

STEP AUSTRALIA *NEWSLETTER*

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A MESSAGE FROM THE STEP AUSTRALIA CHAIR

Welcome to the first edition of our quarterly *STEP Australia Newsletter* in 2023.

The importance and significance of STEP as the only multidisciplinary professional body in Australia advising on intergenerational wealth transfer have never been greater. I am extremely excited and honoured to have been appointed as Chair at such an opportune time and look forward to working together to continue to support branches and members across Australia.

STEP would not exist if it were not for our members, volunteers and various stakeholders who continue to support our amazing organisation. This year, I would like to build upon our engagement and recognition with these stakeholders. Their commitment contributes greatly to STEP's position as a highly respected and regarded professional organisation.

Significant opportunities exist for current STEP members in being able to attract additional multidisciplinary members. This would provide many benefits, such as opportunities for qualified referrals and collaborative practice models. In my experience as an accountant, STEP has been instrumental to my own practice's growth and development. Given the composition of the STEP Board, this year will be a great opportunity to engage more with the leading accounting, tax and financial planning bodies across Australia. This will bring a broader awareness of STEP and the benefits that STEP membership can provide to these professionals.

I would like to acknowledge and pass on my sincere thanks to our past Chair, Bryan Mitchell TEP, for his leadership. His exceptional energy and initiatives will continue to benefit STEP for years to come. Namely the STEP Australia Mentorship Programme, which is now commencing its second year after a successful launch in 2022, as well as the inaugural STEP Australia National Incapacity Conference.

Finally, I would like to draw your attention to the number of wonderful STEP events and conferences occurring across the country this year. As a member, you are welcome to attend STEP events in any branch, so I would highly encourage you to consider these networking and educational opportunities if travelling.

Of particular note, we have the first STEP Australia National Incapacity Conference, being held on the Gold Coast from 4–6 June 2023.

I look forward to seeing you at an upcoming STEP event!

With best wishes,

Ian Raspin TEP
STEP Australia Chair



STEP AUSTRALIA CONTACT INFORMATION

AUSTRALIA

STEP Australia Board Chair

Ian Raspin TEP

iraspin@bnrpartners.com.au

www.stepaustralia.com/about-us/step-australia-board

NSW

STEP New South Wales Branch Chair

Phillip McGowan TEP

pmcgowan@mccullough.com.au

www.stepaustralia.com/branch/step-new-south-wales

QLD

STEP Queensland Branch Chair

Jeff Otto TEP

jotto@northquarterlanechambers.com.au

www.stepaustralia.com/branch/step-queensland

SA

STEP South Australia Branch Chair

Adrian Cartland TEP

adrian@cartlandlaw.com

www.stepaustralia.com/branch/step-south-australia

VIC

STEP Victoria Branch Co-Chairs

Mercia Chapman TEP and David Gibbs TEP

mchapman@eqt.com.au

www.stepaustralia.com/branch/step-victoria

WA

STEP Western Australia Branch Co-Chairs

Loreena Gillon TEP and Janene Bon TEP

janene.bon@hhg.com.au

www.stepaustralia.com/branch/step-western-australia

You thought s.99A was bad; beware of s.99B

JIM O'DONNELL TEP, PARTNER, JACKSON MCDONALD LAWYERS

As TEPs, we come across foreign trusts all the time. This is hardly surprising for a nation of migrants like Australia, where many of us have relatives and clients from other nations where trusts are also popular.

Although we may not know the ins and outs of the laws that apply to a trust set up overseas, including the particular statutory overlays and tax regimes, we might be asked, and sometimes also expected to know, what happens when funds from a foreign trust, whether it's a deceased estate, a family trust or a pension plan, make their way into Australia.

Foreign-sourced income and capital gains are not generally assessable in Australia when they are derived by an individual or entity outside Australia, i.e., by a non-resident.

However, that proposition is flipped on its head where foreign profits are derived by a non-resident trust if those profits are distributed to an Australian-resident beneficiary, whether in the year in which the profits are derived by the trust or in a later year as a payment or loan from retained profits.

This article highlights how a little-known provision of the *Income Tax Assessment Act 1936* (Cth) (the ITAA), s.99B, can result in substantial Australian tax when retained foreign-sourced income and capital gains are distributed from a foreign trust.

TAXATION OF ACCUMULATED PROFITS

It is common for trusts overseas to accumulate income and capital gains. Tax regimes overseas are typically not as punitive as Australia in taxing a trustee on retained profits.

Australia has adopted a highly punitive tax regime against trustees that retain profits.¹

Many will be familiar with s.99A of the ITAA. The rate of tax imposed on trustees on accumulated profits in Australia is 45 per cent (the top individual tax rate) where s.99A applies. In addition, if it is a capital gain, the capital gains tax (CGT) 50 per cent general discount is denied where s.99A applies.

In contrast, in many other trust jurisdictions, relatively modest flat rates of tax are imposed on accumulated profits.²

LIMITS OF s.99A

Section 99A does not apply when a foreign trust accumulates foreign-sourced income, though it can apply where the trustee of a foreign trust accumulates Australian-sourced income or capital gains.



Income and capital gains that are derived outside Australia and accumulated by a foreign trust, and so capitalised to corpus, and not distributed to a beneficiary until a later year, will generally be taxed on derivation either in the country of source or where the trust is resident. Those amounts will not generally be taxed in Australia in the year of derivation if accumulated.³

However, consider what happens when a beneficiary receives those after-tax retained earnings from the foreign trust in a later year: they might receive a nasty tax surprise.

If the beneficiary is an Australian resident for tax purposes at any time during the year of income in which they receive those retained trust profits, then a little-known provision, s.99B, can operate to cause the payment or distribution to be assessable to the beneficiary.

SECTION 99B: SCOPE OF OPERATION

Subsection 99B(1) provides that where an amount, being property of a trust estate, is paid to or applied for the benefit of a beneficiary of the trust who was a resident at any time during the year of income, the amount is to be included in the assessable income of the beneficiary.

Subsection 99B(2) modifies the rule in s.99B(1) by reducing the amount included in the assessable income of the beneficiary to the extent that it represents:

- corpus of the trust estate, but not an amount that is attributable to income derived by the trust estate that would have been included in the assessable income of a resident beneficiary, had it been derived by that tax beneficiary;
- an amount that would not have been included in the assessable income of a resident beneficiary, had it been derived by that beneficiary;
- an amount that is or has been included in the assessable income of the beneficiary under s.97 of the ITAA;
- an amount that has been assessed to either the trustee of the trust or the trustee of another trust under Division 6 of Part III of the ITAA (the transferor trust rules); or
- an amount that has been included in the assessable income of a taxpayer under Division 6AAA of Part III of the ITAA.

Section 99B tax is levied at the beneficiary's marginal rate in the income year they receive it and can apply even if the trust derived and accumulated those profits up to 44 years ago (when s.99B was introduced) and even if the beneficiary only became an Australian resident in the year that they received the amount from the trust. ►

'Sections 99B and 102AAM are not well-known provisions. They can result in substantial Australian tax'

In addition, s.102AAM statutory interest is generally payable when s.99B applies. Under this provision, interest can be charged on each constituent part of the accumulated profit paid to that beneficiary, going back to the year when the profit was derived by the trust, or from December 1990 onwards, whichever is later.

Although there are a few exceptions to this statutory interest, such as profits accumulated within the first three years of a deceased estate, a concession for listed countries and foreign income tax offsets (FITOs) may also be available (giving credit for foreign income taxes paid). The author is aware of cases where the s.99B tax and statutory interest under s.102AAM combined exceeded the amount received by the beneficiary from the trust.

EXAMPLE⁴

An individual is a beneficiary of a non-resident trust estate. From 1 July 1998 to 30 June 2001, the trustee derived foreign-sourced interest income, which was accumulated and formed part of the corpus of the trust estate. The beneficiary was a non-resident of Australia for the period during which the interest income was derived by the trust. The beneficiary became an Australian resident during the income year ended 30 June 2002. The trustee paid an amount to the beneficiary during the income year ended 30 June 2002, which was wholly attributable to the accumulated foreign-sourced income. At the time of the payment, the beneficiary was an Australian resident.

In this case, the conditions in s.99B(1) are satisfied, as the beneficiary has received an amount of trust property during an income year in which they were a resident. The trust property paid to the resident beneficiary is attributable to foreign-sourced interest income derived by the trust. As interest income would have been assessable had it been derived by a resident taxpayer, and as the interest income has not been included in the assessable income of the beneficiary under s.97 of the ITAA or assessed to either the trustee of the trust or the trustee of another trust under Division 6 of Part III of the ITAA, none of the exclusions in s.99B(2) apply to reduce the amount included in the assessable income of the beneficiary.

Does the non-resident status of the beneficiary for the period in which the interest was derived by the trust estate in any way affect the outcome under s.99B? No. According to the Australian Taxation Office (the ATO), it is clear from

the language of s.99B, and by inference from s.102AAM(5), that there is no apportionment of the amount included in assessable income by reference to the residency status of the beneficiary as, at the time, the income was derived by the trust. Rather, the only explicit condition concerning residency is that the beneficiary be a resident at some time during the year of income in which the trust property is paid to them or applied for their benefit.

As the beneficiary in this example satisfies the residency requirement during the relevant year of income, and as none of the exclusions in s.99B(2) apply, the entire amount of the payment is included in the beneficiary's assessable income under s.99B(1).

Several other sobering examples of the operation of s.99B can be found in recent case law and other ATO determinations and interpretative decisions, including in the context of capital gains made on non-taxable Australian property.⁵

Where s.99B applies to a capital gain, it should be noted that the CGT 50 per cent general discount is denied to the beneficiary.⁶

CONCLUSION

Sections 99B and 102AAM are not well-known provisions. They can result in substantial Australian tax.

Trustees and beneficiaries of foreign trusts, and their advisors, often overlook them. TEPs in Australia and overseas need to be more aware of the tax risks arising from these provisions. They need to raise these risks with clients who are beneficiaries of a foreign trust and who either are already or intend to become an Australian resident.

It is usually too late to undertake any meaningful tax planning once the beneficiary has moved to Australia and taken up Australian tax residency. In those instances, effort might be best directed at determining what FITOs may be available to offset the s.99B tax and streaming non-assessable corpus to the Australian beneficiary, although the supporting evidence in each case will be critical.

Seek specialist tax advice if s.99B potentially applies to any of your clients. ■

¹ This is similar to the UK, which taxes trustees at 38.1 per cent on accumulated dividend income and 45 per cent for all other accumulated income. ² For example, New Zealand imposes tax on trustees at 33 per cent; Singapore taxes trustees at 17 per cent; keep in mind that, generally, only Singapore-sourced profits are assessable in Singapore. ³ One exception to this general proposition is where the transferor trust rules apply under Div 6AAA of Part III of the ITAA. Those anti-avoidance rules may apply where an Australian resident has transferred property or services to a non-resident trust. Accrual taxation can then apply to assess the Australian resident on the attributable foreign trust income. This article, and the operation of s.99B, assumes that the transferor trust rules do not apply. ⁴ *Interpretative Decision ATO ID 2011/93* (date of decision, 9 November 2011). ⁵ See e.g., *ATO ID 2004/66*; *ATO ID 2004/69*; *ATO ID 2010/21*; *TD 2017/23*; *TD 2017/24*; *Howard v Commissioner of Taxation* [2012] FCAFC 149; [2014] HCATrans 268; *Campbell and Commissioner of Taxation (Taxation)* [2019] AATA 2043. ⁶ This is similar in effect to the denial of the CGT 50 per cent general discount to a trustee, where s.99A applies to an accumulated capital gain.

The importance of when a testamentary discretionary trust commences

PETER WORRALL, PETER WORRALL CONSULTANT LAWYERS

This article discusses why the commencement date of testamentary trusts is important for legal practitioners and accountants in estate planning. The question of when a testamentary discretionary trust (TDT) commences has been the subject of a quiet, but continuing, debate between trust and estate practitioners for some time.

WHY IS COMMENCEMENT IMPORTANT?

A review of 12 articles about TDTs showed that with five there was no discussion. One noted the obvious that they can only be created by a will; one suggested that TDTs commence on the first transfer of assets; one incorrectly noted that it happens on distribution of the residue (incorrect because the fund for the trust may come out of another portion of the estate); another suggested that the executor establishes it; another suggested that it was when probate is granted, and yet another on the death of the will maker.

None of the articles noted provisions in wills that provide 'each Trust established under this Will is deemed to be established on my death',¹ wills that provide 'each Trust established under this Will is deemed to be established on and from the date on which my executor first transfers an asset from my estate to the trustees of the trust'² or, as *Hutley's Australian Wills Precedents* provides, 'I create a testamentary discretionary trust'.³

Commencement is important from the point of view of the rights arising from the choses in action being available.⁴

WHAT ARE THE NECESSARY ELEMENTS OF A TRUST?

For the purposes of this article, the following is adopted: there are four essential elements in every form of trust '... the trustee, the trust property, the beneficiary ... and the personal obligations annexed to the property'.⁵ Dal Pont states the essential elements as being



three: '... that the essence of a trust is the holding of property by its legal owner ("the trustee") for the benefit of others ("the beneficiaries")'.⁶ He adds: 'This is the more traditional view of there being property held by a Trustee for the objects (Beneficiaries) of a Trust.'⁷ Based on these two definitions, and *Livingston*, no trust is in existence until there is property. *Livingston* requires the transfer of property from the estate to the TDT for commencement; nevertheless, a TDT may have a form of existence if it is possessed of a chose in action.⁸ It can only have those rights, from death, if the terms of the will do not provide

for the commencement or, in *Hutley's* terms, 'creation' of those rights on a date different, or potentially different, from the date of death.⁹

LIVINGSTON

The first principle in *Livingston* is that there is no interest at law, in the sense of property, held by a beneficiary in an estate where the interest of that beneficiary derives from the unadministered part of that estate: 'there is no property in Queensland over which the respondent (beneficiary) can claim to exercise powers as the administrator of Mrs Coulson'. *Livingston* was dealing with the rights transferred on the death of a beneficiary to her executors in the estate of her deceased husband at para.41.¹⁰

The second principle, on which there are many authorities including *Livingston*, is that a beneficiary holds a right to enforce due administration of the estate and related rights:

citing *Livingston* and other cases at footnote 39 on page 10 (paragraph 1-008). Mitchell at page 1 notes: '*Livingston* therefore establishes that duties can be imposed on an owner of property respecting her stewardship of the property and that another person can be given corresponding rights against her.' A TDT is a beneficiary in this sense.

The second principle affects the first principle – to what extent does a right to enforce

'Livingston requires the transfer of property from the estate to the TDT for commencement; nevertheless, a TDT may have a form of existence if it is possessed of a chose in action'

‘The importance of when a TDT commences is best illustrated by considering a potential TDT that cannot commence because of the (deficient) will drafting, which results in a loss, or suspension, of the rights to the enforcement of remedies under the choses in action’

due administration; the ability to trace or ‘follow’ misapplied assets, amount to a non-proprietary right, and a right for a distribution – constitutes something of value.

DRAFTING ERRORS AND LACK OF ASSETS

A TDT cannot commence if there are no assets to pass from the estate to a testamentary trust.

THE ATO VIEW

The Australian Taxation Office’s (the ATO’s) view of when a TDT commences is the TDT is created out of residue on the completion of the administration of the estate. It commences earlier if assets are transferred to it from the estate at an earlier date.¹¹

PROVISIONS IN WILLS

The author has used the word ‘commence’ and its derivatives in this article as there is a wide range of terms used for the ‘starting’ of a TDT. Commence is a term of convenience rather than of art. Other terms used are ‘comes into operation’ or ‘established’.

There is no doubt that a TDT has commenced when it has assets transferred to it from the estate, provided the other elements of a trust exist. Under the second principle in *Livingston*, if at law it is in existence (because there is no contrary provision in the will), it has commenced in the sense of holding valuable rights as choses in action.

Some wills are silent about when there is commencement of the TDT created under them. Others provide for the commencement on death by specific provision. A third class of wills provides for the commencement only on the receipt of assets from the estate. A fourth class of wills provides for a part of an estate

to be appointed by either a beneficiary, the executor, or both, to a TDT and on that appointment happening the TDT commences.

Both the third and fourth classes give rise to the difficulty that a TDT that has not commenced or been brought into existence cannot be possessed of the choses in action referred to in *Livingston* or the bundle of choses in action referred to in *Mitchell*; which gives rise to a right to enforce the due administration of the will, to pursue rights against third parties where the executors have acted wrongfully and to pursue rights for a distribution.

The importance of when a TDT commences is best illustrated by considering a potential TDT that cannot commence because of the (deficient) will drafting, which results in a loss, or suspension, of the rights to the enforcement of remedies under the choses in action.

If there is a dispute between potential trustees of a TDT (potential in the sense that if the TDT comes into existence, those trustees will possess those choses in action as valuable rights), but the TDT has not come into existence (in the sense of the second principle in *Livingston*) because of the terms of the will, then it is difficult to see how a court will recognise the right of the potential trustees of a TDT to enforce those valuable chose in action rights.

PRACTITIONER GUIDANCE

It is considered risky for practitioners to draft wills that provide for the commencement of a TDT to only occur at the point in time that the ATO deems it to occur for tax purposes. Any suggestion that it is necessary to comply in the document itself with tax law commencement seems to be spurious, because tax law commencement will not be affected by a will that clearly states the common-law position about the choses in action being available from the death of the will maker. The preferred drafting is that adopted in *Hutley*’s or the form ‘each trust established under this Will is deemed to be established on my death’. ■

¹ From a copy will in the author’s possession. ² From a copy will in the author’s possession. ³ Craig Birtles et al, *Hutley’s Australian Wills Precedents* (LexisNexis, 10th edn., 2021) p.345. This gives commencement at death as the will is read as at the date of death. ⁴ Charles Mitchell, ‘Commissioner of Stamp Duties (Queensland) v *Livingston* (1964): Rights of Estate Beneficiaries and Trust Beneficiaries Compared’ (2019) in Brian Sloan (ed.), *Landmark Cases in Succession Law* (Hart, 2019) 4. ⁵ J. D. Heydon and M. J. Leeming, *Jacob’s Law of Trusts in Australia* (LexisNexis Butterworths, 8th edn., 2016), p.3. ⁶ Gino Dal Pont, *Equity and Trusts in Australia* (Thomson Reuters, 7th edn., 2018), p.485. ⁷ Above, note 6. ⁸ *Commissioner of Stamp Duties (Qld) v Livingston* [1964] UKPCHCA 9. ⁹ See Charles Mitchell’s article on *Livingston* and the comparison of the rights of trust and estate beneficiaries. ¹⁰ See also Tucker, Le Poidevin and Brightwell, *Lewin on Trusts* (Sweet & Maxwell, 20th edn., 2020), vol 1, p.9. ¹¹ *Taxation Ruling No IT 2622*, [13], about TDTs deriving from residuary estate.

OBITUARY

Vale The Honourable Ian Vitaly Gzell AM KC

It is with much regret that STEP Australia announces the passing of The Honourable Ian Vitaly Gzell AM KC on 22 December 2022.

Ian Gzell was called to the Bar on 15 December 1965 and appointed Queen's Counsel on 1 December 1977. Having built a successful practice in commercial and revenue law, Ian was appointed a judge of the Supreme Court of New South Wales in 2002.

He was instrumental in establishing STEP as a highly regarded professional body in New South Wales and in Australia.

As part of a strategic plan for the growth of STEP in Australia, formulated with the assistance of Bill Ahern TEP, David Russell KC TEP AM and Michelle Johnson TEP, Ian assumed the role of Chair of STEP New South Wales in 2007.

Ian was determined to demonstrate the educational benefits of being a member of STEP and persuaded his judicial colleagues to write papers and present seminars on contemporary issues for delivery at monthly events. In his first two years as Chair, guest speakers included The Right Honourable Lord Walker of Gestingthorpe, Dr Donovan Waters KC, The Honourable Mr Justice Young AO, The Honourable Justice Gummow AC, James Kessler KC TEP and Dr Mark Leeming SC, as His Honour then was.

Due to Ian's dedication, enthusiasm and leadership in the role of Chair, the membership of STEP New South Wales doubled within a short period. Potential members found it difficult to decline an invitation from Ian to join STEP. He worked tenaciously to raise the profile of STEP throughout Australia, including by supporting the formation of a branch in Perth, Western Australia. As part of his work to ensure the future success of STEP in Australia, Ian drafted changes to the constitution of STEP Australia Limited to enable the affiliation of the STEP branches throughout Australia.

Ian's legal and judicial career was combined with wider community service. He was an active member of the Taxation Institute of Australia and supported the Queensland Philharmonic Orchestra, the Queensland Symphony Orchestra and the National Council of Opera Australia.

In June 2016, he was awarded the honour of Member of the Order of Australia for significant service to the judiciary, estate and trust law, the advancement of professional development and to the performing arts.

When Ian retired from the court and as STEP NSW Chair in 2013, STEP in Australia had benefited from Ian's leadership, diligence and intellectual rigour over many years.

STEP Australia extends its sincere condolences to Mrs Sylvia Gzell and Ian's family. ■

STEP AUSTRALIA MENTORSHIP PILOT PROGRAMME 2022

STEP Australia would like to acknowledge the following mentors for their immense contribution to the 2022 STEP Australia Mentorship Pilot Programme

- **Brendan Ashdown TEP, John Toohey Chambers**
- **Renee Bennett TEP, wilson/ryan/grose Lawyers**
- **Caite Brewer TEP, Callinan Chambers**
- **Michele Davis TEP**
- **Lyn Freshwater TEP, BNR Partners**
- **Kelly Gatehouse TEP, Nuture Law**
- **David Gibbs AM TEP, MVA Bennett**
- **Roland Gridiger OAM TEP, Gridiger Lawyers**
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- **Carla Parsons TEP, Parsons Law**
- **Michael Perkins TEP, Autonomy First Lawyers**
- **Carolyn Sparke KC TEP, Owen Dixon Chambers**
- **John Stinson TEP, Diamond Conway Lawyers**
- **Andrew Woods TEP, Woods Wills Lawyers**

STEP Australia appreciates your generosity in giving your time and expertise back to the profession through the programme.

EVENTS AND RESOURCES



STEP
ADVISING FAMILIES ACROSS GENERATIONS

Register now

Attend in person or virtually!

STEP AUSTRALIA NATIONAL INCAPACITY CONFERENCE 2023

Sunday 4 June to Tuesday 6 June 2023
The Star Gold Coast, Queensland, Australia

STEP Australia's first National Incapacity Conference, bringing together leading minds in capacity from across STEP Australia and beyond. It is not to be missed.

Date: 4-6 June 2023

Venue: The Star Gold Coast, Queensland, Australia

Register: www.step.org/events/step-australia-national-incapacity-conference-2023

The programme will provide an unparalleled opportunity to network with Australian trust and estate practitioners.

WEB LINKS AND CONTACTS

**STEP AUSTRALIA
EVENTS PROGRAMME**

View the full events programme at
www.stepaustralia.com/events

We welcome all STEP members to attend events hosted by other branches.

For more information on the STEP Australia events calendar, or to register your interest to be a speaker at STEP Australia events, contact Dior Locke at dior.locke@step.org

Can't make an event? Many speakers provide a paper for members. Get in contact to find out more.

**SEE MORE ON EVENTS
AND KEEP UP-TO-DATE**

Keep informed about upcoming worldwide STEP events at www.step.org/events

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**STEP AUSTRALIA NATIONAL
COMMITTEE CONTACTS**

- Advocacy** STEP Australia National Policy Committee Chair
Jennifer Sheean TEP
sheean@qldbar.asn.au
www.stepaustralia.com/advocacy-and-policy-submissions-in-australia
- Mentorship** STEP Australia National Mentorship Programme
Committee Chair
Ashleigh Poole TEP
apoole@thymac.com.au
www.stepaustralia.com/step-mentorship-program
- Newsletter** STEP Australia National Newsletter Committee Chair
Andrea Olsson TEP
andrea.olsson@mst.com.au
www.stepaustralia.com/step-australia-newsletters
- Conference** STEP Australia National Trusts & Estates
Conference Committee Chair
Bryan Mitchell TEP
bmitchell@mitchellsol.com.au

STEP Australia National Incapacity Conference
Committee Chair
Christine Smyth TEP
christine@csel.com.au
- Membership** STEP Australia National Membership Committee
Chair
Chris Herrald TEP
cherrald@mullinslaw.com.au
www.stepaustralia.com/join-step

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CHAIR: **ANDREA OLSSON TEP**. COMMITTEE MEMBERS: **ESTERINA AZZI**, **ROB CUMMING TEP**, **ROD JONES TEP**
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