

BULLETIN NUMBER:	PENS 16-004
TITLE:	Pension Plan Administration in the Event of a Postal Strike at Canada Post
LEGISLATION:	<i>Pension Benefits Standards Act</i>
DATE:	June 2016

PURPOSE

This bulletin outlines the responsibilities of plan administrators in the event of a Canada Post Strike.

BACKGROUND INFORMATION

On June 27, 2016, Canada Post published a Public Advisory regarding a potential work disruption. They advised that a legal work disruption could occur as early as July 2, 2016. In the event of a labour disruption, Canada Post will not operate. Mail and parcels will not be delivered and no new items will be accepted.

RESPONSIBILITIES OF PLANS ADMINISTRATORS

It is the expectation of the Superintendent of Pensions (the Superintendent) that pension plan administrators will make reasonable efforts to meet all disclosure requirements under the *Pension Benefits Standards Act* (PBSA), even in the event of a service disruption at Canada Post,

For example, under sections 30 and 31 of the Pension Benefits Standards Regulation, plans with a fiscal year end of December 31, 2015 registered with the Superintendent must provide annual pension statements to their active and retired members by June 27, 2016.

To minimize the disruption to plan administrators and plan members, we suggest that plan administrators immediately consider some alternative service delivery methods for these statements, including:

- delivering the statements to active members at their place of work;
- using e-mail to distribute the statements (if appropriate security measures are in place for the distribution of personal information); or
- using courier services.

Plan administrators should also consider alternate methods for delivery of statements involving terminations, or the retirement or death of plan members.

Please note that if regulatory issues arise, including the receipt of complaints or enquiries from plan members regarding the non-delivery of statements or relating to a lack of communication, the Superintendent will take the duration of the postal disruption, the efforts made to explore alternative service delivery methods, and the overall costs associated with using couriers into consideration in evaluating these issues.

Filing Documents with the Superintendent

1. Annual Information Returns

If you are filing an Annual Information Return, please use our online filing service available on our website at: <https://fic-efile.gov.bc.ca/>

If cessation of postal service occurs, plan administrators may submit the prescribed fees to the Superintendent either by courier or, subject to further notice, when postal service resumes at Canada Post.

2. Amendment, Termination, or Registration and Supporting Documents

Courier services or email may be used to submit these documents to the Superintendent for the duration of the strike. If email is used, please ensure that all required documents, including any prescribed or required forms, are included in the submission to the Pensions Department.

3. Correspondence

Plan specific correspondence may be delivered electronically to the Department or directly to the staff of the Superintendent. Please contact the Analyst or Senior Analyst responsible for your plan to make arrangements for the delivery of plan specific correspondence.

If you do not know the name of the Analyst or Senior Analyst responsible for the regulation of your plan at FICOM, please phone 604.660.3555 for more information.

Staff of the Superintendent is committed to minimizing any inconvenience or disruption that may result from an interruption of postal service at Canada Post.

MORE INFORMATION

If you have any questions, you may contact the Superintendent at Pensions@ficombc.ca or by phone at 604.660.3555.

*At the Office of the Superintendent of Pensions, we issue information bulletins to provide technical interpretations and positions regarding certain provisions contained in the *Pension Benefits Standards Act*, Regulations and other pertinent legislation. While the comments in a particular part of an information bulletin may relate to provisions of the law in force at the time they were made, these comments are not a substitute for the law. The reader should consider the comments in light of the relevant provisions of the law in force at the time, taking into account the effect of any relevant amendments to those provisions or relevant court decisions occurring after the date on which the comments were made. Subject to the above, an interpretation or position contained in an information bulletin generally applies as of the date on which it was published, unless otherwise specified.*