



June 18, 2015

FSCO/FST/DICO Mandate Reviews
Ministry of Finance
Financial Institutions Policy Branch (FIPB) &
Income Security & Pension Policy Division
Frost Building North, Room 424
95 Grosvenor Street, 4th Floor
Toronto, ON M7A 1Z1

Dear Sir/Madam:

Re: Responses to FSCO/FST/DICO Consultation Paper

ACPM is a national non-profit volunteer-based organization acting as the informed voice of plan sponsors, administrators and their service providers, advocating for improvement to the Canadian retirement income system. Our membership represents over 400 retirement income plans consisting of more than 3 million plan members, with assets under management in excess of \$330 billion.

INTRODUCTION

We are pleased to provide ACPM's comments in response to the consultation paper dated April 21, 2015, on the review of the mandates of the Financial Services Commission of Ontario (FSCO), Financial Services Tribunal and the Deposit Insurance Corporation of Ontario (DICO).

Please note that our comments are limited to those consultation questions pertaining to the regulation of registered pension plans and in particular, as they relate to FSCO.

1. Whether, and to what extent, each agency's mandate continues to be relevant to Ontario's goals and priorities?

The expressed mandate for FSCO generally remains relevant.

2. Whether the agency is carrying out the activities and operations as required in its mandate?

FSCO has developed much hands-on experience in the area of registered pension plans. As a result, its mandate to make recommendations to the Ministry of Finance about the regulation of pension plans is important. We do not have any first-hand knowledge as to whether FSCO is carrying out this mandate effectively as this would involve dialogues and communications to which we are not privy. However, it is our perception that greater communication and integration between FSCO and the Ministry of Finance concerning either the drafting of new regulations or amending the existing regulations should be encouraged. It is crucial that FSCO has the necessary staffing and general resources in order to carry out its mandate.

6. Should the legislated mandates of the agencies explicitly refer to the goal of consumer protection, and should that goal be balanced with the goal of promoting a strong financial services sector? If yes, how?

ACPM supports the view that FSCO's mandate should include both the protection of plan beneficiaries as well as to promote a strong pension plan sector. We believe that this mandate could be supported by enhancing FSCO's policymaking functions. Again, the ACPM supports the recommendation of the Expert Commission that the pension regulator should "assist in the development of pension policy by collecting data, contributing its experience-based insights into the operation of the regulatory system and refining and reflecting on the exercise of its statutory powers".

Conclusion

We appreciate the opportunity to provide our feedback to the Ministry of Finance on the consultation questions. We would be pleased to make ourselves available to discuss or expand upon our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bryan D. Hocking", is written over a faint, light blue circular stamp or watermark.

Bryan D. Hocking
Chief Executive Officer