

# The 3 Trillion Dollar Blindspot: Rethinking Superannuation's Investment Function

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by Mike Duncan, Para Bellum Advisors

[mike.duncan@parabellumadvisors.com](mailto:mike.duncan@parabellumadvisors.com)

[www.parabellumadvisors.com](http://www.parabellumadvisors.com)



## Executive Summary

Australian superannuation funds manage over AUD 3.5 trillion in assets, yet their investment functions often remain dominated by compliance, benchmark tracking, and outsourced execution. This paper argues for a strategic reframing - positioning the superannuation investment office as an integrated, value-generating function. Drawing lessons from international leaders and diagnosing current gaps in governance, execution, and capability, this white paper outlines a comprehensive reform blueprint. It calls for dynamic risk management, capital efficiency, and automation as levers to transform passive compliance into active capital stewardship.

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## Introduction: Why This Matters Now

Australia's superannuation system is one of the largest pension systems in the world. With over AUD 3.5 trillion in assets and growing influence in global capital markets, the sector plays a vital role in long-term financial security and macroeconomic stability. Yet, despite its scale, the investment function within many superannuation funds remains conservative and compliance driven.

Several forces now compel a transformation:

- **APRA Heatmaps & YFYS Benchmarks:** Pressures from the Your Future, Your Super (YFYS) test have entrenched benchmark-tracking behaviour, reducing tactical flexibility and innovation.
- **Market Volatility & Geopolitical Risk:** Traditional risk models are strained under macro instability, supply shocks, inflation, and climate risk. Investment strategies must now consider a broader range of exogenous variables and tail risks.
- **Internalisation Trends:** Larger funds build in-house teams for public and private markets, but execution and risk integration remain underdeveloped. This has created a growing bifurcation between governance ambition and implementation capability.
- **The Scale Paradox:** Despite trillion-dollar mandates, many super funds lack the tactical infrastructure, in-house structuring skills, or dynamic capital frameworks to unlock scale benefits.

This white paper presents a critique of current practices and a practical roadmap to reframe the investment office from fiduciary formality to strategic capital catalyst. With regulatory clarity, member expectations, and global competitiveness all rising, the time for transformation is now.

# The Hidden Cost of Benchmark-Hugging and Governance Gaps

## Legacy Governance

Many super funds maintain well-developed fiduciary structures, with multiple layers of oversight – boards, investment committees, risk committees, and consultants. However, governance remains largely policy-oriented rather than execution-focused. Risk oversight often functions independently of investment strategy, and committees rarely consider solvency-adjusted performance or scenario-linked responses. Instead, meeting agendas are dominated by compliance reporting, performance benchmarking, and manager review cycles.

This disconnect results in structural inertia. Investment committees avoid deviation from the strategic asset allocation (SAA), even when relative value or risk conditions warrant tactical action. In some cases, governance rigidity leads to missed rebalancing opportunities or an over-allocation to safe-haven assets that erode long-term performance.

## Outsourcing Dependency

Historically, funds outsourced asset management to external managers. While this supports diversification and scale, it fragments accountability. Consultants often intermediate execution, and OCIO mandates dilute control. Fee leakage is significant, up to 60- 80bps in some models, and multi-manager structures inhibit nimble rebalancing.

Strategic overlays, derivatives, and hedging decisions are commonly left to custodians or banks and rarely challenged by internal teams. This overreliance on external parties creates information asymmetry and delays execution. In-house teams struggle to evaluate overlay pricing or collateral terms, resulting in operational drag and suboptimal cost structures.

## "Safe" Mandates and Static SAA

Tracking error aversion is common due to regulatory benchmarking. Strategic Asset Allocations (SAA) are locked and rarely challenged by dynamic inputs. This inertia prevents alignment with changing macro conditions, currency volatility, or capital opportunities. Most investment policy statements prohibit tactical bands, derivatives, or flexible overlays.

Moreover, the industry's reaction to the YFYS test prioritises peer-relative returns over absolute capital preservation or member-centric outcomes. This has suppressed innovation in asset classes such as structured credit, options-based hedging, and real-time execution management.

## Risk Without Reward

Despite the growing complexity of global markets, most super funds underutilise relative value trades, volatility structures, or capital-efficient overlays. Risk is reported but not monetised, and opportunities for alpha in the form of swap curve steepens, FX collars, or convexity overlays are ignored.

Investment teams are rarely empowered to propose or execute trades that deviate from benchmark weightings. Risk is seen as a constraint to comply with, not as a variable to optimise. This conservatism results in performance drag and inefficient allocation of risk capital.

## Case Studies of Structural Inefficiency

### FX Execution Drag

Super funds often hedge foreign exchange exposure passively via monthly forward rolls. Without strategic discretion, these are generally executed in routine cycles by custodians or via pre-approved dealer panels. The result is execution slippage, missed alpha from mark-to-market P&L harvesting, and the absence of optionality in hedge structures.

There is typically no usage of collars, layered hedging, or even relative value timing between currency pairs. FX is treated as a cost centre rather than a source of convexity or tactical value. Funds that avoid managing this exposure dynamically risk persistent yield erosion.

### Illiquid Credit Overexposure

In pursuit of yield, many funds have overallocated to illiquid credit and private debt, sectors such as direct lending, mezzanine finance, and infrastructure debt. While these assets can offer attractive spread pickup, they are rarely managed with appropriate exit planning or liquidity stress testing.

Some funds have become over-reliant on primary deal flow, chasing allocations without questioning valuation models or downside scenarios. Additionally, private credit allocations are often opaque in return attribution, and governance around manager performance, covenants, and recovery assumptions is weak.

### Overdiversification Without Differentiation

The belief that diversification is inherently valuable has led many funds to maintain excessively broad portfolios, often with 30–50 external mandates. This introduces complexity, blurs accountability, and results in return dilution.

Mandates are frequently benchmarked to similar indices with overlapping exposures. Risk systems struggle to aggregate exposures across managers, making identifying systemic tilts or overconcentration in factor risks difficult. Rather than diversification, this leads to duplication and execution noise.

### Collateral and Margin Management

Despite the increasing use of derivatives for hedging or duration extension, few super funds manage collateral dynamically. Custodian-driven margin calls are reactive. CSA agreements are standardised and often unfavourable, requiring daily variation margin in cash, even when more efficient collateral could be used.

Funds may need to sell yield-bearing assets during periods of market volatility to meet margin demands. These fire sales impair long-term performance and signal poor

treasury integration. Proper CSA negotiation, collateral ladders, and forecast dashboards are mainly absent.

## Gating Risks in Private Assets

Superannuation funds are among the largest global allocators to private equity, infrastructure, and unlisted property. However, the combination of illiquid assets and member liquidity obligations presents a structural mismatch.

Gating clauses in LP agreements, lack of exit strategies, and valuation lag risk leave funds vulnerable in stressed conditions. Real-time liquidity buffers are thin, and ALM stress tests often ignore the impact of simultaneous market and withdrawal shocks.

## Lessons from Global Pension Powerhouses

### Canada: CPP, OTPP, HOOPP

Canadian pension plans are often cited as the global benchmark for integrated investment governance. Their models blur the lines between actuarial management, investment execution, and treasury oversight, fostering collaboration across disciplines. CPP Investments, OTPP, and HOOPP operate internally managed investment teams with expertise in deep capital markets. Structurers, traders, and risk professionals work within the same governance frameworks, enabling real-time strategy alignment with opportunity.

These funds treat capital and risk as dynamic variables. Derivatives are used not just for hedging, but to manage liquidity, duration, convexity, and currency overlays in a capital-efficient manner. Investment decisions are routinely assessed against internal cost-of-capital thresholds, and execution is supported by automated trading infrastructure. Daily dashboards track ALM metrics, P&L, margin positions, and regulatory capital exposure. This creates the conditions for agile decision-making while maintaining strong control and accountability.

### Netherlands: Scenario-Based Governance

Dutch pension funds embed scenario thinking into their core decision-making. Leading funds such as ABP and PGGM conduct quarterly reviews of stress scenarios and align investment playbooks accordingly. These scenarios are not academic—they are actionable, linked to pre-agreed shifts in SAA, overlay implementation, and liquidity repositioning.

This structure is supported by internal governance that includes quant, actuarial, and strategy professionals working as cross-functional teams. They maintain flexibility in derivative usage and are mandated to respond tactically to rates, FX, credit, and inflation shocks.

### UK: Solvency-Informed Innovation

UK insurers and pension funds operate under the shadow of Solvency II, which mandates rigorous capital attribution. Rather than resist it, many have used these rules to drive innovation. For example, Legal & General and Aviva have adopted capital-efficient structured credit overlays and Matching Adjustment portfolios, supported by sophisticated internal models.

Governance models now permit risk budgeting by strategy. When capital or return conditions warrant, investment desks are authorised to deploy structured overlays (e.g., credit default swaps, bond forwards, inflation caps/floors). Risk reports are reviewed

weekly, and trades are stress-tested using scenario simulations calibrated to LDI risk frameworks.

### Australia: Capable Boards, Execution Gaps

Australian super funds have made significant strides in fiduciary governance. Boards are highly qualified, investment committees are well-resourced, and regulators have provided clear guidance. However, the gulf between strategic intent and tactical execution remains wide.

Few funds have internal structuring capability. Derivatives are rarely evaluated for capital impact. FX and interest rate exposures are mechanically hedged rather than tactically optimised. Execution remains outsourced, and performance drag from passive policies persists.

The opportunity is to learn from international peers by building execution fluency within governance structures. Funds must move beyond best-practice committees to create best-in-class capital integration.

## Framework for Reform: Eight Strategic Levers

Transforming superannuation investment offices into strategic engines of value requires more than isolated improvements. It calls for an integrated approach that spans governance, skills, systems, and decision-making culture. Below are eight critical levers of reform, each grounded in global best practices and tailored to the Australian context.

### Governance Reform

Governance must evolve from fiduciary oversight to capital-oriented stewardship. Investment committees should broaden their mandate beyond compliance and peer benchmarking to explicitly include objectives such as surplus maximisation, capital efficiency, and downside risk management.

Action Steps:

- Establish cross-functional governance teams (investment, treasury, actuarial, risk)
- Redesign board papers and IC dashboards to include solvency-adjusted metrics
- Schedule quarterly scenario planning sessions with investment response protocols
- Set KPIs linked to risk-adjusted return, capital deployment efficiency, and execution quality

### Internal Capability Building

Execution quality and strategic flexibility depend on internal capability. This means hiring professionals with capital markets experience and creating execution-authorised roles within the investment office, not solely relying on consultants or external fund managers.

Action Steps:

- Recruit structurers, traders, and treasury professionals from banks or asset managers
- Create overlay desks with mandate authority to execute tactical trades
- Crosstrain actuarial, investment, and operations teams to understand each other's constraints and objectives
- Introduce real-time investment "war rooms" during high volatility periods

## Tooling Up: Infrastructure and Integration

Most super funds operate with fragmented or outdated systems. Reform demands investment in tools that unify portfolio analytics, cash forecasting, risk dashboards, collateral management, and execution monitoring.

### Action Steps:

- Deploy TCA platforms across all execution desks
- Integrate ALM and PMS/OMS platforms to enable scenario-based allocation
- Build dashboards for daily liquidity, collateral, margin, and P&L tracking
- Implement APIs to connect external pricing, custodial data, and hedge valuations in real time

## Execution Strategy: Beyond the 3-Quote Rule

Rigid compliance rules such as mandatory 3-quote execution limit tactical flexibility. Sophisticated funds adopt execution playbooks with pre-agreed discretion boundaries, enabling them to preserve alpha and avoid market signalling.

### Action Steps:

- Segment trades by product and market depth to determine execution method
- Allow single-dealer or negotiated execution where market impact is high
- Use algorithmic execution or TWAP for larger trades
- Review execution quality monthly with performance and TCA data

## Capital-Linked Investment Mandates

Investment mandates should include capital consumption as a design variable. Funds should quantify the opportunity cost of different exposures and measure strategies by surplus impact, not just return volatility.

### Action Steps:

- Apply internal capital charges by asset class or overlay
- Introduce RAROC or EVA-style metrics into manager evaluations
- Tie SAA risk bands to capital budget thresholds
- Develop internal dashboards that quantify return per unit of capital consumed

## Automation and Intelligent Infrastructure

As portfolios grow in complexity, automation becomes essential. Manual spreadsheets and static reports cannot support dynamic portfolios. Leading funds deploy OMS/EMS systems, smart order routers, and cloud-native dashboards that link execution, liquidity, and risk.

### Action Steps:

- Automate FX and rates execution with limit, stop-loss, and dynamic hedging strategies
- Pre-configure trade templates and overlay instructions based on scenario triggers
- Establish centralised risk data lakes to support real-time analytics
- Replace manual reporting with visualised dashboards for boards and regulators

## Active Risk Management as a Strategic Advantage

Risk should not be limited to compliance. It should be a proactive, forward-looking input into portfolio design. Dynamic risk budgeting, stress-linked portfolio overlays, and marginal risk contribution analysis can help funds move from passivity to preparedness.

### Action Steps:

- Deploy real-time VaR, expected shortfall, and tail risk analytics
- Integrate actuarial and market risk scenarios into tactical investment planning
- Develop pre-agreed “war room” protocols for major shocks (e.g. interest rate spike, geopolitical conflict)
- Budget and monitor risk usage by strategy and team

## Capital Management as a Strategic Lever

Although Australian super funds are not subject to regulatory capital constraints, capital management principles still apply. Viewing investment decisions through a capital lens reveals hidden inefficiencies and uncaptured value.

### Action Steps:

- Map capital impact of all overlays and hedge structures
- Create internal transfer pricing for liquidity usage and margin drag
- Evaluate strategies based on their ability to generate surplus, not just nominal return

- Integrate capital and liquidity planning into quarterly investment reviews

## The Execution Gap: Where Para Bellum Adds Value

Bridging the gap between strategic intent and market execution is the missing link for many superannuation funds. This is where Para Bellum Advisors delivers a differentiated impact – by embedding deep capital markets expertise directly into institutional workflows.

Our philosophy is simple: Execution is not just a function. It's a strategic capability. Para Bellum enables super funds to act with precision, speed, and capital clarity – without dependence on conflicted counterparties or slow-moving consultants.

### Strategic Structuring Expertise

We bring decades of front-line experience across structuring desks, trading floors, and treasury functions. Our role is not to manage portfolios but to help you build execution authority and deal fluency internally.

Examples of impact:

- Restructuring FX overlays using zero-cost collars and layered hedging strategies
- Engineering interest rate swap ladders aligned with ALM cashflows and curve risk
- Reviewing and re-negotiating CSAs to unlock collateral efficiency

### Capital Efficiency Intelligence

We help super funds assess capital consumption, return drag, and surplus efficiency across mandates. Our approach includes tools for internal liquidity pricing, RAROC measurement, and overlay calibration.

Benefits include:

- Identifying low-capital strategies that preserve yield with lower risk drag
- Designing internal dashboards to visualise capital deployment per strategy
- Linking investment evaluation with solvency-adjusted outcomes

### Tactical Execution Playbooks

We don't replace your managers; we help you empower your internal teams. With execution playbooks, scenario triggers, and risk escalation ladders, your investment office moves from reactive to responsive.

Key enhancements:

- Designing trade protocols by product class (e.g., FX, IR swaps, CDS, bond forwards)
- Embedding playbooks with triggers (e.g., AUD spike, spread widening, policy shocks)
- Running TCA reviews to monitor slippage, cost of delay, and spread leakage

### Independent and Conflict-Free Advice

Unlike banks or consultants, Para Bellum operates independently. We do not sell products, manage assets, or accept commissions. Our only allegiance is to your outcome.

We are:

- Independent of custodians, asset managers, and dealers
- Paid transparently on a project or retainer basis
- Outcome-driven, focusing on cost savings, alpha preservation, and risk clarity

## Knowledge Transfer and Uplift

Our engagement model emphasises capability building. We don't stay embedded forever; we build internal fluency so your teams can scale and sustain execution excellence.

Support includes:

- Live training for structuring and overlay implementation
- Collaborative scenario testing and playbook walkthroughs
- Governance uplift for ICs and executive teams on capital-aware strategy

## Para Bellum's Value Table

Area	Status Quo	Para Bellum's Edge
FX & Hedging	Passive roll forwards	Dynamic overlays, optionality integration
Execution	Compliance-driven	Tactical playbooks, discretion protocols
Private Credit	Illiquidity blind spots	Exit strategy design, valuation realism
Risk	Static, siloed	Integrated, scenario-based with ALM feedback
Capital	Ignored in portfolio design	Embedded in trade evaluation & return attribution
Infrastructure	Manual, spreadsheet-reliant	Automated dashboards, risk liquidity integration

Para Bellum Advisors exists to make execution strategy a source of alpha, not a cost of delay.

## Conclusion: From Fiduciary to Forward-Looking

The Australian superannuation system is world-class in terms of size, regulatory clarity, and governance ambition. But its investment offices now face a strategic crossroads.

To meet the demands of volatile markets, growing member expectations, and international competitiveness, super funds must evolve from fiduciary administrators into capital catalysts. That means rethinking what investment execution means – not just selecting managers, but architecting overlays, shaping risk dynamically, managing liquidity with intent, and measuring outcomes through a capital lens.

This paper has shown:

- The structural inefficiencies that persist – from passive FX hedging and illiquid credit blind spots to over-diversified portfolios and execution bottlenecks
- How global peers have transformed their investment offices into agile, integrated capital engines
- What it will take for Australian super funds to leapfrog incremental improvement and adopt a new paradigm of execution, automation, and capital fluency

The transformation isn't hypothetical. It's practical, actionable, and already underway in leading institutions across the globe. With the right partnerships, tools, and mandates, Australian funds can build internal capability that outperforms on both return and responsibility.

Para Bellum Advisors stands ready to help lead that transformation – not with theory, but with tactical execution, real-world structuring, and capital-savvy design.

The future of the investment office is not compliance. It's command.

## About Para Bellum Advisors

Para Bellum Advisors is an independent institutional advisory firm that helps investment teams boost returns, unlock capital, cut performance drag, and strengthen portfolio resilience. We focus on derivatives, structuring, capital efficiency, and real-world implementation – delivering clarity, execution discipline, and measurable outcomes. Our purpose is simple: to equip investment teams with the frameworks to execute with clarity and efficiency, regardless of size or structure.

We work with teams across Asia-Pacific, Singapore, and Hong Kong, partnering with CIOs, portfolio managers, and senior risk leads who need hands-on practitioner expertise across FX, rates, credit, equity, and volatility markets. Our clients include private credit and infrastructure investors, project-finance specialists, family offices, emerging hedge funds, and boutique asset managers – along with larger institutions seeking targeted structuring capability without adding headcount.

Our advisory centres on four core offerings:

- **Para Bellum Hedge Rebuild™** – The design and redesign of cross-asset hedge programmes to minimise bleed, tighten execution, and ensure hedges deliver optimally on their objectives.
- **Alpha Overlay Engine™** – A portable-alpha and derivatives-based return enhancement sleeve that runs alongside existing portfolios.
- **Capital Drag Audit™** – A detailed assessment of liquidity, collateral, margin, and execution friction across the portfolio lifecycle, identifying trapped capital and quantifying the cost of inefficiency.
- **Structuring-as-a-Service™** – An embedded structuring function providing trade design, pricing, risk-transfer solutions, documentation support, and execution oversight for teams without in-house capability.

We also offer targeted mini offers for specific institutional needs:

- **Rapid Diagnostic™** – A fast assessment highlighting high-impact inefficiencies across hedging, drag, capital, and execution.
- **Governance Pack™** – Clear, actionable decision frameworks for committees and boards evaluating derivative use or hedge programme changes.
- **Crisis Playbook™** – A practical, step-by-step monetisation and execution protocol for stressed-market conditions.

Across all work, we apply one principle: **no unnecessary complexity, no irrelevance – just structures and strategies that improve outcomes materially.**

We also support bespoke structuring and special-situation mandates for unique portfolio, risk, or execution challenges.

For inquiries on advisory services:

Connect directly with **Mike Duncan**

[mike.duncan@parabellumadvisors.com](mailto:mike.duncan@parabellumadvisors.com)

[linkedin.com/in/mikeduncan-structuring](https://linkedin.com/in/mikeduncan-structuring)

Explore our service offerings at [www.offers.parabellumadvisors.com](https://www.offers.parabellumadvisors.com)

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