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20 August 2026

Submission: Proposed updates to superannuation reporting standards (SRS 533.0, SRS 610.2, SRS 101.0) and revocation of SRS 001.0

Executive Summary

Submission: Proposed updates to superannuation reporting standards (SRS 533.0, SRS 610.2, SRS 101.0) and revocation of SRS 001.0

We welcome the opportunity to comment on APRA's proposed amendments to Reporting Standard SRS 533.0 Asset Allocation, Reporting Standard SRS 610.2 Membership Profile, associated definitions in SRS 101.0, and the proposed revocation of SRS 001.0 Profile and Structure (Baseline), as set out in APRA's letter to RSE licensees dated 8 July 2026.

RegCentric provides specialist regulatory reporting software, including our Reg360 platform, and consulting services to APRA-regulated entities. We have extensive experience supporting the implementation and operationalisation of APRA reporting standards across the APRA regulated industries including superannuation, including across multiple administration platforms and reporting environments.

Our observations are therefore based on practical experience helping regulated entities translate reporting standards into efficient operational processes, data models and governance frameworks.

1. Support for the migration to APRA Connect and reduction in reporting

We support APRA's proposal to remove duplicated and superseded data items from SRS 533.0 and SRS 610.2 as part of migrating these collections from D2A to APRA Connect. Consolidating asset allocation data into SRF 550.0/551.0 and removing SRS 610.2 items 5 and 7 (already effectively exempted since 30 September 2022) reduces the number of overlapping taxonomies that vendors and RSE licensees must maintain, and should lower the ongoing compliance burden industry-wide.

2. Item 2.1 of SRS 533.0 — alternative reporting solutions

APRA has specifically invited feedback on practicable alternative reporting solutions for Total Investments data (Item 2.1), which is to be retained for MySuper products with a lifecycle investment strategy pending the outcome of the Your Future, Your Super review.

We understand there may be a practicable alternative to collecting SRS 533.0 Item 2.1 separately, by deriving or validating the Total Investments figure from existing SDT collections - in particular, using SRF 550.0 in combination with relevant product/member profile data reported through SRF 606.0. We recommend APRA assess deriving this information from other SDT collections, so that industry can avoid maintaining a residual standalone SRS 533.0 collection.

3. Implementation timeframe

We note the proposed timeline of:

1. response to consultation in October 2026;
2. collections available in the APRA Connect External Test environment in November 2026; and
3. the first applicable reporting period in APRA Connect being 31 December 2026 due in January 2027.

This leaves minimal time between finalisation of the reporting standards and the opening of the External Test environment, within which vendors must update taxonomy mappings, validation and derivation rules, and reporting software, before RSE licensees can in turn test and sign off their own submissions.

Given D2A has already been decommissioned, there is no fallback submission channel if this timeframe slips. We ask APRA to consider:

- releasing draft taxonomy artefacts and validation/derivation rules for SRS 533.0 and SRS 610.2 as early as possible, rather than only after the response to consultation is published

We also note that change required in such short timeframes adds implementation costs and compliance costs as there is very little time to approach change in a strategic manner. Where possible, we request that change be managed in a more sustainable way.

4. Revocation of SRS 001.0

We support the proposed revocation of SRS 001.0 and the transition to using SRS 604.0, SRS 605.0 and SRS 607.0 data for reporting form allocation, including for MySuper products with a lifecycle investment strategy.

We ask that APRA publish the specific allocation logic (i.e. which fields in SRS 604.0/605.0/607.0 drive form allocation, and how frequently allocation will be recalculated) so that vendors can design systems for this.

5. Related issue: reconciliation between SRF 610.2 and SRF 611.0 member account figures

While outside the direct scope of this consultation, we note that industry raised concerns during the original Superannuation Data Transformation consultation about the risk of member account totals not reconciling across SRF 606.0, SRF 610.0/610.2 and SRF 611.0.

If APRA could acknowledge that this is expected through a frequently asked question, this will alleviate some concerns held in the superannuation industry.

6. Confidentiality proposal

We have no specific comment on APRA's proposal to determine data collected under revised SRS 533.0 and SRS 610.2 to be non-confidential, noting this is a matter primarily for RSE licensees as the reporting entities.

7. Ongoing engagement

We would welcome the opportunity to participate in any vendor-specific technical working group or taxonomy review sessions APRA convenes as part of implementing these changes, given the direct role reporting software plays in RSE licensees' ability to meet their obligations under the revised standards. Given our consulting work directly

with RSE licensees, we would also be glad to help APRA understand how these changes are landing in practice as licensees move through implementation.

Please contact [redacted] at [redacted] if it would be of assistance to discuss any of the above.

Yours Faithfully

[redacted]

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Principal Consultant

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