



January 30, 2026

The Honourable Peter Bethlenfalvy
Minister of Finance
c/o Communications Services Branch
Frost Building North, 3rd Floor
95 Grosvenor Street
Toronto, Ontario
M7A 1Z1

Dear Minister,

Re: 2026 Ontario Budget Consultation

Thank you for the opportunity to provide comments to inform the *2026 Budget*.

The Association for Canadian Pension Management (ACPM) is the leading advocacy organization for a balanced, effective, and sustainable retirement income system in Canada. Our private and public sector retirement plan sponsors and administrators manage retirement plans for millions of plan members, including both active plan members and retirees. Collectively, their priority is to ensure the best possible outcome that will provide their plan members with the pension and retirement security that they expect.

Key areas that are important to the pension industry include:

- Identifying measures that expand retirement income coverage and support innovations that can lead to better outcomes for pension plan members, including bringing forward standards to support the introduction of variable life benefits in Ontario;
- Building on the important Defined Contribution (DC) portability measures announced in the 2025 Fall Economic Statement to enable greater flexibility for members to purchase past service or, as enabled by their plan, transfer these balances into an additional voluntary contribution (AVC) account and broaden the applicability of these changes to include members of DC MEPPs.
- Harmonizing pension rules across provinces to reduce complexity and administrative burdens for employers and plan sponsors, improving efficiency and accessibility.

We encourage a continued focus on these areas of importance. We also wish to draw your attention to the following:

- ACPM's May 22, 2025 [letter](#) on digital communications for pension plan members, and
- ACPM's support of an amendment to the *Employment Standards Act* to enable default auto-enrolment and auto-escalation features that can help Ontarians build retirement savings, as discussed in our [Decumulation 2.0 White Paper](#).

We look forward to continued collaboration and discussion as the Ministry of Finance finalizes and implements the 2026 Budget. Please do not hesitate to contact us if we can provide further information or assist in any way.

Yours truly,

A handwritten signature in dark ink, appearing to read 'Korinne Collins', with a stylized flourish at the end.

Korinne Collins
Chief Executive Officer
ACPM