



April 12, 2021

Sally Day-Hanotiaux  
Organization for Economic Cooperation and Development (OECD)  
Via email: [Sally.DAY-HANOTIAUX@oecd.org](mailto:Sally.DAY-HANOTIAUX@oecd.org)

**Re: Revised OECD Roadmap for the Good Design of Defined Contribution Retirement Savings Plans**

Dear Ms. Day-Hanotiaux:

ACPM (The Association of Canadian Pension Management) 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 millions of Canadian plan members.

We are responding to the OECD's request for public input on the updated roadmap for good design in defined contribution (DC) plans. The roadmap identifies good design and public policy to help countries to strengthen retirement income adequacy. We note that a significant amount of pension regulatory policy in Canada is in line with OECD roadmap recommendations.

One proposed change to the roadmap relates to enrollment, contribution levels and contribution periods. The change notes that (i) DC systems should be "as inclusive as possible," highlighting that policymakers should avoid eligibility criteria that may disadvantage specific groups of participants, such as women; and (ii) any early access to retirement savings "should be a measure of last resort and based on individuals' specific hardship circumstances." We are supportive of this change as it is consistent with ACPM's general views relating to DC pension plans within the Canadian retirement system.

The OECD also proposes dropping the recommendation that 'For the payout phase, encourage annuitization as a protection against longevity risk' and replacing it with a more general statement to 'Ensure protection against longevity risk in retirement'. ACPM supports this new roadmap wording, which acknowledges the emergence of variable benefits or drawdowns paid from DC plans as a solution in addition to annuitization by saying "flexibility could be provided by allowing for partial, deferred or delayed lifetime income combined with programmed withdrawals".

Thank you for the opportunity to comment on the updated roadmap for DC plans. We are generally supportive of the 10 key messages of the roadmap and applaud the OECD's continuing efforts aimed at strengthening retirement plans and retirement income adequacy for citizens around the world.

Yours sincerely,

Ric Marrero  
Chief Executive Officer  
ACPM