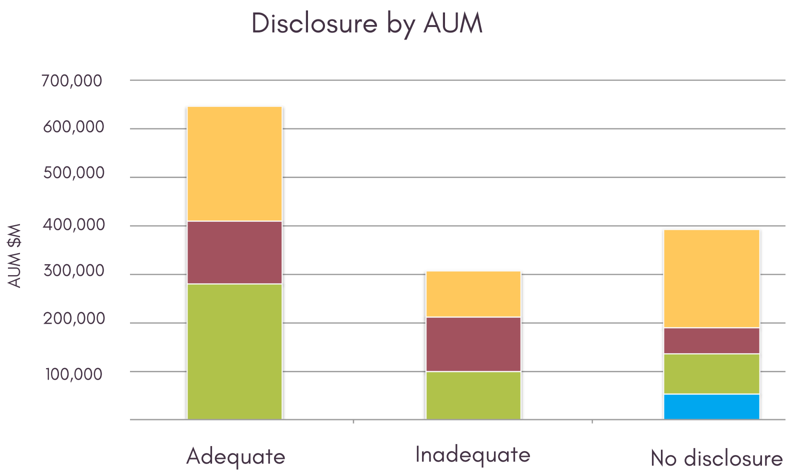
Methodology

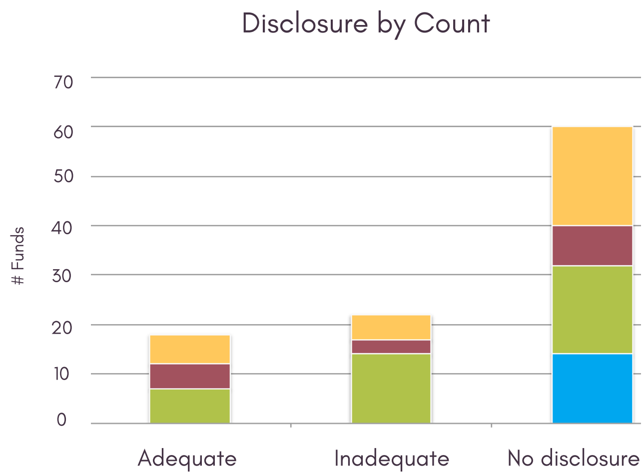
Market Forces reviewed the public disclosures of Australia's 100 largest superannuation funds by assets under management, including both APRA-regulated entities, and Exempt Public Sector Superannuation Schemes (EPSSS). Public disclosures included Product Disclosure Statements (PDS), supplementary information to PDS, annual reports, investment policies, ESG policies, climate change policies (where available), periodic investment updates, factsheets and websites. All online sources were accessed during the month of June 2017.

Super funds' climate risk disclosure was classified against the following criteria:

Adequate: discloses a public policy or position statement on climate change, or has published research discussing the impacts of climate risk on its portfolio
Inadequate: discloses an Environmental, Social and Governance (ESG), ethical or responsible investment policy that specifically mentions climate change or climate risk without any context or discussion; is a member of the Investor Group on Climate Change or has made a public commitment relating to climate change[34]
No disclosure: no mention of climate change or climate risk in any disclosure to members.

	Count	Total Fund AUM $M	Share of Total AUM %	Total Members	Average Fund AUM $M	Median Fund AUM $M
Adequate	18	646,456	50.2%	12,387,904	35,914	28,224
Inadequate	22	306,494	20.2%	5,194,623	13,932	6,483
No disclosure	60	393,331	28.7%	8,844,253	6,556	2,022
	100	**1,346,282**	**99.0%**	**26,426,780**	**13,463**	**4,392**





Corporate Industry Public Sector Retail

Findings

60 of Australia's 100 largest superannuation funds disclose no tangible evidence that they have considered the impacts of climate risk on their investment portfolios. These funds are responsible for $393 billion or 28.7% of all large superannuation fund assets and 8.8 million member accounts. These funds fail to mention climate change or climate risk in any communication to members.

22 of Australia's 100 largest superannuation funds disclose inadequate evidence that they have considered the impact of climate risk on their investment portfolios. These funds are responsible for $306 billion or 20.2% of all large superannuation fund assets and 5.2 million member accounts. These 22 funds provide a cursory mention of climate change in a sustainability or ESG policy, are a member of the IGCC or have made a public commitment on climate change without disclosure to members.

Just 18 of Australia's 100 largest superannuation funds disclose adequate evidence that they have considered the impact of climate risk on their investment portfolios. These funds are responsible for $646 billion or 50.2% of all large superannuation fund assets and 12.4 million member accounts. These funds provide detailed information to members about how they view and manage climate risk.

Retail funds represent 52% of assets under management of the group of funds that disclose no consideration of climate risk; despite retail funds accounting for just 31% of the assets under management in the 100 largest superannuation funds. This may be due to the fact that the majority of retail members are channelled through financial planners, or platforms, allowing funds to deflect the responsibility for managing climate risk onto external fund managers or indeed the members themselves, by providing the choice of 'sustainable' investment options.

Funds that disclose no consideration of climate risk are typically smaller. The median size of the 60 climate laggards is $2 billion, compared to a median of $9.4 billion for those providing adequate or inadequate disclosure. This is despite the presence of significant large funds within the list, including Colonial First State ($87 billion AUM), REST ($41.5 billion) and ANZ OnePath ($40.6 billion). This finding may seem relatively obvious, given that smaller funds have fewer staff, hence limited capabilities. However, there are several funds managing less than $10 billion, whose climate risk disclosures are far better than their much larger peers, including Local Government Super, Catholic Super and Vision Super.

Corporate super funds do not seem to be influenced by their parent policies. There is a significant disconnect between the lack of action in addressing climate risk between corporate super funds and the policies of their 'group' or 'parent' companies.

Just nine funds provide regular updates or research to members on climate risk. The lack of communication by funds to members about climate risk is stark; even those funds reporting 'Adequate' disclosure provide limited regular updates or company/investment specific information.

What does adequate disclosure look like?

In the absence of complete portfolio holdings disclosure in a format that is useful to members, and to avoid the ranking of alternative approaches, this study has not sought to determine the 'leading' fund on climate risk disclosure. There are, however, good examples of disclosure within the Australian superannuation sector. For example, here are two different approaches that met the criteria for 'Adequate' disclosure of climate risk consideration.

Cbus[35]	Local Government Super[36]

• Position statement
• ESG Policy
• Discloses 60-65% of portfolio holdings
• First super fund in Australia to commit to implementing final TCFD recommendations
• Fund is committed to:
  ◦ Actively measure, monitor and disclose the carbon emissions from its investment portfolio;
  ◦ Encourage our active external fund managers and the listed companies in which we invest to incorporate and consider climate change risk and opportunities in their investment processes;
  ◦ Actively participate in various climate change surveys and studies in order to share information about climate change investment best practice.
• Member of/signatory to:
  ◦ IGCC
  ◦ Paris Pledge
	• Responsible Investment Policy
	• Discloses 25-30% of portfolio holdings
	• Fund is committed to:
	  ◦ Manage the risks and take advantage of the opportunities associated with climate change;
	  ◦ Monitor the carbon performance of the portfolio and strive for improvements; Ensure that climate change risks are considered by LGS' advisors and investment managers;
	  ◦ Ensure that climate change risks are analysed as part of the due diligence procedures for new investments;
	  ◦ Participate in climate change related collaborative initiatives;
	  ◦ Communicate the climate change performance and activities to members.
	• Member of/signatory to:
	  ◦ IGCC
	  ◦ Montreal Pledge
	  ◦ Paris Pledge
	
	NB: Local Government Super also excludes investment in companies that derive one third or more of their revenues from high carbon sensitive activities (coal mining, oil tar sands and coal fired electricity utilities) across its entire portfolio.

Corporate disconnect

Corporate funds seem to be operating in an environment disconnected from the policies of the 'parent' companies which they nominally represent. Corporate funds are not-for-profit entities, run for the benefit of members, where trustee directors are typically company employees. Yet for many corporate funds, group policy does not seem to apply to the oversight of staff super funds. For example, none of CommBank Group Super, Qantas Super, Rio Tinto Staff Super and Telstra Super publicly acknowledge climate risk, yet each of the parent companies have made public statements, and in some cases, significant commitments on climate change.

"As a financial institution, we play a role in supporting the transition to a low carbon economy and will continue to actively seek opportunities to lend to, invest in, and support innovative technologies and businesses that decrease dependence on fossil fuels and mitigate the effects of climate change." [37]

Group statement: Commonwealth Bank
Staff fund climate risk disclosure? None

"Beyond 2030, we're targeting 'carbon neutral growth' and aiming to reduce net emissions by 50% by 2050, compared to 2005 levels." [38]

Group statement: Qantas
Staff fund climate risk disclosure? None

"Climate change will create risks and uncertainties for businesses and society... Rio Tinto is taking action to appropriately manage risks and capture opportunities, consistent with our objectives of delivering superior performance and creating long-term shareholder value." [39]

Group statement: Rio Tinto
Staff fund climate risk disclosure? None

"We believe that business has an important role to play in addressing global warming. We need to work in partnership with governments and the wider community to minimise the environmental, economic and social impacts of climate change." [40]

Group statement: Telstra
Staff fund climate risk disclosure? None

The need for regular disclosure

Just nine funds provide regular updates of portfolio carbon intensity to members - Australian Ethical, BT, Catholic Super, Cbus, Commonwealth Super Corporation, HESTA, Local Government Super, VicSuper and Vision Super. (AustralianSuper has only reported a one-off comparative, rather than absolute measurement). Carbon intensity is a widely used measure of carbon emissions per dollar invested (tCO2e per $m), and provides a useful tool for determining a portfolio's exposure to companies most vulnerable to carbon pricing risk. However, it is not suitable for identifying potential stranded assets, as coal miners for instance, are not necessarily energy intensive. Though it does provide a useful measure by which funds can be compared to one another, and how a portfolio's carbon intensity improves or declines over time.

Portfolio holdings disclosure is a vital component of climate risk disclosure, without it, members are blind to their true exposure. Mandatory portfolio holdings disclosure has been delayed for a number of years, but is expected to be implemented in 2018. Not only will this allow members to understand their exposure, but it will also provide another useful measure by which funds can be compared to one another.

Engagement with companies is a vital tool deployed by funds to manage climate risk, and to aid the transition to a low carbon economy. Yet transparency on engagement is almost non-existent. While many funds publish their proxy voting records, no fund publishes the outcomes of engagement with companies, particularly those in sectors most vulnerable to climate risk. Understandably, there are issues around confidentiality, but the industry must design an appropriate tool for the disclosure of engagement practices, in order to satisfy members that engagement is worthwhile, particularly with companies in the Energy and Utilities sectors.

Poor Risk Management or Poor Disclosure?

The level of disclosure and reporting on climate risks by many super funds is haphazard, confusing and often difficult to acquire. Most retail funds would prefer to direct members to financial planners than respond to questions about climate risk directly. In addition, many funds bury information relating to ethical and responsible investment in an obscure corner of their website, making it unnecessarily difficult for members to determine how the fund is addressing climate risk, if at all.

In the absence of mandatory disclosure standards, most funds have developed a culture of poor or non-disclosure, providing information to members on a "need to know" basis. In the digital age, this approach is no longer acceptable for any risk to which members are exposed, let alone climate risk.

As shown in this analysis, the vast majority of funds are not disclosing to members if or how they are managing climate risk. Whether this is because they are failing to consider it, or are preferring to keep members in the dark is difficult to tell. But as Hutley and Mack concluded, and as the TCFD recommends, it is incumbent upon trustees to record and communicate their climate risk consideration. Members have a right to know if and how their interests are being protected by competent climate risk management processes.

Conclusion

Super funds can no longer pretend that climate risk is a "future problem or a non-financial problem". Climate risks represent material, financial risks to the retirement savings of all Australians.

While there is no single, sector-wide method to manage climate risk, acknowledgement and consideration of the issue is clearly the first step. Yet, eighteen months after the seminal Paris Agreement, many super funds are either ignoring the risks, or failing to adequately communicate the risks to members. Without immediate action, trustee directors are putting themselves at risk of legal liability by failing to perform their fiduciary duties.

Recommendations

Members

Members should contact their fund and demand more information on how they are managing climate risk. You can do this at: superwitch.org.au/riskybusiness

Trustee directors

Trustee directors must consider climate risk as a financial risk as well as an ESG issue, ensuring that both investment and sustainability teams are equipped to act on trustees' decisions. Trustee directors' considerations of climate risk should be expressly communicated to members.

Super funds

Funds should commit to implementing the TCFD recommendations and improve climate risk disclosure, through the provision of regular, informative and engaging information, preferably via digital channels.

Regulators

Regulators should increase regulation and oversight to ensure all trustee directors are adequately considering the implications of climate risks in their investment portfolios, and that those risks are communicated to members in a relatively standardised format.

References

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2. Superannuation Fund Trustee Duties and Climate Change Risk, Noel Hutley and James Mack, 15 June 2017
3. Climate change and the fiduciary duties of pension fund trustees – lessons from the Australian law, Barker et al, Journal of Sustainable Finance & Investment, 2016
4. As at 30 June 2016; funds with more than four members; excludes self-managed super funds (SMSFs)
5. Corporate funds are not subsidiaries of the parent company, though trustees are typically company employees
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33. Recommendations of the Task Force on Climate-related Financial Disclosures, June 2017
34. Including the Global Investor Statement on Climate Change, the Montreal Pledge or Paris Pledge
35. Cbus' Climate Change Position Statement, August 2016
36. Sustainable & Responsible Investment Policy, Local Government Super, April 2017
37. Group Environment Policy, Commonwealth Bank, 2015
38. Our Commitment to Environmental Sustainability, Qantas
39. Climate Change Report, Rio Tinto, 2016
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Disclosure assessment

FUND NAME	AUM $M	MEMBERS	FUND TYPE	DISCLOSURE	POSITION
AMP[1]	109,809	3,584,915	Retail	Adequate	ESG Policy+Research
AustralianSuper	103,697	2,135,939	Industry	Adequate	Position+Research
BTFG[2]	80,115	1,204,838	Retail	Adequate	Position+Research
First State Super	57,092	751,116	Public Sector	Adequate	Position+Research
UniSuper	56,646	421,083	Industry	Adequate	Position+Research
Sunsuper	39,297	1,136,507	Industry	Adequate	ESG Policy+Research
Commonwealth Super Corporation	37,602	664,416	Public Sector	Adequate	ESG Policy+Research
HESTA	36,004	833,325	Industry	Adequate	Policy+Research
Cbus	34,493	735,178	Industry	Adequate	Position+Research
Mercer	21,956	214,443	Retail	Adequate	ESG Policy+Research
VicSuper	16,655	239,504	Public Sector	Adequate	Position+Research
State Super Retirement Fund	16,354	74,824	Retail	Adequate	ESG Policy+Research
Local Government Super	9,458	91,538	Public Sector	Adequate	ESG Policy+Research
Catholic Super	9,318	73,333	Industry	Adequate	Policy+Research
Russell Investments Master Trust	7,924	74,249	Retail	Adequate	ESG Policy+Research
Vision Super	7,791	101,098	Public Sector	Adequate	ESG Policy+Research
Christian Super	1,164	25,256	Industry	Adequate	Position+Research
Australian Ethical	1,083	26,342	Retail	Adequate	Position+Research
MLC[3]	81,105	1,256,526	Retail	Inadequate	ESG Policy
QSuper	66,126	558,735	Public Sector	Inadequate	Blog
ESSSuper	24,554	137,000	Public Sector	Inadequate	ESG Policy
GESB	22,149	290,000	Public Sector	Inadequate	ESG Policy
HOSTPlus	20,351	1,021,234	Industry	Inadequate	ESG Policy
Care Super	14,271	249,132	Industry	Inadequate	ESG Policy
MTAA Super	9,446	249,434	Industry	Inadequate	ESG Policy
equipsuper	7,635	48,182	Industry	Inadequate	ESG Policy
ACSRF	7,393	93,970	Industry	Inadequate	ESG Policy
NGS Super	7,307	98,631	Industry	Inadequate	ESG Policy
Statewide Super	6,670	170,820	Industry	Inadequate	ESG Policy
Energy Super	6,295	47,766	Industry	Inadequate	ESG Policy
Perpetual	5,321	487,186	Retail	Inadequate	ESG Policy
LUCRF	5,205	169,884	Industry	Inadequate	ESG Policy
Maritime Super	4,876	28,308	Industry	Inadequate	ESG Policy
Media Super	4,580	93,010	Industry	Inadequate	Paris Pledge
NAB Group Super	4,365	37,552	Retail	Inadequate	ESG Policy
BHP Billiton Super	3,478	20,591	Retail	Inadequate	ESG Policy
legalsuper	2,905	43,622	Industry	Inadequate	ESG Policy
REI Super	1,369	30,301	Industry	Inadequate	IGCC Member+Paris Pledge
Virgin Superannuation	549	19,507	Retail	Inadequate	ESG Policy
Nationwide Superannuation Fund	543	43,232	Industry	Inadequate	ESG Policy
Colonial First State[4]	86,987	2,194,685	Retail	No disclosure	NA
REST	41,522	1,960,282	Industry	No disclosure	NA

Disclosure assessment

FUND NAME	AUM $M	MEMBERS	FUND TYPE	DISCLOSURE	POSITION
ANZ [5]	40,568	1,040,557	Retail	No disclosure	NA
IOOF	24,455	424,705	Retail	No disclosure	NA
Super SA	21,693	210,158	Public Sector	No disclosure	NA
Telstra Super	18,069	101,953	Corporate	No disclosure	NA
Macquarie	15,972	92,109	Retail	No disclosure	NA
CommBank Group Super	10,197	74,557	Corporate	No disclosure	NA
Mine Wealth and Wellbeing	10,025	70,076	Industry	No disclosure	NA
LGIAsuper	9,952	83,742	Public Sector	No disclosure	NA
PostSuper	7,605	37,357	Public Sector	No disclosure	NA
Qantas Super	7,271	31,921	Corporate	No disclosure	NA
Suncorp	6,855	231,170	Retail	No disclosure	NA
Westpac	6,214	282,255	Retail	No disclosure	NA
Rio Tinto Staff Super	5,306	30,196	Corporate	No disclosure	NA
Energy Industries Super	5,067	21,594	Public Sector	No disclosure	NA
TWU Super	4,452	121,851	Industry	No disclosure	NA
Netwealth Superannuation	4,419	30,476	Retail	No disclosure	NA
Prime Super	4,205	121,584	Industry	No disclosure	NA
ANZ Staff Super	3,879	31,912	Corporate	No disclosure	NA
BUSSQ	3,803	85,489	Industry	No disclosure	NA
Tasplan Superannuation Fund	3,578	109,375	Public Sector	No disclosure	NA
Kinetic Super	3,272	277,240	Industry	No disclosure	NA
AON	3,113	74,292	Retail	No disclosure	NA
WASuper	2,627	40,773	Public Sector	No disclosure	NA
Club Plus Superannuation Scheme	2,465	90,723	Industry	No disclosure	NA
First Super	2,431	64,284	Industry	No disclosure	NA
Austsafe Superannuation Fund	2,091	133,583	Industry	No disclosure	NA
AvSuper Fund	2,059	6,580	Public Sector	No disclosure	NA
ING Direct Superannuation Fund	2,029	50,496	Retail	No disclosure	NA
Intrust Super Fund	2,015	121,207	Industry	No disclosure	NA
Alcoa of Australia Retirement Plan	1,999	6,266	Corporate	No disclosure	NA
Australian Meat Industry Superannuation Trust	1,893	67,456	Industry	No disclosure	NA
The Executive Superannuation Fund	1,867	43,375	Retail	No disclosure	NA
IAG & NRMA Superannuation Plan	1,806	15,615	Corporate	No disclosure	NA
ClearView Retirement Plan	1,693	22,903	Retail	No disclosure	NA
HUB24 Super Fund	1,684	9,518	Retail	No disclosure	NA
TAL Superannuation and Insurance Fund	1,545	96,078	Retail	No disclosure	NA
Guild Retirement Fund	1,344	74,734	Retail	No disclosure	NA
QIEC Super	1,268	25,890	Industry	No disclosure	NA
Zurich Master Superannuation Fund	1,183	39,794	Retail	No disclosure	NA
Mercy Super	1,019	13,016	Corporate	No disclosure	NA
Fiducian Superannuation Fund	985	5,365	Retail	No disclosure	NA
Challenger Retirement Fund	939	5,493	Retail	No disclosure	NA

Disclosure assessment

FUND NAME	AUM $M	MEMBERS	FUND TYPE	DISCLOSURE	POSITION
Toyota Super	878	5,876	Corporate	No disclosure	NA
The Bendigo Superannuation Plan	846	18,693	Retail	No disclosure	NA
Combined Super Fund	783	9,353	Industry	No disclosure	NA
Meat Industry Employees Superannuation Fund	740	23,777	Industry	No disclosure	NA
Holden Employees Superannuation Fund	693	4,407	Corporate	No disclosure	NA
Boc Gases Superannuation Fund	660	3,686	Corporate	No disclosure	NA
Victorian Independent Schools Superannuation Fund	644	8,726	Industry	No disclosure	NA
NESS Super	626	14,545	Industry	No disclosure	NA
Mars Australia Retirement Plan	598	2,393	Corporate	No disclosure	NA
Fire and Emergency Services Superannuation Fund	585	2,187	Public Sector	No disclosure	NA
IRIS Superannuation Fund	518	3,357	Retail	No disclosure	NA
Club Super	494	27,658	Industry	No disclosure	NA
Lutheran Super	472	7,074	Corporate	No disclosure	NA
AMG Super	472	7,038	Retail	No disclosure	NA
Concept One The Industry Superannuation Fund	466	30,903	Industry	No disclosure	NA
Goldman Sachs & JBWere Superannuation Fund	435	1,895	Corporate	No disclosure	NA

Fund AUM and members sourced from APRA, correct as at 30 June 2016

References:

1. Includes fund RSEs: AMP Superannuation Ltd, N.M. Superannuation Pty Ltd
2. Includes fund RSEs: BT Funds Management Ltd, BT Funds Management No.2 Ltd
3. Includes fund RSEs: MLC Nominees Pty Ltd, Nulis Nominees (Australia) Ltd, PFS Nominees Pty Ltd
4. Includes fund RSEs: Avanteos Investments Ltd, Colonial First State Investments Ltd, Colonial Mutual Superannuation Pty Ltd
5. Includes fund RSEs: Oasis Fund Management Ltd, OnePath Custodians Pty Ltd