

13 May 2016

Mr Pat Brennan
General Manager, Policy Development
Australian Prudential Regulation Authority
GPO Box 9836
SYDNEY NSW 2001

Sent via email: exemptiondp@apra.gov.au

Dear Mr Brennan

Response to APRA's Response to Submissions: Religious Charitable Development Funds

Anglican Funds South Australia ("AFSA") welcomes the opportunity to provide comment to your *Response to Submissions: Religious Charitable Development Funds*. We welcome the many helpful changes made to APRA's policy position, and also the opportunity you provided to meet with the APRA team at your offices in April.

We believe that the most helpful development is the proposed definition of Affiliate, and while noting the intention indicated by Mr Charles Littrel at the April meeting that this definition be as broad as possible, we see that one further change would be helpful.

The Anglican Church of Australia is a complex network of organisations all subscribing to the tenants of the Anglican Communion, but are not necessarily subject to common legal, or coercive control. AFSA believes that this situation would not be unique to the Anglican Church, and would suggest that APRA expand its definition of affiliate to include explicitly bodies corporate that have a common religious or charitable purpose.

We trust that our submission has been helpful to APRA. If I can provide and further information or assistance, please contact me at either janderson@adelaide.anglican.com.au or by telephone [REDACTED]

Yours sincerely



Jamie Anderson
Head of AFSA