



November 24, 2016

The Honourable Bill Morneau  
Minister of Finance  
Department of Finance Canada  
140 O'Connor Street  
Ottawa, Ontario  
K1A 0G5

Dear Minister:

**RE: Bill C-27 and Target Benefit Plans**

The Association of Canadian Pension Management (ACPM) is a national, non-profit organization acting as the informed voice of plan sponsors, administrators and their service providers in advocating for improvement to the Canadian retirement income system. Our membership represents over 400 companies and retirement income plans that cover more than 3 million plan members.

We would like to extend our congratulations to the federal government and, more specifically, to the Minister of Finance in respect to the introduction of legislation that will ultimately enable target benefit plans to be another retirement income option for Canadians. By providing more options for employers and employees, Canadians will be able to more effectively plan and select those opportunities that can best accommodate their individual financial situations and that can address their personal retirement challenges.

Beyond providing the framework for the establishment of target benefit plans, ACPM would also like to acknowledge the provision of Bill C-27 that permits pension plan administrators to purchase immediate or deferred life annuities for former plan members or survivors. The liability discharge for plan administrators in conjunction with a purchased annuity is something that the retirement income industry has requested for several years and we are encouraged by the proactivity that is being taken by this government in this regard.

We look forward to a timely and efficient process in advancing this legislation through the House of Commons and ACPM is willing and able to provide guidance and support during the development of legislation and regulations in connection with this positive and necessary development. We also encourage provincial governments to provide their support to this legislation as it progresses as it is a retirement income option that will benefit people across the country and potentially increase the availability of pension plans in the private sector.

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On behalf of the retirement income industry, ACPM would like to express the value we place on our relationships with the federal and provincial governments and we look forward to meeting with the Ministry of Finance in the near future to discuss Bill C-27 as well as other pressing retirement income challenges that are facing Canadians.

Should you have any questions or wish to discuss further, please feel free to contact us at any time.

Sincerely,



Bryan D. Hocking  
Chief Executive Officer, ACPM