17th November 2026

Kate Metz
Senior Executive Leader
Regulatory Reform and Implementation
Regulation and Supervision Group
Australian Securities and Investments Commission

Email: rri.consultation@asic.gov.au

Dear Ms Metz

CS 67 PROPOSED REMAKE OF INSTRUMENT ALLOWING LIMITED EXEMPT TAX ADVICE

Chartered Accountants Australia and New Zealand, CPA Australia, Financial Advice Association Australia, Institute of Public Accountants and the SMSF Association (joint bodies) welcome the opportunity to provide this submission in response to ASIC's proposal to remake *ASIC Corporations (Recognised Accountants: Exempt Services) Instrument 2016/1151* (ASIC Instrument 2016/1151).

The joint bodies support the remaking of ASIC Instrument 2016/1151 to allow Australian financial services (AFS) licensees (including limited licensees) and their authorised representatives to provide limited tax advice to retail clients on financial products that are not covered by their licence.

We acknowledge that the number of limited licensees has significantly reduced in recent years, primarily because of the disproportionate increase in regulatory burden and cost compared to the quantum of financial product advice that would be provided by authorised representatives under a limited licence. As a result, fewer AFS licensees and authorised representatives now rely on this exemption.

However, the exemption enables those remaining authorised representatives to continue to provide tax advice that may also be financial product advice on financial products outside the scope of their licence or authorisation to a retail client where they are also a registered tax agent with the Tax Practitioners Board.

It also continues to ensure that all AFS licensees and their authorised representatives can continue providing exempt advice under regulation 7.1.29(4), for example a financial adviser who is not authorised to provide life insurance advice can explain to their client that they can claim a tax deduction for income protection premiums when paid for outside of superannuation.

If you have any questions about our submission, please do not hesitate to contact Keddie Waller, Head of Professional Standards at the SMSF Association via email at keddiewaller@smsfassociation.com

Sincerely,

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