

The following was sent by email to [pensions@gov.mb.ca](mailto:pensions@gov.mb.ca) on February 21, 2018.

To The Office of the Superintendent, Pension Commission:

I am writing on behalf of the Superannuation and Insurance Liaison Committee (SILC, or Liaison Committee). The SILC represents the members of the CSSB pension plan and is comprised of elected and appointed representatives from the various unions and associations that represent employee and retiree members of the Civil Service Superannuation Plan. Today there are over 55,000 members who are entitled to, or in receipt of benefits under the plan.

The CSSB plan was established by, and is regulated under the Civil Service Superannuation Act. In accordance with the act, the Liaison Negotiating Committee consults with the Employer Pension and Insurance Advisory Committee (Advisory Committee) on changes to the plan.

The government has communicated that there are no plans for changes to Manitoba's public sector pension plans. In view of this, and being that there is already the effective structure in place for consultation between the Liaison Committee and the Advisory Committee, our response centers on the Pension Commission's recommendations to the extent that they may affect the CSSB plan.

The Liaison Committee is opposed to having the recommended new target benefit/shared risk plan design apply to the CSSB plan. An objective of the SILC is to modernize the governance of the plan, through collective bargaining and negotiation with the SILC, to a jointly trustee pension plan that is fully funded and independent of government.

The plan is already exempt from the solvency funding regulations of the Pension Benefits Act; and, we do not see a need for any changes in solvency funding requirements for the plan. We believe plan membership should remain compulsory. Members should be able to access locked-in funds due to financial hardship only in exigent circumstances; we do not believe any changes to the plan are required in this regard.

We look forward to continuing engagement with the Advisory Committee and welcome dialogue with government on improving sustainability and governance of the plan.

Sincerely,

Jody Gillis  
Chairperson, Superannuation and Insurance Liaison Committee  
[www.liaisoncommittee.org](http://www.liaisoncommittee.org)