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ABOUT THIS PAPER

I'm pleased to release this paper on behalf of the provincial-territorial Steering Committee of Ministers on Pension Coverage and Retirement Income Adequacy. The Steering Committee's mandate was to study retirement income adequacy and the specific issue of pension plan coverage, as well as propose and analyze options for improving pension plan coverage.

Federal, provincial and territorial Finance Ministers will undertake further analysis of these two options and consider other ideas for improving the retirement income system. Provincial and territorial Finance Ministers will report out in August 2010. Among the broader range of options to be considered are potential innovations in pension plans and other retirement savings vehicles created by and for employers, employees and individuals, along with tax and other public policy changes that might be needed to facilitate such innovations.

Finance Ministers have agreed that each jurisdiction may undertake consultations as it deems appropriate. The release of the Steering Committee's paper is intended to aid in public discussion. Three important points should be kept in mind to put this information and any consultations into context:

- 1) No jurisdiction – federal, provincial or territorial – has endorsed these options;
- 2) Finance ministers do not view the options in this paper as the only ones under consideration;
- 3) These options, as well as others that are being analyzed or that may be proposed, are not mutually exclusive. In fact, some combination of options may provide the best solution to improve Canada's retirement income system.

The Steering Committee looks forward to the development of viable options to ensure the retirement income security of future generations of Canadians.

Colin Hansen
Chair
Steering Committee of Ministers on Pension Coverage
and Retirement Income Adequacy

**STEERING COMMITTEE OF PROVINCIAL/TERRITORIAL MINISTERS
ON PENSION COVERAGE AND RETIREMENT INCOME ADEQUACY**

**OPTIONS FOR INCREASING PENSION COVERAGE AMONG
PRIVATE SECTOR WORKERS IN CANADA**

EXECUTIVE SUMMARY

This paper analyses the most promising options for increasing pension coverage through a national pension plan. It is intended as an aid to Ministers to determine whether there is sufficient consensus to recommend proceeding with the development of one, or a combination, of the options.

The Problem

Although research suggests that in Canada, most of today's retirees have sufficient income to maintain their pre-retirement lifestyles, concerns have been raised about the fate of future retirees.

Current pensioners receive a significant proportion of their income from workplace pension plans. Yet workplace pension coverage has been steadily declining. Employers are not required to offer a pension plan. Despite good business reasons for offering them, changing workplace dynamics (international competition, reduced unionization of the workforce and declining size of employers), rising costs and increasing regulatory burden are making employer sponsorship of pension plans less attractive.

Today, sixty-seven percent of the Canadian labour force and three in four private sector employees are not covered by an occupational pension plan.

This may not create a problem if other types of savings fill the gap. But evidence indicates that the average Canadian is not saving enough for retirement. Registered Retirement Savings Plans (RRSPs) are tax-effective savings vehicles, yet they are not being fully utilized – contribution rates are low, and are skewed towards higher income individuals. And the capacity of individuals to accumulate personal savings for retirement is seriously impacted by high fees for retail investment – some studies say the highest in the world.

What about the mandatory part of Canada's pension system? Canada's public pension system (Canada/Quebec Pension Plan (CPP/QPP) and Old Age Security programs) is designed to provide up to approximately 40% of the average wage to retirees (\$46,300 in 2009). The CPP is considered exemplary for its funding model, but ranks poorly among comparable high-income countries within the Organisation for Economic Co-operation and Development (OECD) for its limited scope. Public pensions in comparable OECD countries cover almost double the average wage, twice the scope of the OAS and CPP.

In summary, shortfalls appear to exist in both the mandatory and voluntary parts of Canada's retirement income system. Those individuals who are not adequately covered by mandatory programs, who have no access to a voluntary employer-sponsored pension plan, and who are not accumulating enough personal savings will not have adequate income in retirement. Specifically, those earning between approximately \$30,000 and \$100,000 appear to be the most vulnerable. Individuals earning less than \$30,000 appear to be well-served by our public pension system. Those earning more than \$100,000 are likely to have sufficient resources to plan for their retirements. According to a 2007 study by the University of Waterloo:

... two-thirds of Canadians in the private sector earning between \$30,000 and \$100,000 who are planning to retire in 20 years will not have sufficient retirement income to cover necessary living expenses.¹

This problem will manifest in the future. Uncertainty about the future is challenging for decision-makers. Are we certain the problem will materialize? Can we afford to wait and see? What are the consequences of inaction to future retirees and taxpayers if the problem is real?

Calls for Reform

Four provinces (Alberta, British Columbia, Ontario and Nova Scotia) and the federal government have undertaken significant pension reviews over the last two years. Among numerous recommendations on pension standards issues, the idea of expanding the mandate of the CPP or creating a national voluntary pension plan arose in every review.

A broad spectrum of stakeholders is calling for a national pension approach to address the problem of waning pension coverage. The Canadian Association for Retired Persons, the Canadian Labour Congress and the Federal Superannuates National Association have all proposed an expansion to the existing mandatory, defined benefit CPP. A number of experts recommend the addition of a voluntary, defined contribution "tier" to the CPP. The federal NDP and Liberal parties have both recently announced that they are in favour of expanding the CPP in some manner. The House of Commons passed a motion in June that the federal government should work with provinces and territories to introduce measures such as expanding and increasing the CPP and other federal retirement programs.

The insurance industry has recommended against a "government-run" pension plan. Representatives suggest they could create an effective pension plan model to increase pension coverage if pension regulations and income tax rules were modernized.

British Columbia has already announced that, barring the creation of a national supplementary plan, it will spearhead the establishment of a pension plan for all workers who do not have access to an employer-sponsored plan. Alberta and Saskatchewan have agreed to collaborate with British Columbia to explore the possible design of such a plan, and other provinces have shown a strong interest in the idea.

¹ In the report, necessary living expenses are identified as food, shelter, clothing, transportation, health care, energy and taxes.

The Options

This paper analyzes two proposals for increasing pension coverage in Canada through a national pension plan:

1. A Canada Supplementary Pension Plan (CSPP) – a voluntary, defined contribution “tier” that would be added to the CPP;
2. A CPP Expansion – an expansion of the existing mandatory, defined benefit plan through an increase in the replacement rate, or the upper limit on income on which the pension is calculated, or both. A CPP Expansion could take a variety of forms. As a result, three variations are presented for consideration in the paper.

The analysis highlights the similarities and differences between the proposals and shows how each could contribute to addressing the future pension coverage problem.

The CPP Expansion would naturally leverage the existing CPP infrastructure to provide efficiencies that would lower overall costs. The CSPP contemplates a close relationship with the CPP that would achieve a similar result.

Both models emphasize the advantages of scale, low cost, expert administration and investment management. The CSPP would offer limited investment choice based on risk tolerance. The expanded CPP, like the current CPP and other defined benefit pension plans, would not offer any investment choice to members.

Both proposals would target particular income groups by setting upper and lower limits on the income that would be subject to contributions. The CSPP focuses on the target group identified in the University of Waterloo study (workers earning between \$30,000 and \$100,000). Each variation for a CPP Expansion targets different income ranges. One variation proposes increased benefit levels to all CPP participants.

The CSPP model, envisioned as a voluntary plan, contemplates automatic enrolment as an effective way to maximize participation without making it mandatory. The CPP Expansion would retain the mandatory nature of the existing CPP.

The CSPP would be operated independently, at arm’s length from government. The CPP Expansion would fall within the existing CPP governance structure, that is, joint stewardship of federal and provincial governments, and an independent, arm’s length Investment Board. Both reflect the need for independent investment management that is free from political interference.

Both models consider the potential role for the private sector in administration, investment management, custodianship and annuitization (i.e., the purchase of a life-time pension with a pot of money on retirement), where applicable. The insurance industry proposal that pension standards be modernized so that insurance companies can create innovative plan designs is also considered.

The evolving character of the retirement market points to a major role for governments. The products are complex, and there is an asymmetry of knowledge and information between

consumers and sellers. This suggests a role for governments in ensuring that individual interests are protected and that all Canadians have the opportunity to save for their retirement in a cost-effective and efficient manner.

Reaching Consensus

While the two options for a national pension solution are presented as separate options, they are not mutually exclusive. Ministers may wish to consider mixing elements of each model to arrive at the best solution. In addition, a blend of the two models has the potential to address savings deficits in both the mandatory and voluntary sections of the Canadian retirement income system. The role of the private sector should also be considered, both in terms of its expertise in pension plan administration, investment management, custodianship and retirement income delivery, and as innovators in alternative pension plan design.

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SCOPE

This paper focuses on the most promising options for a national supplemental pension solution for consideration by the Steering Committee and, ultimately, Finance and Pensions Ministers at the December meeting in Whitehorse. It is not intended to examine every possible option or alternative. While it addresses key policy issues, some are set aside for future consideration, should Ministers decide to pursue a national solution. A list of policy issues that will require further analysis is included for reference in Appendix B. The paper is intended primarily as an aid to Ministers to determine whether there is sufficient interest to proceed with further development of one, or a combination, of the options outlined.

CANADA'S RETIREMENT INCOME SYSTEM

Retirement income systems around the world are often described in terms of “three pillars” of retirement income. There are different interpretations of how the components of the pillars should be categorized. For the purposes of this paper, the pillars are defined according to the OECD framework for retirement income.

Pillar 1 is comprised of publicly funded pensions. It generally consists of programs that are financed from tax revenues and focus on the elimination of poverty. These programs are typically available to the elderly based on criteria such as age and years of residence or citizenship, with or without an income or means test.

In Canada, Pillar 1 consists of Old Age Security (OAS), the Guaranteed Income Supplement (GIS) and two smaller programs targeted at surviving spouses of couples in receipt of OAS/GIS benefits.

Pillar 2 is made up of compulsory programs for the employed and self-employed that focus on the maintenance of comparable living standards before and after retirement and are designed to replace a portion of pre-retirement earnings.

In Canada, Pillar 2 consists of the Canada and Quebec Pension Plans (CPP/QPP).

Pillar 3 consists of voluntary personal savings, including employer-sponsored occupational pension plans and tax-assisted individual retirement savings. It is designed to supplement the first two pillars so that when combining all three sources, retirees have adequate income to approximate their pre-retirement living standards.

In Canada, Pillar 3 includes registered pension plans (RPPs) provided voluntarily by employers and/or unions, group or individual registered retirement savings plans (RRSPs), and the new Tax Free Savings Accounts (TFSA).

The OECD model does not include other personal savings, such as non-tax-assisted investments and home equity. These forms of saving are included in other models. The World Bank's three pillars include them in pillar three, and other studies place them in a fourth pillar (e.g. University of Waterloo, 2007).

In Canada, it is generally agreed that the combination of all three pillars contributes to a healthy retirement income system. To the extent that all three pillars are strong and sustainable, all Canadians will have adequate resources in retirement to maintain a standard of living comparable to their pre-retirement standard.

An important and somewhat controversial issue is the appropriate target for replacing pre-retirement income as individuals transition to retirement. The debate focuses on a number of issues, including the different replacement rates that may be necessary for families depending on their size, pre-retirement income levels, and whether the family unit owns a home or rents. Since post-retirement expenses are usually less than pre-retirement expenses, and taxes are generally lower, it is commonly acknowledged that individuals usually require less income in retirement to maintain a similar lifestyle.² Individuals with low pre-retirement incomes may need higher replacement rates than individuals with high pre-retirement incomes. Some suggest that home ownership could reduce the required replacement rate, as homeowners do not pay rent and may downsize or sell their homes in retirement, thus converting their asset into a potential stream of income. However, homeowners must pay property taxes and maintenance costs that may increase as housing stock ages, and may not intend to downsize or sell their homes in retirement.

A frequently used target for an adequate level of income replacement in retirement is between 60% and 85% of pre-retirement income. In the final analysis, individuals will likely have different objectives and plans in retirement – there is no one size fits all.

The public components of the Canadian retirement system (Pillars 1 and 2) are targeted to provide support at the lower end of the income spectrum, and are designed to deliver about 40% of pre-retirement income (15% from OAS/GIS, and 25% from CPP/QPP) for individuals earning up to the national average wage (\$46,300 in 2009). They provide a high degree of income replacement at the lower end of the income scale – those earning up to approximately \$30,000 – but contribute progressively smaller proportions as incomes increase.

The CPP has been cited by the OECD as exemplary world-wide for its financial sustainability, and Canada compares favourably internationally in terms of future income security for its lower

² Keith Horner's paper for the Research Working Group, "Retirement Saving by Canadian Households," concludes from a net disposable income continuity analysis that, depending on family type and home ownership, gross replacement ratios in the 53% to 75% range are needed to ensure full continuity of pre-retirement consumption in retirement (p. 22). To promote 100% consumption continuity, he suggests that a replacement ratio of 80% for modest income Canadians is required (p. 45).

income citizens (OECD, 2009). However, the scope of Canada's public programs at middle to higher income levels compares less favourably. The World Bank observed in 2007:

...the ceiling on public pensions averaged across 16 high-income OECD countries is 190 percent of average economy-wide earnings. At roughly the level of average economy-wide earnings, the Canadian ceiling is exceptionally low.

In other words, the first and second pillars in the Canadian system, although financially strong, contribute considerably less to those who were middle to higher income earners than these pillars do in most other comparable OECD countries. The World Bank data shows that Canada's public pension programs cover incomes up to the level of our average wage, while comparable programs in other high-income OECD countries cover income levels up to almost double the average wage in those countries. According to Baldwin:

...on earnings up to one half average wages and salaries [\$23,150], the benefits from Canada's publicly administered programs meet the commonly used replacement rate target of 70 per cent of pre-retirement earnings. However, the replacement rate that emerges from these programs declines quite steeply as a result of the flat rate amount of the OAS and the offset of CPP benefits against GIS entitlements. Thus at average wages and salaries, there is a significant gap to be filled by third pillar income to eliminate the difference between what is available from OAS, C/QPP and GIS, and a replacement rate target of 70 per cent. As earnings increase beyond the level of average wages and salaries, the gap to be filled continues to increase.

Table 1 below illustrates the role played by the first two pillars in Canada in terms of replacement rates provided, compared to other OECD countries (Baldwin, 2009, p. 15). Canada's comparative rank is 13th with a 76.5% replacement rate for those at the lower end of the income spectrum (annual income in the \$23,000 range) but drops to 26th out of the 30 OECD countries, with a replacement rate of only 29.7% at 1.5 times the average wage (\$69,450 in 2009).

Table 1: Gross Replacement Rates (RR) Provided by Pillars 1 and 2, Canada and OECD Comparators

| | 0.5 x Average Wage [\$23,150] | 1.0 x Average Wage [\$46,300] | 1.5 x Average Wage [\$69,450] |
|-----------------|----------------------------------|----------------------------------|----------------------------------|
| Canada RR | 76.5 | 44.5 | 29.7 |
| Canada Rank | 13 | 20 | 26 |
| OECD Average RR | 71.9 | 59.0 | 54.3 |
| OECD Highest RR | 124.0 | 95.7 | 95.7 |
| OECD Lowest RR | 43.0 | 30.8 | 21.3 |

Based on OECD, 2009

With Pillar 1 and 2 combined replacement rates of 44.5% at the \$46,300 wage level, and only 29.7% at the 69,450 level, it is clear that middle and higher income Canadians must rely extensively on Pillar 3 (occupational pensions and personal retirement savings) to maintain pre-retirement standards of living in retirement.

THE PROBLEM

Except for very low income Canadians (those earning below approximately \$23,000 annually) who receive adequate income replacement levels from Pillars 1 and 2 sources, Canadians must rely significantly on Pillar 3 (RPPs and tax-assisted savings) to maintain pre-retirement consumption levels after retirement.

Research suggests that most of today's retirees in Canada are achieving adequate income replacement rates to maintain pre-retirement levels of consumption, and certainly to pay basic living expenses. However, current pensioners receive a significant proportion of their income from RPPs and personal investments. Of an average annual income for seniors of \$30,000, almost 50% comes from Pillar 3 sources.³

Given today's heavy reliance on Pillar 3 income sources, what are the prospects for future retirees?

In Canada, employers are not required to provide a registered pension plan or any other retirement savings vehicle for their employees. Most employers have strong business reasons for including pensions in the compensation package in order to attract and retain scarce labour; but rising costs and mounting risks, along with increasing regulatory burden, are making employer sponsorship of pension plans far less attractive.⁴ As regulatory standards are strengthened to secure the benefits of members, increasing obligations for plan sponsors may have had the unintended consequence of deterring employer participation in the current voluntary system.

Employer-sponsored pension plan coverage has been declining since the late 1970s, and has fallen from 46.1% of paid workers in 1977 to 38.3% in 2007 (Baldwin 2009 at p. 8). Sixty-seven percent of the Canadian labour force and three in four private sector employees are **not** covered by an occupational pension plan.

Not only has pension coverage by employer-sponsored pension plans declined, but other Pillar 3 programs have fallen short of the social policy objective of increasing retirement savings to meet targeted retirement income replacement rates.

Existing tax incentives on their own do not appear to have encouraged adequate savings. RRSP contributions are low (only 31% of eligible tax filers made an RRSP contribution in 2007 and contributions represented only 6% of the total RRSP room available to tax-filers). Further, contributions are skewed towards individuals in the top level of income distribution (TD Economic Special Report, 2009; Horner, 2009, Table 4.4, pp. 31-32) and the high costs associated with retail investing have impacted the capacity for these plans to accumulate sufficient savings over time.⁵ Since the economic downturn of the past year, one in eight

³ \$10,100 from pension plans and \$3,500 from investments (Baldwin, 2009, p. 33). Another \$2,500 comes from earnings, a source not included in any of the retirement income pillars.

⁴ The introduction of solvency funding requirements in the late 1980s, combined with weak stock market performance, increased longevity and low interest rates in the current decade has had a serious impact on pension plan financing, while adverse court rulings on surplus ownership and the introduction of governance guidelines for both DB and DC plans has imposed further obligations on employers who wish to have pension plans for employees.

⁵ Ambachtsheer and Bauer, 2007.

Canadians has either reduced contributions or stopped contributing to an RRSP (HSBC, 2009 at p. 4). In his paper for the Research Working Group, Horner observes:

RRSP contributors who do not belong to RPPs do contribute more on average to RRSPs than do contributors who are RPP members. The difference is not great enough, however, to support the idea that RRSP-only contributors are achieving savings levels similar to those of RPP members. (p. 36)

Even if RPP and RRSP savings are insufficient, some argue that there is no evidence, at least up until now, of significant gaps in the retirement system (Baker and Milligan, 2009). They suggest that other forms of personal savings, such as non-tax-assisted investments, home equity and business ownership will fill the gap for those that do not have occupational pensions or sufficient RRSP savings. However, others argue that there is no tangible evidence to support this theory and that there a looming problem. Horner states (at p. 33):

[The] analysis suggests that in the modest/middle earnings range, about 40% of households are not saving enough for full maintenance of their pre-retirement consumption, and about 28% face serious shortfalls in their living standards.

According to a 2007 study undertaken by the University of Waterloo and funded by the Canadian Institute of Actuaries, two-thirds of Canadians in the private sector earning between \$30,000 and \$100,000 who are planning to retire in 20 years will not have sufficient retirement income to cover *necessary living expenses*.⁶ Baldwin, 2009 suggests that roughly one-third of the near elderly⁷ will not achieve continuity of living standards in retirement.

While the future can never be certain, there is considerable evidence to suggest that a significant proportion of modest to middle income Canadians are not saving enough to maintain their pre-retirement living standard, and a significant minority of these may not be able to cover basic living expenses in retirement. Only 25% of working-age Canadians in the private sector are members of pension plans. While, in theory, tax-assisted vehicles provide the opportunity for adequate savings in retirement, actual savings rates do not appear to be filling the gap.

A challenging combination of factors, not contemplated previously in the evolution of our retirement system, faces Canadian decision-makers today:

- an aging population - increasing pressure on not only the retirement system, but also on health and other social program costs,
- slower labour force growth - creating potential intergenerational funding pressures,
- the trend toward early retirement - in part due to incentives built into the system under earlier demographic and mortality assumptions,
- inadequate retirement savings - especially in Pillar 3,
- increasing pension costs due to greater longevity, low interest rates and poor investment returns,
- the growing complexity of investment markets and retirement products,
- low general levels of financial literacy in the population,

⁶ Necessary living expenses are identified as food, shelter, clothing, transportation, health care, energy and taxes.

⁷ Unattached individuals and family units with a head of family aged 45 to 64.

- some of the highest investment management fees in the world,⁸ and
- increased risks to employers - resulting in an overall decrease in employer-sponsored pensions, as well as a shift from defined benefit (DB) plans in favour of defined contribution (DC) plans⁹ and group RRSPs.

Collective wisdom suggests that the number of pension plans in the private sector, particularly DB plans, will continue to decline unless there are significant fundamental changes to the regulatory framework, including both pension standards and income tax rules. Several provinces and the federal government are currently working on improvements to their regulatory frameworks, and recently announced federal income tax changes will help to allow for more prudent funding of DB plans in future.¹⁰

However, even with improvements, many believe that the best that can be expected is a slowing of the pace of declining coverage – and perhaps the preservation of existing DB plans. There is considerable pressure from pension experts to modernize pension standards to encourage innovative plan designs that could replace the current DB model. Further, they recommend that we consider shifting the pension delivery model away from employers on the grounds that employers are increasingly unwilling or unable to bear the costs and risks of pension plans. They tell us that multi-employer pension plans with sufficient scale could achieve cost efficiencies, increase coverage and portability, and provide reasonable benefit security. High-performing expertly managed DC plans¹¹ and target benefit plans,¹² with shared governance models (such as joint trusteeship), are of growing interest to employers who wish to minimize risk and costs, and to employees (particularly younger Canadians) concerned with mobility and flexibility.

The combination of the weaknesses in Pillar 3 and the limited scope of Pillar 2 form the nub of the savings deficit problem in Canada.

CALLS FOR REFORM

Calls for pension reform are mounting, with pension coverage and benefit security rapidly becoming pressing public policy issues for Canada. Recent economic events have called into question not only the immediate needs of current pensioners and those nearing retirement, but

⁸ See Rekenhaller et al., 2009 at pp. 13, 26; Khorana et al., 2009; Appendix E.

⁹ A defined contribution pension plan is one for which contributions are “defined” or fixed, and the amount of the benefit depends on the investment performance of the fund. In contrast, a defined benefit pension plan is one for which benefits are defined, or guaranteed, regardless of the investment performance of the fund, and contributions may be adjusted to achieve the guaranteed level of benefits.

¹⁰ The federal government announced on October 27 that it will amend the income tax rules to increase the amount of surplus that may be held in pension plans from 10% to 25% of liabilities. Currently, employers must cease contributing if surplus exceeds the 10% limit, effectively precluding the ability of employers to build prudent margins into their funds. However, until employers have assurance that they will have unrestricted access to excess surplus in the future, it is not likely that many employers will create surplus buffers in their DB plans.

¹¹ The concept of high-performance, expertly managed DC plans has emerged as an alternative to the “traditional” DC plan, which is often ineptly administered by an employer and under-performs due to its reliance on member selected investments. Strong governance, expert investment management and large scale, features which are generally found in large DB plans, have been identified as characteristics that greatly improve DC plan performance.

¹² Target benefit plans are similar to DB plans since contributions are based on projected retirement benefits, but are similar to DC plans in that benefits are not guaranteed and are based on investment performance. Commingling would combine the funds of a number of pension plans into a single fund, thereby achieving the advantages of scale.

also the long-term retirement income prospects of Canadians. Four provinces (Alberta, British Columbia, Ontario and Nova Scotia) and the federal government have undertaken significant pension reviews over the last two years.

In November 2008, the Ontario government released *A Fine Balance*, the report of the Ontario Expert Commission on Pensions (OECPE). Despite its mandate being limited to DB plans, the OECPE made a number of recommendations for improving benefit security and expanding pension coverage. Articulating the need to complement the traditional “pure” DB or DC model, the OECPE recommended a new strategy to offer the advantages of scale and expert administration to Ontario’s pension plans by allowing them to access “super-plans” (those with assets in the range of \$10 billion). Ontario responded by enacting legislation in June that allows two large public sector plans in Ontario (Ontario Teachers’ Pension Plan (OTPP) and Ontario Municipal Employees Retirement Pension Plan (OMERS)) to form subsidiaries to take over the administration of smaller plans.

The OECPE report also suggests that rules be enacted to enable and promote large, commingled target benefit plans that might provide affordable pension coverage to those who do not currently have it.

In addition, the OECPE noted that a number of stakeholders had urged an expansion of the existing CPP to increase the unit of benefit, the maximum earnings on which benefits accrue, or both. It suggested that the government investigate the advantages and disadvantages of expanding the mandate of the CPP, or creating a comparable provincial plan, so as to enhance pension coverage, control costs and improve benefit continuity when individuals change employers (pp. 187 – 88).

One week after the release of the OECPE report, the Alberta/British Columbia Joint Expert Panel on Pension Standards (JEPPS) issued its report on pension standards, *Getting Our Acts Together*. In addition to recommendations to improve the provinces’ minimum pension standards, JEPPS recommended that the two provinces facilitate the establishment of an independent, widely accessible, privately-run DC voluntary pension plan to address the problem of low pension coverage in the private sector (pp. 180 – 92).

In January, 2009, Nova Scotia’s Pension Review Panel also recommended a province-wide pension plan similar to the model recommended by JEPPS.

In response to the JEPPS report, British Columbia has already announced that it will spearhead the establishment of the recommended plan and passed enabling legislation. However, recognizing the advantages of larger scale and improved portability afforded by a national or multi-province plan, the Alberta and British Columbia governments have been working to attract other provinces to collaborate on the initiative. As a result, British Columbia, Alberta and Saskatchewan premiers signed a letter of intent in March 2009 agreeing that their governments would explore the possible establishment of a regional occupational pension plan. Since the establishment of the Research Working Group and the Steering Committee, further development of the regional plan has been temporarily deferred in favour of building support for a national approach.

A variety of stakeholders, including pensioners' organizations, labour unions and pension experts have called for a national supplementary occupational pension plan or an expansion of the existing CPP to address the problem of waning pension coverage. A number of other provinces, as well as the federal House of Commons, have also expressed interest in the idea. On June 16, 2009, the House passed a motion that "in light of the legitimate concerns of Canadians that pensions and their retirement security may not be there for them in their retirement years," the federal government should work with provinces and territories to "ensure the sustainability of Canadians' retirement incomes by bringing forward at the earliest opportunity, measures such as expanding and increasing the CPP/QPP, OAS and GIS to ensure all Canadians can count on a dignified retirement" (Debates, June 11 and 16, 2009).

STAKEHOLDER PERSPECTIVES

Most stakeholders participating in the consultations undertaken in Alberta/British Columbia, Ontario and Nova Scotia agreed that the future retirement income security of Canadians is of concern. While suggested solutions varied, a common theme was that remedies to the pension system are urgently required.

Stakeholders consulted by the JEPPS were strongly in support of a broadly-based multi-employer pension plan, and many argued for a national approach - leveraging the existing infrastructure of the CPP. When consulted by the Alberta and British Columbia governments after the release of the JEPPS report, respondents were also generally supportive of the idea of a widely-accessible plan. Some trade unions and labour organizations indicated their strong preference for a mandatory DB model over the voluntary DC plan recommended by the panel, because they believe that a mandatory DB model would produce better incomes and risk protection for workers. Furthermore, they fear that a voluntary DC plan could supplant existing DB plans.

The announcement by the British Columbia government that it would spearhead the establishment of a broadly accessible multi-employer DC pension plan has been well-received, particularly by the self-employed and small business sectors. They see a large multi-employer occupational plan as a viable way for the self-employed to access a registered pension plan,¹³ and for small enterprises to offer low-cost pensions with expert services normally only available to large-scale pension plans. Smaller businesses also see the proposal as a vehicle that would allow them to compete more effectively with larger firms in the same sector for scarce labour resources.

On the other hand, stakeholders in the insurance industry have expressed significant concerns that a government-facilitated pension model would directly compete with them in their traditional market territory, and would prefer a hands-off approach. They acknowledge that the existing retirement income system in Canada will not provide adequate retirement incomes to a significant portion of the future retired population. However, they believe that government's involvement should be limited to improving the regulatory framework to provide the flexibility required for the private sector to develop alternative pension products similar to the model recommended by JEPPS, using their existing infrastructure and expertise.

¹³ As noted elsewhere in the paper, self-employed Canadians participate in the CPP/QPP, paying both employee and employer contributions.

The Financial Advisors Association of Canada recently commissioned a report, “Encouraging Small and Medium Sized Firms to Participate in Pension Plans,” which advocates the fostering of group plans in the private sector to exploit economies of scale, thereby reducing administrative complexities and fees (Gunderson and Wilson, 2009). Suggested plan design elements, such as automatic enrolment with opting out provisions, the simplicity of the DC model, a limited range of investment options and life-cycle investment strategies, have much in common with the recommendations of the JEPPS and others for a more centralized, government-facilitated pension plan. The key differences centre on how these plans would be governed, and beliefs regarding the ability of the private sector to deliver on large scale and low cost. These differences are explored later in the “Discussion” section of this paper.

OPTIONS FOR A NATIONAL PENSION PLAN

Under the Terms of Reference for this analysis, three possible models for a nationwide pension plan were to be examined:

- Option 1: Canada Supplementary Pension Plan (CSPP) – based on the multi-employer, DC top-up to the CPP, originally proposed by Keith Ambachtsheer.
- Option 2: Pension One – based on the multi-employer, DC model originally proposed by the JEPPS as the “ABC Plan”.
- Option 3: CPP Expansion – builds on the current mandatory, DB national plan by increasing contributions and/or the income threshold subject to contributions, originally proposed by the Federal Superannuates National Association (FSNA).¹⁴

On further analysis we have concluded that the essential features of Pension One are almost the same as those of the CSPP. The primary difference between the two models is their relationship with the existing CPP. The CSPP is described as an additional “tier” overlaid on the existing CPP, while Pension One is envisioned as a stand-alone multi-employer pension plan. Under either arrangement, there would be clear advantages to working in close cooperation with the existing CPP. The details of the relationship with the CPP under each model would require further study should it be decided to pursue a CSPP-like approach. To simplify the following analysis, we have focused on just two models:

- Option 1: CSPP (or Pension One), and
- Option 2: CPP Expansion.

Minor differences between Pension One and the CSPP are identified where relevant.

While the two options in this paper are presented as separate and distinct, they could be seen to address different aspects of the problem, and should not be viewed as mutually exclusive. Rather, considering the problem in terms of the weaknesses identified in both Pillars 2 and 3, the options could be also combined in some manner to address them.

¹⁴ Federal Superannuates National Association, 2008.

1. Canada Supplementary Pension Plan

The CSPP would be a supplementary occupational pension plan that is:

- voluntary,
- available to all employers,
- available to all workers (including the self-employed) who are not otherwise covered by a workplace pension plan, and
- regulated under the existing regulatory framework for pensions and income tax.

While it is intended to operate at arm's length from government, the CSPP does contemplate a role for governments during its establishment phase. The role of government would be to provide a framework that ensures a sustainable, low-cost pension plan is ultimately developed and maintained. Economies of scale and portability (or continuity of coverage) would be achieved by creating one very large plan that would bring together unrelated employees, self-employed individuals and employers. Scale and portability (or continuity of coverage) are core features to achieving the objectives of low cost and flexibility for members.

The government would not be the plan “sponsor,”¹⁵ nor would it be responsible for pension obligations to members. A non-profit board of trustees with relevant expertise and representation would be the fiduciary of the plan.¹⁶ The board would operate independently of government, and would likely hire agents to invest the funds and provide other relevant services as required. Board appointments would likely be made by a nominating committee, similar to the current arrangement for the Canada Pension Plan Investment Board (CPPIB).

The CSPP is a simple DC pension plan into which it is proposed that both employers and employees would be automatically enrolled with the ability to opt out. The use of automatic enrolment in a voluntary model is examined later in the Discussion section of this paper.

One of the elements of a low-cost model is a simple contribution formula. The CSPP proposal contemplates an annual contribution rate of 10% of earnings: 5% each from employer and employee. (JEPPS recommended a tiered approach: an option of 3%, 6% or 9% each from employer and employee.) Contribution levels may change over time to accommodate changing priorities and financial resources of the member or the employer. Contributions would be credited to fully funded individual member accounts (similar to the proposed UK personal accounts system).

Because Pillars 1 and 2 already provide adequate retirement income to those at lower income levels, a contribution threshold of \$30,000 of earnings is suggested. That is, contributions would not be payable on income below \$30,000. The proposed contribution rate of 10% is expected to achieve a target replacement rate of 70 to 75% of pre-retirement income.¹⁷ To keep administration and investment costs low (50 basis points is considered appropriate and

¹⁵ A plan sponsor is an entity that plans, designs, normally helps to administer and may guarantee the benefits of an occupational pension plan for its employees or members.

¹⁶ A pension plan fiduciary is the individual or entity that is charged with the responsibility of acting in the best interests of the members in administering the plan and investing the pension funds.

¹⁷ Ambachtsheer, 2008.

achievable), and ensure maximum returns, there would be limited or no individual investment choice. Rather, investment strategy would be developed by the trustees, who would rely on expert investment managers to recommend specific investments. This approach is consistent with that of DB pension plans, which have been shown to consistently outperform employee-directed investment.¹⁸

Investment management, administration and custodianship could be handled internally, or they could be publicly tendered, offering opportunities for the private sector to provide these services. A combination of internal and external management could also be considered. Life-cycle investment strategies and options for staged annuitization within the plan are also suggested, and should be further explored should a decision be made to pursue this model.

2. Expansion of the Canada Pension Plan

A number of stakeholders have suggested that the existing CPP should be expanded as a way of addressing the pension coverage problem. The FSNA (represented by Bernard Dussault, former federal chief actuary with the CPP), the Canadian Association of Retired Persons (CARP), the Canadian Labour Congress, and both the federal Liberals and NDP have all proposed that the existing CPP be expanded in some fashion.

An expansion of the existing CPP would provide enhanced benefits under a pension plan model that:

- is mandatory,
- requires the participation of all employers,
- covers all workers (including the self-employed), and
- is operated under the existing framework for the CPP.

The degree to which coverage would be expanded depends on the details of the model, i.e. the targeted replacement rate on pensionable earnings and the maximum level of income that would be subject to contributions (otherwise referred to as the Year's Maximum Pensionable Earnings or YMPE).

The FSNA proposal goes the furthest, with a target replacement rate of 70% for everyone earning up to the maximum income level for RRSP contributions (\$116,667 for 2009). This would require a doubling of contributions at the lower income levels (up to the current YMPE of \$46,300) as well as new contributions on incomes between the current YMPE and the proposed YMPE of \$116,667 (which would increase annually to keep pace with wage trends, as in the existing CPP). As a result, income replacement rates would rise from the current 25% of the average industrial wage, to 70% of pre-retirement income up to the \$116,667 level. These increases would be gradually phased in, to avoid significant short-term shocks to the system.

The FSNA proposal would be a major departure from the current situation since it would effectively replace Pillar 3 forms of retirement savings by expanding Pillar 2 to such an extent that no additional savings would be required. As noted by Baldwin, most OECD countries have three pillar pension systems. However, there are exceptions. For example, Austria, Germany,

¹⁸ Tang et al., 2009.

Hungary, Italy, and the United States have no first pillar programs; Iceland and New Zealand have no second pillar programs, and Finland, Greece, Italy, Poland, Portugal, Spain and Turkey have such comprehensive publicly administered programs that Pillar 3 savings, including employer-sponsored pension plans, are not necessary. If Canada were to implement the FSNA proposal, it would join the third list of countries by eliminating the need for third pillar savings.

In Canada it is generally believed that all three pillars contribute positively to income security in retirement, and that the three pillar system reduces risk by fostering a diversity of retirement savings mechanisms.

At the same time, the level of income provided by the first two pillars in Canada to middle and upper income individuals is extremely low relative to other high-income OECD countries.¹⁹ An expansion of the existing Pillar 2 would improve Canada's ranking on public program adequacy when compared with other OECD countries, and could mitigate the risks of savings deficits in the third pillar.

While the FSNA version of expanding the CPP may be considered too extreme,²⁰ variations on it could have strong potential for an efficient and relatively simple fix. Three variations are considered below. Under either variation, implementation is projected over a full 40 years.

Table 2: CPP Expansion – Comparison of Current CPP with Three Variations

| | <i>Current CPP</i> | <i>Variation 1</i> | <i>Variation 2</i> | <i>Variation 3</i> |
|---|--------------------|--------------------|--------------------|--------------------|
| YMPE | \$46,300 | \$92,600 | \$92,600 | \$69,450 |
| Maximum pension as a percent of career pensionable earnings | 25% | 50% | 25% | 25% |
| Maximum pension payable (monthly) | \$908.75 | \$3,635.00 | \$1817.50 | \$1363.13 |
| Employee/employer contribution rate to \$46,300 | 4.95%/4.95% | 7.95%/7.95% | 4.95%/4.95% | 4.95%/4.95% |
| Employee/employer contribution rate from \$46,301 to new YMPE | 0.0%/0.0% | 6.0%/6.0% | 3.0%/3.0% | 3.0%/3.0% |
| Notes: Self-employed individuals pay both the employee and employer contributions. These rates are not additive. A portion of the contribution rate up to the current YMPE pays for unfunded liabilities arising from the payment of benefits for service that predated the establishment of the CPP. The contribution rate from the existing YMPE to the new YMPE assumes the new benefits are fully funded, with no retroactive effect. | | | | |

¹⁹ See Table 1 above, and related discussion.

²⁰ For example, the NAFR proposal would provide significant additional pensions to individuals at the lower end of the salary spectrum for whom existing Pillar 1 and 2 programs already provide sufficient income replacement in retirement.

As can be seen in Table 2, the CPP Expansion model allows for significant variations in benefit levels. Variation 1 doubles both the replacement rate and the maximum pension covered by the CPP. Variations 2 and 3 leave the replacement rate as it is, and increase the maximum pensionable earnings by 2 times and 1.5 times respectively.

- Variation 1 applies to all earnings levels. It would quadruple the maximum pension payable (available to individuals who work a full 40 years and have earnings at or greater than the YMPE of \$92,600 in each of those years). Employee and employer contributions would each increase by 3.0% on earnings up to \$46,300, and by 6% on earnings between the \$46,300 and \$92,600.
- Variation 2 does not apply to earnings of less than the average wage. It would double the maximum pension payable (available to individuals who work a full 40 years and have earnings at or greater than the YMPE of \$92,600 in each of those years). Employee and employer contributions would not increase on salaries up to \$46,300, and but each would pay 3% on earnings between \$46,300 and \$92,600 to pay for the cost of providing benefits on the higher salaries.
- Variation 3 does not apply to earnings of less than the average wage. It would see the maximum pension payable increase by one and a half times (available to individuals who work a full 40 years and have earnings at or greater than the YMPE of \$69,450 in each of those years). Again, employee and employer contributions rates would not increase on salaries up to \$46,300, but each would contribute 3% on earnings between \$46,300 and \$69,450 to pay for the cost of providing benefits on the higher salaries.

The contribution rates are split because of the 1995 requirement that any new benefits under the CPP be fully funded. The current total annual contribution of 9.9% salary up to the YMPE (4.95% from both employees and employers)²¹ includes about 6% of salary to cover the cost of benefits accruing currently plus about 3.9% of salary to partially fund the benefits earned in the past. Hence, based on the assumptions currently employed to perform actuarial valuations of the CPP,²² the full cost of increasing the CPP benefit under all three variations is equal to 6% of the related pensionable salary, 3% by employees and 3% by employers.²³ It should also be noted that the cost estimates assume that the changes would also apply to disability and survivor benefits. Additional work will be required regarding other possible changes, such as increasing the age at which members are entitled to payment of benefits, or making adjustments to disability and survivor benefits for future service.

²¹ Or 9.9% up to \$46,300 and 6% between \$46,300 and the new YMPE for the self-employed.

²² The existing actuarial assumptions are developed as best estimates of the very long term future demographic and economic environment with the purpose of establishing and monitoring a steady state contribution rate for many decades into the future. The assumptions reflect the expectation that the diversified portfolio of assets accumulating for the CPP will earn rates of return in excess of the returns on risk-free Government of Canada bonds. There is a body of thought that argues that the true economic cost of any CPP enhancements should be measured on the assumption that the CPP assets earn only the risk-free return, and therefore the cost estimate should not anticipate higher returns on risky assets which may not materialize. In the current economic environment of low interest rates, the economic cost of CPP improvements would be materially higher than indicated by the existing actuarial assumptions.

²³ Assuming the cost of CPP enhancement is shared equally by employees and employers.

For some examples of the impact the three variations would have on individuals at different ages with different salary levels, see Table 3 below, under the “Contributions” section of “CSPP versus CPP Expansion – A Comparative Analysis.”

The plan would remain mandatory and DB, and would continue to be administered by the Canada Revenue Agency (deduction of contributions) and Human Resources and Social Development Canada (payment of benefits). All benefits and administrative costs would be financed from contributions of employers, employees and self-employed persons, and investment earnings. CPP legislation requires that additional contributions must be adequate to fully fund additional benefits. Since these variations would apply prospectively, no past service unfunded liabilities would incur: that is, cost increases would only affect the current service costs, and full implementation would not occur for 40 years.

Investments could either be managed by the CPPIB or invested separately under a different regime, should that be considered appropriate. For example, options for providing opportunities for the private sector to participate in the management of investments are also under consideration, and are discussed further below.

DISCUSSION

Before considering the relative advantages and disadvantages of each of the proposals, a number of more general topics warrant further examination.

First, it is important to be clear on who we are attempting to help, and why. Appropriate solutions cannot be properly designed or evaluated without identifying the primary target group for whom the reforms are being considered, and what we would like to do for them. The identified target group is defined below under the heading “Primary Target Group”. The objective is to ensure that we have a framework that will provide adequate income in retirement for this group to not only cover basic living expenses, but to maintain a standard of living similar to their pre-retirement standard.

Second, the appropriate role for governments in providing solutions is controversial. While some support a strong role for governments in both setting the legislative framework and ensuring the ongoing sustainability of the policy solution, others favour a private sector solution that could be developed with governments only acting to provide an appropriate regulatory framework. This difference of opinion appears to be a fundamental driver for what type of solution is preferred. The range of possible roles for government is explored in more detail below, under the heading “Role of Governments”.

Third, it is also important to understand what has been attempted in other jurisdictions to address similar problems. International experience can provide invaluable guidance and help to avoid pitfalls. A summary of some of the initiatives undertaken in other countries is included below under the heading “International Comparisons”.

Fourth, a common theme throughout this paper is the assumption that large scale offers economies that are critical for the efficient operation of pension plans. Some current perspectives on the issue of scale are provided below under the heading “The Advantages of Scale”.

Finally, it has been suggested that the private sector is well-positioned to address the coverage problem. Some say group RRSPs already provide an effective vehicle for employers who wish to provide a retirement savings vehicle to their employees, and that new pension plan designs could be created by the private sector if pension standards were modernized to allow for them. These concepts are discussed below under the heading “Private Sector Solutions”.

Primary Target Group

It is important to ensure that the preferred solution fits the actual problem identified. We must clearly identify who may suffer from the retirement savings deficit identified earlier in this paper, and how the proposals apply to this group and others. By targeting the right group for action, we can avoid creating problems or unintended consequences for those who would not benefit from any of the alternatives under consideration.

In defining the appropriate target group, the timeframe is also important. Available research shows that the financial situation of most of today’s retirees is relatively healthy. The concern is that current savings levels for a significant proportion of middle-income Canadians are not adequate for them to maintain their pre-retirement standards of living as they transition into retirement. The proposed solutions focus on the future – i.e., those that will retire in twenty years.²⁴

Based on the evidence that Canadians at the lower income levels (those earning less than \$30,000) are already receiving a relatively high level of income replacement through Pillar 1 and 2 programs, retirement savings solutions should target Canadians earning over \$30,000 (Ambachtsheer, 2008). As noted by Baldwin, it is important to avoid mandatory “over-saving” for retirement at the lower income levels, i.e., forcing lower income individuals and families to curtail current consumption in order to increase post-retirement living standards (p. 25). At the same time, those earning high incomes relative to the average wage (e.g., those earning over say, \$100,000) are generally expected to have sufficient resources, both financial and educational, to prepare adequately for retirement. Therefore, the target group for a national solution appears to be middle income Canadians earning between \$30,000 and \$100,000.

The CSPP, as proposed, focuses on the identified target group - those earning from \$30,000 to \$100,000 (or the upper limit for RRSP contributions, which is \$116,667 for 2009), but also contemplates additional voluntary contributions from higher income earners.

Depending on which variation is considered, the CPP Expansion model could apply equally to those who earn up to the RRSP maximum of \$116,667, or could be designed to focus more on the identified target group. In all three suggested variations, the CPP expansion would be aimed at improving income replacement ratios for Canadians earning up to 1.5 to 2 times the current average wage. However, the first variant would also increase the maximum pension payable to individuals at the lower end of the salary spectrum whose pre-retirement income is essentially replaced by Pillars 1 and 2. Because the CPP provides more than retirement benefits, changes to the plan could also have positive consequences for disabled and surviving spouses.

²⁴ University of Waterloo, 2007.

A question has also arisen as to whether it is possible to have women who do unpaid work in the home rather than in the paid workforce participate in a supplemental DC plan. The labour force participation rate for women, with and without young children, has increased significantly, and is one of the key reasons why the level of poverty among the elderly has been reduced significantly. However, there remains a cohort of women who are not eligible to participate in occupational pension plans because they do not have employment earnings. Some are self-employed in home-based businesses and are therefore eligible for CPP participation. Others may have no earnings. The recently introduced TFSA does go some way to enabling tax-assisted savings by these women. While tax provisions do allow for a spouse to make contributions on behalf of their non-earner spouse, they must use part of their own contribution room. Should ministers decide to pursue a national pension plan, this issue will require additional research and analysis.

Role of Governments

There is no evidence that the expected future shortfall in savings for middle to high income earners will improve without positive action. This suggests a role for governments in helping Canadians achieve adequate income security during retirement,²⁵ particularly given the potential for greater government health and social program expenditures and slower revenue growth as the “baby boomers” retire, a situation that may be aggravated by improvements in longevity (Hamilton, 2009, pp. 26-28). Indeed, there is some evidence that Canadians are looking to various levels of government to address these issues.

The role of governments in retirement savings was explored by Baker and Milligan, 2009. Noting that certain features of risk environments can weaken the efficiency of insurance markets, they suggest that, in addition to “need and fairness”, government has a role in ensuring that all risks (both good and bad) are included in the marketplace so that products (such as annuities and implicit insurance against poor lifetime earnings) are available at a fair price. They suggest that government-imposed mandatory participation can level the market by mitigating the effects of “adverse selection”.²⁶ The consequences of market and decision-making failures for the individual and society as a whole make a good case for government involvement (Baker and Milligan, 2009, pp. 6-8).

There is a wide range of possible levels of government involvement in the potential solution. For example:

- *Modernizing pension standards to allow for innovative plan designs* - Some have suggested that the role of governments should be limited to modernizing pension and employment standards legislation to allow for more flexibility in pension plan products designed and offered by the private sector (insurance companies, investment brokers and/or third-party administrative service providers).
- *Modernizing income tax rules* - Others have recommended that income tax limits that deter prudent retirement saving or limit participation in tax-assisted savings vehicles to certain categories of income earners be reviewed and updated. (The federal government has recently

²⁵ See Baker and Milligan, 2009 for reasons for government involvement in retirement savings.

²⁶ The concept underlying “adverse selection” is that riskier (more expensive) customers are more likely to buy insurance, with the result that insurance contracts will only be offered at very high prices by for-profit companies.

responded, in part, to these recommendations by announcing that it will increase the limit on the amount of surplus that may be held in pension plans from 10% to 25% of liabilities.)

- *Expanding the mandate of existing high performance public sector plans* - Expanding the mandate of some of the larger, high performance public sector employer pension plans to enable them to provide management services to smaller plans has also been recommended. (As noted earlier, the Ontario government has introduced legislation to allow the OTPP and OMERS to provide such services to other pension plans.)
- *Facilitating the establishment of a new multi-employer pension plan* - As recommended by many (the JEPPS, the Nova Scotia Expert Pension Review Panel, along with many pension experts and stakeholders) governments could facilitate the establishment of a pension plan. The level of government involvement could range from a government-administered model to an independently run pension plan. In the former case, the plan would be managed by government, but investments would be made by an arm's length party, free from political influence (the current CPP/CPPIB model). In the latter case, government would limit its involvement to providing a legislative framework that would allow for the consolidation under one plan of employers, employees and self-employed individuals who otherwise would have no common ground to join together to achieve the economies of scale necessary to provide a low-cost plan with a first class governance structure. The framework would include a mechanism for the appointment of an independent board of trustees that would undertake the role and fiduciary obligations of plan administrator.
- *Introducing a mandatory pension system* - Some believe that a strong government role is necessary along with mandatory participation to ensure high levels of pension coverage and avoid the need for future reliance on other government "social safety net" programs (some trade unions, other labour organizations, some retiree organizations).

International comparisons

Several countries around the world have attempted to address retirement savings deficits by creating alternative pension plan structures. Notable among these are Australia's Superannuation Plans, New Zealand's "KiwiSaver", the United Kingdom's proposed "Personal Accounts" and the Netherlands' industry-centred pension plans. A separate paper detailing the approaches to the pension savings deficit in a number of countries is currently under development.

On the international front, a few commonalities stand out.

First, most of the supplemental systems were developed in response to a concern that a significant percentage of people were not appropriately supplementing expected benefits under first and second pillar state plans. They were either not saving at all, or if they were saving, it was estimated that they were not saving sufficiently to maintain an adequate lifestyle in retirement.

Some designs address these concerns by imposing mandatory enrolment (Australia), or automatic enrolment with an opt-out provision (New Zealand,²⁷ United Kingdom, United States 401(k)

²⁷ The KiwiSaver has an automatic enrolment with limited opt out for new employees: once existing employees opt in, they are not allowed to opt out.

plans²⁸). Mandatory plans are often characterized as too paternalistic and inflexible, but voluntary plans have yielded low participation rates.²⁹ Behavioural studies have shown higher participation rates occur with automatic enrolment where individuals must take steps to opt out of a plan, rather than where individuals must take steps to opt into a plan. Experience in the United States is consistent with this observation, as there has been a marked increase in participation in 401(k) plans under an automatic enrolment approach. See further discussion on mandatory, voluntary and automatic enrolment in the comparative analysis below, under the heading “Mandatory versus Voluntary”.

Second, several of the alternative plan structures developed to address low pension coverage have been designed to transfer risk away from employers. Excessive risk has been identified as one reason employers are losing interest in offering pension plans. Many experts have recommended that alternative plan designs that limit employers’ risk are key to increasing employer participation in Pillar 3 occupational plans. This has spurred innovations that incorporate DC features that rebalance risk between employers and employees (e.g., eliminating liability for guaranteed benefit delivery) with other characteristics commonly associated with DB pension plans: strong governance, expert trustees, sophisticated investment management, scale and cost effectiveness.

Third, contributions are often encouraged through preferred tax treatment, offering favourable treatment (tax deferrals, deductions, tax credits) of contributions and/or investment earnings.

Experience in the other countries that have already taken positive action to address coverage problems may also be instructive. The Australian experience is noteworthy. “Superannuation”, the main source of retirement income for most Australians, is a mandatory pension scheme whereby employers make tax-deductible payments to their employees’ superannuation funds. The system is governed by federal departments, but contributions are made to independent superannuation funds. These funds, which are not government-sponsored, were often started to serve a specific industry (e.g., health services) or region (Queensland), however, many funds now cater to a broader client base than their original mandate. Members choose their superannuation fund, and then have a range of investment options within that fund. The retirement income marketplace in Australia is dominated by what is known as the “superannuation industry.”

A fundamental flaw identified in the Australian system is the negative impact on scale caused by allowing any number of funds to be developed under the program (De Bever, 2008). As noted above, scale is a key advantage of centralizing retirement savings in one very large plan (sometimes referred to as a “super-fund”, as discussed earlier in this paper).

Another emerging weakness in the Australian system is the significant increase in the size of the investment industry that competes to provide advice to investors. While a competitive free market can work effectively to keep costs low, this expectation does not always bear out in

²⁸ 401(k) plans are US individual savings vehicles that are similar to RRSPs in Canada.

²⁹ See Baker and Milligan, 2009 who talk about a new trend towards “libertarian” or “soft” paternalism as a compromise designed to maximize pension coverage without mandatory participation. See also Thaler and Sunstein, 2003, who coined the term “libertarian paternalism”. Thaler and Sunstein are well-known as the authors of *Nudge: Improving Decisions About Health, Wealth and Happiness*.

imperfect markets where consumers have insufficient information and comprehension to make informed decisions. The Australian example is important when considering the solution proposed by the insurance industry (see “Stakeholder Perspectives” above). Although the industry argues that the objective of low cost can be met by allowing private sector financial service providers to compete amongst themselves for pension business, the evidence from Australia appears to be the opposite. Rather than reducing costs, competition in this asymmetrical market³⁰ appears to have increased costs, as providers compete on bells and whistles rather than cost. In this case, it is argued that competition has increased costs as a result of dysfunctional capital markets (Bird and Gray, 2009; De Bever, 2008).

The Advantages of Scale

The CSPP and CPP Expansion options under consideration share the advantages of large scale, a characteristic that has been identified by many as critical in achieving the economies required to minimize costs and maximize investment earnings in order to deliver sufficient retirement income. Advantages of both models relating to their proposed large scale include the following:

- Significantly lower administration and investment management costs (management expense ratios or MERs),³¹
- Ability to hire expert staff or advisors to execute their investment strategies,
- Access to sophisticated investment products not available to smaller plans or individuals,
- Ability to participate in longer term illiquid investment opportunities not available to smaller funds,
- Ability to spread risks across a larger member base, resulting in more predictable outcomes and less volatility,
- Ability to offer members more information, education and service,
- Ability to keep up with best practices for governance and administration,
- Ability to influence corporate governance of prospective investees.

Toronto-based CEM Benchmarking Inc. tracks the performance of pension plans around the world, and has considered the impacts of scale on unit costs and net returns. Its findings confirm that unit costs are materially lower in larger pension funds, and that they generate higher net returns than small funds:

...in a global database of 89 pension plans, annual pension benefit administration costs range from \$24 to \$546 per member. Plan membership ranges from 100,000 to two million. Statistical analysis confirms that these scale differences are the No. 1 explanation for the observed material differences in unit costs. In a global database of 252 pension funds, annual investment costs range from a low of 0.05% to a high of 1.31% of assets. Asset values range from \$100 million to \$340 billion. Once again, statistical analysis confirms that these scale differences are the No. 1 explanation for the material differences in unit costs. A 17-year analysis with 4,500 return and cost

³⁰ In this context, “market asymmetry” refers to the fact that sellers have key product information or information processing availability that is not available to buyers. This lack of symmetry violates the necessary conditions for a perfect market and results in what is termed as “market failure”.

³¹ In the Canadian mutual fund industry, MERs in the order of 2.5% of assets under management are common, particularly at the retail level. By comparison, 0.5% is the benchmark for large, expertly managed DC pension plans including administration costs. Investment management costs for a large DB plan are in the order of 0.25% to 0.45% (Jog, 2009, p. 15). MERs for the CPP are approximately 1.10% of assets under management for 2008/09, and are expected to decrease with the growth of the fund.

observations confirmed that large pension funds generate higher net returns than small funds. The net return differential was higher than could be explained by the large funds' cost advantage alone. For example, \$100-billion funds outperformed \$1-billion funds by an average of 0.56% per annum, of which 0.36% was pure cost advantage, and the remaining 0.20% was due to other factors.³²

While the advantages of scale appear to be generally agreed upon by most experts, there has been some recent cautionary commentary on the subject, particularly from Professor Jack Mintz in his article "Beware the Super-fund" (Financial Post, April 22, 2009). Mintz points out that the "super plan" concept assumes that there are cost savings due to economies of scale. His article asserts that group RRSPs can achieve similar results. He questions whether pension plan managers are better at achieving positive investment results than individuals. However, other than noting that Canada's greatest existing super-fund, the Caisse de dépôt et placement, had disastrous results this past year, Mintz provides no evidence or research that would substantiate his views.

While Mintz's comments are of interest, they are not directly relevant to the issue of scale. Rather, they seem to represent a generally unfavourable view of the concept of "super-plans" that do not offer individual investment choice and one that characterizes government involvement in such plans as paternalistic.

It has been speculated that very large super-funds could result in inefficiencies due to lack of competition and over-size, or could have unknown impacts on the economy due to an over-concentration of assets under one governance structure. Problems with governance structure and representation have also been suggested. However, no supporting data have been found to validate these claims. Indeed, one of the top five US funds in terms of meeting set investment return benchmarks, the Teachers Insurance and Annuity Association – College Retirement Equities Fund (TIAA-CREF), is also one of the largest and most cost-efficient funds in the survey. It reported assets under management of \$367 billion as at December 31, 2008,³³ a size similar to some projections for a Canada-wide supplemental plan.

Private Sector Solutions

A number of the research papers reviewed at Experts Day referred to the problems individual investors face in attempting to save for retirement. It is noted that most individuals do not achieve anywhere near the same investment results as those of large, expertly managed pension funds. Further, except for the small proportion of individuals who have the interest and knowledge to do their own investing, Canadians rely on investment advisors to help them with their retirement savings plans. Individuals who rely on retail investment markets face very high administration and investment management costs that impede their ability to save efficiently and effectively for their retirement years.

The impacts of high retail investment costs as compared with those in an efficiently-run DC plan are significant. For example, if total administration and investment costs can be reduced to 0.5%,

³² Ambachtsheer, 2009.

³³ Global equity markets have rebounded significantly since December 31, 2008 and the TIAA-CREF assets will have enjoyed similar returns. The weighted returns on TIAA-CREF equity and bond mutual funds to November 19, 2009 exceeded 20%. The market value of the TIAA-CREF assets will have increased significantly since 2008 year end.

accumulated savings after a 35 year career are 48% higher than the accumulations in a typical mutual fund (Appendix E, p. 1).

In other words, an individual saving for retirement through RRSPs (or other private savings using mutual funds and investment advisors) must set aside almost half as much again to achieve the same retirement savings target as one that saves in an efficiently-run pension plan.

Group RRSPs

A group RRSP is a collection of individual RRSPs with centralized routine administration. Plan sponsors (employers) are not required to contribute, but arrange for employees to make contributions through a schedule of regular payroll deductions. The employee can decide the size of contribution per year and the employer deducts an amount accordingly and submits it to the investment manager selected to administer the group account. The contribution is then deposited into the employee's individual account and invested as specified.

In some cases, employers offer to match employee contributions to a group RRSP. However employers cannot technically make contributions directly into an employee's RRSP. Any contribution by the employer must be characterized for tax purposes as employee wages subject to other payroll deductions, such as CPP and Employment Insurance. This treatment of employer contributions to group RRSPs means that such contributions are more expensive than pension plan contributions, which are not subject to other payroll deductions.

While group RRSPs can provide individual choice and flexibility, numerous studies have shown that individuals generally make poor buy and sell decisions – typically “buying high” and “selling low”.³⁴ Since many fund managers do not produce consistent historical returns (there is little evidence of persistence in investment manager returns), a recent history of high returns is more typically followed by period of underperformance. As noted by Jog, 2009, earlier studies have concluded that the average household under-performs the market index by as much as 3.7% annually (p. 6).

Group and individual RRSPs are also not “locked in” in the same manner as pension funds.³⁵ While they are tax-efficient on the contribution side, the taxation of early withdrawals from RRSPs, often at higher rates than the related deductions for contributions, can exacerbate savings deficits. Further, withdrawals from RRSPs cannot generally be reinstated in future years.³⁶ RRSP room that is lost by withdrawals can never be recovered. This unfortunate restriction detracts from the effectiveness of RRSPs as a vehicle for retirement savings, given that many group RRSP plans are seen as savings plans – and are not necessarily treated as retirement savings. In fact, some group RRSP plans are seen as a way of “getting around” the locking-in

³⁴ As noted in Appendix E: “research reveals that when individual investors have access to a selection of investment funds, their choices on average are not optimal. A recent Pension Research Council Working Paper (Tang et al., August 2009) analyzed the individual investment returns over 7 years of almost 1 million participants in over 1,000 401(k) plans in the US. The researchers estimate that “retirement wealth over a 35-year worklife might be reduced by as much as one-fifth due to participant diversification errors.”

³⁵ “Locking in” refers to rules that limit withdrawals from pension funds. All Canadian jurisdictions have rules that govern and restrict the withdrawal of funds from registered pension plans. The degree of required locking in varies amongst jurisdictions.

³⁶ Except for withdrawals under special programs for home purchase or education.

regulation applicable to registered pension plans. Allowing early withdrawals makes the accumulation of adequate retirement income more challenging, as there are many competing uses for accumulated assets and retirement often seems a long way off.³⁷

The Insurance Companies' DC Plan Solution

As noted above, some believe that the best solution would be for governments to simply provide the flexibility in pension standards that would allow the private sector to establish pension plans for a broad range of unrelated employers. For example, the insurance industry has suggested that insurance companies could create plans much like the ABC plan proposed by JEPPS if government would change the rules so that they could act as the administrator of a pension plan. However, there are important questions as to how this approach would achieve the key objectives of benefits security, low cost and large scale.

Current research suggests that too much investment choice for members and too much non-price competition in an imperfect market can have detrimental effects on investment results - with high fees reducing returns to retirees. While the industry argues that strong competition would naturally result in the desired economies, recent commentary from Australia indicates that the key circumstances that lead to efficient free markets may not work well in the imperfect retirement savings market, where most individuals do not have the time or knowledge to process the information made available to them.³⁸

At the same time, recent studies indicate that financial service providers and advisors often have pay incentives that are not based on investment performance, but rather on such measures as frequency of transactions and the sale of products that are subject to high fees for active management.³⁹ A number of stakeholders have noted that the asymmetry of information between buyers and sellers combined with these types of incentives for advisors can result in “market failure”, a situation where normal market forces, such as value for money and competition, do not operate appropriately. Instances of market failure can make a case for corrective action by government to ensure that the interests of the investor are protected.

These considerations serve to highlight a critical attribute of an effective retirement savings vehicle: that those charged with running it on behalf of members/beneficiaries should clearly act in the sole interests of those persons. In other words, they should have a fiduciary responsibility for the members and beneficiaries.

Expert advisors have recommended that pension standards should be designed to permit flexibility in the development of new governance structures, and in particular, to allow for more options for who can be the administrator of a pension plan. However, they caution that the key

³⁷ A Scotiabank survey released in January 2007 reported that nearly half of Canadians withdraw retirement savings before retirement, for a variety of reasons, including paying down debt, covering living expenses and home investments. A study by Giles and Maser (Statistics Canada, Dec 2004) reported that high income tax filers were less likely than low income tax filers to withdraw RRSP contributions, but even at the highest income levels, 25% of individuals pulled funds out of their RRSPs at least once. Further, of those individuals who had contributed five or more years into RRSPs, over half of them had withdrawn funds three or more times.

³⁸ Fear and Pace, 2009; Ambachtsheer, 2007, Baker and Milligan, 2009. Also, see earlier discussion on the Australian experience under “International Comparisons”, above.

³⁹ Rekenhaller et al., 2009.

role of governing fiduciary should be limited to existing permitted entities (the employer, a pension committee or a board of trustees), not-for profit entities with sufficient capital or liability insurance, or for-profit entities subject to regulation consistent with the objectives of pension standards.⁴⁰ Insurance industry representatives have indicated that the legal framework for insurance companies may preclude them from assuming the fiduciary role. Without an administrator that is liable as a fiduciary, members' interests and benefit security would be jeopardized. Discussions with the industry and the question of the fiduciary role are ongoing.⁴¹

The Canadian investment industry appears vibrant and profitable, with a large number of insurers and mutual fund providers. Nevertheless, the industry has had little success in filling the gap in retirement savings among the middle to high income group. Where the industry has been successful, such success has been accompanied by some of the highest MERs in the world – particularly mutual funds (see Appendix E).

CSPP versus CPP Expansion – A Comparative Analysis

A number of the key characteristics of each of the options under examination are compared and contrasted below, followed by a general summary. A comparison chart is also included as Appendix D for quick reference.

In reviewing the following, it will be important to consider whether some of the characteristics described could be “mixed and matched” to better meet the objectives, or whether both options could be combined in some manner to develop the optimal solution for Canada.

Scale

As noted above, both the CSPP and the CPP Expansion proposals rely on large scale to achieve economies, efficiencies and marketplace power. Both proposals could conceivably leverage the existing scale of the CPP.

Low Operating Cost

Both the CSPP and the CPP Expansion models emphasize the importance of low cost administration and investment management. The literature in this area reinforces that inefficiencies, competing profit motivations and other cost-drivers have a direct and significant impact on the adequacy of resulting pension incomes (Ambachtsheer, 2007). The CSPP proposal suggests that in an efficient DC pension plan, MERs should not exceed 0.5% of assets under management (and could be as low as 0.3%). Evidence from around the world confirms that this level of MERs is achievable in an efficiently-managed DC plan.

The CPP Expansion proposal also relies on the efficiencies of scale and expert governance to minimize costs. In his most recent report, the Chief Actuary of the CPP anticipates that administration costs will decrease as the CPP fund grows, since costs will not grow as fast as assets.

⁴⁰ Alberta-British Columbia Joint Expert Panel on Pension Standards, 2008.

⁴¹ It would appear that the legal framework for insurance companies precludes them from assuming the fiduciary role, because the underwriting and trust functions are required to be separated.

Attached for reference is a paper on world-wide MERs prepared by Alberta Finance and Enterprise staff (Appendix E).

Continuity of Coverage/Portability

One of the greatest potential advantages of a national pension plan would be the continuity of pension coverage if an employee changes jobs. In today's labour markets there are a number of sectors where it is common for employees to move frequently from one employer to another. Both the CSPP and the CPP Expansion models would improve the accumulation and continuity of pension credits over time for Canadians.

Ultimately, the CPP Expansion, because of its more universal and mandatory nature, would provide the best continuity of benefits. As the CSPP is proposed for only those that are not otherwise covered by a workplace pension plan, the advantage of continuous pension coverage may not extend to the entire working population. Should the CSPP ultimately be selected for development, more work will be required to determine how it should relate to other existing pension plans in this regard. For example, if an employee were to move from an employer that sponsors a pension plan to one that does not, we may or may not wish to ensure that the value of the individual's accrued pension benefits could be transferred from the RPP to the CSPP. The transfer of assets from one vehicle to another is called portability.

Defined Benefit versus Defined Contribution

The CSPP is a DC model, meaning that the contributions, rather than the benefits, are defined. In a DC model, benefits paid out of the plan rely entirely on the level of contributions and the investment performance of the fund. The traditional DC model shifts investment, longevity and timing risk to members. The CSPP, however, would leverage strengths currently associated with healthy DB plans – scale, cost effectiveness, expert investment and strong governance – that help to maximize benefits. For example, the CSPP proposal includes possible automatic annuitization mechanisms that would enable members to pool their longevity risk by locking in values at various points in time (say, between the ages of 45 and 65). The topic of annuitization is complex and should be further researched should a CSPP approach be decided upon.

The CPP Expansion model would reflect the current defined benefit nature of the CPP, guaranteeing a benefit related to salaries earned over working lives. This reduces the uncertainty to beneficiaries with respect to their benefit entitlements. As a national, mandatory DB pension plan, the CPP can significantly mitigate risk and facilitate intergenerational risk-sharing by pooling longevity, investment and timing risks⁴² among all contributors and beneficiaries. With the significant changes to the CPP in the 1990s that resulted in improvements in funded status and mechanisms to ensure that contribution rates are adequate to fully fund any new or enhanced benefits, intergenerational inequities have been mitigated to some degree.

Eligibility

The CSPP as proposed would initially apply to those workers not currently covered by a workplace plan, but could also be expanded to allow for additional voluntary contributions from

⁴² "Timing risk" refers to the risk that an individual will reach retirement age at a time when asset values are low, cash flows from investments are low, costs of purchasing annuities are high – or all three combined.

current RPP participants who may have available contribution room. If a “savings plan” component were added, those that do not have earnings from employment or self-employment could also be included.

Initially restricting eligibility to those who are not currently covered by a workplace plan would simplify administration and avoid complications arising from potential over-contributions.

Some employers currently offering a workplace plan might wish to switch to the CSPP in order to reduce costs and risks. More study on the policy impacts of this possibility will be required if it is decided to pursue the CSPP option.

The CPP Expansion model would apply to all employed or self-employed Canadians.

Mandatory versus Voluntary Enrolment

Participation levels are an important aspect of achieving the objective of scale as well as the overall objective of expanding pension coverage and improving retirement incomes among the target group.

Participation in the CPP Expansion would be mandatory for all employers and all workers receiving income from employment or self-employment.

Participation in the CSPP as proposed would be voluntary. To maximize participation, eligible individuals would be automatically enrolled, with the ability to opt out. Research on 401(k) plans in the United States strongly suggests that member participation rates increased significantly after the introduction of automatic enrolment, even with an unlimited right to opt out (Madrian and Shea, 2002; Choi et al., 2004; Choi et al., 2001).

The impacts of a voluntary approach utilizing automatic enrolment and opt out provisions are complex and may vary depending on its application to employers, employees and the self-employed. A separate paper exploring these issues is under development, and may be of interest should a decision be made to pursue a voluntary pension option.

Contributions

The CSPP as proposed suggests a total minimum contribution level of 10% of earnings, 5% from the employee and 5% from the employer, to achieve a target replacement rate of 70 – 75% of pre-retirement earnings (including Pillar 1 and 2 pensions). Although not specifically mentioned in the proposal, it is assumed that the self-employed would contribute both portions – i.e., 10% of earnings. The proposal also contemplates the potential for additional voluntary contributions, in addition to the minimum level.

Contribution levels under the CPP Expansion model would depend on which variation was selected. At one end of the spectrum, the FSNA proposal contemplates a doubling of contributions up to the YMPE, which would mean total contribution rates on income up to \$46,300 would increase to 19.8% of earnings. On income between \$46,300 and the proposed new YMPE (\$116,667 for 2009), total contributions would be 15.4% of earnings. For

contribution levels under the three variations presented in the CPP Expansion model, refer to Table 2, above.

Table 3 below illustrates the impacts of the three variations on monthly employee contributions and net replacement ratios at four different age and salary level combinations.

Table 3: CPP Expansion Variations – Effect on Individuals at Selected Ages and Incomes

| | <i>Current CPP</i> | <i>Variation 1</i> | <i>Variation 2</i> | <i>Variation 3</i> |
|--|--------------------|--------------------|--------------------|--------------------|
| Individual earning \$30,000 (Age 26, retiring in 2048) • Employee contributions/mo. • Net replacement ratio | \$109.31 58% | \$175.56 87% | \$109.31 58% | \$109.31 58% |
| Individual earning \$46,300 (Age 35, retiring in 2039) • Employee contributions/mo. • Net replacement ratio | \$176.55 49% | \$283.55 83% | \$176.55 51% | \$176.55 51% |
| Individual earning \$69,450 (Age 45, retiring in 2029) • Employee contributions/mo. • Net replacement ratio | \$176.55 37% | \$399.30 78% | \$234.42 49% | \$234.42 47% |
| Individual earning \$92,600 (Age 55, retiring in 2019) • Employee contributions/mo. • Net replacement ratio | \$176.55 31% | \$515.05 73% | \$292.30 45% | \$234.42 37% |

Notes: Self-employed individuals would pay double these contributions as they are responsible for both the employee and employer contributions. Single individual is assumed to retire at age 65. Net Replacement Ratio = OAS/GIS/ CPP (net of income) benefits in the first year after retirement divided by net income (net of income and payroll taxes) in the year before retirement. The calculations assume that the changes are fully implemented, which overstates the replacement rate for older individuals in this table. On the other hand, the calculations assume that there are no adjustments to OAS/GIS between 2009 and the year of retirement other than quarterly adjustments to the Consumer Price Index for Canada. Salaries are assumed to increase by 1.3% per annum above inflation to provide for future real wage growth. Over time, as the individual's income rises faster than inflation, the relative value of the OAS/GIS decreases. In effect, this calculation assumes that the government does not recalibrate the level of OAS/GIS to catch up with real wage growth in the projection period, which reduces the NRR over time.

Investment Choice for Members

Both models under consideration contemplate little or no investment choice for members, contrary to the common contemporary DC model that allows members considerable scope for

choosing investments. The approach to investment choice in the CSPP proposal reflects mounting evidence that offering member choice increases pension plan costs without reliably compensating with an improvement in results, and that individuals are generally ill-equipped to make the informed investment decisions necessary to select an investment mix that will maximize returns while providing stability over the long-term. Studies show that, when faced with a myriad of fund choices, individuals tend to make no choice at all, or make the wrong choices (i.e., choose funds that do not match their risk profile), or choose one or two funds at most. Thus, there is a limit to the number of choices that should be made available to members to avoid unnecessary complexity and higher costs.

However, the CSPP proposal also allows for portfolio selection based on low, medium or high risk tolerances with a default option to be determined.

As is currently the case with the CPP and other DB pension plans, the CPP Expansion does not contemplate member involvement in investment decisions. The CPP's investment fund is managed by the CPPIB and invested by a combination of in-house and external investment managers.

Role of Government

The CSPP model is intended to operate at arm's length from government, with investment decisions free from political interference. Government's role could be limited to the creation of the corporate framework under which the plan operates and to facilitate its start-up (i.e., use of government data bases to maximize potential participation), and developing a mechanism for appointing the board of trustees. The level of government involvement could be minimal or more – depending on public opinion, social policy, private sector capacity and plan objectives. (The Pension One model more clearly articulates independence from government by proposing an independent, non-profit board of trustees operating as an independent legal entity.)

An expanded CPP would operate as the existing CPP functions now, with the investment arm independent of government, but with stewardship and administration remaining the responsibility of government – in fact, joint stewardship by the federal and provincial governments.

Role of the Private Sector

Depending on the ultimate decisions on how the plans would be operated, both the CSPP and the CPP Expansion as proposed could potentially provide for important roles for private sector participants to leverage their expertise in administration, investment management, annuitization and/or custodianship.

In the CSPP model, scale is achieved by government facilitating the centralization of the pension plan, and the fiduciary role is covered off by an independent board of trustees. The proposal suggests that investment management would be undertaken by the existing CPPIB, using professional managers, and working at arm's length from government. While the concept of outsourcing this function to private sector managers is not contemplated in the original proposal, this could be one method of distributing risk, as well as utilizing and involving private sector expertise. Transferring risk in this manner may have the advantage of reducing early cashflow

requirements, but would likely increase overall costs of the plan due to the pricing of risk by the private sector participants.

The Pension One model contemplates competitive tendering of investment management and plan administration. Other potential roles for the private sector might include custodianship of the fund and the delivery of retirement income through annuities, as discussed in the Life Cycle Approach section below.

The CPP Expansion model assumes that the administration and investment mechanisms in the existing CPP would be used. As proposed by the FSNA, the investments could be managed by the CPPIB, or externally by a number of investment managers.⁴³

Cost to Government

The CSPP would involve start-up costs, including systems costs, communications and other administrative costs to support the implementation of the plan. Costs would be greatly reduced if the existing data/administrative infrastructure supporting the CPP could be leveraged.

Depending on the approach chosen, some initial start-up financing may also be necessary to ensure equal treatment of early members versus later entrants to the plan. Options for financing this “smoothing” of administrative costs in the early years of the plan are currently under examination by officials. One potential option would be for one or more private sector providers to provide early financing in return for an agreement that would offer them net returns over a guaranteed period of time.

The CPP Expansion model would also involve some initial systems and communications costs to reflect the changes adopted, including the development of appropriate phase-in periods. These costs would likely be absorbed into the contribution rate of the plan. Due to the existing infrastructure and scale of the CPP, start up costs for the Expansion model would likely be considerably lower than those anticipated for a CSPP.

Both models would have government tax revenue impacts, depending on how contributions are treated, as deductible contributions (RPPs, tax-assisted retirement savings plans), or as tax credits (CPP). As individuals defer current consumption for future consumption in retirement, so governments would defer tax revenue. There may be pressure to increase other taxes or lower program expenditures to adjust for the deferral in tax revenue. However, over the longer term, revenue will be realized and there exists the potential for the mitigation of future social and health expenditures that could arise if retirees do not have adequate income in retirement, especially for income-tested pension benefits such as the GIS.

Fiduciary

The fiduciary role is a key element of our pension system. A fiduciary is charged with the duty to act solely in the interests of plan members and beneficiaries. Pension standards across the

⁴³ The FSNA CPP Expansion model, given its potential size, gave rise to the possibility that the investment of the new funds would be divided into several sub-funds for investment purposes. Further work would be needed to explore the implications of dividing the fund and having it invested under different regimes.

country require that the administrator of a pension plan act in a fiduciary capacity in the best interests of the members, an important role in the protection of members' rights and benefit security.

Under the CSPP model, a separate board of trustees could act as fiduciary to the plan, or, if the CPP governance model is shared, the federal and provincial finance ministers would assume this role. As noted above, federal and provincial finance ministers are the stewards of the CPP, and the *Canada Pension Plan Act* and the *CPPB Act* provide that the plan is to be administered and invested in the best interests of plan members and beneficiaries.

Governance

Both models rely on best practices in plan governance, including the use of expert administration and investment managers and the adoption of principles related to independence for investment decisions. That is, they assume investments will be undertaken by an arm's length entity that is free from political influence, and the plan will have the interests of contributors and beneficiaries at the forefront of their investment decisions.

A notable difference between the CSPP and Pension One is in the degree of independence recommended for plan administration as a whole. Pension One would be framed as a separate legal entity, with an independent, non-profit, expert board of trustees to serve as plan sponsor and administrator. Depending on the role of the private sector, those who govern the plan might oversee private sector providers. There would be a clear fiduciary role for the Board.

The CSPP proposal is less clear on this point. Although investment management is clearly intended to be independent from political influence, the proposal is vaguer on the question of independent administration. As a supplemental plan to the CPP, the CSPP could either share the governance features of the existing CPP, or could be independently run and managed in the same manner as the Pension One model.

In the case of the CPP Expansion, the default position would be to rely on existing governance arrangements of the CPP. That is, federal and provincial governments would serve as stewards of the plan. The CPPIB, whose board of directors is appointed by the federal Minister of Finance after having gone through an extensive nomination and consultation process involving federal and provincial governments, would invest the funds to maximize returns without undue risk of loss for the sole benefit of the plan members and beneficiaries.

A detailed analysis of the existing CPP governance structure and considerations of options for governance structures for an expanded CPP or a CSPP would be required before the details of any proposal were determined.

Tax Treatment

Under the CSPP model, contributions are proposed to be allowed as deductions from income for both the employee and the employer – this would reduce the cost of contributing, but also reduce RRSP contribution room.

Under the CPP Expansion model, unless the tax treatment is changed for CPP as a whole, employee contributions would be treated as a tax credit. Due to the less favourable treatment of tax credits, this means that the cost of contributing is higher than the cost of contributing to other retirement vehicles for which contributions are deductible from taxable income. Employer contributions would be allowed as a deduction from corporate income. RRSP pension contribution limits would not be impacted, but the program itself could be viewed as an additional tax because of its mandatory nature.

The existing difference in tax treatment between employee contributions to the CPP and other tax-assisted retirement savings has been a source of some criticism. In 1988, CPP contributions, unlike all other tax-assisted retirement savings, began to be treated as a tax credit, rather than a tax deduction for individuals. The difference in this treatment creates a situation of double taxation: an individual with income greater than the first federal tax bracket pays tax at a higher rate on the earnings withheld for CPP, but obtains a tax credit at the lower bracket rate, i.e. pays tax on a portion of the contribution now, and will be subject to tax on the full CPP benefits later.

Life Cycle Approach

The CPP Expansion proposal, which relies on the existing CPP DB model, does not address life cycle theory. Since the benefits under a DB plan are provided for the life of the individual and a pension is also payable over the life of the surviving spouse, the life cycle approach is not relevant to this model. Life cycle theories are more applicable to DC pension plans, where risks are borne by the members.

The CSPP proposal includes recommendations for customizing contribution levels, investment selection and timing of annuitization based on stage of life and proximity to retirement. The purpose is to manage risk appropriately while optimizing returns. This “life-cycle approach” to investment and pension plan administration is rapidly evolving to become best practice. As noted by Hamilton in his paper for the Research Working Group, if the fund were to offer annuities rather than relying on the (currently) small and expensive annuity market in Canada, longevity risk for individual beneficiaries could be mitigated through pooling (Hamilton, 2009, p. 22). Consideration should be given to the question of whether private sector insurers would offer better annuity prices than at present if given the opportunity to bid on large bulk purchases such as this plan would need.

Implementation Issues

Legislation would be required for both options. Under a best-case scenario, they would likely take at least two years to implement from date of decision. Any changes to the CPP (e.g., CPP Expansion) would require parliamentary approval and the agreement of two-thirds of the provinces, representing two-thirds of the population. Changes to the CPP are generally implemented on a three-year cycle to match the triennial actuarial valuation cycle.

The majority of public sector employers and many larger private sector employers sponsor DB pension plans. These plans are typically integrated with the CPP.⁴⁴ Implementation of a CPP

⁴⁴ The unit of pension on salary up to the YMPE (\$46,300 in 2009) is reduced to reflect the value of the CPP benefit earned on that portion of salary. For example, many DB pension plans in the public sector provide a pension of 1.4% on salary up to the YMPE and 2% on salary above the YMPE.

Expansion option would require that these plans be amended to adjust for the CPP changes. Additional policy work may be necessary to decide on the appropriateness and manner of integration if a decision is made to proceed with a CPP Expansion.

A further complication of the CPP Expansion option is the traditional parallelism of QPP benefits and contributions. Quebec's willingness to make parallel amendments would be a key factor.

Summary of Discussion

Both models under consideration would be expected to increase pension coverage and lifetime accumulations of retirement savings by offering an easy method for employers and workers to access an efficient, low-cost savings vehicle that would provide continuity of plan participation.

Some (labour and some retiree groups) are convinced that a supplemental pension plan cannot achieve its objective unless it is mandatory and DB. They support a second pillar solution - a CPP Expansion-styled approach that would extend coverage to incomes up to the same limit as the RRSP income threshold (\$116,667 for 2009).

Others believe that a mandatory approach is too paternalistic and does not provide the flexibility expected by most Canadians. They support a third pillar solution – a voluntary supplemental system that would allow for individual choice as to whether and how to save. They generally believe that a DB model would not be practical considering the risks associated with this type of promise, and suggest that a DC formula, combined with the large scale, strong governance and expert investment management that have traditionally been associated with DB plans, would provide the best result.

Many of those that support a voluntary system suggest that automatic enrolment with the ability to opt out is an effective mechanism for increasing voluntary pension participation, and could be an elegant way to preserve the voluntary character of our current system while achieving high levels of participation. This approach is incorporated into the CSPP proposal.

Both options would benefit from efficiencies of the large-scale, expert investment management and strong governance recommended by most experts. Both could benefit from the advantages of the existing scale of the CPP and its infrastructure (e.g., the existing databases of all potential participants).

Both options would require significant cooperation or partnership from the federal government. The CPP Expansion would require approval by Parliament. Parallel amendments to the QPP would require National Assembly approval. The CSPP contemplates leveraging the CPP infrastructure, which would require federal government cooperation. Pension One, while it is theoretically independent of the CPP, would be extremely expensive to implement without the benefit of CPP data and other potential assistance.

While the CPP Expansion proposal in the form proposed by the FSNA is controversial in its extreme approach, the more modest variations noted in this paper should be considered as a way to strengthen the second pillar - in combination with other measures. Because governance, investment and administrative frameworks are already in place, this model builds upon one of

Canada's acknowledged success stories and provides the best benefit security and protection from risk for members.

The CSPP proposal is a way to strengthen the voluntary third pillar, while allowing for individual flexibility. It could be combined with a CPP Expansion as a way to bolster both second and third pillars, furthering the objective of strengthening the system in a balanced way.

CONCLUSIONS

This paper provides the basis for ministers to consider two options for expanding pension coverage in Canada through a national pension plan. While the options are compared and contrasted for analytical purposes, they may also be viewed as complementary. An important role for the private sector also exists, to the extent that it can provide services competitively and effectively, and to the extent it can develop innovative plan designs that would enhance the choices available to Canadian employers and workers. A comprehensive approach to pension reform in Canada could combine all three to strengthen our three pillar retirement income system.

In evaluating the options, it will be important to be clear on the objective: to ensure that retirees of the future will have adequate retirement income to maintain their pre-retirement standards of living. Underlying this objective is an implicit need to ensure our retirement income system is reliable, sustainable and strong enough to withstand a variety of potential risks. It is generally believed that these goals are best achieved by maintaining a three pillar approach to retirement income, with each pillar contributing differently to the strength of the system.

In moving to the next step, from research and evaluation to development, Ministers will need to find common ground on the way forward. Once a direction is agreed upon, additional analysis will be required in a number of areas (see Appendix B). A consultation strategy, which could include a federally hosted Pension Summit, should also be developed.

In assessing the options presented in this paper, ministers should keep in mind that other measures to improve the retirement income system are not precluded, and indeed are necessary for a comprehensive approach pension reform in Canada. Most proponents of a national pension option⁴⁵ support a multi-pronged approach to address the savings shortfall: modernizing pension standards and related tax rules, improving the general level of financial literacy in the Canadian population and establishing a widely accessible supplementary pension plan for those that are not otherwise covered. Many also believe that the existing CPP should be expanded as a complementary measure.

Proposals for a government-facilitated supplementary pension plan do not preclude a significant role for the private sector in the provision of services such as administration, investment management, custodianship and annuitization. However, the insurance industry's notion that it could create a large-scale, low cost model that would be equivalent to the JEPPS ABC plan may not be realistic. At the same time, many proponents of a national pension solution agree that more flexibility must be provided so that the industry can develop innovative plan designs that could meet the needs of today's employers and workers, in particular those that wish to compete

⁴⁵ Ambachtsheer, 2009; Denison 2009; TD Economics 2009.

for labour with enhanced benefit packages. They believe that, even with a CSPP, there is room in the third pillar for new savings products that could arise from private sector innovation.

The foregoing analysis indicates that both models under examination can help to solve the pension coverage deficit, particularly for the target income group, in different ways. The CPP Expansion focuses on strengthening the second pillar, while the CSPP option would enhance the third pillar.

One striking finding in the development of this paper is the limited scope of Canada's second pillar when compared to other OECD countries (see Table 1). Canada's poor comparative results and observations of the World Bank regarding the low Canadian ceiling on public pensions are compelling. While an expansion of the CPP would address this concern, this is likely not the complete solution.

A modest expansion of the second pillar that would put Canada on an even footing with other OECD countries could be complemented by a voluntary CSPP for those not otherwise covered by a workplace pension plan. Once again, this may not be the complete solution.

Increased flexibility in pension standards could allow for innovative plan designs that offer something more to employers that wish to distinguish themselves when competing for scarce labour – a likely scenario once the economy has recovered and labour markets feel the full impacts of the baby boomer retirement process.

APPENDICES

Appendix A: August 6, 2009 Communiqué from the Council of the Federation

Appendix B: Policy Issues to be Resolved

Appendix C: “Research Study on the Canadian Retirement Income System”
by Bob Baldwin

Appendix D: Overview of Comparative Analysis of CSPP and CPP Expansion

Appendix E: Investment Expenses by Alberta Finance & Enterprise

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APPENDIX A



PREMIERS AGREE ON EI REFORMS AND CALL FOR A RETIREMENT INCOME SUMMIT

REGINA, August 6, 2009 – Premiers agreed on the urgent need to modernize the Employment Insurance system to support a modern workforce in a modern economy and called for a national summit on retirement income.

Modern Employment Insurance Program

Premiers agreed that the following principles should be used to modernize the EI system:

1. EI should build a temporary bridge to get workers through these challenging economic times. A renewed emphasis on training should be a critical component of the reform. The federal government must increase its allocation to training, other active employment measures and maternity benefits, under the *Employment Insurance Act*.
2. EI should provide Canadians with equitable support regardless of where they live.
3. The program should be simplified and streamlined to have fewer than the current 58 EI regions.
4. Reforms must not reduce access or benefits from the current standards.
5. The program must be affordable and sustainable and financed through a stand-alone and independent fund.

National Summit on Retirement Income

Premiers called for urgent attention to the issue of how private and public retirement plans can better meet the needs of Canadians as they retire. They called on the federal government to host a national summit on retirement income.

Finance Ministers have established a Research Working Group on Pension Coverage and Retirement Incomes. Premiers welcomed this as a good first step. However, due to the urgent nature of this issue, Premiers directed Finance Ministers to report on possible options for reform by the private sector and governments by the end of the year.

The national summit should be conducted by 2010 and should bring together provinces and territories, the federal government and interested stakeholders and experts to discuss possible options to improve saving options for Canadians and to encourage greater saving.

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APPENDIX B

APPENDIX B: POLICY ISSUES TO BE RESOLVED

Eligibility for Membership

- What should the target group be (i.e. income floor and ceiling)?
- Residency requirements?
- Immigration status?
- Minimum age? Maximum age?
- Age of eligibility for benefits payment?
- Participation in RPP?
- Federally regulated workplace?

Enrolment

- Mandatory or voluntary (automatic enrolment with option to opt out)?
- Who will be required to participate and on what level (e.g., should employers who do not participate in the plan still be required to withhold and remit contributions from participating employees)?

Specifics of Plan Design

- Contribution levels?
- Ability to transfer existing pensions, RRSPs, TFSAs into the plan?
- Locking-in requirements?
- Vesting?
- Life-cycle strategies, i.e. auto-glide, auto-annuitization, etc.?
- Source of annuities, i.e. from within the plan, from external providers such as insurance companies?
- Option for benefits to be paid from the plan in a RRIF format?

Role of Government and Governance

- For a CSPP model, should the plan be completely arm's length from government, or is it sufficient for investment management to be free from political interference?
- If the plan is to be completely independent, how will an independent administrator/fiduciary be established independently from government (e.g., nominating committee for board of trustees established by legislation, other)?

Role of Private Sector

- How much (or how little) private sector involvement would there be, in either the CSPP or CPP model? Investment management? Administration?
- If private sector involvement, who would choose the provider(s)? What would the selection process be?

Start-up Costs

- What would each option require? Quantification of start-up costs?
- How would start-up costs be funded?
- What are the opportunities for private sector partnership?

Timing of Implementation

- How long will implementation take under each model? Factors that might affect timing?
- A CPP Expansion model would require the review of the Chief Actuary.

Legal/Constitutional Issues

- Confirm whether legislation is required in each participating jurisdiction.
- Changes to CPP – would there be enough support to achieve the required approval of Parliament as well as approval of at least 2/3 of the provinces with 2/3 of the population of Canada?

Data and systems

- Will IT systems be needed for a CSPP model? If so, costs?
- Is there an “off the shelf” system that could be used?

Other

- Option for individuals who do unpaid work in the home to participate?
- Adjustments to disability and survivor benefits for future service under a CPP Expansion model?
- Degree of difference in total benefits under a CPP Expansion model with benefits indexed to the Consumer Price Index versus a CSPP model with annuities that include stock market gains?

APPENDIX C

Research Study on the Canadian Retirement Income System

Prepared for the Ministry of Finance, Government of Ontario

By

Bob Baldwin

October, 2009

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Acronyms

| | |
|--------|--|
| BC | British Columbia |
| CIA | Canadian Institute of Actuaries |
| CPI | Consumer Price Index |
| CPP | Canada Pension Plan |
| CPPIB | Canada Pension Plan Investment Board |
| C/QPP | Canada and Quebec Pension Plans |
| DB | Defined Benefit (pension plan) |
| DBS | Dominion Bureau of Statistics |
| DC | Defined Contribution (pension plan) |
| DPSP | Deferred Profit Sharing Plan |
| EPP | Employment Pension Plan |
| ERPM | Elderly Relative Poverty Measure |
| FAMEX | Family Expenditure Survey |
| GIS | Guaranteed Income Supplement |
| GRRSP | Group Registered Retirement Savings Plan |
| GSS | General Social Survey |
| HRSDC | Human Resources and Skills Development Canada |
| IRC | Industrial Relations Centre (Queen's University) |
| ITA | Income Tax Act |
| JEP | Joint Expert Panel (to advise the governments of Alberta and BC on EPP issues) |
| LAD | Longitudinal Administrative Database |
| LICO | Low Income Cut Off |
| LIM | Low Income Measure |
| LIS | Luxemburg Income Study |
| MEPP | Multi Employer Pension Plan |
| OAS | Old Age Security |
| OCA | Office of the Chief Actuary |
| OECD | Organization for Economic Co-operation and Development |
| OECP | Ontario Expert Commission on Pensions |
| PPIC | Pension Plans in Canada |
| PRP | Pension Review Panel (to advise the government of Nova Scotia on EPP issues) |
| QPP | Quebec Pension Plan |
| PIT | Personal income tax |
| RIS | Retirement Income System |
| RR | Replacement rate |
| RRSP | Registered Retirement Savings Plan |
| SCF | Survey of Consumer Finance |
| SFS | Survey of Financial Security |
| SHS | Survey of Household Spending |
| SLID | Survey of Labour and Income Dynamics |
| TFSA | Tax Free Savings Account |
| U of W | University of Waterloo |
| UK | United Kingdom |
| US | United States |
| YBE | Year's Basic Exemption (under the C/QPP) |
| YMPE | Year's Maximum Pensionable Earnings (under the C/QPP) |

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Errors of both omission and commission remain the responsibility of the author.

Bob Baldwin

Executive Summary

Purpose of the Report

This research study was prepared for the Ministry of Finance of the Province of Ontario to “... assess the capacity of Canada’s retirement income system to provide retirement incomes in the future.”

The paper includes six sections, which, together, provide an analysis of the elements of Canada’s retirement income and their efficacy in providing retirement income. Gaps in data and questions for future research are identified, as well as the resources used in developing the paper. This executive summary highlights key findings of the research study.

Structure of Canada’s Retirement Income System (RIS)

Canada’s RIS is composed of three pillars. Two programs administered by the federal government and financed out of general tax revenues comprise the first pillar: Old Age Security (OAS) and the Guaranteed Income Supplement (GIS). OAS and GIS combine to provide a minimum income guarantee for older Canadians. Most provinces provide income-tested top-ups to the OAS and GIS.

The Canada and Quebec Pension Plan(s) (C/QPP) make up the second pillar. The C/QPP are compulsory earnings-related programs that replace 25 per cent of pre-retirement earnings up to average wages and salaries. When combined with OAS and GIS, the C/QPP allows a person with half-average wages and salaries to maintain their standard of living in retirement. For people with higher levels of earnings, additional income is needed from the third pillar to meet this objective.

The third pillar, made up of privately administered Employment Pension Plans (EPPs) and Registered Retirement Savings Plans (RRSPs), is extremely diverse. The third pillar is privately administered but receives government support in the form of special tax measures and regulatory oversight. EPPs may be either defined benefit (DB) or defined contribution (DC) plans, and a growing number combine elements of both DB and DC. Participation in EPPs is positively associated with: large employers, a unionized workplace, level of earnings and education, and sector of employment. Until the recent past, male employees were more likely than females to be EPP members, but that is no longer the case.

Participation in RRSPs grew rapidly from the mid-1970s to the mid-1990s and has been stable since then. Participation is strongly associated with level of income. Since the early 1990s, some employers have introduced group RRSPs (GRRSPs) as an alternative to EPPs. RRSPs and GRRSPs operate outside of the regulatory framework that applies to EPPs.

Many of Canada’s elderly get additional income from sources other than the RIS (e.g. earnings from employment and self-employment, and investments). Their standard of living is influenced by the ownership of consumer durables such as housing. It may also be influenced by provincial government subsidies for housing and prescription drugs.

Canada’s RIS in Comparative Context

The Organization for Economic Co-operation and Development (OECD) brings together 30 high-income democracies and provides a good point of comparison for Canada’s RIS.

Canada is similar to most OECD countries in having a three-pillar RIS. However, there are important differences among OECD countries in the roles played by different pillars. Compared to the OECD as a whole, Canada's first and second pillars together place more emphasis on providing minimum income protection to the elderly, and less emphasis on replacing earnings across a broad range of pre-retirement earnings. Canadian first and second pillars have a higher rank among OECD countries in replacing low versus high levels of earnings.

The latter part of the 20th century was a period of income improvement for the elderly through much of the OECD.

Criteria for Judging Canada's RIS

The adequacy of incomes arising from an RIS is commonly judged by two criteria: how incomes compare to poverty measures, and how they allow retired persons to maintain their pre-retirement standard of living. Although these concepts are quite straightforward, there is a great deal of debate about how to make them operational.

There is also debate as to whether poverty is a state of absolute deprivation or a state of relatively low income, and this generates further debate about the correct measure of poverty.

The common approach to determining whether the elderly are maintaining their standard of living is to compare the income of the elderly population with their pre-retirement earnings. This comparison is called the "replacement rate" and is usually expressed as a percentage. Actual replacement rates are compared with a benchmark replacement rate — usually in the range of 70 to 75 per cent of gross pre-retirement earnings — to decide whether people are maintaining their pre-retirement standard of living.

The predictability of retirement income is also cited as an important consideration. Predictability is seen as an intrinsic virtue, as the elderly often have little ability to adjust to adverse income shocks by changing their participation in the labour force. Predictability is also thought to be important in allowing people to plan their personal financial affairs.

Pensions are also judged in relation to criteria such as financial sustainability and/or fairness among generations. Like the standards of income adequacy, however, these concepts are not easy to make operational.

The life cycle consumption theory provides some help in thinking about the extent to which pre-retirement earnings should be set aside to provide for retirement. According to the theory, savings during the pre-retirement period should be at a level that permits continuity in consumption between the pre-retirement and post-retirement periods. However, many people do not set aside enough to meet this objective. On the other hand, over-saving for retirement, especially if it is forced over-saving, is not benign. Lifetime consumption and well-being may be negatively affected for people who are forced to over-save for retirement.

The RIS and Today's Elderly: An Assessment

Over the period from 1976 to 2007, the median real income of elderly couples increased by 55 per cent, and the real income of elderly singles by 79 per cent. There was also a general equalizing tendency in incomes of the elderly until the mid-1990s.

Income from the C/QPP and the third pillar has grown very strongly. (Canadian income data does not permit a separation of income from EPPs versus income from annuities and RRIFs.) Most of the growth in income from the C/QPP occurred by the mid-1990s, while income from the third pillar continues to grow. Income from investments and employment has declined over time, although there has been some increase in employment income in the recent past.

Generally speaking, people in the lower half of the elderly income distribution rely heavily on income from the OAS, GIS and C/QPP, while people in the upper portion of the distribution rely much more heavily on third pillar income. At the highest level of income (the 10th decile), investment and employment income is much more prominent: 20 per cent from each source.

Since the late 1970s, there has been a sharp decrease in poverty among the elderly from about 35 per cent to roughly 5 per cent based on the Low Income Measure (LIM). The elderly poverty rate in Canada is one of the lowest in the OECD. However, subsets of the elderly (e.g. widowed and separated women) have notably higher rates of poverty.

Three Statistics Canada analysts have recently used newly available data to measure Canadian replacement rates over the period from the early 1980s to the middle of the current decade. They found that most elderly Canadians have incomes that amount to 80 per cent or more of their pre-retirement earnings. At the same time, there are significant minorities whose incomes are less than 60 per cent of pre-retirement earnings. This finding is generally consistent with the way the elderly assess their current financial situation compared to their pre-retirement financial situation.

The latter part of the 20th century was a period of significant improvement in the incomes of older Canadians. However, this positive achievement must be qualified. First, by most measures, positive developments were achieved by the mid-1990s, and the period since then has been one of stability or mild deterioration. Second, the improvements reflect not just the strength of the RIS, but the way it interacted with a particular set of financial and economic circumstances. The existing RIS will produce different outcomes under different circumstances.

The RIS of the Future: Outcomes and Influences

Several attempts have been made to estimate quantitatively the likely retirement income situation of Canada's future elderly. Generally, these efforts have focused on age cohorts near retirement age. As there is no established protocol for this type of work, existing studies use a variety of approaches. Among them, the most convincing is prepared by two analysts at Statistics Canada based on data from the 1999 Survey of Financial Security (SFS). They estimate that roughly one-third of Canadians in the 45 to 64 age range are likely to end up with incomes that fall short of adequate minimum incomes and/or incomes that will allow them to maintain their standard of living. Other studies reach different numerical conclusions, but agree that income adequacy will be a problem for a significant minority of the future elderly.

Limitations in the attempts to quantify the future incomes of the elderly point to the need for tools that are very granular, longitudinal and stochastic. Analytical methods that rely on "average" experience and suppress a view of uncertainty are a chronic problem in the pension world. Attempts to quantify incomes of the future elderly generally assume that the RIS has a

stable institutional structure and that economic, financial and labour market environments are also stable. The RIS structure and the economic environment are, of course, changing all the time.

Economic, labour market and demographic trends may make it harder for third pillar institutions to deliver adequate retirement incomes in the future. Two developments stand out in particular:

- The ratio of the retirement period to the pre-retirement period is growing.
- The gap between returns on financial assets and wage and salary growth is likely to shrink.

These developments will increase the contribution/savings rates required by third pillar institutions.

Since the late 1970s, the portion of employed Canadians who participate in EPPs has declined from 46 per cent to 39 per cent. Both public and private sectors have experienced this decline, but it has been more acute in the public sector.

So far, the decline in EPP participation has not been reflected in declining third pillar income. Until the mid-1990s, the decline was partially offset by the increasing use of RRSPs. Another mitigating factor has been that, as the portion of the employed who participates in EPPs has declined, the portion of the adult population that is employed has gone up. Thus, the portion of the adult population that participates in EPPs has been quite stable. In addition, coverage at the level of couples has not declined as steeply as has coverage of individuals. Underlying both of these mitigating factors is the increasing portion of women in the paid labour force. Finally, regulatory changes in the late 1980s increased EPP beneficiaries, thanks to new rules on vesting and survivor benefits. Some of these mitigating influences have limits to the relief they can provide: once all adults are coupled and in the paid labour force, no further relief will come from these sources.

The other major development that is widely noted with respect to EPPs is a general shift from defined benefit (DB) to defined contribution (DC) coverage. This change has been taking place in both sectors, but has been more pronounced in the private sector. It raises concerns about the predictability of retirement incomes. The shift away from classic DB has included the emergence of hybrid plans in addition to the growth of pure DC. Research done for the Ontario Expert Commission on Pensions (OECPC) indicates that two-thirds of EPP members who are classified as belonging to DB plans in Ontario actually belong to hybrids.

Data from the SFS suggest that the decline in EPP coverage and the shift from DB to DC are not prompting offsetting forms of wealth accumulation for retirement. This is a very important issue that needs further study.

Four provincial governments established inquiries into the problems of EPPs in the recent past: Ontario, Nova Scotia, and a joint review by Alberta and British Columbia. In addition, the federal government and Quebec undertook inquiries that were somewhat less formal.

The scrutiny to which EPPs have been subjected reflects a number of problems: concerns about DB funding rules as result of volatile contributions; unresolved legal disputes about appropriate use of DB pension surplus; lack of clarity about plan sponsor responsibilities

under DC plans; lack of clarity about the application of regulatory law to new hybrid plans; lack of uniformity of regulatory law among jurisdictions; and declining coverage of EPPs.

The provincial inquiries addressed a wide range of issues related to the regulatory law and processes, and the governance of EPPs. Proposed changes should make EPPs easier to manage if only by removing legal uncertainties. The inquiries also made proposals that reflect concerns raised by Ambachtsheer about the limited scale, lack of expertise in EPP governance and management, and lack of alignment of beneficiaries' interests with those of plans' governors and managers. The reports also note the need for changes to tax and bankruptcy law. Despite the potential benefits of the proposed changes, the inquiries recognized the need for more substantial change in order to address the coverage issue.

The reports prepared for Alberta and British Columbia, and for Nova Scotia recommend the creation of provincial pension plans. Employees with earnings above a minimum level who do not belong to EPPs would be enrolled in these plans unless they opt out. The self-employed would opt in. The OECP recommended the creation of an Ontario Pension Agency that might serve as an investment and pension plan manager. It also recommended that large plans be allowed to sell investment and other services to small plans and individuals, and that Ontario consider proposals to expand the role of the CPP.

Gaps in Data, Research and Information Systems

The research study identified important gaps in data, research and information systems. See section 7.

Conclusions

The incomes of the elderly improved significantly in the latter part of the 20th century and there is reason to believe that significant portions of the future elderly will be well served by existing arrangements. But a number of issues remain.

In the first and second pillars, an important issue is how the OAS and GIS benefits will be adjusted in the future if real wage growth resumes in response to demographic change. If benefits remain price indexed with no further adjustment, these programs will be less useful in preventing poverty and maintaining pre-retirement living standards.

The EPP component of the third pillar faces serious challenges. Provincial inquiries have made recommendations that should facilitate the operation of EPPs. However, the big question is whether something needs to be done outside the purely voluntary framework in order to address the coverage issue. This report identifies the questions that need to be addressed in considering this issue:

- what is the earnings range to which a new initiative might apply;
- what age cohorts would participate in a new initiative;
- how should any new initiatives relate to existing EPPs;
- what is the right balance of voluntarism and compulsion in a new initiative and is it the same for employees and the self-employed;
- what is the right mix of public and private institutions in a new initiative; and,
- what are appropriate federal and provincial roles?

The status quo is an option. However, it is an option that may leave a significant minority of people with moderate to high earnings facing a decline in their standard of living in retirement, and force many people to rely on sub-optimal pension and retirement savings institutions.

Section 1: Introduction

This paper has been prepared for the Ministry of Finance of the Province of Ontario. The general purpose of the report is to “... assess the capacity of Canada’s retirement income system to provide retirement incomes in the future ...”. The Ministry has also specified that:

“... retirement incomes should be compared to poverty indices and pre-retirement earnings with appropriate adjustments. The study should assess these broad questions in terms of individuals and families to the extent possible using existing and publicly available data sources.”

The issue raised by the Ministry is profoundly important. Over the coming twenty years, the portion of the population over 65 will nearly double, from 13.4 per cent in 2007 to 23.2 per cent in 2030 and continue to increase to 26.3 per cent in 2075. (OCA, 2008) Thus, the success (or lack thereof) that is achieved in providing adequate incomes to the older and largely retired population will have an increasing impact on the economic and social well being of the population in general. It is equally clear that providing adequate incomes to the elderly¹ population entails increasing the claims that the elderly population will make on national income. These are two sides of the same coin that will have to be balanced.

The issue raised by the Ministry also has dimensions that extend in many directions. The Retirement Income System (RIS) in Canada is in a constant state of flux and participation in its component parts is also in a constant state of change. Changing degrees of participation reflect not only changes in taste, but changes in variables such as: levels of earnings, the sector composition of employment, rates of unionization, changes in female participation in the labour force, and so on. Moreover, the outcomes generated by the RIS will vary based on economic and financial variables, such as rates of inflation and real wage growth and rates of return on financial assets.

The Ministry asked the author of the report to prepare this report within a time frame that precludes undertaking original research on all aspects of the issue. Fortunately, there is a good deal of relevant literature, analysis and data already in the public domain and it has been drawn on heavily. Nonetheless, there are some dimensions of the general issue that deserve more attention than they get in the report. As is noted in Section 7, much of the discussion in this report needs an assessment with the specific situation of women and immigrants in mind. The report does present new data on the incomes of the current elderly.

Two things about the way the report has been prepared need mentioning at the outset.

¹ Unless context demands otherwise, the terms elderly, pensioners, seniors and retirees will be used interchangeably and will be used to designate individuals who are 65 years of age and older and/or economic families in which the oldest member of the household is 65 or older.

In the process of preparing the report, gaps in existing data and analysis have become evident. Indeed the author of the report has been noting these for some years. (See: Baldwin, 2007 and 2008) Despite these limitations, issues that need to be addressed have been addressed even where the existing data and analysis have been less than complete. Relevance has trumped reliability in the preparation of this report. Second, the subject matter of this report, like pensions as institutions, focuses on the future, which by its nature is uncertain. This is not a field that permits fixed and firm answers to questions (though many are propounded). Answers to all of the key questions in this report need to be treated with some caution irrespective of the source. The reality of uncertainty also has some implications for analytical tools that are best suited for analyzing future retirement income prospects and these are noted in Section 7 and in the Conclusions in Section 8.

The report proceeds as follows.

Section 2 provides an overview of the Canadian RIS. The component parts are briefly described, as is the manner in which they combine to meet retirement income goals.

Section 3 looks at the Canadian RIS in an international comparative perspective. The comparators are provided by the 30 high income democracies that make up the membership of the Organization for Economic Co-operation and Development (OECD). The roles played by different parts of the RIS are compared with those in other countries.

Section 4 is largely conceptual and discusses criteria for judging the RIS. It notes some of the difficulties in making key concepts operational.

Section 5 describes the income situation of the current elderly, as well as elderly income trends. It notes amounts and sources of income, the evolution of poverty among the elderly, replacement rates and quasi-replacement rates. All but the discussion of replacement rates relies on data gathered for the report.

Section 6 looks to the future with a view to answering the key questions the report has been asked to address. It begins with a review of several attempts to quantify the future retirement income prospects of Canadians and it also notes the subjective assessment of near retirees in Canada of their retirement income prospects. Section 6 moves on to discuss changes that are taking place in Employment Pension Plans (EPPs) in Canada and some proposals that have been made to overcome some of their current problems and limitations. Section 6 also includes a brief discussion of issues related to Canada's public pension plans.

Section 7 takes stock of some of the limitations in data, research and information systems relating to incomes of the elderly and future retirement income prospects.

Conclusions are drawn in **Section 8** and references are identified in **Section 9**.

Section 2: The Structure of Canada's Retirement Income System

2.1 Introduction

In order to describe the structure of the Canadian RIS in a manner that is consistent with the comparative context presented in the next section of the report, the Canadian RIS will be described in terms of the three pillars structure employed by the OECD. (See for example: OECD, 2009). In the OECD's classification:

- The first pillar is made up of programs that are financed from general tax revenues and are available to the elderly based solely on age plus years of residence or citizenship, or these qualifications plus an income or means test.
- The second pillar is made up of compulsory programs that are designed to replace pre-retirement earnings. These programs could be either defined benefit (DB) or defined contribution (DC).
- The third pillar is made up of privately administered retirement income plans, including those that are put in place "voluntarily"² by employers for their employees (EPPs) and individual tax assisted retirement saving accounts.

This typology developed by the OECD is useful and widely used. However, several things about it are worth noting. First, incomes of the elderly include sources of income that are not encompassed by it because they are not specifically designed to provide income in retirement. Investment income and earnings from employment and self-employment are the most obvious cases in point. Second, publicly administered retirement incomes are not the only source of public support for the elderly. Other types of support may include drug and housing subsidies. Public support is also provided to privately administered retirement income plans through tax support and regulation. Finally, it is noteworthy that the typology does not differentiate among pillars based on funding method.

Pension plans can be financed on one of two classic bases: pay-as-you-go (pay-go) or fully pre-funded. In a pay-go plan, contributions are levied at a rate sufficient to pay benefits due to be paid in the current time period. No reserve fund is built up, there are no pension investments, and investment income plays no direct role in the financing of the plan. The contribution rate under a pay-go plan will reflect two ratios: the ratio of pensioners to contributors, and the ratio of retirement benefits to contributory earnings.

In a fully pre-funded plan, contributions in a particular year are levied to match the present value of the future benefit payments that are earned that year. Typically, assets that accrue in the pension fund are required to match the full amount of the financial obligation of the plan to its members. In cases where there is a shortfall of assets in relation to plan obligations (liabilities), special payments to the pension plan over and above those needed to match newly accruing benefits are typically required. Conversely,

² EPPs are voluntary for employers in the sense that they are not required to provide them by law. But, union bargaining pressure and pressures from competitors on the demand side of the labour market may leave employers little choice but to offer them as part of a compensation package.

if there is an excess of assets over liabilities, reduced contributions may be allowed or required. Contribution rates in fully funded plans will depend on the ratio of the retirement period to the period over which contributions are made and, assuming wage related benefits, the relationship between returns on pension investments and wage growth.³

First pillar programs are almost invariably pure pay-go programs and until the recent past the same could also have been said of second pillar programs in OECD countries. However, the tax base used to support first and second pillar programs usually differs even where both are being financed on a pay-go basis. First pillar programs usually rely on the full tax base of the government which means that to some degree, capital income and the incomes of the elderly form part of the tax base. Second pillar programs usually levy contributions exclusively on labour income and then, only up to a maximum level. In recent years, a number of OECD countries have begun to introduce or expand pre-funding in second pillar programs and Canada is a case in point. Other members of the OECD, particularly new members, have complete pre-funding of their second pillar as a result of having adopted mandatory DC arrangements.

Plans in the third pillar are almost invariably fully pre-funded. This is true by definition of pure DC plans and true, with some notable exceptions, of DB plans.

Canadian arrangements will be described against this backdrop.

2.2 Pillar 1: OAS, GIS, The Allowance and Provincial Top-Ups

In Canada, the first pillar is dominated by two large programs that are financed and administered by the Government of Canada – namely, Old Age Security (OAS) and the Guaranteed Income Supplement (GIS), which is part of the OAS program in a formal, legal sense. It also includes a smaller income tested supplement (The Allowance) and provincial top-ups to GIS in most of Canada's provinces and territories.

The OAS was established in 1952 as a universal flat rate benefit that provides monthly benefits to all Canadians who satisfy age and residence requirements. Initially, the age of eligibility was 70 but was lowered to 65 in one-year annual stages from 1966 to 1970. The residence requirement was ten years of residence in Canada between ages 18 and 65 in order to qualify for OAS. Starting in 1973, the amount of the monthly benefit was indexed to changes in the Consumer Price Index (CPI), with the price adjustments being made quarterly.

³ It is typically assumed that returns on investment will exceed wage growth and that therefore pre-funded contribution rates will be lower than pay-go contributions. While this assumption is likely to hold true in most situations, it will not hold true in all. Moreover, the fully funded contributions are likely to be more volatile and, even if the contribution rates are lower, the claims of the pensioners on national income do not change from one funding method to another. The claims of the pensioners on national income are determined entirely on the benefit side of the pension plan. What allows the contribution rate to be lower in pre-funded plans is their ability to claim property income through the ownership of assets, in addition to wage based contributions.

Residence requirements for OAS were amended in 1977 so that 10 years of residence would qualify a person for 10/40ths or one quarter of a full benefit. Each additional year of residence would qualify a person for an addition 1/40th of a full benefit. Forty years of residence would be required for a full benefit. At the time of the change in residence requirements, it was hoped that Canada would enter into social security agreements with countries that were the source of immigration so that partial payments of social security pensions would be received by adult immigrants to Canada. In addition, immigrants from countries with which Canada had signed social security agreements would be allowed to aggregate years of residence in Canada and countries of origin in order to satisfy qualifying requirements.

In 1989, the universal flat rate nature of the OAS program was ended. For individual OAS recipients with incomes above a threshold level, a surtax of 15 per cent was imposed on income above the threshold until the full amount of the OAS benefit was taxed. The threshold level of income at which the tax applied was originally set at \$50,000. For tax year 2008, it was roughly \$65,000 and the threshold is now indexed to movements in the CPI. In 2008, the surtax applied to incomes between \$65,000 and \$105,000 and, in effect, no OAS is paid to older individuals with incomes above \$105,000.

The GIS was established in 1966 as an income tested supplement to the OAS program. GIS benefits are available to OAS recipients with low incomes. Maximum GIS benefits are established for individuals and couples (the maximum benefit for couples is 1.6 times the maximum benefit for individuals reflecting the idea that there are economies of scale in cohabiting). The maximum benefit is paid to individuals and couples who have no income except OAS and the maximum benefit is reduced by \$1 for every \$2 of income from sources other than OAS. The maximum GIS benefits are indexed to price increases in the same manner as OAS.

The GIS was introduced at the same time as the Canada and Quebec Pension Plans (C/QPP) and was modest in amount. The maximum GIS for singles was \$30.00 per month compared to an OAS benefit of \$75.00 per month and, initially there was no difference between the maximum GIS for singles and for couples. Part of the thinking in introducing the GIS was that the elderly at that time should get some compensation for not being able to participate in the newly created C/QPP. But, with the passage of time, GIS benefits have tended to grow in relation to other public programs for the elderly. The rationale for this shifting balance has been that limited fiscal resources of governments should be targeted to those most in need. Thus, there have been no discretionary increases in OAS benefits above the increases attributable to CPI increases since indexation was introduced in 1973. GIS benefits have been increased on a number of occasions. As a consequence, maximum GIS benefits for the single elderly at the end of 2008 were \$653 per month, compared to OAS benefits of \$517 per month.

In 1975, the Spouses' Allowance (SPA) was introduced. It was designed to extend the minimum income guaranteed to couples through OAS and GIS to couples in which one

spouse was eligible for OAS and the other was aged 60 to 64. In 1979, the SPA was amended so that a surviving spouse under age 65 in couple receiving an SPA benefit would continue to receive the benefit if their spouse who was eligible for OAS died. Starting in 1985, the SPA could be paid to all widows and widowers aged 60 to 64. The SPA was renamed the Allowance in 2000. As of 2007, it provided benefits to about 94,000 people compared to about 4.4 million recipients of OAS benefits.

In addition, most provinces and territories offer income tested top-ups to OAS and GIS. Being in receipt of GIS is typically a condition of qualifying for the supplements. In some cases, the provincial top-ups can be quite substantial. In Alberta, for example, they amount to more than \$2,800 per year for a single and \$4,200 for a couple as of 2003. In Newfoundland and Labrador the amounts are much smaller at \$350 and \$700 per year for singles and couples, respectively, again in 2003. Quebec and Prince Edward Island do not have supplements. (Cohen and FitzGerald, 2004)

Provinces may also supplement top ups with additional forms of support that are delivered through the tax system. For example, Ontario's top up, known as GAINS, provides maximum benefits of almost exactly \$1,000 per years to singles and \$2,000 to couples. In addition, senior home owners may qualify for a property tax grant that provide a tax benefit of up to \$1,300 per year when combined with property and sales tax credits.

All of the first pillar programs described above are financed from federal and provincial general tax revenues, and expenditures under the programs are included in relevant government budgets.⁴

2.3 Pillar 2: The Canada and Quebec Pension Plans

Since 1966 when the C/QPP was created, all employed and self-employed Canadians have been required to contribute to the C/QPP on earnings between a yearly basic exemption (YBE) and yearly maximum pensionable earnings (YMPE). The YMPE roughly tracks average wages and salaries. Retirement benefits from the C/QPP amount to 25 per cent of lifetime contributory earnings. For purposes of the benefit calculation, each year's contributory earnings (i.e. earnings up to the YMPE) are increased to reflect growth in the YMPE over the period that separates the years when contributions were made and the YMPE at retirement date. Adjusted earnings are averaged over the entire period from age 18 to retirement date, with provision being made for dropping from the calculation limited periods when adjusted earnings are below average. Once C/QPP retirement benefits begin to be paid, they are indexed to increases in the CPI on an annual basis. Retirement benefits calculated according to the basic formula in the plans are payable at age 65. Retirement benefits can be initiated between ages 60 and 65 but are reduced from what would be paid based on the formula, and benefits can be initiated

⁴ Prior to 1972, the OAS program was financed by a designated tax and a notional OAS account was maintained to track program revenues and expenditures.

between ages 65 and 70 but are increased above what would be paid based on the formula.⁵

The C/QPP also provide survivor and disability benefits in addition to retirement benefits. In the case of the death of a contributor who is receiving a retirement benefit the survivor benefit is based on the retirement benefit in pay in the case. In the case of a contributor dying or becoming disabled before receiving a retirement benefit, the survivor and disability benefits are somewhat more complicated, but are based largely on the retirement benefit that would have been paid had the contributor reached 65 on the date of death or disability.

Throughout its history, the C/QPP has operated on a modified pay-as-you go basis. In the late 1990s, a number of changes were made to the plans, with particular emphasis on their financial arrangements. The target size of the reserve funds was raised from two to five years of plan expenditures (roughly 25 per cent of liabilities) and the CPP fund was to be invested in marketable securities, as had always been the case with the QPP. The investments of the new CPP fund were to be managed by an “arm’s length” CPP Investment Board (CPPIB).

An important objective of the 1990s reforms was to stabilize the combined employer and employee contributions below 10 per cent of contributory earnings. According to the new rules put in place in the late 1990s, if a future triennial actuarial report establishes the required contribution rate at more than 10 per cent and the federal and provincial finance ministers cannot agree to a new rate above 10 per cent, the indexation of benefits will be curbed in order to keep the contribution rate below 10 per cent. Thus, the purely DB character of the C/QPP has been ended. The new rules also require that any benefit improvements be fully funded.⁶

The CPP is administered by various departments of the Government of Canada. However, changes to the benefits and contributions require an agreement between the Government of Canada and two thirds of the provinces with two thirds of the Canadian population. For purposes of this amending formula, Quebec is a province like the others in spite of its managing its own QPP. It is also noteworthy that the revenues and expenditures of the CPP are not budget items for the Government of Canada.

2.4 Pillar 3: EPPs and Individual Retirement Savings

While some third pillar pension plans existed as early as the late 19th century, they became widely available in the twenty years following the Second World War A study

⁵ At the time of writing (August, 2009), the Government of Canada and the provinces have agreed to three small changes to the CPP that are described in Section 6.4.

⁶ The 1990s changes also included benefit reductions, mainly to survivor and disability benefits, that were expected to reduce CPP expenditures by 10 to 15% in 2030. In addition, the YBE was frozen in its absolute dollar amount, thus increasing the size of the plan’s contributory earnings’ base and limiting the redistributive character of the C/QPP. The CPPs pay-go contribution rate is now estimated at 11.02 in 2030 (OCA, 2007) compared to 14.2% in OCA, 1995.

undertaken by the Industrial Relations Centre (IRC) at Queen's University in 1938 could identify only 615 EPPs in Canada. (IRC, 1938) According to a 1965 survey by Statistics Canada's predecessor, the Dominion Bureau of Statistics (DBS), there were 13,600 plans with 2,346,000 members. (DBS, 1967) As of 2008, data from Statistics Canada's Pension Plans in Canada (PPIC) data base suggest there were no less than 19,185 EPPs in Canada with 5,908,633 active members. The absolute numbers of members in EPPs continues to grow and is impressive in size. But, in relation to the size of the employed workforce, EPP membership has been declining since the late 1970s and has fallen from 46.1 per cent of paid workers in 1977 to 38.3 per cent in 2007.

By its nature, the third pillar is very diverse. The PPIC data base classifies 11,539 EPPs as DB plans in 2008 and these plans have 4,538,192 members. The same source identifies 7,165 plans as DC with 935,236 members.⁷ While this suggests that DB plans predominate, the portion of plan members that are in DB plans has declined steadily in recent years, as is documented in Section 6.2 below.

The evolution of DB and DC participation is important and this issue will be returned to in Section 6.2. But, it understates the degree of diversity in plan design in Canada. The DB world has always included a variety of basic plan types, and more and more plans are emerging that combine elements of classic DB and DC plan designs.

Through most of the public sector and parts of the private sector (e.g. finance, transportation, telecommunications and utilities), it has been common for DB plans to provide retirement benefits based on final or best average pay. In unionized parts of the private sector – especially mining and manufacturing – it has been common for DB plans to be flat benefit plans that provide a fixed number of dollars per month per year of service. Until the mid-1980s, a very common type of DB plan was the career average earnings plan, in which benefits were based on a percentage of each year's earnings over a working career. These plans were widely abandoned in the high inflation environment of the 1970s and 1980s and tend now to be found in a minority of smaller plans.

In its classic form, DB plans provide complete certainty of benefit promises and complete uncertainty of required contributions, and the employers who sponsor these plans accept the contribution rate uncertainty.⁸ At the other extreme, classic DC plans provide complete certainty of contribution rates and complete uncertainty of benefits, and the plan members accept the uncertainty of benefits.⁹

⁷ As is noted below, the emergence of hybrid plans that include elements of DB and DC make this bimodal classification somewhat unsatisfactory.

⁸ DB plans that make no provision for post retirement adjustments may define a standard of living for retirees at the moment of retirement, but offer little definition of the standard of living that a retiree will enjoy over the retirement period. Also, there is a great deal of uncertainty about whether the economic burden of the special contributions that employers make to DB plans to offset deficits is shifted to plan members. See: Pesando, 2008.

⁹ There are many ways to conceptualize the difference between DB and DC. In view of what comes later in this report, it is worth adding the following distinction: classic DC establishes a fixed rate of pre-retirement savings and the benefit and replacement rate are unknown; and DB establishes a benefit and/or replacement

In the provincial public and near-public sectors, pension plans have been moving away from the classic DB structure for nearly 20 years, led by the Ontario Teachers' Pension Plan (OTPP). Pension models that involve joint governance and the joint sharing of financial risk on the contribution side of the plans have emerged. More recently, the acceptance of financial risk by plan members has been extended to the indexation of benefits, which is now provided in whole or in part based on the financial performance of the pension plan. On the other hand, the university sector has for many years provided examples of plans that are DC at core but which include DB guarantees. Although tax law currently blocks their introduction in Canada, cash balance plans that combine known rates of contribution and minimum rate of return guarantees have become quite common in the US, especially in the private sector.

Union initiated multi-employer plans (MEPPs) provide a longstanding example of the plans that incorporate elements of classic DB and DC. These plans establish rates of contribution to a common plan with a number of different employers and are governed by boards of trustees who are union nominees and/or a mix of union and employer nominees. On the advice of an actuary, the board of trustees will establish a benefit rate as in a DB plan and benefits will be paid based on the DB formula, as long as financial circumstances permit. Benefits are usually expressed in flat benefit terms. However, in order to accommodate the certainty of employer contributions required by these plans, regulatory law in all Canadian jurisdictions allows trustees to reduce accrued benefits in order to balance the plans' assets and liabilities. Sponsors of single employer DB plans are not allowed to reduce accrued benefits except in the context of the bankruptcy of an employer who is sponsoring a plan.

Given the emergence of new plan types that combine elements of DB and DC, it is less useful to think of DB and DC as a bimodal choice than it is to think of a spectrum of choice, with DB and benefit certainty at one end of a spectrum, and DC and contribution certainty at the other end.

Diversity within the EPP sector is not limited to the basic design features just noted. There are also important differences among DB plans in terms of the ancillary benefits they provide, with early retirement options being one of the most important. DB and DC plans vary, too, in terms of size. In general, DC plans have tended to be found in smaller workplaces and establishments – a fact that is reflected in their representing a much larger share of the plan universe than the plan membership universe. But, whereas one might have felt free to generalize in the past that DC is found only where the risks and costs of DB cannot be borne by a small employer, that generalization would not be safe today.

rate that is known and constantly adjusts the rate of pre-retirement savings (based on actuarial valuation reports) to meet the target. DB funding rules and practice typically allow the effects financial risks to be pooled and spread across cohorts, within formal and informal limits. In DC, there is a much stronger tendency for financial risks around the age of retirement to impact only those close to either side of retirement. Those who are just retired are not affected if they have chosen annuities as opposed to self-managed withdrawals as the means of converting their accumulated assets into retirement income.

On the other hand, it is striking that while DC tends to be associated with small firms and workplaces and while there are strong arguments for the positive importance of scale in the operation of all types of plans, there are a sizeable number of small DB plans that operate only for executives. PPIC data for 2004 identify 3,081 of these plans (43.9 per cent of DB plans in Canada) that include 0.9 per cent of DB plan members and have an average size of 14 members. Finally, it is worth noting that while most EPPs in Canada now insure their own benefits, this was not always the case. Until the early 1980s, it was common for small pension plans, in particular, to buy fully insured products. But from 1984 to 1986, the percentage of all EPPs doing so declined from 45 to 13 per cent. Fully insured products transfer the financial risk of providing pensions to the insurance industry.

Participation in EPPs has never been randomly distributed among members of the paid labour force and, indeed, it would be somewhat odd if it were randomly distributed, since the public administered programs fill much more of the retirement income needs of low earners compared to high earners. However, there are other social and economic characteristics that come into play, as well. One of the most thorough investigations of the social and economic characteristics of participants in EPP was undertaken roughly a decade ago by Lipsett and Reesor, two analysts at Human Resources and Social Development Canada (HRSDC). Quoting from an earlier study by the author of this report:

... some ... job characteristics prove to be strong explanatory variables [for EPP participation] on both the bivariate and multivariate analyses. This is particularly true of firm size and union status. Clear relationships also existed for full time and permanent employment status, seniority, sector and occupation. Sectors with high coverage include public administration, community services, and finance, insurance and real estate. Low coverage rates are found in agriculture, business and personal services, wholesale and retail trade and construction. In view of the sectoral shifts in employment and the growth in non-standard employment that were observable at that time, Lipsett and Reesor express some pessimism about future levels of RPP coverage. Also, given the widely noted difference between RPP coverage rates in the public and private sectors, it is worth noting that Lipsett and Reesor find that this difference is largely explained by differences in unionization rates, education and occupation.¹⁰

Lipsett and Reesor, like other analysts, also note a positive relationship between EPP coverage and level of wages or earnings. It is commonly found, however, that the positive relationship between earnings or income and EPP coverage does not extend to the very highest levels of earnings or income, while it does for participation in RRSPs. (See, for example, Horner, 2007)

The third pillar also includes tax assisted individual retirement saving accounts in the form of Registered Retirement Savings Plans (RRSPs). The Income Tax Act (ITA) has

¹⁰ Lipsett and Reesor also note the importance of firm size in explaining EPP coverage. This consideration is also relevant to differences in EPP coverage in the public and private sectors.

made provision for these since 1957, with support taking the form of tax deductible contributions within specific limits and the non-taxation of investment income while savings are accumulating. Benefit payouts are taxable. Financial institutions offer registered plans to individual consumers. As is noted by Dilnot, 1996, the exemption of pension contributions and investment income from taxation and the taxation of benefit payments is typical of OECD countries.

RRSPs were not heavily used until the 1970s, when there was an expansion in the dollar limits up to which tax deductible contributions could be made. Until major reforms were made to the ITA provisions relating to pensions and RRSPs at the beginning of the 1990s, the tax room provided for RRSPs was a minor fraction of what was available for DB pension plans in particular, and to a lesser degree, DC pension plans. The tax reforms of the early 1990s substantially eliminated the differences among plan types in terms of the amount to tax support they would receive. With the growth in RRSP usage following the 1990s reforms, the number of RRSP contributors has come to exceed the number of EPP members, though there has been a levelling off in RRSP usage since the mid-1990s. RRSP use is strongly associated with income as well as age and EPP membership. The reforms of the early 1990s also established a highly integrated set of rules for DB and DC pensions and RRSPs; that had not been the case in the years beforehand.

In recent years, it has become a common practice for employers to establish “group RRSPs” (GRRSPs) that, typically, employees can opt into but are not required to join. Employers may offer incentives to employees to participate in them, with the incentives taking the form of offering matching contributions up to a limit. The GRRSPs are usually an alternative to a formal EPP. They merit attention here because they obscure the distinction between EPPs and individual retirement saving arrangements. Indeed, Horner, 2007 speculates that the 1990s ITA changes may have led to some substitution of GRRSPs for EPPs. The GRRSPs operate outside the regulatory framework that applies to EPPs and, like individual RRSPs, accumulated savings can be withdrawn before retirement age but PIT will be paid on the withdrawal as if it were income.

Use of the third pillar is voluntary on the part of employers, individuals or both.¹¹ There is, however, a strong public policy presence in this realm. EPPs are regulated in all but one Canadian jurisdiction and regulations tend to cover a common set of issues: plan member benefit rights in areas such as eligibility to be a member, vesting of benefits and survivor benefits; disclosure of information to plan members and related member rights in governance structures; and funding requirements for DB pension plans. In recent years, there has been a good deal of debate about the suitability of the regulations currently in place in Canada and four provincial governments (Alberta and British Columbia jointly, Ontario and Nova Scotia) have recently established three inquiries into pension regulation in their jurisdictions. The Government of Canada has had two public consultations of a similar sort in recent years and Quebec has conducted stakeholder

¹¹ In 2008, 85% of the members of EPPs are in plans in which membership is compulsory: 90% of DB members and 60% of DC members.

consultations on the same issues. The issues addressed by these inquiries are identified in Section 6.3 of this report.

The ITA also plays an important role in shaping the third pillar. The ITA sets contribution limits for DC pensions and RRSPs, and maximum benefit limits for DB plans, including ancillary benefits. The ITA has also set limits on employer contributions to DB pension plans that have limited the building up of prudential reserves in them.¹²

The operation of the third pillar is also impacted by judicial interpretations of statutory law, the common law of trusts, professional standards of the actuarial and accounting professions, and related fields of statutory law such as bankruptcy law. In the course of this report, data on incomes of the elderly are identified by source and the term “pension income” and “3rd pillar income” are used interchangeably. This use of language reflects the fact that, in data on sources of income, it is impossible to distinguish among incomes that might arise from RRSPs in the form of RRIFs or annuities, and incomes that might arise from EPPs. Incomes from EPPs cannot be identified as coming from DB or DC plans. Some data sources refer to income from all of these sources as pension income, but it is best thought of as third pillar income.

2.5 Combining Programs and Pillars

In combination, the OAS and GIS provide a minimum income floor for Canadians over 65 and the Allowance extends this minimum floor to 60 for those who qualify. In 2007, the minimum income floor for individuals over 65 was roughly \$13,500 per year and the minimum for couples was \$21,825. These amounts are \$1,900 and \$1,275 below the annual Low Income Measure (LIM) lines for individuals and couples. Thanks to the presence of provincial programs that top up GIS payments, the minimum income guarantees are somewhat higher for most of Canada’s elderly.

The C/QPP is specifically designed to replace pre-retirement earnings and replaces 25 per cent of pre-retirement earnings from zero earnings to roughly average wages and salaries. The OAS program also contributes to this objective. But because the OAS pays a flat rate amount irrespective of pre-retirement earnings, it replaces a higher portion of low earnings than high earnings. OAS currently replaces about 14 per cent of average wages and salaries, 28 per cent of half-average wages and salaries, and 7 per cent of twice average wages and salaries. Although GIS is designed with a view to providing an income floor, its size means that if an older Canadian has no source of income but OAS and a maximum C/QPP retirement benefit payable at age 65, they will be eligible for a small GIS payment. Thus, the combination of OAS, GIS and a maximum C/QPP retirement benefit replaces: 73 per cent of half-average wages and salaries; 42 per cent of

¹² In 2008 the Government of Canada introduced the Tax Free Savings Account (TFSA), which permits after tax contributions to the TFSAs to accumulate investment income tax free and exempts payouts from the TFSAs from personal income tax. The TFSAs are not established specifically to generate retirement income but may become important vehicles for people who anticipate facing very high marginal tax rates in retirement (e.g. people who anticipate receiving GIS). The TFSAs are too new to have an established pattern of use.

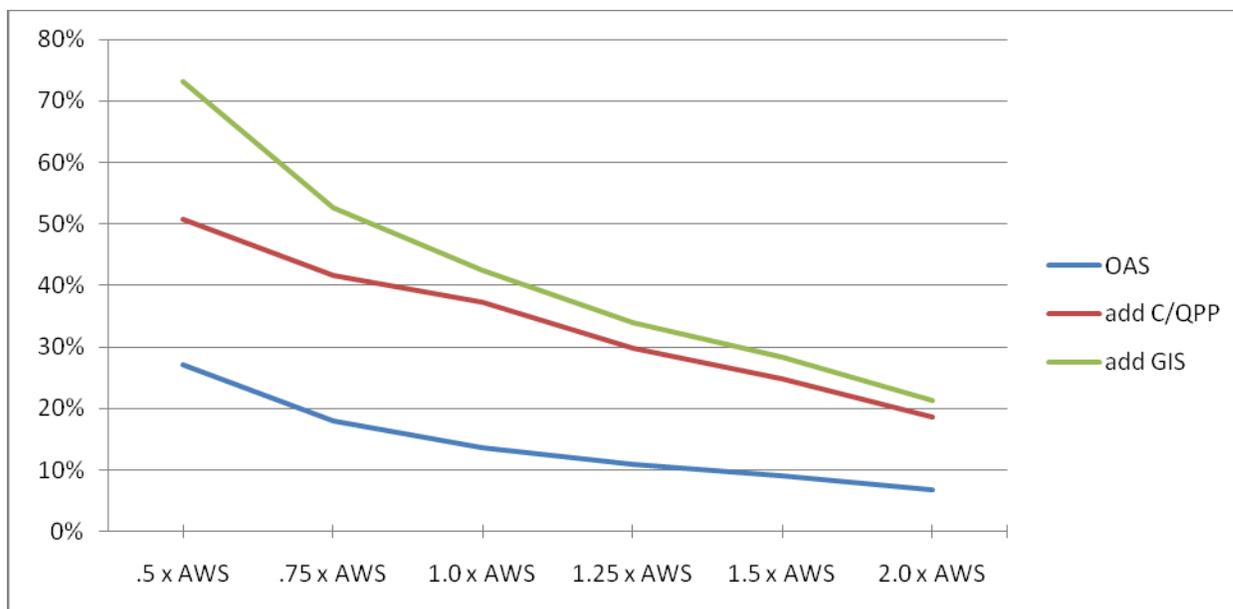
average wages and salaries; and 21 per cent of twice average wages and salaries. Canadians with higher wages and salaries will have to rely more heavily on privately administered retirement income programs to achieve a given percentage of pre-retirement incomes than will Canadians with lower wages and salaries. This issue is discussed more thoroughly in Section 4.

Figure 1 below illustrates amounts available from OAS, C/QPP and GIS. The amounts are expressed as percentages of pre-retirement earnings; earnings are expressed as fractions or multiples of average wages and salaries (i.e. replacement rates); and the YMPE under the C/QPP serves as a proxy for average wages and salaries.

As can be seen in Figure 1, on earnings up to one-half average wages and salaries, the benefits from Canada's publicly administered programs meet the commonly used replacement rate target of 70 per cent of pre-retirement earnings. However, the replacement rate that emerges from these programs declines quite steeply as a result of the flat rate amount of the OAS and the offset of CPP benefits against GIS entitlements. Thus, at average wages and salaries, there is a significant gap to be filled by third pillar income to eliminate the difference between what is available from OAS, C/QPP and GIS, and a replacement rate target of 70 per cent. As earnings increase beyond the level of average wages and salaries, the gap to be filled continues to increase.

Two additional points about Figure 1 are significant. At lower levels of earnings, the GIS is playing an important role in replacing pre-retirement earnings. The good news is that GIS is adding to income but it has somewhat unfortunate (dis)incentive effects that should not be forgotten. In addition, provincial top-ups are not included in these calculations.

Figure 1
Benefits from OAS, GIS and C/QPP as a Percentage of Pre-retirement Income
 (based on 2008 benefit levels)



Section 3: Canada’s RIS Structure in Comparative Context

Formal pension arrangements are associated with societies in which work takes place largely in the context of formal employment relationships and labour productivity is high enough that deferring consumption from working years to retirement makes sense. Pension arrangements in the OECD countries form an appropriate point of reference for comparing Canada’s pension arrangements, as the OECD brings together 30 high income democracies.

Most OECD countries have three pillar pension systems. Exceptions are provided by five countries that have no first pillar programs (Austria, Germany, Hungary, Italy, and the US), and two countries with no second pillar programs (Iceland, and New Zealand). In addition, a few countries have such comprehensive publicly administered programs that the third pillar and EPPs have little role to play (Finland, Greece, Italy, Poland, Portugal, Spain, Turkey). Deciding whether EPPs belong in the second or the third pillar is not straightforward in countries where EPPs are mandatory as a result of legislation (e.g. Finland, Iceland, Switzerland), or effectively mandatory thanks to highly centralized and comprehensive collective bargaining regimes (e.g. Denmark, Netherlands, and Sweden). Generally, the OECD has classified EPP regimes of this sort as second pillar.

While there are typically three pillars in the pension systems in most OECD countries, there are important differences in the structure of the first two pillars and in the balance

among pillars. Thus, most countries have one first pillar program that provides either a universal flat rate benefit or a benefit based on an income or means test. Seven OECD countries in addition to Canada have both a flat rate benefit and an income or means tested program – namely: Czech Republic, Denmark, Iceland, Luxembourg, Mexico, Norway and the UK. In the Czech Republic, Luxembourg and Mexico, the minimum income protection in the first pillar only applies to pension income (i.e. there is a minimum pension guarantee and income from other sources is ignored in calculating the benefit).

Until recently, second pillar programs were overwhelmingly earnings-related DB plans that operated on a pay-as-you-go basis. But the landscape has become quite diverse in recent years. A number of OECD countries now have mandatory individual savings accounts as their second pillar program (e.g. Australia, Denmark, Hungary, Mexico, and the Slovak Republic)¹³. In other cases, a small layer of mandatory individual savings has been added to a second pillar that still operates largely on a DB basis (e.g. Norway, Poland, Sweden). In addition, new program designs have emerged that combine elements of DB and DC. In the late 1990s, Sweden introduced what was called a notional DC design in its second pillar. It functions, though, much like the career average adjusted plan design of the C/QPP with the twist that longevity risk for each age cohort is reflected in the amount of benefit payout. Wage-related post retirement adjustments can be capped under specified financial circumstances. Notional DC schemes also exist in Italy and Poland. In the early 2000s, EPPs in the Netherlands switched from being final pay schemes with wage indexed benefits, to plans that guarantee nominal career average benefits but aspire to provide indexation of both pre-retirement accruals and post retirement adjustments. The plans in the Netherlands are fully funded and have to be funded to achieve the aspired level of benefits.

The role played by the first two pillars (including mandatory privately administered plans) in meeting retirement income needs varies widely within the OECD. This can be illustrated by comparing benefits from the first two pillars with different levels of pre-retirement earnings as is done in Table 1 immediately below. In Table 1, benefits provided by Pillars 1 and 2 are expressed as replacement rates at three levels of earnings: 0.5 times average wages; 1.0 times average wages; and 1.5 times average wages. Rows identify Canada's replacement rate (RR); Canada's rank among 30 OECD countries (counting down from the highest rate); the OECD average RR; the highest RR among OECD countries and the lowest RR among OECD countries.

¹³ In the case of the Slovak Republic and Hungary, the DC schemes are only mandatory for entrants to the labour market after specified dates.

Table 1
Gross Replacement Rates Provided by Pillars 1 and 2,
Canada and OECD Comparators

| | 0.5 x Average Wage | 1.0 x Average Wage | 1.5 x Average Wage |
|-----------------|---------------------------|---------------------------|---------------------------|
| Canada RR | 76.5 | 44.5 | 29.7 |
| Canada Rank | 13 | 20 | 26 |
| OECD Average RR | 71.9 | 59.0 | 54.3 |
| OECD Highest RR | 124.0 | 95.7 | 95.7 |
| OECD Lowest RR | 43.0 | 30.8 | 21.3 |

Based on OECD, 2009

Table 1 reflects the fact that pillars one and two in Canada tend to focus on meeting minimum retirement income needs rather than replacing large percentages of earnings across a broad range of pre-retirement earnings. The earnings replacement provided by the C/QPP is modest even after taking account of OAS, and the level of covered earnings under the C/QPP is the lowest in the OECD. (OECD, 2005) The emphasis on providing minimum income protection is a characteristic feature of social security in the liberal Anglo-Saxon countries in the OECD. (See: Esping-Andersen, 1990)

Many of the European members of the OECD have older populations than Canada, and population ageing was putting upward pressure on pay-go contribution rates through the late 20th century. Thus, many of these countries adopted pension reforms that varied in their specifics but were generally designed to reduce future pension expenditures. Increasing the age of retirement and/or eliminating early retirement incentives were common features of reforms. In OECD, 2007 it is noted that 28 of 30 member countries introduced pension reforms since 1990. (See also: OECD, 2000)

OECD, 2009 provides some insight into the achievement of retirement income goals in OECD countries. Over the period from the mid-1980s to the mid-2000s, average incomes of the population over 65 tended to grow in line with incomes in the population as a whole in the 20 OECD countries for which relevant data were available. (Incomes are measured on an after-tax basis adjusted for family size and the taxes considered include social security contributions). There are a few cases of more rapid growth in the incomes of the older population and some of slower growth, but in most countries the differences amount to no more than a few percentage points. In cases where the growth in the incomes of the older population is more rapid, it typically reflects the maturing of pension arrangements that were introduced relatively recently.

Incomes of the over 65 population are compared to average incomes of the total population for OECD countries in the mid-2000s. Canada is somewhat above the OECD average of 82.4 per cent, and measures range from 97 per cent in Mexico and Austria to 66 per cent in Ireland. This range is significant, but is less dramatic than one might expect from the differences among OECD countries in sources of income in the mid-2000s. Public transfers account for less than 50 per cent of income received in a number of

OECD countries with relatively mature pension systems, including Canada, and more than 85 per cent in France and Hungary. In eight OECD countries, earnings from employment account for one quarter or more of total incomes of the over 65 population.

The incidence of poverty among the elderly is also identified in OECD, 2009. Poverty is measured based on what is described below in Section 4 as the after-tax LIM measure. Because there is a further discussion of poverty among the elderly in Section 5.2, a few points will suffice at this juncture. Across the OECD, the elderly poverty rate is 13.3 per cent and Canada is one of eight countries with poverty rates below 5 per cent. Seven countries have rates in excess of 20 per cent. Overall, women in the OECD tend to have higher poverty rates than men (15 per cent versus 10 per cent). Poverty rates among the elderly fell over the period from the mid-1980s to the mid-2000s in most OECD countries. Ireland and Spain are two countries where that did not happen, as the elderly did not share fully in rapid economic growth to which the LIM measure is sensitive. There have also been increases in elderly poverty between the mid-1990s and the mid-2000s in Australia, Finland, Sweden, Switzerland and the United States.

Section 4: Criteria for Judging Canada's RIS

4.1 Assessing Income Adequacy

It is a common feature of pension policy discourse in Canada and abroad that the adequacy of incomes provided by pension systems are judged by two criteria: do they provide incomes above a minimum acceptable level, typically some variant of a poverty line; and do they allow people who are retiring from active employment to maintain their standard of living?¹⁴ The achievement of the latter objective is usually measured by a replacement rate that expresses retirement income as a percentage of pre-retirement earnings.¹⁵ The actual replacement rate calculated in this manner is compared to a benchmark replacement rate deemed to allow people to maintain the continuity in their standard of living in retirement. These criteria have already been introduced in passing in earlier sections of this report. Here they will be explored a little more fully. Despite their conceptual simplicity, they are not easy to make operational in a fully satisfactory way.

Even at a conceptual level, there is a longstanding debate about whether poverty is a state of absolute deprivation or a relative state of low income. The lack of conceptual agreement is reflected in the existence of a variety of measures of low income that accentuate either the relative or absolute nature of poverty. Measures also vary in using pre-tax versus after-tax incomes.

The most widely recognizable and commonly cited low income measure in Canada is Statistics Canada's Low Income Cut Off (LICO), which is a hybrid of the absolute and relative measures of low income. Separate LICOs are established for different sized family units and for rural and different sized urban areas. Until recently, Statistics Canada has given higher profile to the before tax measure of LICO, but now focuses attention on the after-tax measure. It should be noted that Statistics Canada has always taken the position that the LICO is not a measure of poverty.

In recent years, Canadian academic writers on poverty issues have tended to use the purely relative LIM. Much of the international discourse on poverty issues is cast in terms of purely relative measures like the LIM. This is true of the work of the OECD.¹⁶ Unless otherwise noted, this report will use the LIM measure as it will facilitate comparability with other commentaries on poverty to a greater degree than will other measures.¹⁷

¹⁴ Horner, 2007 reminds his readers that the policy of the Government of Canada is to achieve the anti-poverty objective through public programs and to facilitate the achievement of the earnings replacement objective.

¹⁵ It bears emphasis that it is earnings from employment and self-employment that need to be replaced in retirement, and other forms of income (i.e. property income and transfers) are ignored for purposes of calculating the replacement rate.

¹⁶ A major exception is provided by the World Bank, which tends to focus on low-income countries and uses a measure of one or two dollars per day.

¹⁷ In recent years, there has been some interest among Canadian government officials in a Market Basket Measure of poverty, which reflects an absolute deprivation approach. For purposes of this report, the

It is difficult to avoid some arbitrariness in choosing a low income or poverty measure. The choice matters in some contexts but not in all. It will make a difference to measures of the number of people living in poverty, poverty rates and measures of the depth of poverty. It is also the case that minimum income guarantees are likely to be assessed in terms of poverty measures. On the other hand, the directional nature of poverty trends should not vary significantly based on the measure that is chosen. In Table 2, below, a number of low income measures are identified and the portion of different household types (seniors and all Canadians) with incomes below the different lines are noted. The table also identifies the incomes and income ranges associated with each measure. The sensitivity of low income rates to the choice of measure is clear from the table.

Table 2
Poverty Rates for Senior Families, 2007,
Various Measures

| | Low-Income Cut-Off – Before Tax LICO-BT | Low-Income Cut-Off – After Tax LICO-AT | Low-Income Measure (50% of Median) LIM | Near LIM (+10%) Near LIM | Market Basket Measure MBM |
|--|--|---|---|---------------------------------|------------------------------------|
| Senior Family (highest income person is senior) | 11% | 3% | 9% | 15% | 5% |
| Senior Family (highest income person is non-senior) | 0% | 0% | 0% | 3% | 0% |
| Senior (unattached individual) | 3% | 0% | 1% | 4% | 0% |
| Couple | 33% | 14% | 10% | 20% | 5% |
| All Family Types | 16% | 6% | 6% | 12% | 3% |
| Income Thresholds* - Single Person | \$14,914 - 21,666 | \$11,745 - 17,954 | \$15,400 | \$16,940 | \$12,142 - 15,884 |
| Income Thresholds* - Couple | \$18,567 - 26,972 | \$14,295 - 21,851 | \$23,100 | \$25,410 | \$16,998 – 22,238 |
| * Income concepts vary between the poverty definitions. | | | | | |
| <i>Source: Tabulations by Tristat Resources using Statistics Canada SCFs and SLIDs</i> | | | | | |

As is true of the poverty and low income measures, the conceptual simplicity of the replacement rate generates a wide variety of approaches as it is made operational. The replacement rate can be thought of in terms of a simple equation:

$$\text{Replacement Rate} = \text{Retirement Income} / \text{Pre-retirement earnings}$$

The problem in applying this simple formula is that it is not clear what belongs in the numerator and how the denominator should be defined.

market basket measure suffers from the weakness that it does not permit an historical time series of any length.

Establishing the numerator requires a decision on what to include in it. While income from pensions and individual savings programs designed to provide retirement incomes are obvious inclusions, the appropriate way to treat housing and other forms of non-pension wealth is less obvious. Should assessments of the replacement rate presume the annuitization of housing and other forms of wealth and/or attribute imputed rent to home owners? Another important question about the numerator is the time frame over which retirement incomes are measured. Should one look only at income received immediately after retirement; average (real) income over the retirement period; (real) income at the end of the retirement period; or something else? These measures are likely to vary for the entire income received in retirement, as well as income from specific sources.

The denominator, like the numerator, requires some decisions about how to define it. The time frame over which pre-retirement earnings are measured will have a substantial impact on the size of the denominator. Unadjusted career average earnings will result in a smaller denominator than career average earnings that are adjusted to reflect wage growth, as in the C/QPP benefit rate calculation, and both are likely to be lower than a measure of best average earnings for people whose earnings are high relative to average earnings for limited periods of time. Either implicitly or explicitly, the denominator will also have to come to terms with how to deal with periods spent outside the labour force.

To the extent that the denominator is supposed to reflect an established standard of living, other important considerations that mediate the relationship between earnings and living standards come into play. For instance, many Canadian adult households will be making mortgage payments and raising children through a significant part of working life. Both of these will limit the direct contribution that pre-retirement earnings will make to the living standard of the pre-retiree. These conditions could be taken into account in either the denominator of the replacement rate calculation and/or the criteria for judging the replacement rate. But, in thinking about how to deal with them, it is important to bear in mind that the time frames over which these considerations are relevant are not identical to the periods of work and retirement, nor are they relevant in equal degree to all people.

The criteria for judging replacement rates typically incorporate a recognition that the pre-retirement period includes expenses associated with making provision for retirement (e.g. pension contributions, individual retirement savings, and so on) and certain work related expenses that will end with retirement. In addition, other payroll taxes on employees will end (e.g. EI premiums), and certain tax measures targeted on the elderly will come into play (e.g. the aged exemption, the pension income deduction, the non taxation of GIS, pension income splitting, and so on). In addition, assuming replacement rates of less than 100 per cent, the progressive element in the personal income tax will result in lower personal income taxes in the retirement period compared to the pre-retirement period.¹⁸ The net result of these considerations is that a replacement rate of less than 100 per cent will allow a retired person to maintain their standard of living in retirement.

¹⁸ Recipients of GIS and other income tested benefits tend to face very high marginal tax rates in retirement.

The relevance of many of the questions that arise in calculating replacement rates and in establishing criteria for judging the adequacy of replacement rates will vary from person to person, and household type to household type. Thus, it has become quite common practice in Canadian analytical discourse and internationally to accept a somewhat arbitrary benchmark as the target replacement rate and to judge actual replacement rates accordingly. Typically, a gross replacement rate of roughly 70 per cent of pre-retirement earnings from all sources is a standard measure in Canada. In the following sections of this report studies of replacement rates generated by Canada's RIS will be reviewed and a range of methods and assumptions in the calculation of replacement rates will be noted. Some of the preferences of the author of this report with respect to methods and assumptions are presented after reviewing replacement rate analyses in Section 6.1.

To measure replacement rates, longitudinal data that measure incomes of the same individuals before and after retirement should be used and the path of their incomes should be followed. In addition, the current elderly at any point in time can be asked to assess their standard of living compared to what it was in working years, and this may be the most useful way to come to grips with the idiosyncratic aspects of living standards, although it is less helpful in assessing replacement rates prospectively. Until recently, there has not been a longitudinal data base in Canada that is adequate to measure replacement rates and here, as in many countries, reliance has been placed on "quasi-replacement rates" that compare the incomes of the current elderly with the incomes or earnings of younger age cohorts.

The quasi-replacement rate has traditionally been considered the analytic poor cousin of the replacement rate. Its focus is attention on the relationship between the incomes and living standards of the elderly compared to younger age groups at particular moments in time. The quasi-replacement rate has often garnered attention in discussions of whether the elderly do (and should) have the real value of their incomes protected and/or whether they should share in economic growth during their old age.¹⁹ At a more mechanical level, concern about the quasi-replacement rate has been important in discussions about whether pension income should be indexed to price movements, wage movements or not at all.

However, the issue of how the elderly share in the fate of the economy is an issue that is not only relevant to periods of economic growth and/or inflation. One could imagine periods of economic decline and/or deflation in which pension commitments to the elderly would generate growing real and relative incomes. Beyond some point, it is hard to imagine the elderly not being asked to share in the decline in some fashion. The point has been argued that the only promises to the elderly that can be honoured in all circumstances are promises that are framed as shares of current income.

In Section 5 of this report, note will be made of actual replacement rates, self-assessed comparisons of living standard before and after retirement, and quasi-replacement rates.

¹⁹ An interesting analysis of this issue is found in Musgrave 1980, who extends the discussion to address sharing the impact of demographic change.

4.2 Predictability of Retirement Income

The shift from DB to DC coverage in the third pillar has given rise to concerns about the predictability of pension and retirement income. In part, predictability is seen as an intrinsic merit, especially for the elderly who have limited opportunities to offset negative financial surprises through participation in the labour market. It has also been seen as important in allowing people to plan their individual savings efforts in the pre-retirement years.

Traditionally, concerns about predictability have been central to debates about the relative merits of DB and DC. DB has been seen to provide predictable and certain benefits but not contributions, and the opposite is true of DC. This distinction still carries some weight but it also tends to overlook: the context in which the issue is relevant; benefit risks in DB; and, the emergence of new plan designs that combine elements of DB and DC.

Notwithstanding the recent changes to the C/QPP that create some risk to the indexation of benefits, it is a safe generalization that the first two pillars of Canada's retirement income system are DB. Thus, the unpredictability of DC benefits is an issue for people who need third pillar benefits to close the income gap between what is available from pillars one and two and a replacement rate that will permit continuity of living standards. The low end of the income range where this issue becomes relevant is somewhere between half-average wages and salaries, and average wages and salaries. (This is also the part of the population for whom coverage by EPPs is an issue).

While uncertainty or unpredictability of pension income is associated with DC plans, there are some noteworthy sources of uncertainty in third pillar DB plans, as well. The most prominent source of uncertainty stems from the absence of any formal adjustments to pensions in pay in light of price or wage movements. In an inflation environment like that of the 1970s, this can be catastrophic; more than half of the purchasing power of a nominal income was lost during that decade. But, even if the Bank of Canada succeeds in keeping inflation at 2 per cent per year, 35 per cent of the purchasing power of a non-indexed benefit will be lost over the average remaining lifetime of a 65 year-old Canadian woman. Thus, DB benefits that make no cost of living adjustments define an income at retirement age but not over the period of retirement.

Other sources of uncertainty about incomes provided by DB plans are also worth noting. One is that people who change jobs prior to reaching retirement age often find that the settlements they receive from the DB plans of the employers they are leaving are less valuable than what their accumulated service would have provided had they stayed with their employer to retirement age.²⁰ The same issue arises for active members of DB plans whose plans are partially or totally wound up.

²⁰ It is important to note that while common practice in the settlements with early leavers tends to have the effect noted here, this is not an intrinsic characteristic of DB.

Moreover, when DB plans get into financial difficulty, the result may be a reduction in DB benefits based on future service or a switch to DC for future service. Either type of change may increase the onus on individual plan members to save for their own retirement. Financial difficulties may also lead to increased employee contributions to their pension plans. As is noted two paragraphs below, in jointly governed and cost sharing plans, this is sometimes a precursor to benefit changes.

An important source of uncertainty in private sector DB pension plans is the risk that the employer who sponsors the plan will go bankrupt and the assets of the pension fund will not be sufficient to provide all of the benefits promised to the plan members. Underlying this risk is the reality that, while private sector DB plans always have to be financed with the aim of having sufficient assets to match the value of benefit promises (liabilities), this is not a condition that has to be satisfied at all times. Indeed, underfunding can persist for long periods of time. (Also at risk in bankruptcy are the non-registered retirement plans that are common among high paid employees in the private and public sectors, and insurance benefits for retirees.)

Finally, as was noted above, third pillar pensions in Canada have come to include an increasing number of plans that combine elements of DB and DC. The need to make a bimodal choice between the extremes is giving way to making a choice to locate at a particular point along a spectrum. The practical question in pension design is becoming how much benefit certainty or predictability is compatible with the degree of contribution rate uncertainty that can be tolerated. It is striking that the move away from “classic DB” to plans that involve some degree of risk bearing in the benefit structure is not confined to plans operated in the private sector. Some of the most prominent changes of this sort have been made in plans in the public and near public sector at the provincial level in plans with joint governance structures and joint cost sharing. In practice, these plans have discovered the outer limit of the willingness of both plan members and employers to absorb contribution rate increases.

4.3 Sustainability & Intergenerational Equity

Providing adequate and somewhat predictable income in retirement is a central concern in assessing a pension or retirement income system. However, the achievement of this objective typically requires a considerable sacrifice of pre-retirement income and consumption. Thus, consideration has to be given to the impact of the pension systems on pre-retirement as well as post-retirement incomes. Much of the discussion of these issues is cast in terms of sustainability and inter-generational equity – two concepts that are important but difficult to make operational.

The sustainability of a pension system is important in that arrangements that are put in place at a particular moment in time are often counted on to deliver incomes for decades into the future. Individuals planning their retirement need to be able to count on the survival of existing arrangements. Thus, the path dependency that political scientist Paul Pierson, 1997 has observed in pension reforms is not just an observed fact, but a desired

characteristic.²¹ Threats to sustainability are typically identified as expenditures rising above an acceptable level, and especially in prefunded DB plans, volatility of pension contributions or accounting expenses for pensions. However, discussions of pension sustainability are often slippery in not being clear about the criterion used to distinguish between sustainable and unsustainable expenditure increases. While it is useful and important to estimate what pension expenditures will be in the future, it is something else again to decide whether they are acceptable. For pillars one and two, the decision on what is acceptable will and should bring into play concerns about the appropriate role of governments in this area. Thus, creating institutional arrangements that do not enjoy broadly based support could be added as an additional threat to sustainability,.

For purposes of this report, the discussion of intergenerational equity can be limited to a few statements that apply to both existing arrangements and proposals for change:

- It is important to try to understand the impact of pension arrangements on different cohorts and generations in terms of benefits received, contributions made and financial risks borne.
- Windfall gains for particular cohorts and generations need to be identified and justified.²²
- Preferences for pensions change through time and tend to increase as individuals and societies get older and increase their incomes. (See: Burtless and Quinn, 2002)
- Ongoing mortality improvements mean that each cohort that passes through a DB pension system, all other things being equal, will get a more valuable benefit than earlier cohorts and, as a corollary, it is not possible to stabilize both contributions and benefits.
- As third pillar DB plans become more mature they become riskier financially and the risk is borne by younger and future plan members – assuming that past accruals cannot be reduced. (See: Hamilton, 2007)
- In classic DC plans, members of different cohorts whose work lives and retirement savings have otherwise been similar will retire with different ratios of benefits received to contributions made, and these differences will manifest themselves in different replacement rates and/or different retirement ages. (See: Thomson, 1998 and Bodie, 2003)
- Differences within cohorts and generations may be greater and of greater significance than differences between generations.

There is a good deal of latitude in how the important concepts of sustainability and intergenerational equity might be applied in particular contexts. A further idea that helps frame the appropriate relationship between pension contributions and benefits is provided

²¹ In recent years, there have been many pension reforms that do not conform to the path dependency model and many of these have been strongly influenced by the World Bank. (See: Orenstein, 2008). Proponents of radical reforms have complained of governments resisting paradigm shifts in favour of parametric reforms and in doing so, tacitly acknowledge the importance of path dependency. (See: Holzman, MacKellar and Rutkowski, 2003)

²² On the possibility that they may be justifiable, see: Baldwin, 1997 and 1998.

by the life cycle theory of consumption. According to this theory, it is a rational choice for people to give up pre-retirement consumption to the degree that it will generate an income in retirement that will permit continuity in their level of consumption. This concept is not always identified in popular pension discourse, but is often implicit in it.

Historically, the major concern about the relationship between pre-retirement earnings and retirement income has been that people do not save enough to provide for continuity of consumption, and this remains a concern for considerable parts of the population. However, it is also important to register the concern that “over-saving” for retirement, especially if it is forced saving, is not entirely benign. People who are forced to over-save (i.e. their pre-retirement consumption is being forced below their post-retirement level) may be better off consuming more and saving less prior to retirement.

In closing, this discussion of criteria for judging the retirement income system, it is worth noting that there is a degree of tension between providing adequate and reasonably predictable retirement incomes on the one hand, and recent policy interest in encouraging people to work later on the other hand.

Section 5: The RIS and Today’s Elderly: An Assessment

This section presents several different perspectives on the incomes of today’s elderly. The amounts of income received by the elderly and how both the amounts and sources of income have changed over time are presented first. The next issue to be addressed is poverty among the elderly. This discussion draws on both data gathered for this report and on two recent commentaries on elderly poverty. Then the replacement rates achieved by the current elderly are discussed, also relying on secondary commentaries. The evolution of quasi-replacement rates is then noted and a concluding comment is added.

5.1 Amounts and Sources of Income of the Elderly

The movement in the amounts of real income received by senior couples and senior individuals over the period from 1976 to 2007 is presented in Figures 2 and 3. For both household types, the continuous improvement in real median incomes is striking. For couples, real incomes increased by 55 per cent from \$33,380 in 1976 to \$51,682 in 2007.²³ For singles, the increase is a little larger. Incomes net of inflation grew by 79 per cent from \$12,076 in 1976 to \$21,576 in 2007. For couples, the growth in real median incomes is concentrated at the two ends of the period while for singles, it is concentrated more at the beginning of the period.

Figures 2 and 3 also illustrate the movement in incomes at the 5th and 95th percentiles. The growth in incomes at the 5th percentile is similar to that at the median but is a little stronger over the entire period at the 5th than the 95th percentile. Overall, the real incomes of couples at the 5th percentile grew by 99 per cent compared to 28 per cent at the 95th percentile. For singles, the comparable numbers were 140 per cent and 79 per cent. But,

²³ The dollar figures in Sections 5.1 and 5.2 are 2007 dollars.

as is evident in Figures 2 and 3, income movements at the 95th percentile were much more erratic than at the median or 5th percentile. The incomes of couples at the 95th percentile fell continuously in relation to the 5th percentile from roughly 1978 to 1994. But the 2000s have seen some widening in the 95th/5th income gap. Among single seniors, the relationship between incomes at the 95th and 5th percentiles has been broadly similar. The decline in the ratio of income at the 95th compared to the 5th percentile starts earlier and ends earlier and is less pronounced at the very end of the period.

The general tendency for elderly incomes to become more equal over the time period observed is also reflected in Table 3. Whether one focuses on singles or couples, medians or averages, the general tendency is for incomes in the lower deciles to grow more rapidly than incomes in the higher deciles. While this tendency is clear and quite pronounced, it is not monotonic. It is striking for example, that the median and average growth rate for couples in the tenth decile is higher than in the ninth decile. For singles, the pattern of growth from decile to decile is less stable, but shows the same general tendency.

Figure 2
Median and Selected Percentiles Income After Tax and Ratio of 95th to 5th Percentiles, Senior Couples, Canada, 1976 to 2006

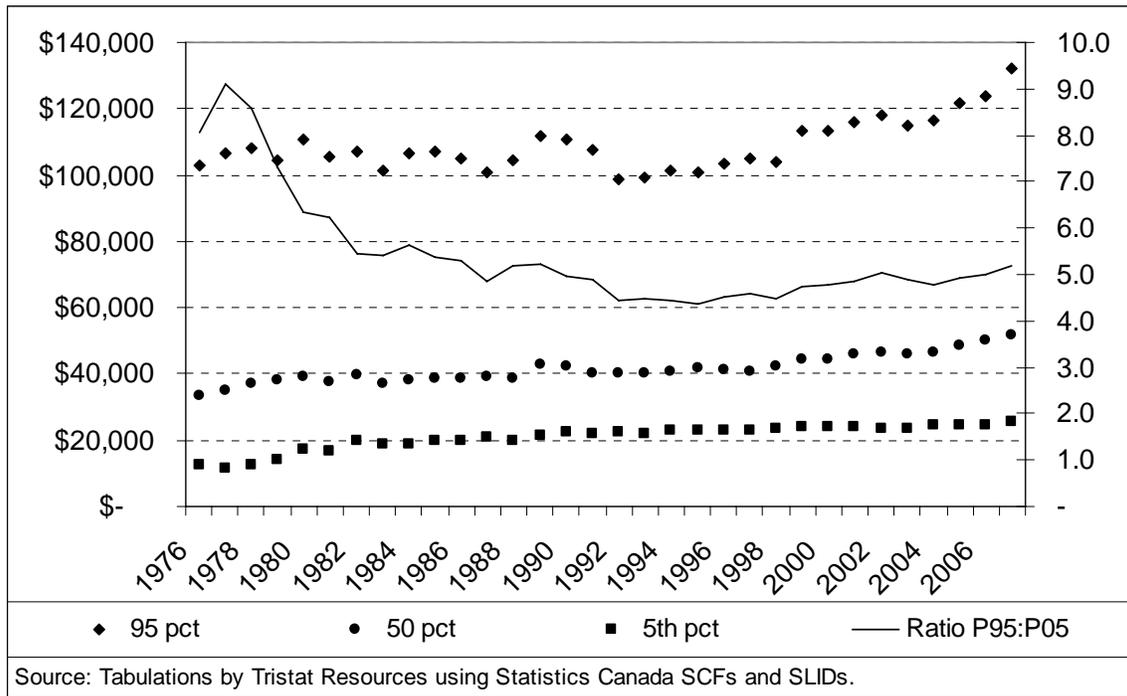


Figure 3
Median and Selected Percentiles Income After Tax and Ratio of 95th to 5th Percentiles, Senior Singles, Canada, 1976 to 2007

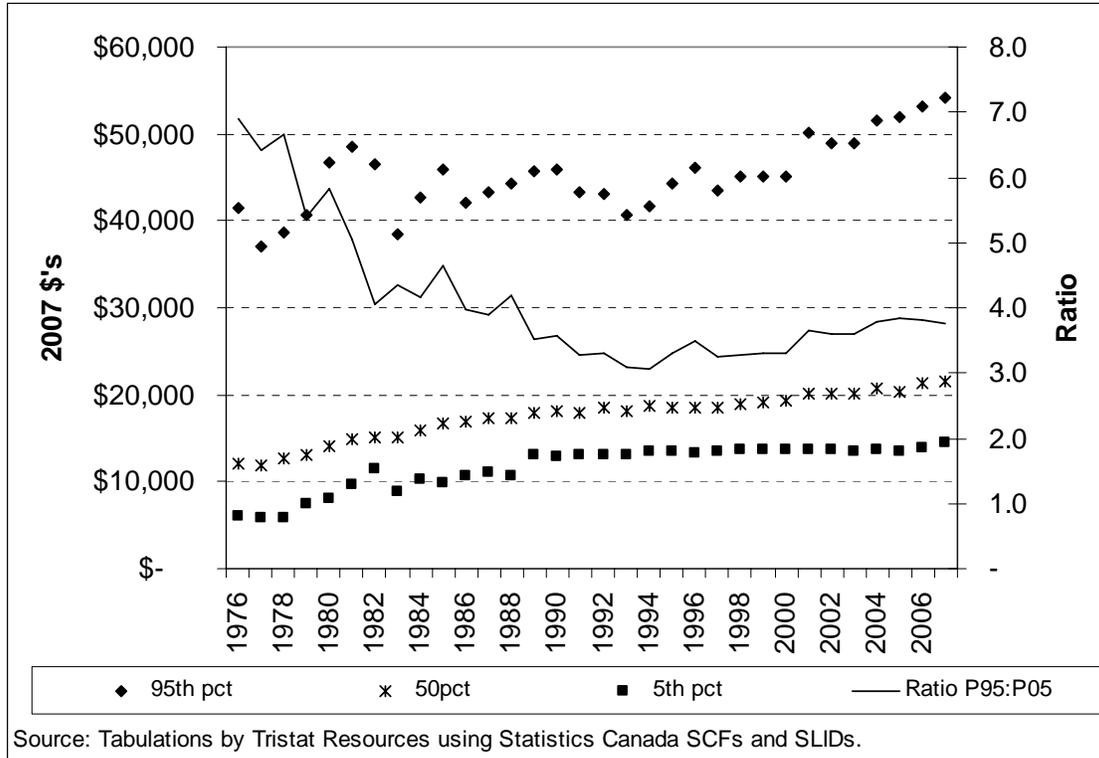


Table 3
Growth Rate in Real Median and Average After-Tax Incomes of Elderly Couples and Singles, by Decile, 1976 to 2007

| Percentile* | Decile | Percentage Change in Income | | Average Annual | | |
|--------------------|--------|-----------------------------|------------|----------------|-------------|-------------|
| | | Couples | Single | Couples | Single | |
| 5 | 1 | | 99% | 140% | | |
| 15 | 2 | | 61% | 91% | 2.2% | 2.9% |
| 25 | 3 | | 66% | 76% | 1.6% | 2.1% |
| 35 | 4 | | 68% | 82% | 1.7% | 1.8% |
| 45 | 5 | | 60% | 80% | 1.7% | 2.0% |
| 55 | 6 | | 49% | 81% | 1.5% | 1.9% |
| 65 | 7 | | 49% | 81% | 1.3% | 1.9% |
| 65 | 7 | | 38% | 85% | 1.0% | 2.0% |
| 75 | 8 | | 29% | 74% | 0.8% | 1.8% |
| 85 | 9 | | 24% | 57% | 0.8% | 1.5% |
| 85 | 9 | | 24% | 57% | 0.7% | 1.5% |
| 95 | 10 | | 28% | 31% | 0.8% | 0.9% |
| All Deciles | | | 55% | 79% | 1.4% | 1.9% |

Note: the median of the first decile is the 5th percentile
 Source: Tabulations by Tristat Resources using Statistics Canada SCFs and SLIDs.

Figures 4 to 6 include indicators of total income growth of older Canadians before and after tax, and focus attention on sources of income of older Canadians and how incomes from different sources have evolved over time. These Figures present data for all individual seniors, and the amounts by source are pre-tax amounts. Figure 4 presents data on the average amount received from each source for all seniors, while Figure 5 presents data on average amounts received from each source by seniors in the third decile, and Figure 6 does the same for seniors in the 8th decile.

In view of the strong growth in the incomes of couples and singles noted above, it is no surprise to see the individual real average incomes of seniors rise. The fact that they rise somewhat more slowly than the incomes of couples is also no surprise, as it reflects the wider access that both spouses in a married couple have to pensions. However, the key issue to be addressed by these Figures is the source of change in the incomes of older Canadians.

Looking at the overall averages in Figure 4, the sources of growth are the C/QPP and “pensions.”²⁴ There is, however, an important difference between them in that the increase in income from the C/QPP has been almost fully achieved by the mid-1990s, whereas the increase in pension income continues through to the end of the period under observation.

²⁴ The term “pension income” refers to income that arises from both DB and DC pension plans, as well as annuities and RRIFs that arise from RRSP savings. Available Canadian data does not permit a separation of income from these different sources. Thus, the pension category might best be thought of as income from the 3rd pillar.

Figure 4
Average Incomes of Senior Individuals by Source of Income
1976 to 2007 (\$2007)

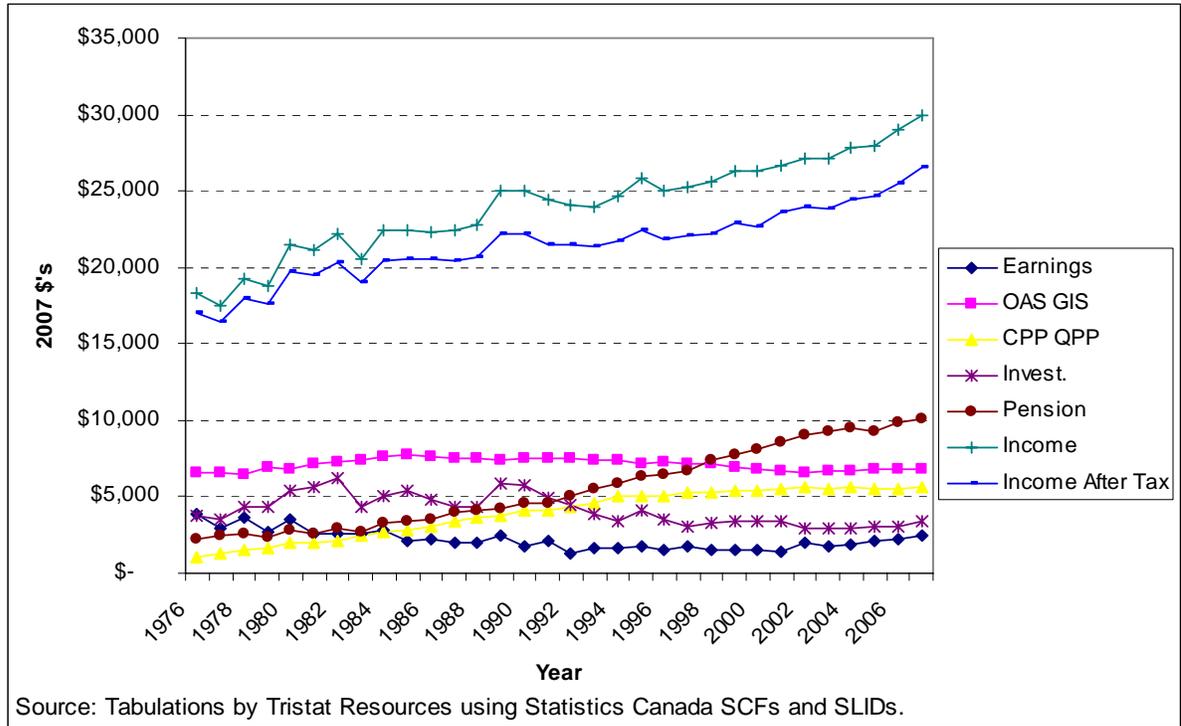


Figure 5
Average Incomes of Senior Individuals by Source of Income,
1976 to 2007, 3rd Decile (\$2007)

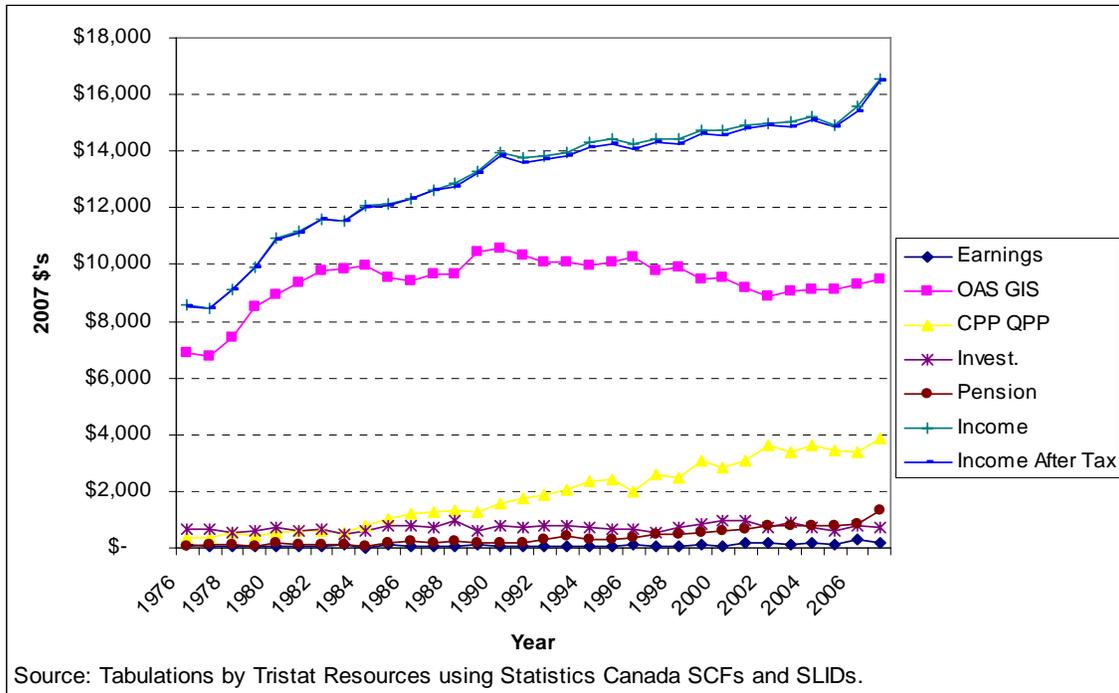
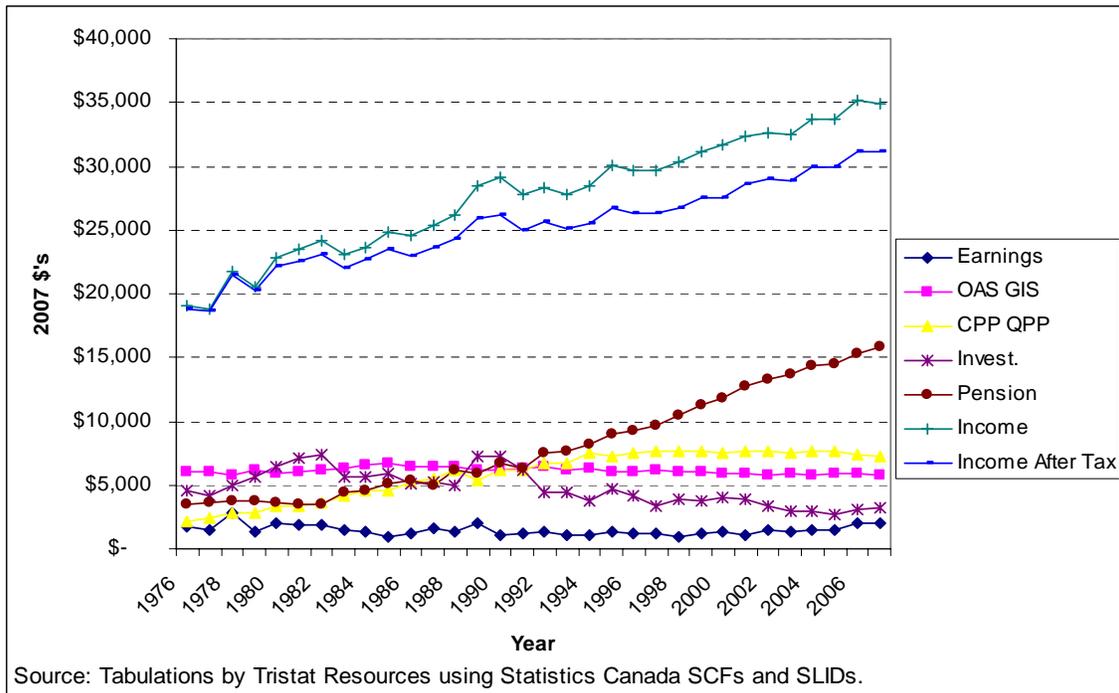


Figure 6
Average Incomes of Senior Individuals by Source of Income,
1976 to 2007, 8th Decile (\$2007)



Income from OAS and GIS, which is the most stable of all sources, declined slightly after the mid-1990s. Investment income is the least stable of all sources and has declined somewhat since the early 1990s. Earnings from employment are relatively low and stable over the entire period. They decline slightly from the late 1970s to 2000 and increase slightly thereafter.

Figures 5 and 6 provide an insight into the importance of different sources of income to seniors with different levels of income. Differences in both the relative levels of income at particular points in time and their movements through time are of some interest.

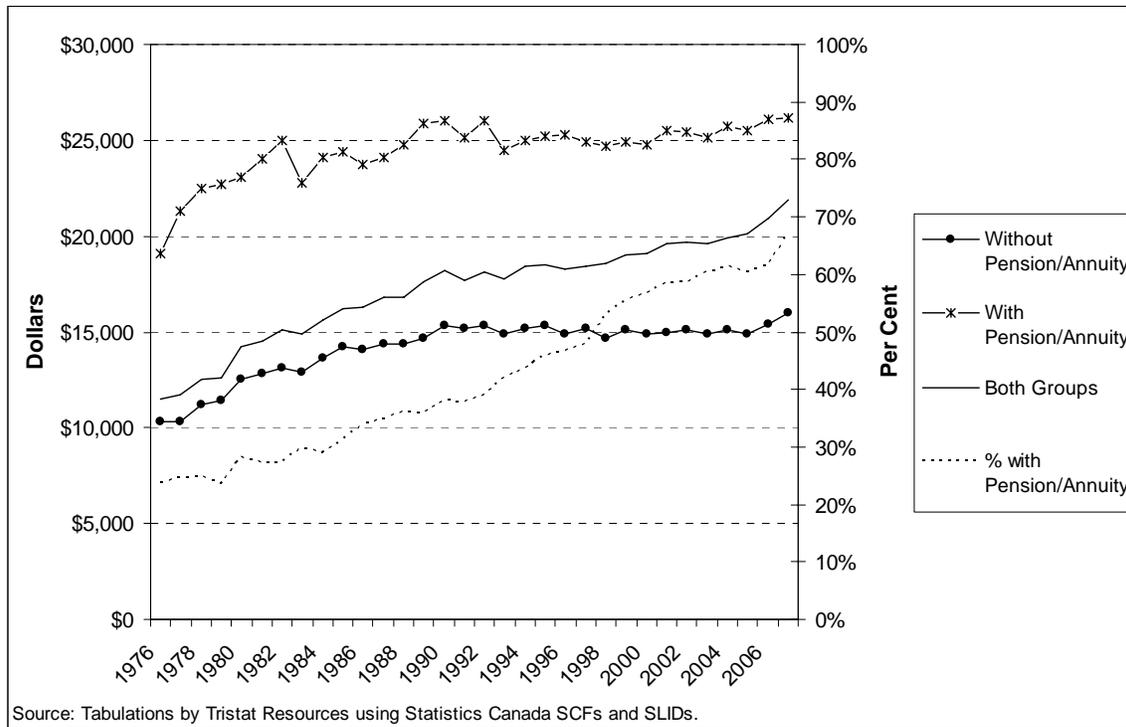
What is most striking about income sources in the third decile is the prominent role of incomes generated by the first two pillars – especially pillar 1. OAS/GIS alone is accounting for nearly 60 per cent of total income. The C/QPP is accounting for roughly 25 per cent of total income and the GIS tax back associated with the growth of C/QPP income may account for the decline in OAS/GIS payments starting in the 1990s. Increasing female access to C/QPP benefits may go some distance in explaining these overall patterns. Income from other sources plays a relatively insignificant role for seniors in the third decile. Since the mid-1990s, there has been a small increase in the income coming from the 3rd pillar.

In the 8th decile, the importance of the first two pillars is much smaller. Together, they account for roughly one out of every three dollars received in 2007. Income from the 3rd pillar accounted for nearly one out of every two dollars of income for seniors in the 8th decile. The pattern of income received from these sources through time is also noteworthy. Income from the OAS/GIS has been stable over the entire period. Income from the C/QPP grew from the beginning of the period until the start of the 1990s and has been stable since then, while income from the third pillar has grown over the entire period. Amounts received from the 2nd and 3rd pillars were roughly equal at the start of the 1990s, but 3rd pillar income now exceeds 2nd pillar income by a significant amount. For seniors in the 8th decile, investment income has declined somewhat since the early 1990s and earnings from employment have increased slightly since the late 1990s from a very low base.

The third and eighth deciles were chosen to illustrate the variations in income sources on the grounds that they are more representative of high and low incomes than the very ends of the distribution. However, there is an aspect of incomes received in the tenth decile that is worth noting with 2007 data. The tenth decile is the one decile where earnings from employment still play a prominent role as a source of income. More than 40 per cent of seniors in the tenth decile have earnings from employment, and income from this source accounts for 20 per cent of all income received. In no other decile does income from this source account for more than 7 per cent of total income received and that is in the 9th decile. In the tenth decile, investment income also accounts for 20 per cent of total income received and this is almost double the 11 per cent of income from this source in the 9th decile, the only other decile where investment income accounts for a double digit portion of total income.

In light of issues discussed elsewhere in this report, brief note will be made of three things. First, in Figure 7 below, the difference in the level of income of seniors with and without 3rd pillar income is noted. Incomes of both groups rise strongly until about 1990 and then tend to stabilize until roughly 2004 when growth resumes. One aspect of Figure 7 that is interesting is the continued growth in income of the two groups combined. This continuing increase is the result of a growing portion of the elderly receiving 3rd pillar income.

Figure 7
Median Income After Tax for Individual Seniors With and Without
from the 3rd Pillar, 1976 to 2007
(\$2007)



The growth of the incomes of the elderly in relation to poverty measures and earnings replacement is documented in Sections 5.2 and 5.3 below.

The amounts and sources of income received by individual senior women and men, by senior immigrants and the entire senior population deserve more attention than can be given to them here. In Table 4 below, the average total income before tax for individual senior women and men is presented along with amounts received from various sources and in Table 5 similar data is presented for all seniors and senior immigrants.

Table 4
Amounts and Sources of Income of Seniors, Women and Men,
Canada, 2007

| | Total Income | OAS/GIS | C/QPP | Pension | Investment | Earnings |
|-------|---------------------|----------------|--------------|----------------|-------------------|-----------------|
| Women | \$23,700 | \$7,000 | \$4,600 | \$6,800 | \$2,700 | \$1,100 |
| Men | \$34,600 | \$6,200 | \$6,600 | \$13,400 | \$3,400 | \$3,400 |

The broad patterns of income received by individual men and women are much as Baldwin and Laliberté, 1999 found them to be a decade ago. Men had higher incomes, and the more the income source is linked to paid employment during working life, the greater is the male advantage. However, the gap in average incomes has narrowed by degree from roughly 38 per cent in the mid-1990s to 32 per cent in 2007. The percentage of older women receiving C/QPP benefits has increased over this time period from 70 to 84 per cent²⁵ and the percentage with 3rd pillar income has increased from 34 to 55 per cent. There remains, however, a substantial but narrowing gap between the amounts that men and women who have 3rd pillar income get from that source — \$12,300 versus \$18,900 in 2007.

Table 5
Amounts and Sources of Income of All Seniors and Immigrant Seniors,
Canada, 2007

| | Total Income | OAS/GIS | C/QPP | Pension | Investment | Earnings |
|-------------------|---------------------|----------------|--------------|----------------|-------------------|-----------------|
| All seniors | \$30,000 | \$6,800 | \$5,600 | \$10,100 | \$3,500 | \$2,500 |
| Immigrant Seniors | \$29,000 | \$6,900 | \$4,900 | \$8,100 | \$4,000 | \$3,100 |

²⁵ Female recipients of CPP retirement benefits now outnumber male recipients.

Two things stand out in Table 5. First, the total income gap between the two populations is not large — \$1000 or 3.4 per cent. Second, the incomes are composed somewhat differently. The C/QPP and 3rd pillar income play a somewhat larger role for the total population than for immigrants. Immigrant seniors rely somewhat more on earnings from employment and investment income. In considering these data, it is important to bear in mind that no distinction is made within the immigrant population with respect to time of arrival in Canada, gender or source country. All of these variables may be relevant to amounts and sources of income in old age. In context, note should be made of Veall's comments below.

5.2 Poverty Among the Current Elderly

Figure 8 below illustrates changes in the low income rates among the elderly families and unattached individuals in Canada over the period from 1976 to 2006 using the LIM measure. It also illustrates the “near LIM” low income rate — i.e. the rate if 10 per cent is added to the LIM measure.

The most striking thing about the movement of both measures is the steep decline in the low income rate over the period of observation. Just over 35 per cent of elderly families and unattached individuals had incomes below the LIM rate in the late 1970s and this is now down to roughly 5 per cent. Most of this decline was achieved by the mid- to late 1980s, by which time the LIM rate had dropped below the double digit level. The LIM rates reached their low point in the mid-1990s and have increased marginally and unsteadily since that time. The sharp decline in the LIM rates through the late 1970s and 1980s reflects, no doubt, the benefit increases in the GIS and the maturation of the C/QPP. (On the role of the latter, see: Myles, 2000). Below, Milligan's interpretation of the increase in the LIM rate is noted.

Figure 8
Low Income Rates for Senior Families and Unattached Individuals
Using LIM and LIM + 10%, 1976 to 2007

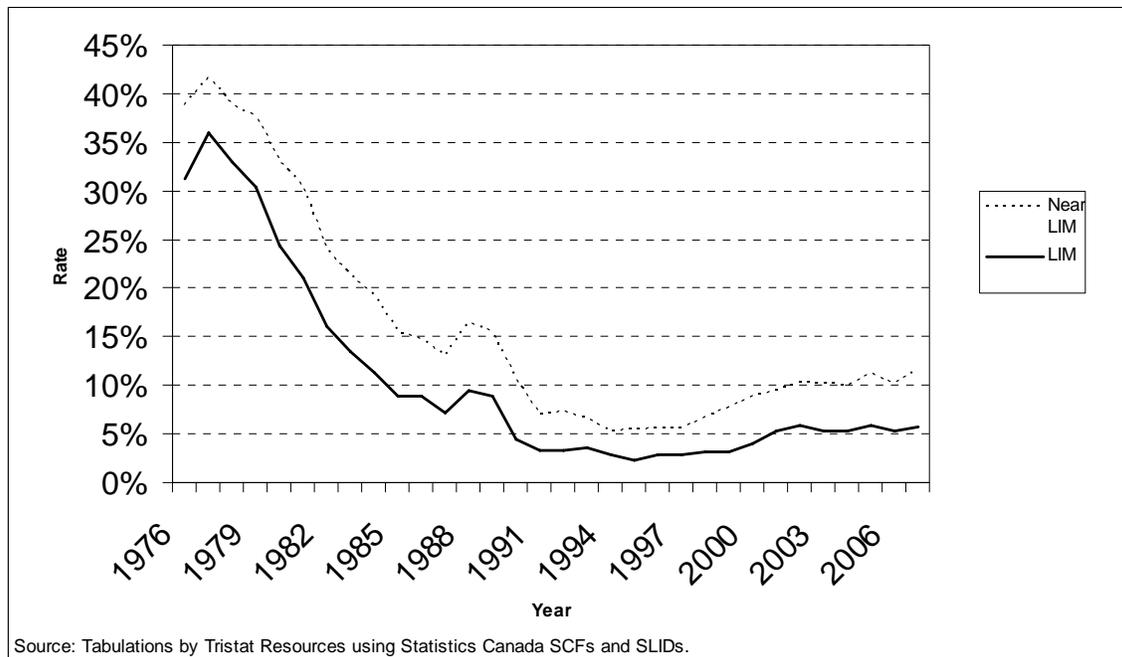


Table 6 below draws on family income data from 2007 to illustrate the point that the incomes of the elderly are clustered more densely around the low income line than is the case with incomes of the non-elderly. The table shows LIM based low income rates and rates based on LIM plus 10 per cent for different age groups. Adding 10 per cent to the LIM adds proportionately more people to the below LIM portion of the population age 65 and over, than it does to younger age groups. It is also striking in Figure 8 that the low income rates defined by the LIM and the LIM plus 10 per cent tend to move in tandem.

Table 6
Low Income Rates Using LIM and LIM plus 10%
Measures by Age of Family Head, 2007

| Year | Age of Family Head | Poverty Rates - LIM | Poverty Rates LIM + 10% | % Increase: LIM to near LIM |
|------|--------------------|---------------------|-------------------------|-----------------------------|
| 2007 | Under 25 | 48.3% | 53.4% | 10.65% |
| | 25-44 | 14.5% | 16.8% | 15.2% |
| | 45-64 | 14.9% | 17.4% | 16.6% |
| | 65 + | 5.7% | 11.6% | 103.1% |
| | All Ages | 14.2% | 17.5% | 23.0% |

Two recent commentaries by Veall, 2008 and Milligan, 2008 on poverty among the elderly are worth noting, as they add further insights on poverty among the elderly in Canada. Both commentaries recognize the sharp decline in poverty rates among the elderly in the latter part of the 20th century and the low level of elderly poverty that has been achieved in Canada.

Veall provides an international comparative perspective on poverty among the elderly by comparing Canadian data with data from the other 24 countries that participate in the Luxemburg Income Study (LIS) over the period from 1970 to 2000. The LIS poverty data are all prepared on a LIM basis.

Veall finds that no country experienced as sharp a decline in elderly poverty as did Canada and, in 2000, only four had poverty rates lower than Canada's 6 per cent (Netherlands, Hungary, Poland and Luxemburg). These countries share with Canada the distinction of being the only countries in the LIS that have lower rates of elderly poverty than child poverty and poverty of the general population. Some other countries have poverty rates among the elderly that are close to the Canadian level (e.g. Sweden and Germany), while some countries have significantly higher rates (e.g. Australia, 23 per cent; the UK, 20 per cent; and the US 25 per cent). As is true of Canada, the poverty rates for other countries are sensitive to the definition of poverty.

One of Veall's chief interests is to determine whether there are subsets of the elderly population for whom poverty rates are significantly higher than for the population as a whole. He generalizes that the following groups are at risk of higher poverty rates: recent immigrants; people who have separated or divorced, especially women; and seniors with young dependents. With regard to immigrants, he notes that his use of LAD data for this part of his research may pose a problem, as the LAD data does not capture the effect of immigrants sharing living accommodations with relatives other than parents and children. Nonetheless, it is worth noting that more than two out of three recent immigrants who are elderly have incomes below the LIM rates. Veall presents below LIM rates for males and females by five year age groups starting at age 66 and then includes an open ended age group 91+. The data are grouped by marital status. Men who are separated and never married have LIM rates somewhat over the elderly-wide rate of 6 per cent: 7-10 per cent and 11-14 per cent, respectively. For women in all age and marriage groups other than married, the below LIM rates exceed 6 per cent: widows, 7-12 per cent; divorced, 10-21 per cent; separated, 18-25 per cent; and never married, 14-16 per cent.

Veall notes that within the elderly population, there is little change in poverty rates by age.

Milligan focuses on low income rates among Canada's elderly over the period from the early 1970s until 2004. He uses three income-based measures of poverty: the LIM, the LICO, and what he has labelled the Elderly Relative Poverty Measure (ERPM), which is similar to the LIM but excludes the elderly from the base calculation of median family

adjusted income. All measures employ family adjusted income measures after tax. He also develops three consumption-based measures of poverty that employ different measures of consumption but are conceptually similar to the ERPM, in that they are used to identify the portion of the elderly population with consumption levels less than half of the consumption levels of the non-elderly. The consumption measures are: consumer non-durables with imputed rent; non-durables without imputed rent; and current expenditure.

The income-based time series are built using data from the Survey of Consumer Finances (SCF) up to the mid-1990s and then the Survey of Labour and Income Dynamics (SLID). The data underlying the consumption measures comes from the Family Expenditure Survey (FAMEX) and then the Survey of Household Spending (SHS).

The general pattern of declining elderly poverty that shows up in the data presented above is found in all of the income measures. Indeed, they all move in close tandem through time. The declines are steep in all measures from the late 1970s until the late 1980s, and Milligan notes real increases in the GIS that helped bring about that result. The decline after the late 1980s is more modest and there is actually some increase in poverty based on the LIM and ERPM measures starting in the mid-1990s. This is driven by increased income in the non-elderly part of the population and the concentration of income growth in the elderly among higher income earners at that time.

Milligan summarizes his conclusions on consumption based poverty as follows:

The consumption poverty analysis produces three major findings. First, the time-trend in consumption poverty measures is sharply down over the last 35 years, similar to income. Second, the level of consumption poverty among the elderly is very sensitive to the treatment of housing flows — when these flows are imputed, poverty rates are quite low, but they are high when no imputation is made. Finally, there is no spike in consumption poverty that resonates with the pattern observed immediately before and after age 65 for income measures.

The foregoing discussion of poverty among the elderly is based on LIM measures. It was noted in Section 4.1 that the LIM is but one of a number of measures of poverty and that the poverty lines and rates are higher if certain other measures are used. It is not clear that there is a science that directs analysts to one versus another low income or poverty line. There is a degree of arbitrariness in the choice. By any measure, there has been a substantial improvement in poverty rates in Canada, but there is ample room for debate about the degree to which the anti-poverty objective has been met. Moreover, Veall reminds us that there may be subsets of the senior population for whom the issue is more important than it is for the older population as a whole.

5.3 Replacement Rates

i) LaRochelle-Coté, Myles and Picot

Maintaining living standards as and after a person makes the transition from work to retirement has long been recognized as an objective in Canadian and international

discourse on pensions. Until recently, however, it has not been possible to directly compare the incomes of the same individuals before and after retirement. This data limitation has been overcome in recent years with the development of the Longitudinal Administrative Database (LAD) which is built from tax files dating from 1982. The LAD links tax files on a longitudinal basis and adds certain other administrative data. It is a large file (20 per cent of T-1 returns) and includes most social and economic markers of interest, except educational attainment.

The LAD was used by three Statistics Canada analysts, Sébastien LaRoche-Coté, John Myles and Garnet Picot (referred to as the StatCan analysts) to study the incomes of Canadians as they make the transition from work to retirement. The incomes of six age cohorts that were aged 54 to 56 in five year intervals from 1983 to 1998 and who had significant employment earnings (more than \$10,000) while aged 54 to 56 were tracked until 2005. The incomes were analyzed on an after-tax, family income basis, and family incomes were adjusted for family size.

The StatCan analysts focus primarily on the age cohort that was aged 54 to 56 in 1983, as this group could be followed over the longest period. The income path of the other cohorts was assessed to check for consistency of results across cohorts, which proved to be high.

The median replacement rate for the 1983 cohort remained close to 1.0 until about age 60, and then declined to about 0.8 around age 65. The replacement rate remained at about this level throughout later life. While the median remained high throughout the observation period, the portion of the population with replacement rates above 1.0 declined from almost 50 per cent at age 59 to 61, to 35 per cent at age 64 to 66 to 23 per cent at age 69 to 71. On the other hand, the share of people with replacement rates of less than 60 per cent increased from 10 per cent at age 60 to 21 per cent at age 75.

The population that is included in the study by the StatCan analysts includes people with low levels of earnings at age 54 to 56 and, if these are accepted as indicative pre-retirement earnings, then it would be expected that public pensions alone would provide significant replacement rates for many people. Thus, it is important to focus on the third and top quintile of earners in the 1983 cohort. In the middle income quintile, 18.1 per cent of the population has replacement rates of less than 60 per cent at ages 64 to 66, as does about 25 per cent at ages 69 to 71 and 74 to 76. Median earnings for the middle quintile in 1983 were \$46,600 in 2005 dollars and the YMPE in 2005 was \$41,100. The top quintile had median earnings of \$101,000 in 1983, again in 2005 dollars. At age 65, 27.4 per cent of the top quintile had a replacement rate of less than 60 per cent, as did more than 30 per cent at ages 69 to 71 and 74 to 76. Significant subsets of the middle and upper earnings groups did suffer significant declines in their income in retirement.

The StatCan analysts note that within the different quintiles there are significant differences in replacement rates, and they identify the income sources that account for these differences. At the age 64 to 66 point, the differences are accounted for primarily

by differences in earnings from employment and self-employment. Smaller but significant differences arise from differences in capital gains and the presence of 3rd pillar income. As the cohort ages, differences are accounted for more fully by differences in income from the 3rd pillar, especially after age 70.

Although it is not a point specifically about replacement rates, it is worth noting that the StatCan analysts found that there was an equalizing tendency in retirement incomes as the incomes of the top quintile fell more than that of the lowest quintile. In addition, the lowest quintiles tend to have more stable incomes thanks to the greater role played by benefits from OAS, GIS and the C/QPP as a source of income. Also, while the patterns noted in the analysis of the 1983 age cohort are generally similar to those of the younger cohorts, the younger cohorts had higher incomes thanks to higher incomes from the 3rd pillar.

The study by LaRochelle-Coté, Myles and Picot is extremely valuable in providing the first direct measure of replacement rates over an extended period of time.²⁶ Their analysis provides a positive picture of median replacement rates for the 1983 and subsequent cohorts. But, it also indicates that there is a significant minority in the middle and upper parts of the 1983 earnings distribution who will have replacement rates of less than 60 per cent on an after-tax basis. It is also important to note that earnings from employment and self-employment play an important role as a source of income in the numerator of the replacement rate calculations. The replacement rates in their analysis are not focused exclusively on people who have withdrawn from the labour force. Finally, the changing composition of households after age 54 to 56 is not discussed specifically, and neither is the replacement rate of surviving spouses after one member of a couple dies. The increase in the number of families with replacement rates below 60 per cent in later ages is related to this transition.

ii) Lise

Lise, 2001, is also interested in the question whether living standards are maintained in old age and investigates the question with a consumption measure. He uses FAMEX and SHS data to construct consumption profiles through time of different cohorts. His consumption measure adds an imputed annual service stream for housing and automobiles to spending on non-durables, and deducts savings. Savings rates, which are important to his work, are calculated as changes in net assets to disposable income. As is true of the other studies cited, Lise works with family data adjusted for family size.

For cohorts that have reached retirement age, Lise finds that there is no disruption of consumption as families pass through the period from when people are typically working to when they are typically retired (ages 50 to 75). Lise breaks down his data by quartiles within cohorts and finds that the only shock faced by the first quartile is likely to be

²⁶ Gower had used the LAD to study the replacement rate of a single age cohort that was 55 years old in 1992. At the time, the LAD had only 14 years of data.

positive. No shocks are evident in higher quartiles though there are modest declines in consumption.

Lise is also concerned about the prospects for baby boomers who will be retiring in the future. He notes that the savings rates of non-retired cohorts are generally higher than those of retired cohorts at the same age. From this, he concludes that if the younger cohorts experience similar returns on their investments, they should experience no disruption in the consumption levels in retirement.

Lise notes that his assessment of the current and future situation of the elderly is optimistic and he declares that Canada's retirement income system is working. But, similar to the results of the research by the StatCan analysts on income continuity, his conclusions are compatible with the possibility that there are subsets of elderly whose consumption levels fall in retirement. Moreover, Horner (2007) says that in an unpublished follow-up paper, Lise reran his data without adding services from durables and that the declines in consumption in quartiles two through four were more evident: 15 per cent, 18 per cent and 12 per cent for quartiles two through four compared to 9.5 per cent, 8 per cent and 5 per cent. Concerns about Lise's inferences about the future will be raised below in 6.1.

iii) Alan, Atalay and Crossley

Retired respondents to Statistics Canada's General Social Survey (GSS) were asked in 1999 and 2002 to respond to the question "Compared to the year before you retired, would you say that you are better off financially, worse off or about the same?" They were also asked "Compared to the year before you retired, do you enjoy life more, less or about the same? The question on the overall satisfaction with life in retirement was also asked in the 1989 GSS, and similar questions were asked in a "one off" survey on retirement conducted in 1975. The results of these surveys form the basis of an analysis by Sule Alan, Kadir Atalay and Thomas Crossley, 2008 on the self-assessed income adequacy of Canada's elderly. The response to the first of the two questions just noted, speaks directly to self-assessed earnings replacement.

The authors screened into their analysis people who are 55 years of age and older, who identify their current labour market status as retired, and who indicate that they were employed in the past. For purposes of this report, the most important findings in the work of Alan, Atalay and Crossley can be summarized in the Table 7 immediately below (which is a slightly changed version of a table created by the authors):

Table 7
General Social Survey

Compared to the year before you retired, would you say now that you are better off financially, worse off or about the same?

| | Aged 55+ | | Aged 70+ | | Retired within Last 5 years |
|--------|----------|------|----------|------|-----------------------------|
| | 1994 | 2002 | 1994 | 2002 | 2002 |
| Worse | 30.5% | 26% | 23% | 21% | 31% |
| Same | 50% | 56% | 51% | 57% | 57% |
| Better | 19.5% | 18% | 26% | 22% | 12% |

At age 55 and over, just over one quarter of respondents indicate that they are worse off financially in retirement than they were immediately before, and for those aged 70 and over, just over 20 per cent respond that way. For both age groups, there was some decline in the percentages of respondents saying that they were worse off. The 2002 survey indicates that the portion that is worse off is somewhat higher among the recently retired than in the retired population as a whole.

The GSS respondents who indicate that they are worse off are comparable to the numbers in the StatCan study in the third and fifth quintiles. It should be noted that the screening process used by Alan, Atalay and Crossley does not include a pre-retirement income screen. Thus, the self-assessed number may look larger than expected based on the StatCan study. Part of the explanation for this may be that the retired population in the analysis of self-assessed well-being excludes all people who are currently employed or looking for work.

The authors undertake an analysis of characteristics of retirees who express more satisfaction with life in general in retirement, and with their financial situation. They present their finding on both a bivariate and multivariate basis. Based on their bivariate analysis, both having a pension from their former employer and owning a home are positively related to retirees' general satisfaction with retirement and with their financial situation. In the multivariate analysis, the relationship between these characteristics and general satisfaction with retirement is found to be statistically significant and, while there is a positive relationship with self-assessed financial well-being and these characteristics, it is not statistically significant. In the multivariate analysis, the strong positive relationships with self-assessed financial well-being are age²⁷ and retiring voluntarily, while there is a strong negative relationship with poor self-assessed health status.

²⁷ The authors' note that age can be a difficult variable to interpret in these cross-sectional data with which they work because it can be indicative of: age itself, cohort effects, selection bias (it is not a random sample of people at a given age who survive to a later age), time in retirement and related adaptation.

While it is not directly related to replacement rates *per se*, the authors use pairs of cross sectional data from the GSS and from Statistics Canada's 1992 Family Expenditure Surveys and the 1998 Survey of Household Spending to illustrate that both real family income and real family consumption adjusted for household size tend to be hump-shaped with respect to age and peak in the 50s, while general satisfaction with life tends to stay relatively constant through different ages.

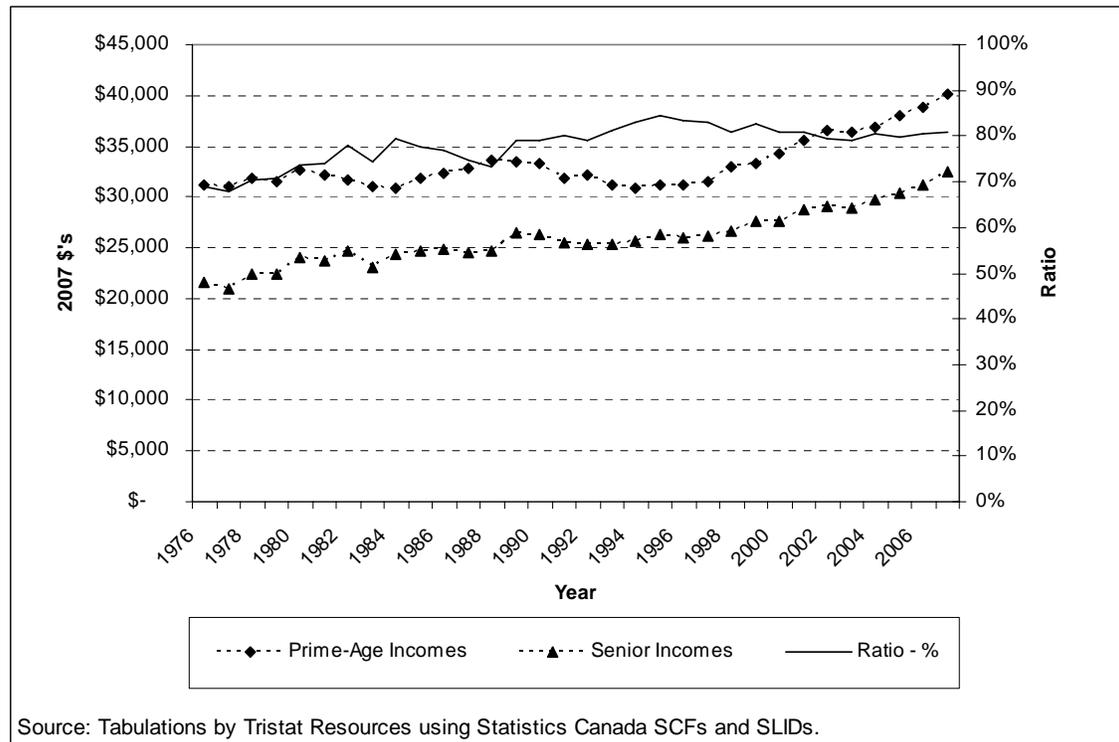
5.4 Quasi-replacement Rates

It was noted above in Section 4 that the incomes of seniors are sometimes compared to the incomes of younger age groups and the comparisons are referred to as quasi-replacement rates. While these rates are sometimes thought of as intellectual poor cousins of actual replacement rates, they do provide an insight into the relative living standards of the elderly in the total population.

In Figure 9, below, the after-tax incomes of elderly families and unattached individuals are compared with the after-tax incomes of families and unattached individuals in the age 45 to 64 (prime age) range. Families are classified by age based on the age of the oldest family member. The family data are adjusted for family size so that they are equivalent.

As can be seen in Figure 9, there has been an increase in the incomes of the older families compared to families in the prime age range, but the improvement has followed a somewhat erratic path. The gap between the prime age and older incomes closed more or less continuously over the period from 1976 to the mid-1990s. Since the mid-1990s, there has been a modest decline in the incomes of the older population compared to the prime age population. But, even at the end of the period of observation, the median after-tax adjusted income of the older population was still 80 per cent of that of the prime age population. Given that this takes no account of pension saving or work related expenses, this may be close to full equivalent income. This type of generalization will not hold for all of the elderly, but the typical experience seems to have been positive. Some of the caveats in Section 5.5 apply to the inferences to be drawn from this Figure.

Figure 9
Median Equivalent Income After Tax,
Families and Unattached Individuals,
Aged 45-64 and 65+,
Canada, 1976 to 2007



5.5 Concluding Comments on Incomes of the Current Elderly

In relation to the standards for judging retirement incomes set out in Section 4, the latter part of the 20th century was a period of remarkable improvement in incomes of the elderly. Real incomes grew, income relative to the younger population grew, poverty rates declined by any measure and replacement rates were generally quite high. Much was achieved. Certain caveats, however, are in order.

First, there is a legitimate debate about the degree of elderly poverty based on different conceptions of what constitutes poverty and different measures of it. Second, even in the context of a generally favourable picture, there may be subsets of the population experiencing relatively higher rates of poverty and/or experiencing non-trivial declines in their standard of living in retirement. It should be recalled, too, that favourable trends tended to level off in the 1990s and earnings from employment and self-employment still play an important contributing role in the favourable outcomes. The income measures that have been used to characterize the incomes of older Canadians have not been limited to the incomes of people who have fully withdrawn from the labour force.

Finally, and maybe most importantly, the favourable outcomes that were experienced in terms of retirement income reflect not only the strength of retirement income arrangements, but the way they interacted with a particular set of economic and financial circumstances. Relatively low inflation after 1990, the absence of real average growth in wages and salaries, unusually high returns on financial assets and a substantial increase in the labour force participation of women, all made a contribution to the favourable outcomes described above. Changes in these circumstances will change outcomes generated by current retirement income programs.

Section 6: The RIS of the Future: Outcomes and Influences

This section looks to the future. It begins with a review of several attempts to quantify future retirement income prospects of Canadians. These efforts, while not flawless, are all serious efforts. They tend to take existing retirement income arrangements, as well as social and economic conditions, as given. Following the review of attempts at quantification, evolving and proposed changes to each of the three pillars of the RIS are discussed. Here, much more attention will be given to pillar 3 and EPPs. The evolution of EPP coverage and the shift from DB to DC will be discussed, as will reports on problems with EPPs prepared by inquiries established by provincial governments. This latter discussion will pick up two other informed commentaries on pillar 3. A relatively brief commentary on issues relating to the future of pillars 1 and 2 will be added. Finally, note will be made of some evolving demographic and labour market developments that will have an impact on incomes generated by the RIS.

6.1 Quantification of Future Retirement Income Prospects

The results of three attempts to quantify the likely retirement income prospects of the future elderly along with a brief description of their methodologies are presented here. A concluding comment on them will be offered, along with a reference back to the Lise study noted in Section 5.3.

i) Maser and Dufour

The 1999 Survey of Financial Security (SFS) was the first survey of the wealth of Canadians conducted since 1984 and it was the first one ever that attempted to estimate the EPP wealth. The SFS data was used by two Statistics Canada analysts, Maser and Dufour, to try to answer the question: what portion of the nearly retired population (unattached individuals and family units with a head of family aged 45 to 64) who were still employed the year before the survey would likely be unable to replace their pre-retirement earnings at age 65 or have an income above the after-tax LICO. (Statistics Canada, 2001) Maser and Dufour use two levels of earnings replacement as indicative of maintaining pre-retirement living standards: 66.67 per cent and 80 per cent. In addition, individuals with prospective retirement incomes in excess of \$60,000 and families with incomes in excess of \$100,000 are deemed to have met their targets irrespective of their estimated replacement rate.

Maser and Dufour go through the following steps to determine whether a household is likely to meet the replacement targets they establish:

1. Based on current income, they establish the dollar amount of the income replacement target.
2. The amount of estimated OAS/GIS and C/QPP benefits is deducted from the target in order to determine what has to be provided by private pension wealth.
3. The income gap established in step 2 is converted into an amount of wealth that has to be present at age 65 in order to meet the target established in step 1.

The conversion from income to wealth is made using standardized annuity factors for men and women.

4. The wealth needed at 65 is discounted to the current age of the person being observed to account for the increase in the amount of existing wealth by age 65 and a second time to account for continuing wealth accrual (i.e. new retirement saving).
5. The discounted wealth established in step 4 is compared to actual retirement wealth accumulated at that date.

In calculating C/QPP benefits, a 20 per cent replacement rate is used on the grounds that very few recipients of CPP retirement benefits collect the full 25 per cent. Also, it is implicit in the study by Maser and Dufour that OAS keeps pace with wage growth. The discount rates used in step 4 above are 2.5 per cent, which is low for this type of calculation. But, there is no wage projection so that the discount rate is implicitly 2.5 per cent per annum in excess of wage growth, which is high. The wealth taken into account by Maser and Dufour in step 5 included not only wealth in the form of pensions and RRSPs, but half of: housing wealth, non-pension financial wealth, real estate wealth and equity in a business.

The central conclusion of the analysis by Maser and Dufour is that 33 per cent of the near elderly will not be able to meet the 66.67 per cent retirement income target and that this number increases to 44 per cent for the 80 per cent target. For economic families, the comparable numbers are 30 and 42 per cent, and for unattached individuals, 46 and 53 per cent. The much higher numbers for unattached individuals reflects a larger number of them having incomes below the LICO.

By level of current income, the likelihood of not meeting the retirement income target has a “u” shaped distribution with families at the two ends of the spectrum being most likely not to meet retirement income targets – though, at the low end it is the LICO target that is being missed and at the top end it is the earnings replacement target. The earnings range where the likelihood of not meeting the targets is at its lowest is the \$20,000 to \$39,999 range where the likelihood of meeting the two-thirds target is less than 25 per cent.

Maser and Dufour present their findings on the likelihood of different subsets of the near elderly meeting the two-thirds replacement target. (The patterns described here for the two-thirds target hold for the 80 per cent target, as well. The latter are not cited for ease of presentation.) They find that the employed are more likely to fall short of target than the self-employed (36 versus 21 per cent). By occupational group, those in government and education are least likely to fall short of target (19 per cent) while those in manufacturing and processing are most likely to fall short (46 per cent). Those in services and trades and transportation also have a high likelihood of falling short (39 per cent). Given the methodology employed by Maser and Dufour, it is not surprising that homeownership is strongly associated with meeting the retirement income target. They estimate that only 15 per cent of people who own their own home without a mortgage

will fall short of their target compared to 34 per cent who own their own home and have a mortgage and 59 per cent who are not home owners.

The SFS was conducted again in 2005 but no comparable analysis has been done on data arising from it. Indeed it is not clear that it can be done, given that the sample size for the 2005 survey was much smaller than in 1999.

ii) University of Waterloo

A more recent attempt to quantify the adequacy of retirement savings was prepared for the Canadian Institute of Actuaries by a group at the University of Waterloo (University of Waterloo, 2007 -U of W), which will be referred to as the Waterloo study. Readers should be cautioned that the study does not explain all aspects of the methodology used.

The Waterloo study is concerned with the question of whether Canadians are saving enough to meet retirement income targets at age 65 in 2030, with the targets being defined as meeting necessary basic living expenses. Necessary basic living expenses are defined as: food, shelter, clothing, transportation, health care, energy and taxes. Average expenditures on these items for the early to middle first decade of the 21st century are established for one and two person senior households, and these expenditure levels are projected forward to 2030 using two different rates of annual inflation (1.43 per cent and 2.53 per cent). The study uses the projected expenditures as retirement income targets. A projected level of retirement income is estimated based on what will be available from OAS, C/QPP, EPPs, RRSPs and home equity. Where the amounts available from these sources fall short of the target, the rate of saving required to meet the target is estimated. Savings are converted into indexed forms of retirement income and savings rates required to achieve the target retirement income are calculated for a 25 year savings period.

The core of the analysis addresses the situations of one and two member households with 2005 earnings of \$40,000 and \$80,000 (roughly average wages and salaries and twice average wages and salaries).

The study calculates a number of hypothetical savings rates, assuming initially the presence of no private retirement savings. In other words, they calculate the savings rate needed to meet the retirement income target, assuming that only OAS and C/QPP is available. These savings rates are of some value in illustrating sensitivities in required savings rates to different variables. For example, the base required savings rate for a single person with earnings of \$40,000 is 14 per cent of gross pay over 25 years to meet the target of necessary expenses at age 65. However, this drops to 12 per cent if the return on saving is increased by 1 percentage point over the base case assumption that used the projected yield curve on Government of Canada bonds; to 10 per cent if retirement is at age 68 and 6 per cent if retirement is at age 73; and to 5 per cent if home equity is considered.

According to the study, the initial hypothetical work was supplemented by data from the 2005 SFS to see how much retirement savings had been done by households with

different characteristics. Established levels of accumulated savings were projected forward using “reasonable” economic assumptions to estimate incomes in 2030 and to compare those estimated incomes with the necessities-based target described earlier. In all, seventy-two household profiles were assessed. The study concludes that, based on existing data, about two-thirds of households expecting to retire at age 65 in 2030 are not saving enough to provide for basic necessities as defined above. It identifies two example profiles that are expected to have sufficient retirement income and four that are not. The two that are have home equity and either an EPP or an RRSP savings rate of 14 per cent. But beyond that, clear patterns of variables are hard to discern. It is at least somewhat surprising that one household with an income of \$40k, with home equity and one member in a DB plan, is deemed to have inadequate saving.

The study claims that two thirds of households appear not to be saving enough to cover basic expenses in 2030. But the authors also acknowledge that they don’t know what portion of the population corresponds with each of their 72 profiles. Several other aspects of the Waterloo analysis are not fully explained: the value assigned to OAS in 2030; wage growth; and the assumed DC savings rate of 5 per cent. Also, passing comment is made on the fact that the modelling has used average asset values from the SFS. More needs to be known about this, as these values tend to be strongly age-sensitive; it is not clear that average values apply to people retiring in 2030. Finally, the use of a twenty-five year saving period is shorter than one often finds in this type of analysis and the relatively short savings period raises the required saving rate. To some degree, this is reflected in the postponed retirement calculations, although these calculations also reflect a shorter period of pension payments in addition to a longer savings period. Finally, it should be noted explicitly that the methodology used in the Waterloo study is not a replacement rate methodology, and the expense-based income target for couples is substantially higher than what would normally be considered the equivalent for singles.

iii) Troubled Tomorrows

An early attempt to quantify the adequacy of retirement savings is provided by the Task force on Retirement Savings of the Canadian Institute of Actuaries (CIA) in a publication *Troubled Tomorrows* (CIA, 1995). In *Troubled Tomorrows*, the Task Force establishes the savings rates that would be required on a consistent basis starting at age 30 in order to meet a retirement income target in 2030. The retirement income target is cast in a familiar replacement rate fashion but is 80 per cent on earnings up to one third of average wages and salaries and 70 per cent on higher earnings. Target replacement rates and retirement savings rates are established separately for one and two earner families, reflecting the higher replacement rate provided by OAS/GIS for one earner families. The assumption throughout the analysis is that the target should be met through retirement income savings programs (i.e. EPPs, RRSPs and deferred profit sharing plans, or DPSPs). Housing and other forms of wealth are ignored.

Fourteen years later, in 2009, some of the assumptions used in the calculations would likely be regarded as “bold”. Inflation is assumed to be 4 per cent per year and returns on a balanced portfolio of equities and fixed income securities is assumed to be 8.75 per cent

nominal, and 4.75 per cent real. Mortality is based on GAM '83, not projected. These assumptions would tend to lower the required savings rate compared to a savings rate based on assumptions that reflect current outlooks and attitudes. A feature of the Task Force analysis that distinguishes it from other attempts to model future retirement incomes is its assumption that the value of OAS declines relative to wages and salaries at retirement date. Unfortunately, the report creates some ambiguity about whether it is capturing the general decline in the relative value of OAS or only the impact of the "clawback."

The analysis of the Task Force is based on 1992 tax data and focuses on the subset of the population that has: made C/QPP contributions that year; relies on earnings from employment and self-employment as its major source of income; is between ages 25 and 65; and has annual income between \$20,000 and \$80,000. The Task Force concluded that, in 1992, the population included in their analysis had a savings rate of 10.1 per cent, which is greater than the 8.9 per cent target rate that would allow two earner families to meet their retirement income target. The breakdown of the source of savings is of some interest: EPP contributions, 6.5 per cent (4.3 per cent by employers); and, RRSP contributions, 3.6 per cent.

The Task Force does some decomposition of its overall results and discovers, for example, that there is a rough correspondence between the actual savings rates by income level and savings targets suggested by the Task Force. This relationship is reflected in Table 8 below.

Table 8
Target and Actual Savings Rates by Income

| Income | Savings Target | Actual Savings Rate |
|---------------|-----------------------|----------------------------|
| < \$20, 000 | 4.5% | 2.9% |
| \$20-40,000 | 6.9% | 7.2% |
| \$40-80,000 | 10.7% | 12.6% |
| >\$80,000 | 12.4% | 8.3% |

Source: CIA, 1995

The Task Force notes that tax assistance for retirement saving was capped at that time at annual earnings just above \$80,000 per year.

The Task Force further differentiates savings targets and rates by public and private sector and by participation and non-participation in EPPs. Results are presented in Table 9.

The Task Force notes that the average situation in the public and private sectors is that people should be able to meet their retirement income targets at age 65 in 2030, and that the relatively stronger situation in the public sector reflects higher levels of participation in EPPs. EPP participation is important in this analysis. The Task Force notes, too, that

public sector employees are as likely to be RRSP contributors as are employees of business and the self-employed although they contribute at a somewhat lower rate (2.7 per cent versus 3.9 per cent and 5.7 per cent).

Table 9
Target and Actual Savings Rates by Public and Private Sector

| Sector | Savings Target | Actual Savings Rate |
|-----------------------------------|----------------|---------------------|
| Public Sector | 9.2% | 15.7% |
| Employees of Business | | |
| <i>With EPP/DPSP s</i> | 8.8% | 9.1% |
| <i>No of EPPs/DPSPs</i> | 8.8% | 4.5% |
| <i>All</i> | 8.8% | 6.8% |
| Other employees and Self-employed | 8.3% | 6.8% |
| All Sectors | 8.9% | 10.1% |

Source: CIA, 1995.

The Task Force notes that it has become a common aspiration to retire before age 65. Thus, they recalculate their retirement savings targets assuming retirement at age 60 and compare the actual savings rates with the new targets. On this basis, they conclude that among the categories of people identified in Table 9, it is only the public employees who are saving at a rate to meet their retirement income target at that age.

iv) Comment on Quantification Efforts

The attempts to quantify the likelihood that the future elderly will be able to maintain their standard of living in retirement employ a range of methods and assumptions and, not surprisingly, yield different answers. No common protocol for assessing the issue has emerged. What is common among the attempts to quantify is that they suggest that some significant subsets of the future elderly are likely to have difficulty maintaining their standard of living in retirement. What is at issue in the three studies above is the size of the group, with the U of W study suggesting a number that is twice the size of the Maser and Dufour number. The Lise study noted in Section 5.3 is an outlier in generalizing without qualification that the future elderly will be able to maintain their standard of living in retirement. As was noted above, Lise's general conclusion is compatible with the possibility that some subsets of the elderly will not achieve this objective. Moreover, some portion of the higher saving rate observed by Lise will be required to accommodate improved mortality, and there is some doubt about whether one should expect similar returns on investment in the future. Given current concerns about EPP coverage, it should also be noted that it is not clear how Lise has treated changes in EPP savings.

Another point in common among the studies is the view that, up to a certain level of lifetime pre-retirement earnings, Canada's publicly administered pension programs provide adequate replacement income. Thus, the need for private source income only arises above this level.

Differences among the studies highlight the importance of basic assumptions about savings periods, assumed returns on retirement savings, retirement age and mortality. It is also important to be as clear as possible about the future value of OAS as it affects the retirement income required from other sources – especially at the lower end of the earnings range. Unless there is a clear commitment on the part of the Government of Canada to have OAS (and GIS) increase in line with real wage growth, it seems appropriate that any modelling exercise include a base line projection that has the relative value of OAS (and GIS) declining over time in the face of real wage growth.

In the modelling reviewed immediately above and in discussion of replacement rates in Section 5.3, the treatment of housing and other forms of non-pension wealth is an important consideration. A case for ignoring it, as is done in *Troubled Tomorrows*, could be based on one of two lines of thought. One would be that not everyone approaching retirement is a homeowner and assuming that everyone is a homeowner will result in lifetime renters being “under annuitized.” One might also argue more abstractly that pre-retirement earnings should be replaced by pensions and that including housing wealth in some form in the assessment of post-retirement income rationalizes a general underperformance in terms of what is expected from pensions.

On the other hand, homeownership is widespread in Canada and provides a flow of services in retirement that obviates the need for cash (and, indeed, home ownership can become a source of cash income through downsizing housing and/or a reverse mortgage annuity). To ignore home ownership and fully replace pre-retirement earnings net only of pension contributions will result in the “over annuitization” of a large part of the population. As is noted above, “over annuitization” is not totally benign. For purposes of calculating replacement rates, it seems appropriate to include some portion of housing wealth in retirement income and, if one believes that the earnings in the denominator is earnings just prior to retirement, it is also appropriate to include some reflection of housing wealth in the denominator, as well.²⁸

The degree of variation in the conclusions reached in the studies referred to above is somewhat dissatisfying for anyone seeking a firm correct answer to the question of how the future elderly will fare. But it also speaks to the inherently unanswerable nature of the question. Indeed, one of the things that is somewhat unsatisfactory about all of the studies is their tendency to have limited granularity (only Maser and Dufour get down to individual experience) and their reliance on deterministic modelling (i.e. modelling that projects a single set of assumptions forward through time).²⁹ The problem of limited

²⁸ As a reminder, studies that explicitly account for housing wealth include: Lise, Maser and Dufour, and the University of Waterloo. Housing wealth may be implicit in the self-assessment studies. It can also be assumed in establishing the criteria for judging the adequacy of replacement rates in the study by LaRochelle-Coté, Myles and Picot. But housing wealth has no explicit presence in that study or in the study *Troubled Tomorrows*.

²⁹ By way of contrast with the approaches taken in the modelling reviewed here, Booth advises individuals who are saving for retirement to adopt an asset allocation that gives them a 70% chance of achieving a 70% replacement rate. In Booth’s approach, the reality of uncertainty is in the forefront. Booth also notes that

granularity is illustrated in the CIA study, where the results get richer with each further decomposition of general data and would be much richer still if they were able to further decompose their results. The problem with deterministic modelling is that it suppresses a clear view of the most salient problem of retirement saving, which is the inherent uncertainty of the future and the variability of key determinants of future well-being. This is nowhere more evident than in returns on retirement saving, which are subject to wide ranges of annual variability and cumulative variability over various time horizons.³⁰ This central aspect of reality does not come to the fore in deterministic modelling. The most appropriate tool for addressing the future retirement income prospects is something like the longitudinal micro-simulation model of Statistics Canada, LifePaths. The results of the model will offer a sense of the probability that can be attached to different outcomes.

In view of the discussion that follows in the remaining portions of Section 6, it is worth underlining the point that the attempt at quantitative projection assumes a stable institutional environment, as well as stable economic, financial and labour market circumstances.

v) *Self-assessment by Near Retirees*

Schellenberg and Ostrovsky, 2008a use data from the 2007 GSS to determine how Canadians approaching retirement age assess their retirement income prospects and they explore certain other features of their retirement planning. They include in their analysis GSS respondents who are aged 45 to 59 in 2007 (born 1948 to 1962), whose main activity during the previous year was “employed,” and who responded negatively to the question of whether they had ever retired before.

Participants in the survey were asked how adequate they thought their household income and investments would be to maintain their standard of living in retirement. They were given four alternative responses and the percentage that responded to each is indicated in brackets: more than adequate (9 per cent); adequate (62 per cent); barely adequate (19 per cent); and, inadequate or very inadequate (9 per cent). There is some uncertainty about what people have in mind in describing their prospects as “barely adequate.” Yet the results seem consistent with the view that emerged from the attempts to quantify future retirement income prospects. For a large segment of the population, replacement expectations are likely to be met. But there is a significant minority for whom retirement may bring a decline in living standards.

Schellenberg and Ostrovsky find that self-assessed adequacy of prospective retirement incomes is, not surprisingly, associated in a statistically significant way with participation

median returns will be below average and that the difference will grow with the volatility of returns. (See: Booth, 2006).

³⁰ Moore, 2009 provides an interesting reminder of the importance of variations in earnings through time in determining replacement rates. He notes that the stylized individual with earnings that track the YMPE closely over an entire working career are rare and that replacement rates for people who have lifetime average earnings close to the YMPE often have replacement rates from OAS and CPP well below 40%, as a result of fluctuations in their earnings in relation to the YMPE.

in EPPs and having contributed to RRSPs. Other characteristics that are positively associated with self-assessed adequacy include: being married; post-secondary education; good self-assessed health status; unionization; job tenure; and home ownership. Significant differences are also found among people working in some sectors of the economy: there is a strong positive association with government employment and a negative association with personal services sector employment. By occupation, managers, professional and clerical workers are found to have a positive view of their retirement income prospects.

Schellenberg and Ostrovsky develop a statistical model that is designed to predict favourable retirement income prospects – not only in terms of self-assessed income adequacy, but also in terms of likely retirement age and certainty of age of retirement. They note that even for people who are quite similar in important respects, differences in other areas can make a significant difference in prospects. They cite the case of two 52 year old married men, who are in very good health and work as technicians. They are both born in Canada and both own their own home with mortgages. One has 20 years job tenure, is a union member, belongs to an RPP and has a small RRSP accumulation (< \$50,000) and a household income of \$100,000. The other has 10 years job tenure, is not a union member, has no EPP, has RRSP assets between \$50 and 100,000, and a household income between \$60,000 and \$100,000. The differences between the two are not remarkable. Yet the statistical model suggest that the predicted retirement age of the former will be three years before the latter (59 versus 62); the likelihood of being very certain about retirement age is greater (46 per cent versus 29 per cent); and the expectation of an adequate retirement income will be greater (81 per cent versus 67 per cent).

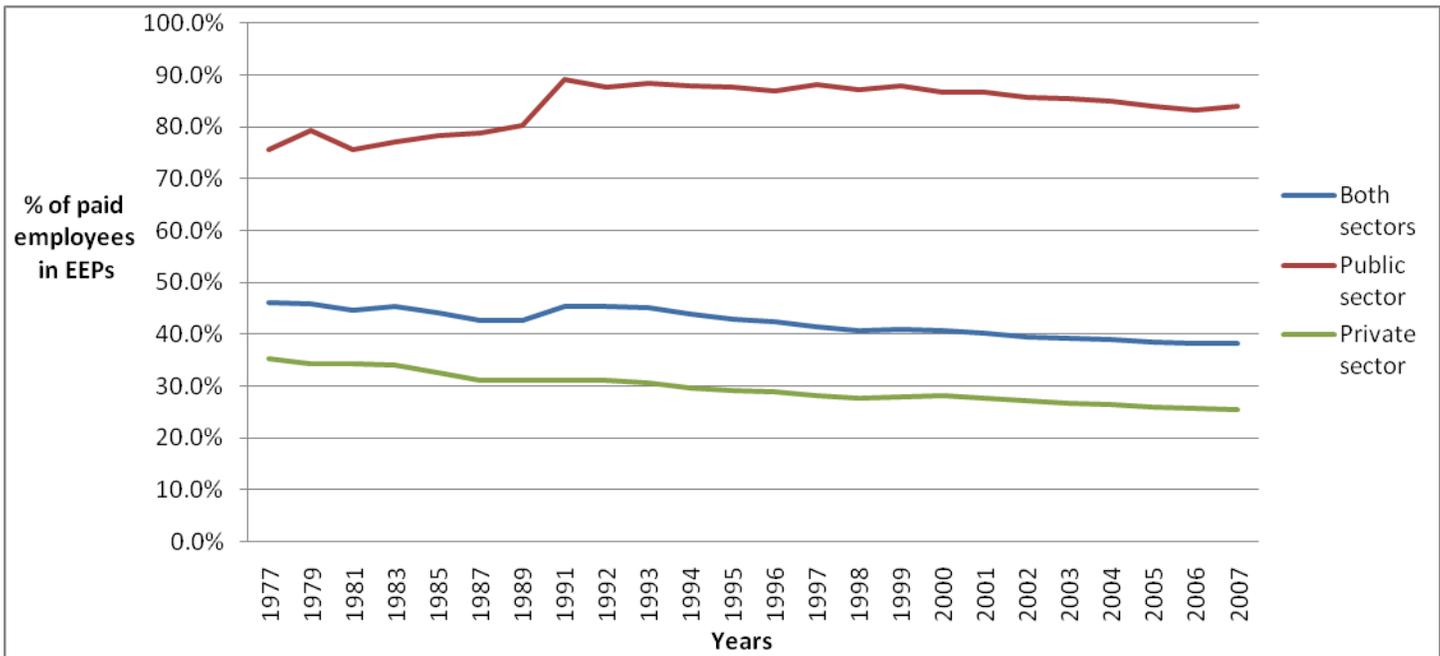
The work of Schellenberg and Ostrovsky is of interest primarily for the light it sheds on the discussion of replacement rates. However, it includes at least two other points of interest. First, they put together time series data on people's expectations with respect to their retirement age. The data comes from 1991 Survey of Ageing and Independence and the 2002 and 2007 GSS. The time series suggests some upward movement in expected age of retirement. Second, the immigrant subset of the population, especially immigrants since 1990, has less certain retirement expectations and is less optimistic about income adequacy. In another study based on the 2007 GSS, Schellenberg and Ostrovsky, 2008b find that the immigrant population also has a lower self-assessed understanding of public and private retirement income programs.

6.2 EPP Coverage and the Shift from DB to DC – Reviewing the Numbers

This discussion of changes to EPPs will begin by documenting two widely noted developments – namely, declining coverage of EPPs and the shift from DB to DC. These changes were noted in the reports on EPPs prepared for the governments of Alberta and British Columbia, Ontario and Nova Scotia, and had an important impact on their recommendations (See: Section 6.3 below). An assessment of these developments will follow, along with a discussion of some related issues.

Figure 10 below presents what have become familiar data on the percentage of paid employees who participate in EPPs. The data cover the period from 1977 through 2008. Bearing in mind the important role played by EPPs in providing retirement income for people with moderate to high earnings, the direction of change conveyed by these data is not encouraging. For the economy as a whole, there has been a continual decline in EPP coverage over the entire period, from roughly 46 per cent in 1977 of employed persons to 38 per cent in 2008. Coverage in the public sector is higher throughout the period, but shows some decline in the 2000s. The decline in coverage in the private sector is more continuous over the entire period and more marked – a ten percentage point decline on an initial base of 35 per cent. One of the striking things about the decline in coverage is the absence of sharp breaks in the data. The one exception to this generalization is the sharp increase in coverage in the public sector in 1991.

Figure 10
Percentage of Paid Employees in EPPs by Sector, 1977 to 2007



There has also been an important change in the gender make up of EPPs and the coverage rates for men and women. Traditionally, men were much more prominent than women in EPP membership and this was not just because of higher rates of labour force participation by men. As recently as the early 1990s, there was a ten percentage point gap between the portion of employed men who belonged to EPPs and the portion of employed women who participated. By the early 2000s, the gap had disappeared.

The other development that has attracted widespread attention is the change in the form of EPP coverage from DB to DC plans. Figure 11 below provides a perspective on the declining portion of EPP members who belong to DB pension plans. While membership in DB plans still accounts for a majority of EPP plan members in both sectors, the trend

to a declining portion of EPP members being in a DB plan is felt in both the public and private sectors. The portion of EPP members in the private sector is smaller throughout the period and declines more rapidly. Once again, the continuous nature of the decline and the absence of sharp break points are striking, although one notes some acceleration in the shift away from DB in the private sector in recent years.

The data that underlie Figures 10 and 11 have attracted a good deal of attention in recent years out of concern that they portend inadequate retirement incomes in the future. With so much emphasis placed on the direction of the trend line, it is important to note that the stocks of EPPs and plan members, and the numbers of DB plans and members remain substantial. These are not institutions on the brink of extinction. The total number of EPPs and EPP members reached all time highs in 2008 at 19,185 and 5,908,633 respectively. Even in the private sector, where concerns about coverage have been strongest, there were 17,936 EPPs with 3,018,408 members, which is a record. Focussing specifically on private sector DB plans, there a record number of them in 2008, 11,130, but the membership at 1,900,360 is about 400,000 less than the high water mark reached in 1992. Much of the growth in DB plans in recent years seems to have been in small plans for owner operators of business or senior executives.

The data that is most commonly cited in discussions of EPP coverage — like the data that underlie Figures 10 and 11 and the discussion immediately above — come from the PPIC data base. This database does not include data on group RRSPs or individual RRSPs. This is worth noting, because if one was include data on GRRSPs, the decline in coverage would likely be somewhat less severe, but the shift to DC (treating a GRRSP as a DC type of plan) would be stronger — again, especially in the private sector. Lipsett and Reesor, 1997 estimated the coverage rate including GRRSP coverage at 52 per cent in the mid-1990s, compared to 41 per cent based on PPIC data alone. The author of this report has estimated the percentage of members in DC arrangements in the private sector at 50 per cent, if GRRSP members are all treated as members of a DC arrangement in the private sector. (Baldwin, 2008)

In the discussion of amounts and sources of income of the elderly in Section 5.1, it was noted that income from the third pillar continues to be more widely available to the elderly in spite of the continuous decline in EPP coverage. A possible explanation for this might be that people are substituting RRSP participation for EPP participation. There has been a marked increase in RRSP participation in recent decades, and analysis by Morissette and Drolet, 2000 covering the time period from 1986 – 1997, found a high degree of substitution of RRSP contributions for declining EPP contributions. But, Horner, 2008 reviewed EPP and RRSP participation in 1995 and 2005 in work for the Ontario Expert Commission on Pensions (OECPC) and noted a larger decline in participation in either type of retirement plan than in EPPs alone.

There is another reason why the decline in coverage may not have begun to affect data on incomes of the elderly such as those in Section 5.1. Over the time frame for which the PPIC coverage data are presented, there has been a marked increase in the percentage of

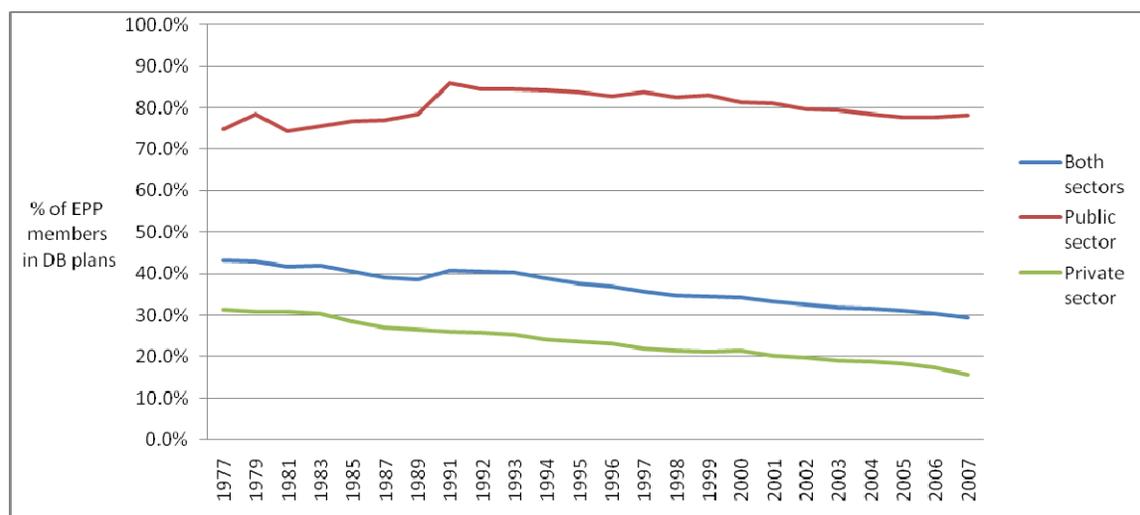
the adult population that is in the paid labour force. Much of this increase is accounted for by the increase in female participation in the labour force. Thus, in an earlier paper, Baldwin, 2007 calculated EPP participation as a percentage of the adult population (aged 18 to 64) and found no decline in coverage over the period from 1974 to 2004. Coverage was stable in the range of 26 to 29 per cent. Male coverage declined from roughly 40 to 30 per cent, while female coverage increased from roughly 15 to 25 per cent.

The foregoing comments on coverage have focussed on coverage of individual members of the paid labour force and/or the adult population. But most of the measures of well-being discussed in this report focus on family units. Thus, it is helpful that Morissette and Ostrovsky, 2006 have used data from a number of sources, most importantly the LAD, to analyze coverage by families. For purposes of this discussion, the most important thing to note is that they found that the possibility of no EPP coverage at the family level increased over the period of their study (1986 to 2003), but by less than individual coverage as declining coverage of “husbands only” was offset to some degree by coverage for “wives only.” “No coverage” at the family level seemed to peak at the end of the 1990s.

The decline in EPP coverage that has been widely noted and that has been the source of concern has had its potentially negative impact mitigated to date, at least by degree, by the increase in the portion of the adult population in paid employment and by the increasing prevalence of two earner households with at least one spouse in an EPP. These mitigating developments have limiting cases. Once everyone is coupled and in the labour force, declining EPP coverage will no longer be offset by movements in these areas.

The relationship between coverage data and retirement income warrants two further comments. First, regulatory changes in the late 1980s in all Canadian jurisdictions required that EPPs provide survivor benefits unless they are waived by both spouses. In doing so, they created EPP beneficiaries who never were members of EPPs. A similar consequence followed from making EPP entitlements family assets in the context of marriage breakdown. The regulatory changes of the late 1980s included new vesting rules that reduced the chance that an employee who terminated employment prior to retirement age would lose their right to a pension. Second, there are always people who are not members of EPPs at particular points in time who become members at other points in their life. This is especially true of young people. Indeed, there is a strong positive relationship between age and all forms of retirement savings. Thus, one always has to be cautious about extrapolating directly from point-in-time coverage to future EPP payments. But, all other things being equal, one might have expected the ongoing ageing of the active workforce to bring about higher rates of EPP coverage and it is clear that this has not happened.

Figure 11
Percentage of EPP Members in DB Plans, 1977 to 2007



Accumulated DB pension entitlements and retirement income wealth in DC pension plans and RRSPs during the period leading up to retirement are likely to be stronger indicators of future retirement income prospects than are data on point-in-time coverage, although there is obviously a link between them. Unfortunately, wealth surveys have only been conducted intermittently in Canada and are still not conducted on a regular schedule. However, the SFS of 1999 and 2005 provides some insight into the pension and other wealth of near-retirees.

The 2005 SFS data suggest several important things about the pension and retirement income wealth of Canadians aged 55 to 64. First, the median net worth of families with EPP assets is substantially greater than that of families with no EPP assets, and families with EPP assets are likely to have significantly more housing wealth than families without EPP assets. Second, median EPP assets for families that have EPP assets significantly exceed the median RRSP assets of those with and without EPPs. Third, there are differences among families with EPP assets based on the sector and type of plan they belong to. Median wealth by sector and plan type is: private sector DC, \$53,000; private sector DB, \$65,000; and, public sector DB, \$165,000.³¹ Even if one focuses exclusively on long term participants (21+ years) in their current DB and DC plans, the median accumulated wealth of 55 to 64 year olds in DB plans is significantly greater than DC plans: \$139,000 versus \$96,000.³²

³¹ These data reflect pension accumulations from both current and former plans. For current plans only, the relevant data are: \$36,000; \$60,000; and \$122,000.

³² In principle, there is no reason why a DC arrangement should result in lower amounts of wealth being accumulated or in lower contribution rates. Yet in practice, the SFS data suggest lower asset accumulation, and in the UK, data suggest that when plans are converted from DB to DC, contribution rates typically go down. (See: Munnell, 2006).

The data from the SFS are highly suggestive that different forms of wealth that might be drawn on in retirement are not being freely substituted for each other. However, the data as presented are only suggestive. Although the data are reliable, they have not been assembled with the purposes of this paper in mind. Nor have they been analyzed in way that eliminates the possibility that variables other than plan type are being measured. (e.g. differences in earnings, job and plan tenure, unionization, and so on). They suggest the need for more a more focussed analysis than has been possible to conduct in the preparation of this paper, and this point will be returned to in Section 7.

The decline in point-in-time coverage may be a less important indicator of future retirement income problems than cumulative experience in EPPs. But participation in EPPs appears significant and so, as a result, are reasons for declining participation. There are two broadly defined schools of thought on the issues. One emphasizes disincentives for actual and potential sponsors of EPPs that arise primarily from regulatory burdens and legal uncertainties. These issues have been considered by a number of provincial inquiries in the recent past and they have made recommendations that should reduce these problems by degree. These inquiries are discussed in Section 6.3.

The other school of thought emphasizes changes in the structure of the labour market as the primary explanation for declining coverage. Morissette and Drolet, 2000 estimate that most of the decline in EPP coverage between 1984 and 1998 can be attributed to shifts in the sector composition of employment from sectors with high coverage to sectors with low coverage, and a decline in unionization. They also find that the largest decline in coverage is experienced by young men.

Despite the apparent importance of DB plans to retirement income prospects, DB plans are facing serious difficulties in the early part of the 21st century. The 21st century is not yet a decade old, and we have already passed through two periods when DB pension plans have faced serious underfunding and plan sponsors have asked for a relaxation of funding rules. The funding difficulties faced by DB plans provide at least part of the explanation for the shift from DB to DC and the general decline in EPP coverage.

A fair question that deserves an answer is: why are these plans any more difficult to manage now than in the past? Several things come immediately to mind in this regard:

- 1) Financial market change. After a stock market boom of unprecedented length and strength from 1982 to 2000, which allowed retirement savings to grow at unusual rates, we have entered a less supportive era. The effect of decelerating equity returns has been exacerbated by lower interest rates, which have increased the liabilities of DB plans and raised annuity prices.
- 2) Regulatory change. In the late 1980s, Canadian jurisdictions changed DB financial regulations and required DB plans to meet solvency requirements that are more sensitive to market movements in interest rates and asset values than were previous regulations. For the first decade after the adoption of the

new rules, they seemed benign if not irrelevant, because market interest rates tended to be above the liability discount rates that had been used in going concern valuations up to that time. But, declining interest rates around the beginning of the millennium caused the solvency requirements to have a serious impact on DB pension financing, especially when coupled with relatively weak stock market performance.

- 3) Risk shifting. Until the early 1980s, it was common for small pension plans to buy fully insured products from insurance companies and, hence, to shift financial risk to them. This practice ended in a very short period of time with the consequence that even small plan sponsors now bear substantial risk if they operate DB plans.
- 4) Tax rules. In many ways, DB pension plans are operated as very high risk operations with the apparent approval of all stakeholders. One manifestation of the high degree of risk taking is the general avoidance of building up prudential reserves during good times to offset bad experience in the future. For plans that might wish to build up reserves, the ITA rule that prohibits employer contributions when assets exceed liabilities by more than 10 per cent is a serious problem.
- 5) Maturing EPPs. Many of Canada's EPPs are maturing and, as they do, two important things happen that make them more volatile financial entities than when they are less mature. (In context, maturing can be thought of as the growth of fixed liabilities for pensioners and deferred vesteds in relation to active plan members' liabilities.) First, the revenue source for the plans tends to shift from relatively more stable pension contributions to relatively less stable investment returns. Second, pension liabilities grow in relation to the sponsors' payroll so that each percentage point of unfunded pension liability represents a growing claim on payroll.

To the extent that the shift away from pure DB has resulted in a shift to pure DC, plan members have been exposed to a great deal of financial risk. But the financial problems faced by DB plans over the past decade have given rise to attempts to mix DB and DC elements in the same plan. This has happened primarily in the public and near public sectors at the provincial level, where a number of large plans now provide benefit indexation based in whole or in part on the financial situations of the plan — typically, some variant of the funded status of the plan. These changes provide important reminders that there is a good deal of middle ground between classic or traditional DB and DC. Despite the prevalence in policy discourse to dichotomize between DB and DC, data gathered for the Ontario Expert Commission on Pensions (OECPE), 2008 suggest that two-thirds of the EPP plan members categorized as being in DB plans are actually in hybrids.

6.3 What Ails EPPs and What To Do About It: The Views of Provincial Reports (Ontario, Nova Scotia, Alberta and BC) and Two Related Commentaries

In November of 2008, the province of Ontario released the Report of the OECF. A week later, the provinces of Alberta and British Columbia released the report of the Joint Expert Panel on Pensions (JEPP), which was commissioned jointly by the two provinces. Then, in January, 2009, the Government of Nova Scotia released the report of the Pension Review Panel (PRP).³³ These inquiries addressed a number of issues relating to the functioning of EPPs in their jurisdictions. In addition to these inquiries, the federal government and the Province of Quebec undertook less formal reviews on EPP issues.

The fact that all of this activity was taking place simultaneously reflects a number of concerns being felt about EPPs in Canada. Among the things that prompted the creation of the inquiries were: financial difficulties facing DB pension plans and related concerns about DB funding rules; long simmering and unresolved legal issues, the most prominent of which revolve around the use of surpluses in DB plans; ambiguity about how EPP regulations apply to new hybrid plans; a lack of harmonization among Canadian regulatory laws; and declining coverage by EPPs in general and DB plans in particular.

The mandates of the inquiries focus on regulatory issues and what the inquiries have to say about these issues is important and can make the operation of EPPs easier to manage in the future — if only by clarifying the rules by which EPPs have to abide. Thus, they all address key issues such as: appropriate funding rules; allowable uses of surplus; and rules that should govern full and partial plan wind-ups. They also recommend regulatory regimes that are somewhat more principles based, engage stakeholders more fully and that are more harmonized across jurisdictions. They all endorsed measures to make plan governance more transparent and initiatives to assure improved quality of plan governance. Moreover, while the JEPP undertook its review of regulatory law in Alberta and BC with the thought that an objective of the regulatory law is to encourage coverage by EPPs, all of the inquiries share the view implicitly or explicitly that coverage problems cannot be fully resolved by changes in regulatory law.

All of the inquiries express concern about declining coverage of EPPs and the implications of declining coverage for retirement incomes in the future. Two of the inquiries (the JEPP and the PRP) recommend the creation of provincial pension plans that would wrap around existing EPPs. The details of the proposals are somewhat different, but a key common element in them is that employees with earnings above a threshold level would be required to participate in the programs unless they chose to opt out. The self-employed would be allowed to opt in.

The OECF took the view that it did not have a mandate to address this question directly. However, it did recommend the creation of an Ontario Pension Agency to provide a home for commuted values of DB pensions that are transferred from EPPs. It also raised

³³ A review of these reports has been prepared for the CD Howe Institute by Baldwin and FitzGerald, (forthcoming).

the possibility that the Agency could receive new pension contributions from individuals and companies. Further, it endorsed the idea that large pension plans in the province, such as Ontario Municipal Employees Retirement System (OMERS) and the OTPP, should be allowed to provide investment and other services to individuals and small companies. The OECP report also noted that a number of stakeholders had recommended increased benefits under the Canada Pension Plan. The OECP did not have a mandate to address this issue but, having noted what it heard, the OECP suggested that the Province study this possibility.³⁴

All of the inquiries recommended significant changes to regulatory law that, if adopted, should make EPPs easier to manage in the future, and they made recommendations that would broaden the range of pension and retirement savings opportunities available to Canadians. But the reports have limitations too. In view of the growth in DC plans in recent years, it should probably be said that the inquiries devote less attention to the regulation of DC plans than is warranted. The OECPs mandate directed it away from this field of inquiry.³⁵ The inquiries in Alberta and BC and in Nova Scotia devote less consideration to plans that involve joint cost sharing and governance than does the OECP, and this may reflect the fact that their mandates exclude provincial employee pension plans. In addition, the DB financing issues and pension financing in general tend to be dealt with at the level of regulatory requirements and do not come fully to grips with some basic conceptual problems in DB pension financing.

In recent years, many private commentators and stakeholders have made important contributions to the discussion of problems facing EPPs. Two will be singled out here because they are particularly germane to the issues being addressed in this report and complement the issues raised by the provincial inquiries.

For some years now, Ambachtsheer has identified the need for three characteristics in the successful operation of pension plans: large scale of operations, expertise in the governance and management of pension plans, and an alignment of interests between those with governance and management responsibilities and plan beneficiaries. (Ambachtsheer, 2007) This has led him to advocate the creation of pension institutions that operate at arm's length from individual employers. He has also noted the shortcomings of EPP management in Canada in relation to these features of well-managed pension plans and his concern applies to both DB and DC plans. He has also expressed a great deal of concern about the absence of these attributes in the institutions that currently serve the individual retirement saver.

These concerns are reflected in varying degrees in the reports arising from the provincial inquiries. They are noted here because they have come to attract a significant degree of support among pension commentators, and also because they add an important dimension to the way one thinks about coverage issues. Understandably, coverage is thought of, first

³⁴ The possibility of having the QPP play a greater role in providing retirement income is under discussion in Quebec's review of pensions.

³⁵ Baldwin, 2008 provides a review of issues that need to be addressed in this regard.

and foremost, in terms of the numbers of people participating in EPPs. One qualitative dimension of coverage frequently cited is the shift from DB to DC. But Ambachtsheer raises another qualitative dimension to the coverage issue, which is the quality of management in retirement savings institutions.³⁶

Finally, Pierlot of Towers Perrin has prepared a paper in which he raises a number of concerns about tax incentives for retirement savings. (Pierlot, 2008) His work should remind readers of an important point made in the provincial reports, which is that the operation of EPPs is impinged on by a number of bodies of law — not to mention legal decisions and standards of professional practice — and among them, ITA rules related to pensions and RRSPs are among the most important. One of Pierlot's chief concerns is that current ITA rules limit the coverage of EPPs to employees in an employer-employees relationship, and prevent the formation of pension plans among affinity groups of the self-employed or employees, separate from their employers. Again, the provincial reports seem to anticipate moves in this direction. Pierlot also expresses his concern about the annual nature of limits on tax support and calls for the creation of lifetime savings limit — something that was proposed in 1984 by the federal government and dropped as being too complex. With the unlimited carry-forward of unused tax room that is now permitted under the ITA, there is plenty of room for catching up for years when contributions were not made, but little room for tax support in anticipation of future earnings.

There is, no doubt, a good deal of debate to be had about the Pierlot proposal for a lifetime limit. But it serves as a reminder that the tax rules need to be brought into the debate on retirement savings and they have not undergone a basic review in nearly twenty years.

6.4 Pillars 2 and 1: In Good Health but Issues Remain

i) Pillar 2

There is a certain irony to the prospects for change to Pillar 2. Major changes were made to the C/QPP just over a decade ago. Those changes are now widely heralded as a great success even by traditional critics of the C/QPP. In the 23rd Actuarial Report on the Canada Pension Plan (OCA, 2007), the Office of the Chief Actuary (OCA) certified that, in spite of the substantial increase in CPP benefit payments that would result from the retirement of the baby boom generation, the current legislated contribution rate of 9.9 per cent for employers and employees combined would be more than enough to pay for benefits through 2075. Federal and provincial finance ministers considered the Report in their triennial review of CPP finances in May, 2009, endorsed its main conclusion regarding the satisfactory state of the Plan's finances, and announced some changes to the plan that will likely have minor financial implications, but are not insignificant. Incentives for early and late retirement will be modified to decrease the attractiveness of

³⁶ It also worth noting, for the record, that he shares the view of the JEPP and PRP that some form of supplement to the C/QPP should be created that would enrol people unless they opt out. He has labelled his proposed plan the Canada Supplemental Pension Plan. (Ambachtsheer, 2008) He has also argued strongly against the understanding that DB and DC represent a bimodal choice of pension plan design.

early retirement and increase the attractiveness of late retirement; phased retirement will be facilitated by allowing people to collect benefits while contributing and earning new claims on CPP retirement benefits; and the number of years of low earnings that can be deducted from the calculation of a CPP retirement benefit will be increased. These proposed changes have not been given legislative effect at the time of writing and are due to be implemented in 2011.

Despite the widespread satisfaction with changes made in the late 1990s, the second pillar could end up being changed more than the other pillars if it is chosen as a response to the problem of coverage by EPPs. No doubt there are groups who would choose to make that the preferred solution to declining EPP coverage.

In the meantime, there are some issues related to the C/QPP that are worth noting briefly, even though they do not involve a major change in its role in the RIS. First, it is not clear that all changes to the C/QPP made a decade ago have been fully absorbed and accepted. The requirement that future benefit improvements be fully funded and the possibility of reducing indexation to balance the C/QPP books are important cases in point. Moreover, the willingness of the contributor population to accept all of the adverse effects of market risk has been tested for only ten years, and so has the ability to keep the CPPIB function at arm's length from government. The challenge faced by CPPIB management on CPPIB management pay in recent hearings of the House of Commons Standing Committee on Finance is interesting in this regard. The decidedly opaque nature of federal-provincial review of CPP finances may also become an issue. In short, historical experience with the CPP as of the late 1990s is limited, and it remains an open question how all aspects of that reform will withstand the test of time.

Aside from the possibility of a significant change in the role of the C/QPP in the RIS, several more micro-focussed issues may get attention: the appropriate age of eligibility for retirement benefits; the ability of adult immigrants to build up C/QPP contributory earnings; the role of survivor benefits in an era of increased female participation in the labour force; and the declining average C/QPP quasi-replacement rate that follows from increasing longevity and price indexation (assuming real wage growth).³⁷

ii) Pillar 1

Since the demise of the proposed Seniors' Benefit³⁸ in the mid-1990s, the OAS program has retreated to the low profile state it occupied before the debate on the Seniors' benefit. Bearing in mind the important role the OAS plays in the Canadian RIS, its low profile is somewhat unusual.

³⁷ To date, the Canada and Quebec Pension Plans have managed to maintain the same contribution rate and very similar benefits structures. Evolving demographic differences may make this parallelism difficult to sustain in the future. Available time has not permitted an exploration of this issue.

³⁸ The proposed Seniors' benefit would have replaced the OAS and GIS with a single benefit based on a family income test.

Like the CPP, the OAS is now required to have actuarial reports on its finances prepared every three years. The most recent one had an effective date of December 31, 2006. (OCA, 2008). The report included both current numbers and projections of: numbers of beneficiaries, nominal dollar amounts of expenditures, and expenditures as a share of national income. The conclusions of the OCA on these points are summarized below in Table 10.

Table 10
Number of OAS Beneficiaries, OAS Expenditures and
OAS Expenditures/GDP,
Various Years: 2007 to 2070

| | Beneficiaries (000) | OAS Expenditure \$ million (nominal) | Expenditures/GDP |
|------|--------------------------------|---|-------------------------|
| 2007 | 4,362 | 24,711 | 1.66 |
| 2020 | 6,731 | 50,406 | 2.14 |
| 2030 | 9,125 | 86,939 | 2.49 |
| 2040 | 10,220 | 124,113 | 2.38 |
| 2050 | 11,909 | 169,558 | 2.20 |
| 2060 | 11,556 | 229,888 | 2.02 |
| 2070 | 11,902 | 302,841 | 1.78 |

With the ageing of the baby boom generation, it is not surprising to see the number of OAS beneficiaries and total nominal expenditures going up in the future. These developments are driven in a quite straightforward way by an increase in the portion of the population over 65 and inflation. The portion of the population over 65 will nearly double between today and 2030. What may be somewhat surprising is the pattern of OAS expenditures in relation to GDP. This ratio rises until 2030 with the increase in the portion of the population over 65, and declines thereafter.

The decline in OAS expenditures as a percent of GDP after 2030 is attributable to the OCA assumption that real wage growth will resume at an average annual rate of 1.3 per cent in response to population ageing. Thus, even though the rate of labour force growth will decline to nearly nothing (0.3 per cent per year), real GDP growth will occur. The related assumption is that OAS continues in its current statutory form and remains price indexed. Thus, its value relative to wages and prices declines. If the OCA assumptions are reflected in future events, the OAS replacement rate will decline from 13.5 per cent of average wages and salaries at present to 12 per cent in ten years and 10 per cent in twenty. These are not dramatic declines, but they do increase replacement rate targets progressively through time and also mean that OAS and GIS will be delivering less in relation to LIM type targets. The nature of future adjustments of OAS is an important issue.

In contemplating the future of OAS and GIS, it is important to remember that these programs differ from the CPP in two important respects. They fall under the exclusive control of the federal government and, therefore, within its budgetary framework. As a consequence, they are somewhat more vulnerable to change in response to immediate political pressures.

The related issues of the real value of OAS (and GIS) in the future and fiscal pressures associated with the programs are likely to be at the focal point of deliberations on their future. But it should be noted that the disincentives associated with GIS may also attract some attention. The 50 per cent tax back rate under GIS overlaps in small income ranges with positive rates of personal income tax, the winding down of tax credits and income tested provincial programs. The resulting marginal tax rates are extremely high and offer little reason for saving prior to retirement and/or earning income after retirement. The high marginal tax rates are incompatible with encouraging late-life work. The issue of the incentive to work has been addressed by degree through the introduction of a level of exempt earnings, which now stands at \$3,500 per year.

6.5 Demographic and Labour Market Changes: Variables in Motion

The incomes generated by the Canadian RIS in the future will reflect not only the intrinsic characteristics of the RIS but their interaction with a variety of labour market, demographic and economic variables. It is beyond the scope of this report to offer a complete review of relevant developments and how they might impact the RIS outcomes. However, a brief survey of some key developments may be of help in contemplating efforts that have been made to date to assess future retirement income prospects and things that might be borne in mind in contemplating future work. These comments will focus mainly on demographic and labour market developments and, because some important developments (e.g. retirement ages) combine labour market and demographic dimensions, no attempt is going to be made to delineate sharply between them. Generally, more broadly defined economic developments will only be raised in so far as they are strongly linked to demographic and labour market developments. The format for presenting these issues will be to identify the development and then comment on its significance. Where appropriate, some measure of the size of the development will be included in the discussion.

i) Ageing population

One of the most widely-noted aspects of demographic change is the general ageing of the Canadian population — a phenomenon that is driven by ever improving mortality and declining fertility. The manifestation of ageing most widely cited is the growing share of the population over 65. The Chief Actuary (OCA, 2008) estimates that the share of the population age 65 and over will increase from 13.4 per cent in 2007 to 26.3 per cent in 2075. The Chief Actuary has estimated that, over the period from the end of World War II to the early 2000s, female life expectancy at age 65 increased by roughly six years and male life expectancy by 4. (OCA, 2005) Life expectancy at age 65 for women is projected to increase by another 3.4 years between 2007 and 2075, and male life expectancy by another 3.8 years over the same time frame.

As was noted in Section 2.1, the ratio of the elderly to the non-elderly population affects pay-go costs directly, and this has been noted with respect to OAS in Section 6.4 above. Prior to the C/QPP amendments of 1997, the C/QPP contribution rates were strongly influenced by the ratio of beneficiaries to contributors, as the plans were largely pay-go. The amendments to the plans were designed to remove that demographic sensitivity. For pre-funded plans, whether they are DB or DC, contributions do not respond directly to changes in the ratio of beneficiaries to contributors. But the required contributions to pre-funded DB plans do respond to the ratio of the retirement period to the contributory period (though not proportionately) and increased life expectancy does increase that ratio. Moreover, the improvements in life expectancy will contribute to increasing ratios of pensioner to active plan member liabilities and, hence, financial volatility in DB plans. Increasing life expectancy may also give rise to some questions about intergenerational equity in these plans, as each cohort that passes through them is getting a more valuable benefit than preceding cohorts. In DC plans, the improvements in mortality will, with a given rate of contributions, result in lower benefits or later retirement.

ii) *Decelerating Population Growth*

Declining fertility, which is contributing to the ageing of the population, is also contributing to decelerating population growth. The Canadian fertility rate has been below the population reproduction rate of 2.1 since about 1970. In 2007, it was 1.56 and the Chief Actuary (OCA, 2008) expects it to stay at about that level over the long-term future. His mid-range population estimate assumes a fertility rate of 1.60. In the Canadian context, the fact that the fertility rate is below the population reproduction rate does not translate directly into a declining population as is true in many countries. In Canada, the effect on total population and labour force growth is mitigated by net inward migration. But declining fertility does mean decelerating population and labour force growth as we look to the future. Thus, Canadian employment grew at an average annual rate of 1.9 per cent from 1976 to 1991 and by 1.8 per cent from 1992 to 2007, but is expected to grow after 2010 at an annual rate of only 0.3 per cent.

The Chief Actuary assumes that decelerating labour force growth will result in a general tightening of labour markets and a resumption in real average wage growth in Canada of 1.3 per cent per annum. At the same time, aggregate labour force and GDP growth are likely to be adversely affected by the deceleration in labour force growth and so, in turn, is aggregate capital income and returns on common stocks. There may be some mitigation of this effect as capital is substituted for labour in response to the rising cost of labour and retirement savings portfolios increase their foreign content. But, in contrast to the previous twenty-five years when the gap between returns on financial assets and wage and salary growth was quite high, which made it relatively easy to meet earnings replacement targets, decelerating population growth is likely to push things in the opposite direction. These effects will be felt by all types of prefunded arrangements. The effects on a status quo OAS/GIS will be to reduce the programs' financial claim on national income. But, as noted above, the favourable effect on OAS/GIS generates its

own policy issue. All other things being equal, the resumption of real wage growth will also have a negative effect on quasi-replacement rates.

The tightening up of labour markets, as anticipated by the Chief Actuary, may on its own generate a stronger interest among employers in providing EPPs as recruitment and retention of workers may become a greater issue. This tendency on the demand side of the labour market may be reinforced by the fact that the supply of labour will increasingly be weighted toward older active workers for whom EPPs are likely a more important benefit than is true for their younger counterparts, and for whom voluntary mobility is usually less of an issue. On the other hand, Ontario data suggest that almost all plans in that jurisdiction are using a unit credit actuarial method under which required current service contributions will increase with an older active plan membership. (FSCO, 2009)

iii) Sector Composition of Employment and Unionization

As was just noted, labour market tightening and an ageing active workforce may give some impetus to wider EPP coverage. However, it is important to remember that EPP coverage in the private sector is sensitive to the sector composition of employment, the level of unionization and the size of firm in which people are employed. None of these dimensions of future labour force development are investigated by the Chief Actuary and time has not permitted a reasonable exploration of them in the preparation of this report. They need to be considered in reflecting on the ability of EPPs to deliver retirement income in the future.

iv) *Female Participation in the Labour Force*

The Chief Actuary (OCA, 2008) notes that, over the period from 1977 to 2007, there was a dramatic narrowing of the gap between female and male labour force participation rates for 15 to 69 year olds. In 1977, the male rate was 77.7 per cent compared to a female rate of 45.7 per cent, making for a 32 percentage point gap. By 2007, the gap was down to 10.4 percentage points, with rates of 72.4 per cent and 62.1 per cent, respectively. The Chief Actuary assumes a continued shrinkage in the gap to 8.2 percentage points in 2050, which is the end of the projection period in the OAS report.

As has been noted above, the labour force participation of women and women gaining access to employment based pensions, both C/QPP and EPPs, has been an important element in the improvement in living standards of the elderly in recent decades. (This source of improvement in the incomes of the elderly is explored in Schirle, 2009). The closing of the gap in labour force participation rates will, all other things being equal, continue to contribute to this outcome. At the same time, the scope for continued improvement coming from this source is declining.

v) *Late Life Work*

It is an observed fact that, since the mid-1990s, the portion of the Canadian population aged 55 to 64 that is engaged in paid work has been increasing. For women, this reflects women of the baby boom working more at all stages of life. For men in this age range, it appears to be a behavioural shift. The Chief Actuary (OCA, 2008) anticipates a continuation of this trend into the future for both women and men. For women, the assumed increase in the age 55 to 59 range is from 62.4 per cent in 2007 to 66.0 per cent in 2030; in the age 60 to 64 range, it is from 37.3 per cent to 41.0 per cent; and in the 65 to 69 range, it is from 12.7 per cent to 14.0 per cent. For men, the increases are somewhat smaller: age 55 to 59, from 76.2 per cent to 79.0 per cent; age 60 to 64, from 53.4 to 56.0 per cent; and age 65 to 69, from 23.4 per cent to 25.0 per cent.

Compared to the possibility of lower levels of employment in old age, the one thing that is certain to follow from more late-life work is a greater contribution to GDP from this sector of the population, which is important in itself. It is not perfectly clear what the impact will be on pension expenditures as the later life work may be combined with receiving pensions. Of the many forces at play that may help to explain more late-life work, one that may increase the age at which pensions are claimed is later entry into career jobs. This is part of a more general phenomenon of later transitions from youth to adulthood that includes dimensions such as: leaving the parental home later, getting married later, and having children later. (A good overview of these developments is provided by Beaujot, 2004.) Late entry into paid employment will make it more difficult to accumulate pension entitlements by a given age and other aspects of net wealth accumulation are also likely to be delayed. If later entry into career jobs and, hence, later accumulations is not accompanied by later retirement, the effect of late entry would be to increase the ratio of the retirement period to the period of pension contributions and to raise pension expenditures (required savings rates).

All other things being equal, the increased late-life work anticipated by the Chief Actuary will increase economic output. But it should be noted that this favourable effect on labour force participation does not fully offset the decline in labour force participation that stems from there being a growing portion of the population in the older age range. Thus, the assumed labour force participation rate for the 15 to 69 age group declines slightly for men from 79.2 per cent to 78.3 per cent over the period from 2007 to 2030. For women, there is a modest decline anticipated between 2007 and 2015 and then an increase to 2030, so that the rate in 2030 is the same as in 2007, namely, 70.1 per cent.

vi) *Immigrants to Canada*

The Chief Actuary, 2008 assumes net inward migration to Canada over the period to 2015 at the historic average of the past 30 years — namely 0.50 per cent of total population per year. For the remainder of the projection period, he assumes a slight increase to 0.54 per cent in response to tightening labour markets. The result is a continual increase in the estimated portion of the population over 65 that will receive partial OAS payments. In 2007, the estimated portion of the OAS recipients who will receive partial payments is 8 per cent. This portion is expected to grow to 13 per cent by 2025 and to 15 per cent by 2050. This portion of the OAS recipient population will have fewer years in which to accrue benefits under the C/QPP and EPPs.

The demographic trends that have been noted immediately above are, for the most part, global trends, with different parts of the world having different beginning and end points by the mid-21st century. This is generally true of declining fertility, mortality improvements — especially in old age — and decelerating population growth. (These trends are reviewed in OECD, 2009 and in Baldwin, 2006.) Also, within the OECD area, the delayed transitions from youth to adulthood (see: Beaujot, 2004) and increased labour force participation among older pre-65s are common developments (see: Sundin, 2006).

Section 7: Gaps in Data, Research and Information Systems

In this section, gaps in data, research and information systems are discussed. This discussion strives less to be comprehensive than to identify those items under each heading that are most important. It should be said that while the PPIC and Trusteed Pension Plan Financial Statistics still provide very useful information, a thorough review of the degree to which they are meeting information needs is in order. Pension investment data, data on the funded status of pension plans and data on combined employer and employee contributions to EPPs come to mind as areas not mentioned further below that need attention.

7.1 Data

Data on pension plans themselves need improvement in a number of areas. Classifications of benefit designs that rely entirely on the DB versus DC distinction are clearly being overtaken by events as new hybrid forms of pension emerge. In addition, it would be very helpful if flow as well as stock data on numbers of pension plans, by type, were available. In other words, the numbers of newly created plans, terminations and conversions should be readily available. Moreover, coverage data remains a problem. The PPIC provides global coverage data and a good deal of useful information on qualitative aspects of coverage. But the PPIC generates very little information on the social and economic characteristics of EPP members and no information on GRRSPs and their members. Other sources of data have provided insights into the social and economic characteristics of EPP members but virtually no qualitative information. The SFS has been an exception in yielding data on both the qualitative aspects of coverage and the social and economic characteristics of EPP members. But the SFS is not a regularly scheduled survey, and the most recent one (2005) had a sample that was too small to permit some necessary types of analysis.

Despite problems with the 2005 SFS, it or a wealth survey like it that includes pension wealth is of enormous value in addressing the state of readiness of near-retirees to provide themselves with the necessary supplement to publicly administered benefits in order to enjoy a comfortable retirement. It focuses attention on the cumulative nature of the benefit entitlement/retirement saving process in a way that the best of cross sectional data cannot. A regular survey of this sort should be regarded as a very high priority.

Finally, it is very unfortunate that data on incomes of the elderly cannot be distinguished by the type of retirement income vehicle from which they are provided: DB versus DC type of EPP, or RRSP or GRRSP. This is highly regrettable, since many important questions of public policy revolve around these distinctions, including many discussed in this report. This is not, however, an easy problem to solve. Most income data gathered by Statistics Canada now relies on data collected through the PIT and, hence, the classifications used in the PIT forms establish the categories that are available in data produced by Statistics Canada. Data that distinguish income by the type of retirement program from which it originates would provide a much clearer picture of the role of different sources of retirement income. It would also help address a number of questions

about DC pension plans, including the amounts and variability of income from DC sources, and whether people who self-manage their withdrawals exhaust their retirement assets before the end of their life. Gaining insight into these DC-related questions may require data collected from individual DC plans.³⁹

7.2 Research

Of the many possible things that could be noted here, four stand out:

- First, much of the research and analysis that has been undertaken in support of this report needs to be repeated with a stronger focus on women and immigrants;
- Second, it would be very helpful to develop a longitudinal perspective on the use of retirement savings vehicles, especially during the period of mid- to late working life;
- Third, research that sheds more light on the degree to which different forms of wealth are substituted for each other needs to be encouraged; and
- Fourth, an analytical tool like LifePaths needs to be employed to help with projections of future retirement incomes. The important characteristics of whatever tool is used are: it needs to be capable of micro-analysis, it needs to be longitudinal and it needs to have stochastic capabilities.

As was noted in Section 6.5, above, a clear sense of future labour market developments with respect to sectors of employment, employment by size of firm and unionization are important inputs to assessing the future of EPP coverage.

7.3 Information Systems

In the 1980s, legislation was passed that required the OCA to prepare regular reports on the financial status and outlook of the OAS and CPP. The new information requirements marked an important step forward in generating an understanding of these programs. But, in one sense, it was like focusing on one-half of an equation. The other half, income adequacy, has not been the subject of an ongoing process of information gathering and dissemination. This gap should be filled. The OAS and CPP expenditure reviews should have a parallel process of information gathering and analysis of the income situation of the current elderly and future retirement income prospects. In view of the stakes that the federal and provincial governments have in this issue, the two levels of government should consider the creation of a joint institution to oversee the process.

The development of relevant data, research and information systems is an appropriate administrative expenditure for public pension programs. In context, it is worth noting that the U.S. Social Security Administration supports both significant “in house” research as well as three outside research centres that focus on pension and retirement related research.

³⁹ The author of the report has not seen the SFS used in this way, but it may be possible to tease some insights out of the SFS.

Section 8: Conclusions

The central issue to be addressed in this study is the capacity of Canada's RIS to provide adequate retirement incomes in the future. In assessing this issue, the author was asked to look at the incomes of the elderly in relation to anti-poverty and earnings replacement objectives. In Section 4, these notions were elaborated somewhat and the question of financial sustainability was added to the criteria relating to income adequacy.

Given the nature of the central issue, this conclusion will begin with a brief comment on the prospects for achieving the income adequacy objectives identified by the Province and on the issue of financial sustainability. Then, attention will turn to some of the issues that have to be addressed in contemplating actions to increase pension coverage and notes will be made of some of the proposals currently being propounded.

With respect to the anti-poverty objective, substantial progress has been made in recent years. However, there is still some legitimate debate about Canada's proximity to complete success and that debate revolves around differences in the conceptual view and measuring stick for deciding who is in poverty. Moreover, even if the general picture is positive, there may be subsets of the population who experience higher rates of poverty. Veall identifies single women, immigrants and older people with dependents as the key cases in point. In context, three comments are worth making. First, the OAS/GIS guarantee for a single person is less than the equivalent guarantee for a couple by almost exactly \$2,000. Second, it is difficult to address the immigrant issue in a way that does not trigger equity concerns by people who are born in Canada. Nonetheless, immigration of larger numbers of people who do not qualify for any OAS or GIS — especially if they have arrived from countries from which payments of pensions to expatriates is unlikely — is a matter of concern. Third, the issue of elderly persons supporting dependents may be as much a horizontal equity issue as an elderly issue.

Looking to the future, the biggest question with respect to the achievement of the anti-poverty objective will be the adjustments made to OAS and GIS if real wage growth resumes. Real wage growth is likely to boost all types of poverty and low income measures faster than the rate of growth in the CPI to which OAS and GIS payments are linked. Price indexing of OAS and GIS with no further adjustment will likely result in some growth in the poverty rate. In addition, the role of GIS and income-tested supplements to it need to be reviewed in terms of their impact on people's economic behaviour over the life course, and especially as people approach and enter retirement.

With respect to earnings replacement, the general picture that emerges from analytical work and from self-assessment is that this objective has generally been quite fully met for the current elderly. However, for a significant minority of elderly who had moderate to high earnings before retirement, retirement may have resulted in a noticeable decline in living standards.

In this report, several attempts to quantify future replacement rates are reviewed and there is also a self-assessment study that is reviewed. The general conclusion that emerges from these studies is that Canada should look forward to a situation in which the earnings replacement objective continues to be met for most of the elderly. However, the studies conclude that minorities of people with moderate to high earnings will not achieve continuity of living standards. The size of the minorities varies from study to study, but the one-third conclusion reached by Maser and Dufour provides a centre of gravity for the estimates. Lise offers the most optimistic conclusion on this issue, but his conclusions are compatible with a significant minority not maintaining their consumption levels in retirement. His methodology is not sufficiently granular to preclude the possibility.

In concluding the review of these studies, it was noted that they tend to take the existing structure of the RIS as a given. Thus, the generally favourable results of the studies rely on OAS maintaining its value relative to pre-retirement earnings, and legislative change to OAS would be required to achieve this state of affairs. Moreover, the replacement income provided by the C/QPP would also have to be maintained. Generally, the studies of future replacement rates do not assess the effect of declining EPP coverage and tacitly assume a stable economic, financial and demographic environment.

In addition to the income adequacy criteria, Section 4 noted that it is important for pension plans to be financially sustainable and fair to different generations of plan members. These issues have not been thoroughly assessed in the foregoing parts of the report. But a few brief comments are in order.

The pattern of OAS expenditures in relation to GDP was noted in Section 6.4. Expenditures are expected to rise through 2030 and decline thereafter. The actual pattern of expenditures will depend very heavily on decisions made about adjustments to OAS and GIS benefits. The C/QPP contribution rate is expected to remain stable at 9.9 per cent for the coming period of nearly 75 years. It should be noted, however, that C/QPP expenditures will rise in relation to the contributory earnings base, which, in context, is a reasonable proxy for GDP growth. As a portion of contributory earnings, CPP expenditures are projected to increase from 8.37 per cent in 2006 to 11.06 per cent in 2030. (OCA, 2007) The difference between the stable contribution rate and the rising expenditures as a portion of contributory earnings is accounted for by the increasing use of capital income generated by the investments of the CPPIB to pay benefits. Some portion of this capital income will be generated by foreign economic growth that is captured through the foreign investments of the CPPIB.

With respect to intergenerational issues, ever-improving mortality means that each cohort will receive benefits of higher value than earlier generations from OAS and C/QPP. The first age cohort that will spend its entire working career participating in the C/QPP as amended is still about 35 years from retirement. The implicit rate of return for successive cohorts of C/QPP contributors will decline gradually over that period time.

The heterogeneous nature of the third pillar makes it somewhat difficult to generalize quantitatively about sustainability and intergenerational fairness as one looks to the future. But some of the demographic trends noted in the report will have a predictable effect on EPPs and retirement savings in a directional sense.

A number of the demographic changes will tend to push required DB contributions upward. Cases in point include: improving mortality; late entry into work that is not fully offset by later retirement; and, the ageing of the active workforce. This upward push may be increased to some degree by decelerating population and labour force growth feeding through GDP growth, the growth in corporate profits and returns on common stocks. The maturation of DB plans will tend to make contributions somewhat more volatile. For DB plans in the third pillar, the first order effect of these changes will be to increase required contributions and make them somewhat less stable. But the emergence of cost- and risk-sharing arrangements and hybrid benefit designs over the past two decades is indicative of the fact that the second and third order effects may run in a number of unpredictable directions.

One aspect of the adaptation of DB plans worth noting is the different impact that change often has on different cohorts of plan members. The regulatory law in all but one Canadian jurisdiction specifically prohibits reductions in accrued DB benefits. While the intent of this requirement is understandable, it does mean that the impact of benefit reductions (like contribution rate increases) falls most heavily on younger and future plan members. Thus, on the one hand, if a DB plan survives in its current form, each cohort gets a more valuable benefit than the preceding cohorts. But if adjustments are required to benefits or contributions, those adjustments will have their strongest negative effect on young cohorts.

The demographic effects that will have an effect on DB plans will also affect DC plans and individual savings efforts. However, unless these changes inspire an increased savings effort, they will manifest themselves in a mix of lower periodic benefit payments or later retirement.

At present, much of the concern about the retirement income prospects of the future elderly revolves around concerns about the declining portion of the employed labour force that participates in EPPs. As was noted in Section 6.2, the decline has been ongoing since the late 1970s and, to date, has had little impact on retirement incomes, in general, or income from the third pillar, in particular. In the early years of declining coverage, there was a compensating increase in the use of RRSPs, but that seems not to have been the case for some years. In addition, the impact of declining coverage has been muted by the increase in the employment to population ratio and the emergence of more two earner couples. Underlying both of these developments is increased female participation in the labour force. While these developments have muted the effect of declining coverage, the scope for gaining additional relief from this source is limited. In addition, as is noted in Section 6.2, wealth data suggest — but do not decisively demonstrate — that EPP

coverage is important. It appears that people find it difficult to establish alternatives means of accumulating retirement income wealth that are as effective as EPPs.

The concern about EPP coverage has a qualitative dimension to it that focuses on the general trend from DB to DC coverage documented above. The central concern that has been raised in this regard is that the benefits provided by DC plans (and individual retirement savings plans) are unpredictable. Individual plan members bear not only the risks associated with their investments over the period prior to retirement, but also substantial interest rate risk at the moment of conversion to an annuity. Moreover, if individuals manage the withdrawal of their DC assets on their own rather than buying an annuity, then the investment risk carries over into that period of life.

There are some policy-relevant variations on the general theme of uncertainty of DC outcomes. For instance, because there is not a fixed relationship between wage growth and returns on financial assets through time, one should expect DC replacement rates (or retirement ages) to vary through time. In addition, it has been noted that women and men tend to invest differently in DC plans and systematic gender difference may arise from DC plans. (Turner, 2001) Moreover, in recent years behavioural economics literature has drawn attention to the difficulties people have in managing their retirement savings. (A review of this literature is provided by: Tapia and Yermo, 2007.) Finally, data presented in Section 6.2 raised questions about whether DC accumulations are adequate.

The concerns about the shift to DC are important and, as the author of this report has argued elsewhere, the regulation of pure DC plans has not been as thoroughly canvassed as it should be (Baldwin, 2008 and Baldwin and FitzGerald, forthcoming). There are some contending considerations with respect to this shift. Given the structure of Canada's RIS, it is only a portion of retirement income that is subject to DC investment risk. Moreover, there are arguments that DC plans do more to facilitate labour mobility and are preferable to DB because they are more neutral with respect the age of retirement. It might also be argued that, even if the wealth accumulated in DC plans is less than in DB under comparable circumstances, there is no reason in principle why this should be so and, therefore, it is not an intrinsic characteristic of DC that is being observed.

Debates about the merits of DB and DC attract a good deal of attention and, at times, passion and heat. However, two points should be reinforced at this point. First, there is a sad lack of data and information on the actual performance of DC plans in Canada. Second, while the discussion of this issue is often cast as it has been here as a bimodal choice, there are many benefit designs that incorporate elements of DB and DC. One can pick a spot along a spectrum at one end of which are plans that offer complete certainty of benefits and complete uncertainty of contributions, and at the other end of which are plans that reverse what is certain and what is uncertain. The author's bias is that EPPs should offer as much certainty of benefits as is compatible with the single or joint sponsor(s) willingness and ability to tolerate the associated uncertainty of contributions.

The discussion of EPP coverage has another qualitative dimension that is relevant to both DB and DC plans. Ambachtsheer, 2007 has raised concerns about the management of EPPs and has organized his concerns around three considerations: lack of scale; lack of expertise in the governance and management of plans; and poor alignment of the interests of people charged with the responsibility for governance and management on the one hand, and the plan beneficiaries on the other. The foundation for these concerns is well documented by Ambachtsheer and needs to be born in mind in contemplating the future of the third pillar. The general concern of Ambachtsheer is particularly relevant for small firms. Indeed, it is quite implausible that many small firms can serve as suitable platforms for delivering pension income even when the earnings and other characteristics of the employees would suggest that 3rd pillar income is needed by the employees. In addition to the issues identified by Ambachtsheer, many small firms will have life expectancies that are much shorter than those of their employees.

Concerns about declining coverage, the shift to DC and the adequacy of EPP management have inspired a number of proposals for pension reform. The proposals deal primarily with means of achieving the earnings replacement objective in the face of declining EPP coverage. Irrespective of what else is done in this regard, it is hoped that the recommendations of the provincial inquiries that would reduce legal uncertainties and irritants would proceed and that tax measures affecting retirement saving would be reviewed. The big question is whether more is required, as is suggested by the provincial inquiries.

This report will not offer a definitive answer to the question, but will identify the key subordinate questions.

If more effort is required to facilitate retirement saving/pension benefit accruals during working life, it is important to be clear about the earnings range where this effort is relevant. In Section 2, it was noted that the earnings replacement capacity of the Canadian RIS is quite complete based on the first two pillars alone at earnings levels up to one-half of average wages and salaries, but declines thereafter. However, this could be a moving target depending future real wage growth and adjustments that are made to OAS. The upper end of the range deserves consideration, too. As is noted in OECD, 2005, the maximum covered earnings of the C/QPP is certainly low by OECD standards. At the same time, an implicit assumption of Canadian pension policy has been that beyond a certain level of earnings, people should look after themselves.

Traditionally, a central question about pension policy options has been whether new initiatives should be voluntary or mandatory. The emergence of “auto-enrolment” schemes in which people are subscribed to a plan unless they opt out has broadened the range of choice in this regard. Experience with auto-enrolment has historical depth in DC plans at U.S. workplaces, where it seems to have increased participation over levels achieved in voluntary plans. There is, then, a general question about which of these three choices is preferred and whether the options implied by a voluntary or auto-enrolment regime are exercised by employees or employers. In the auto-enrolment and mandatory

regimes, are the same rules proposed for employees and the self-employed? The reports to the provinces of Alberta and BC and Nova Scotia would suggest not, but current C/QPP design does not distinguish between the employed and self-employed.

Closely related to the question whether new initiatives to strengthen earnings replacement should be voluntary or compulsory is the question whether they should wrap around or displace existing EPPs. Sections 5 and 6 suggest that existing arrangements have worked reasonably well for many of today's elderly and are likely to do so for many of the future elderly as well. Should new initiatives complement or displace what is working well?

If the wraparound option is preferred, there are questions to be resolved about how the decisions to wrap around get made. Employers and/or employees might have an unconstrained range of choice to opt in or out the new initiative, or there could be legislative constraints on the choice (e.g. opting out is only permitted where employees belong to a plan with specified characteristics). There are also portability issues that need to be considered if a wraparound option is chosen. How will movement of people between the opted-in and opted-out sectors be addressed?

There is a growing range of benefit design options. The choice of option may depend on answers to the prior questions about voluntary versus other forms of participation. Design options with a strong DB component often rely on compulsory participation in order to avoid adverse selection problems. Although it does not have to be the case, there is likely to be a link connecting the choice of benefits design, the time frame for phasing in a new earnings related benefits, and the funding method. A pure DC initiative is likely to be phased in over the full period of a working life and be fully funded, whereas a DB supplement to existing arrangements could, in theory, be phased in quickly and be pay-go. The links among benefit design, funding type and phase-in reflect more historical experience than conceptual necessity.

The question of how new initiatives might be phased in focuses attention on the question whether the retirement income problem to be addressed is one being faced by the current elderly or the future elderly. Much of the discourse on pension issues in Canada, including contributions by the author of this report, has focussed on problems of the future elderly arising from declining coverage. But Canada's historical experience with the introduction of C/QPP and GIS suggests that it may be difficult to introduce a pension reform package that does not deliver any benefit to the current elderly. If new benefits are introduced and phased in over a period that is less than a full working lifetime, then the initial cohorts of recipients will be beneficiaries of net intergenerational transfers, irrespective of how the new benefits are financed.

The fact that two of the reports prepared for provincial governments called for the creation of provincial pension plans and the OECP called for the creation of an Ontario Pension Agency that could evolve into a pension plan administrator, raises questions about the national and provincial roles in any new initiatives. What is appropriate in this regard will clearly depend on the specifics of the initiative being contemplated.

Nation-wide initiatives may be most compatible with desired patterns of labour mobility and may also contribute most readily to scale, expertise and alignment of interests. On the other hand, there may be enough difference in patterns of retirement savings and the economic, financial and labour market environment among the provinces that different arrangements are warranted. Provincial differences in EPP coverage have not been pursued in the report, but Baldwin, 2007 noted that, as of the middle of the current decade, declines in the EPP coverage rate were greatest in provinces where employment growth was strongest. Moreover, the consensus necessary to support new initiatives may be easier to achieve provincially or regionally than nationally.

Closely related to the decisions about national versus provincial roles is a set of decisions about centralized versus decentralized administration and the roles of public and private institutions in delivering new initiatives. The appropriate resolution of these issues depends on the type of initiative one has in mind. But there is ample room for mixing and matching – e.g. centralized public collection of retirement savings and decentralized administration.

In the period ahead, the debate about declining EPP coverage and how to respond to it will intensify. Some will argue that the *status quo* will continue to generate adequate retirement incomes. But there are alternatives that have been proposed by the provincial inquiries and proposals to strengthen the role of the Canada and Quebec Pension Plans have also been made. The OECP also proposed to change the landscape for voluntary initiatives by endorsing the view that large (mainly public sector) pension plans in the Province should be allowed to offer their investment and other services to individuals and employers. The provincial government has begun to amend the terms of reference of some plans accordingly. This initiative provides an important reminder that, even if one does not think that the coverage issue in the sense of the number of participants in EPPs warrants attention, there are still improvements that can be made in the range of organizational choices available for delivering benefits.

Because the central issue to be addressed in this report focuses on the future, it cannot be known in advance how things will work out. The tools we have for analyzing the issue can and should be improved, as has been suggested in Section 7. The option of leaving everything as is will have its adherents, but seems likely to result in a significant minority facing a decline in their standard of living in retirement and — looking beyond the numbers of people participating in EPPs — forcing many people to rely on pension plans and retirement savings institutions that are less effective than available alternatives.

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APPENDIX D

Appendix D: Overview of Comparative Analysis of CSPP and CPP Expansion

| Characteristics | CSPP | CPP Expansion |
|---|--|---|
| Brief Description | An additional voluntary, defined contribution “tier” added to the CPP | An expansion of the existing mandatory, defined benefit CPP |
| Scale | Sufficiently large to benefit from economies of scale | Sufficiently large to benefit from economies of scale |
| Low Operating Cost | Low unit cost (expenses at 0.5% of annual assets or less) | Low unit cost (08/09 expenses are 1.10% of annual assets) |
| Continuity/ Portability | Continuity of coverage for members; plan to determine portability to other plans. | Complete continuity of coverage |
| Defined Benefit v Defined Contribution | Defined contribution | Defined benefit |
| Eligibility | Workers including self-employed who are not members of an occupational pension plan; floor of \$30,000 income and ceiling of \$116,667 ¹ | Workers including self-employed; no floor and ceiling of \$69,450 or \$92,600 ² |
| Mandatory v Voluntary | Voluntary (automatic enrolment with opt-out) | Mandatory |
| Contributions | Employer or employee (self-employed, both): 5% | Employer or employee (self-employed, both): Var 1: \$0 to YMPE 7.90%; to 2xYMPE 5.9% Var 2: \$0 to YMPE 4.95%; to 2xYMPE 2.9% Var 3: \$0 to YMPE 4.95%; to 2x YMPE 1.47% |
| Investment Choice | Low, medium or high risk portfolio | No investment choice |
| Role of Government | Create legal and institutional framework; no other role | Administered under joint federal-provincial stewardship |
| Role of the Private Sector | Potential for investment management, custodianship, annuitization | Potential for investment management, custodianship, annuitization |
| Cost to Government | Start-up costs depend on use of CPP (systems, communications, administration); equalization for early members | Start-up costs to alter CPP infrastructure (systems, communications, administration) |
| Fiduciary | Same as CPP or independent board of trustees with duty to act in interest of plan members/ beneficiaries | Same as CPP |
| Governance | Same as CPP or independent entity | Same as CPP |
| Tax Treatment | Deduction for employer and employee/self-employed | Deduction for employer Tax credit for employee/self-employed |
| Life cycle approach | Customize contribution levels, investment choice and timing of annuitization based on stage of life and proximity to retirement | Not applicable |
| Implementation issues | Legislation, likely in all participating jurisdictions Use of CPP infrastructure may require approval of Parliament and at least 2/3 of the provinces with 2/3 of the Canadian population | Approval of Parliament and at least 2/3 of the provinces with 2/3 of the Canadian population |

¹ Maximum tax deferral limit on income in 2009.

² Depending on which variation is used. The original NAFR proposal would target all Canadian workers with no floor and the same ceiling of \$116,667.

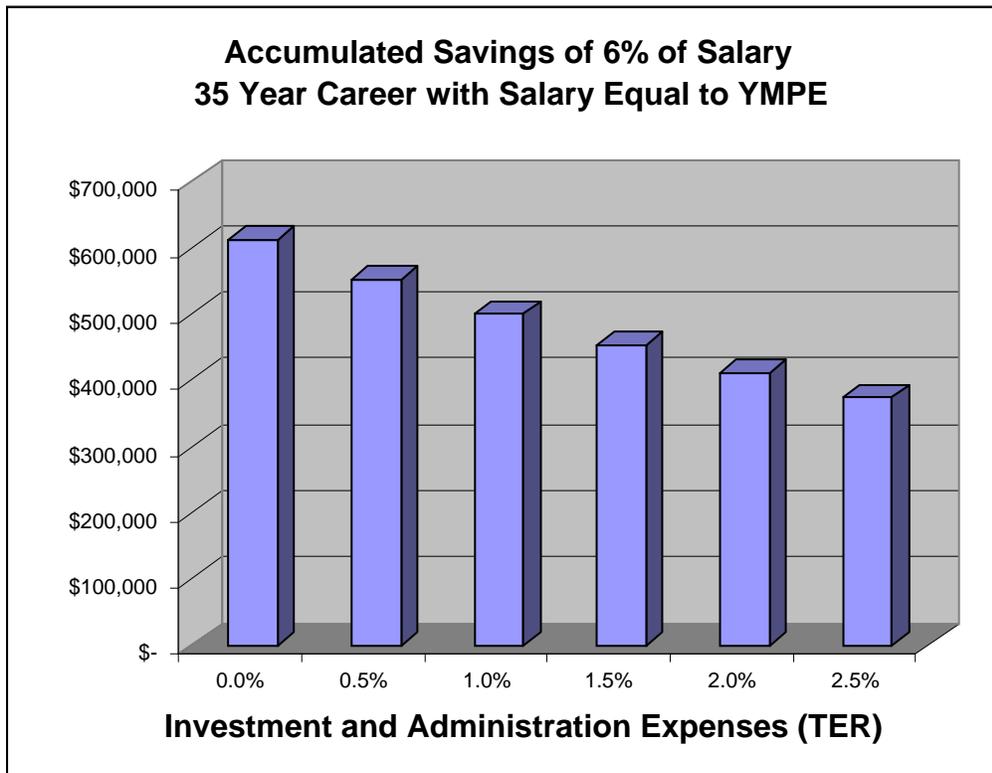
APPENDIX E

Investment Expenses

The magnitude of investment management expenses and administration costs (the Total Expense Ratio “TER”) can have a significant impact on accumulated retirement savings. Graphic I, below, illustrates the magnitude of accumulated savings of 6% of salary for an employee who earns a salary equal to the YMPE¹ throughout a 35 year career. If the MER is 2.5% of the invested assets² each year (a TER typical of equity mutual funds sold in Canada), the accumulated career savings after 35 years is about \$375,000, or about 2.9 times projected salary.³ If the TER is only 0.5% of the invested assets, the expected administration costs for the “Pension One” model, for example, the accumulation is about \$550,000, or over 4 times projected salary.

If the TER can be reduced to 0.5%, accumulated savings after a 35 year career are 48% higher than the accumulations in a typical mutual fund.

Graphic I



¹ The Years Maximum Pensionable Earnings under the Canada Pension Plan – approximately the average salary level of Canadian workers.

² Assuming the assets earn a 7% per annum return.

³ Assuming future increases in the YMPE of 3% per annum.

Mutual Funds

Mutual funds are a common investment vehicle for individual retirement savings. The Investment Funds Institute of Canada reports⁴ that total mutual fund assets amounted to \$752 billion as of December 31, 2007, which represented some 30% of Canadians' financial wealth.

Mutual funds are available to Canadian investors from a large number of insurance companies, banks and investment managers. A listing of the top 20 mutual fund providers by assets under administration at May 31, 2008 is included in Appendix I.

Mutual fund offerings run the gamut from

- short term paper funds to equity funds, and
- indexed funds⁵ to actively managed funds, to
- balanced funds to life cycle funds.

It has long been recognized that the investment and administration costs charged by Canadian mutual fund providers were higher than similar costs in the US. Two recent studies not only confirm that Canadian mutual fund costs are higher than their US counterparts, but that they are generally higher than any other country surveyed.

The study, "Mutual Fund Fees Around the World" (Khorana et al, 2007) surveyed 46,580 mutual fund classes in 18 countries. The study developed country specific measures of total shareholder charges – investment management costs, administration costs and distribution charges.⁶ Total shareholder charges for Canadian bond funds exceed the mean by a wide margin and are the second highest in the survey. Canadian mutual fund equity charges are the highest in the survey. See Appendix II for a subset of the international comparisons.

Table I Total Shareholder Costs (Khorana et al, 2007)

| | Bond Funds | Equity Funds |
|--------------|------------|--------------|
| Canada | 1.84% | 3.00% |
| Survey Mean | 1.21% | 1.80% |
| Highest Cost | 1.89% | 3.00% |
| Lowest Cost | 0.68% | 0.82% |

Khorana et al, 2007 performed statistical analysis to correct the observed investment management charges (excluding administration and distribution charges) for country-specific differences in fund or fund family characteristics. On this more directly comparable basis, Canadian equity management fees remain the highest revealed in the survey at 1.84%.

A more recent report by Morningstar Inc. (Rekenthaler et al, 2009) confirmed the high management expenses charged to Canadian mutual fund buyers. They note that "Canada has notoriously high management expense ratios" out of the survey sample of 16 countries. Specifically, they report that typical Canadian investors in:

⁴ Based on the 2008 Household Balance Sheet produced by Investor Economics

⁵ Fund managed to replicate the returns on an equity index

⁶ Certain funds providers charge initial loads and/or loads when funds are redeemed

- fixed income (bond) funds pay an MER of between 1.25% and 1.49%, and
- equity funds pay an MER of between 2.0% and 2.5%.

Note that these MER values are lower than the TSC values reported by Khorana et al, 2007 because the MER does not include certain distribution costs.

Rekenthaler et al, 2009 note that Canadian MER data includes trailer fees charged by many funds and suggest that these fees are part of the reason for generally higher mutual fund costs in Canada. These fees cover the expenses and commissions of the professional advisor. Not surprisingly, investments in Canadian mutual funds tend to gravitate towards higher cost funds because many investors use financial advisors to help make investment decisions. Rekenthaler et al note that “Advisors direct client assets to funds that pay better trailers ... since the trailer is included in the MER, the result is that assets flow into higher-fee funds.”

Rekenthaler et al, 2009 also analyzed various aspects of the mutual fund industry in each country surveyed and assigned an alphabetic rating (with “F” being the worst rating). With the exception of the Fees and Expense category (Canada was the only country to receive an “F” rating), Canada’s mutual fund environment was highly rated.

The results of the rating analysis for Canada follows:

- | | |
|--|----|
| • Investor Protection | A |
| • Transparency in Prospectus and Reports | A |
| • Transparency in Sales and Media | A |
| • Fees and Expenses | F |
| • Taxation | C |
| • Distribution/Choice | B+ |
| • Overall | B |

Compared to the other countries in the survey, Canada’s overall rating compared favourably:

- | | |
|-----------------|----|
| • Australia | C |
| • Canada | B |
| • China | B+ |
| • France | B- |
| • Germany | C- |
| • Hong Kong | C- |
| • Italy | B |
| • Japan | B |
| • Netherlands | B |
| • New Zealand | D- |
| • Singapore | C |
| • Spain | D |
| • Switzerland | C+ |
| • Taiwan | B |
| • U.K. | C+ |
| • United States | A |

Mutual Fund Investment Performance

The impact of the magnitude of the investment management expenses charged by Canadian mutual funds could be mitigated if the expenses were offset by higher investment returns. However, the available evidence suggests that, on average, Canadian equity and bond mutual funds produce rates of return, net of investment expenses, that are less than the applicable benchmarks and less than returns delivered by pension fund managers. Similar results are reported for US mutual funds.

Ambachtsheer and Bauer report⁷ that in the nine year period ending in 2004 Canadian domestic equity mutual funds, net of expenses, significantly underperformed their benchmark and the domestic equity component of Canadian pension funds. Similarly, Bauer and Kicken report⁸ that for the same period, Canadian bond mutual funds underperformed their benchmarks and the bond component of Canadian pension funds. Selected results of these two studies are summarized in Table II.

Table II – Net Value Added by Canadian Mutual Fund Managers Versus Canadian Pension Fund Managers - 1997 to 2004

| | Gross Value Added over Applicable Benchmark | Investment Management Expenses⁹ | Net Value Added (After Investment Management Expenses) |
|---------------------------------|--|---|---|
| Pension Funds – Domestic Equity | 1.47% | 0.25% | 1.23% |
| Mutual Funds – Domestic Equity | 0.15% | 2.75% | -2.60% |
| Pension Funds – Bonds | 0.189% | 0.124% | 0.065% |
| Mutual Funds – Bonds | -0.044% | 1.69% | -1.74% |

The results in Table II illustrate that in the period 1997 to 2004 Canadian mutual funds earned gross returns close to their benchmarks. However, after investment management expenses, net value added was negative and roughly equal to the investment management expenses.

The investment management expenses reported by Ambachtsheer, Bauer and Kicken are of the same order of magnitude as those reported by Khorana et al. Since the Khorana et al data includes sales charges, their total expense ratios are slightly higher than those of Ambachtsheer, Bauer and Kicken.

⁷ “Losing Ground, Do Canadian mutual funds produce fair value for their customers?” Spring 2007 issue of the Canadian Investment Review. This article was based on data and analysis reported by Bauer, Frehen, Lum and Otten, 2007.

⁸ The Pension Fund Advantage: Are Canadians Overpaying their Mutual Funds?” Rotman International Journal of Pension Management, Volume 1, Issue 1, Fall 2008.

⁹ Does not include certain sales expenses which would further exacerbate the under-performance.

Standard & Poor's maintains quarterly data on Canadian actively managed mutual funds returns relative to the applicable index returns.¹⁰ The September 2, 2009 report reveals that for the 5 year period ending with Q2 2009:

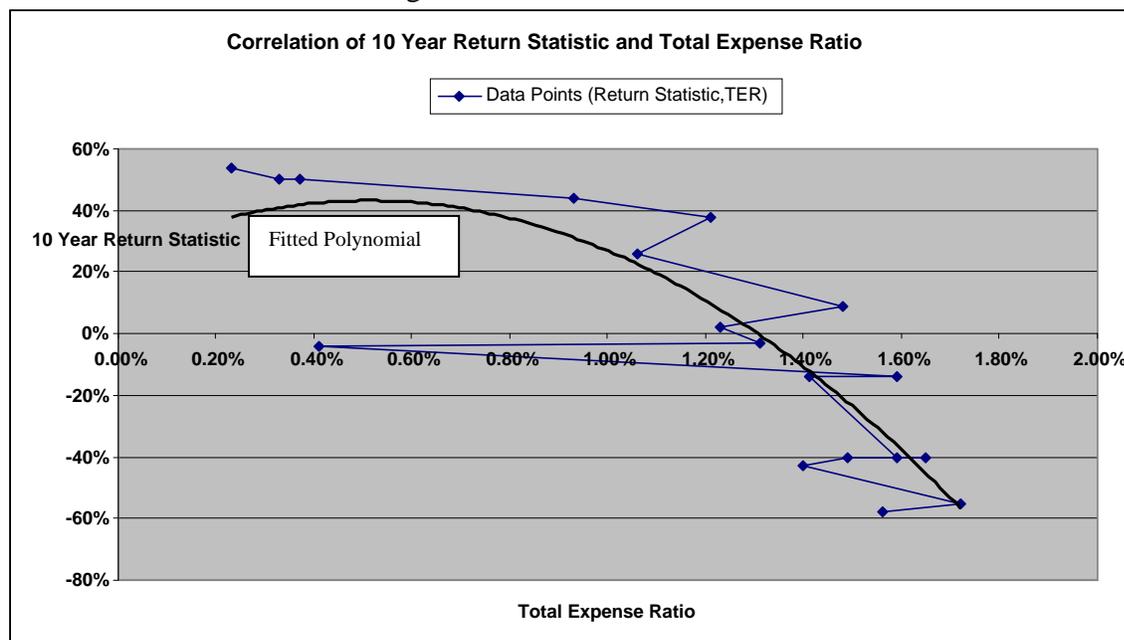
- only 7.62% of Canadian equity funds exceeded the return on the S&P/TSX Composite Index Total Return, and
- 10.56% of US equity mutual funds exceeded the return on the S&P 500 Total Return Index C\$.

The Standard & Poor's fund return data is net of expenses but does not include front or back-end loads or commissions that investors might pay. No expenses are deducted from the index returns. If these additional expenses were reflected, the proportion of fund managers beating their index returns would be even smaller.

Results of recent analysis (Fama and French, 2009) of US mutual fund returns in the period 1984 to 2006 suggest that few fund managers can produce returns which cover their investment management costs. The analysis revealed only weak evidence that any managers can produce gross returns that exceed their applicable benchmarks. Khorana et al. report that US mutual fund investment management costs are significantly less than those in Canada.

A paper published by the Swiss Finance Institute in April 2009 (Barras et al, 2009) reports that very few US based funds produce returns which cover their investment management costs.

John C. Bogle's paper, "Bringing Mutuality to Mutual Funds" (Bogle, 2008) reports on his analysis of 50 mutual fund complexes in the US covering about 80% of the mutual fund industry. The analysis covered the 10 year period ending December 31, 2007. The purpose of this analysis was not to assess net value added by US mutual funds, but rather to demonstrate the strong correlation between investment returns and managers whose management and governance model focused on low fees and tracking index returns.



¹⁰ www.spiva.standardandpoors.com.

The return statistic is an index developed by Morningstar to rank mutual fund complexes marketed by mutual fund providers. As such, the statistic is focused on relative good performance, offset by inferior performance in all of the fund offerings of the provider. It does not focus on nominal returns.

Bogle observes that there are two governance models in the US mutual fund industry, the true mutual fund model and large publicly owned firms. He argues that the true mutual fund model operates to maximize returns to investors in the mutual fund products. The publicly owned fund managers are conflicted because they must satisfy the fund holders return expectations but also maximize return to the shareholders of the firm. The results of the Bogle analysis support the hypothesis – the top three firms in the analysis (Vanguard, DFA and TIAA-CREF) are well known true mutual funds with no outside ownership, a focus on low fees and an investment philosophy directed at replicating index returns.

Bogle notes that “Funds with similar objectives, managed by competent and experienced professionals and measured over an extended period of time are likely to achieve similar returns, but only before the costs of investing are factored in.” Bogle’s work illustrates that in reasonably efficient markets, it is unlikely that any manager can consistently outperform the applicable indices. Hence, fund managers with a focus on minimizing fees and replicating the index returns will usually outperform the active manager, net of their much higher fees.

William F. Sharpe in his 1991 paper (Sharpe, 1991) notes that if

- any particular market is comprised of active and passive investors, and
- passive investors earn returns equal the applicable index return (before expenses),

then, on average, active investors must also earn returns equal to the applicable index return (before expenses).

This tautology does not preclude the likelihood that some managers in the active group will produce returns that exceed the benchmark, at least for some period of time. However, for every active manager that “beats” the index, another active manager must fall below the index. Investing at the aggregate market level is a “zero sum game, minus transaction costs”. The challenge for individual investors is to find the mutual fund managers who will:

1. consistently “beat” the index, and
2. produce excess returns that will more than offset the higher investment management expenses.

Unfortunately, it is unlikely that individual investors have the expertise to find such managers. Further, research reveals that when individual investors have access to a selection of investment funds, their choices on average are not optimal. A recent Pension Research Council Working Paper (Tang et al, August 2009) analyzed the individual investment returns over seven years of almost 1 million participants in over 1,000 401(k)¹¹ plans in the US. The researchers estimate that “retirement wealth over a 35-year worklife might be reduced by as much as one-fifth due to participant diversification errors.”

¹¹ US individual savings vehicle similar to the Registered Retirement Savings Plan in Canada.

Exchange Traded Funds

Exchange Traded Funds (“ETF”) are a low cost alternative to the traditional mutual fund product. An ETF is basket of stocks held in an investment fund and managed to replicate the return on one of various public indices. ETF’s are traded on the various public stock exchanges.

For example, Barclays Global Investors (an early leader in establishing ETF’s) operates the iShares Canadian Composite Index Fund which trades on the Toronto Stock Exchange (TSX) under ticker symbol XIC. This stock (which provides all of the diversification benefits of a mutual fund) tracks the composite return on all of the stocks traded on the TSX. The fund underlying the XIC security holds a position in every stock traded on the TSX. However, the focus is on matching the return on the TSX and no active management is performed. As a result, the cost of administering the XIC fund is minimal – the MER is only 0.25%.

A wide selection of ETF’s is now available. For example, (from Barclays Global Investors) in Table III below:

Table III

| ETF | Index Tracked | MER |
|------------|---------------------------------------|------------|
| XIC | TSX | 0.25% |
| XIU | TSX 60 Largest Stocks | 0.17% |
| XDV | TSX 30 Largest Dividend Paying Stocks | 0.50% |
| XBB | Canadian Universe Bonds | 0.30% |
| XRBB | Canadian Inflation Linked Bonds | 0.35% |
| XSP | US S&P 500 | 0.24% |
| IYY | Dow Jones US Market | 0.20% |
| EFA | MSCI EAFE ¹² | 0.34% |
| EEM | MSCI Emerging Markets | 0.72% |

Using ETF’s, an investor can assemble a simple portfolio of ETF’s and obtain essentially all of the diversification benefits of a traditional mutual fund but at a fraction of the cost.¹³ However, most investors require the services of an investment advisor to help them with their portfolio, and those advisors will have no incentive to steer clients towards these low-cost alternatives unless an advisory fee is charged.

¹² Stocks from Asia, Europe and the Far East.

¹³ Brokerage fees would have to be paid when the ETF’s are purchased.

APPENDIX I

Mutual Fund Companies Operating in Canada

Parent Company **Assets Under Administration**
\$Billions at May 31, 2008

Top 20 Companies

| | |
|-----------------------------------|---------|
| IGM Financial Inc | \$108.2 |
| Royal Bank of Canada | \$111.6 |
| CI Fund Management | \$ 51.9 |
| Toronto Dominion Bank | \$ 59.0 |
| AMVESCAP plc | \$ 40.6 |
| CIBC | \$ 51.9 |
| FMR Corp | \$ 42.4 |
| Bank of Montreal | \$ 38.8 |
| AGF Management Limited | \$ 27.9 |
| Franklin Resources Inc. | \$ 25.2 |
| Phillips Hager & North Ltd. | \$ 20.0 |
| Dundee Corporation | \$ 23.6 |
| Bank of Nova Scotia | \$ 22.6 |
| CMA Holdings Incorporated | \$ 15.9 |
| National Bank of Canada | \$ 13.2 |
| Federation des caisses Desjardins | \$ 12.6 |
| Manulife Financial Corporation | \$ 10.3 |
| AIC Limited | \$ 5.6 |
| Industrial Alliance and Insurance | \$ 8.1 |
| Brandes Investment Partners, L.P. | \$ 5.2 |

Others \$ 91.2

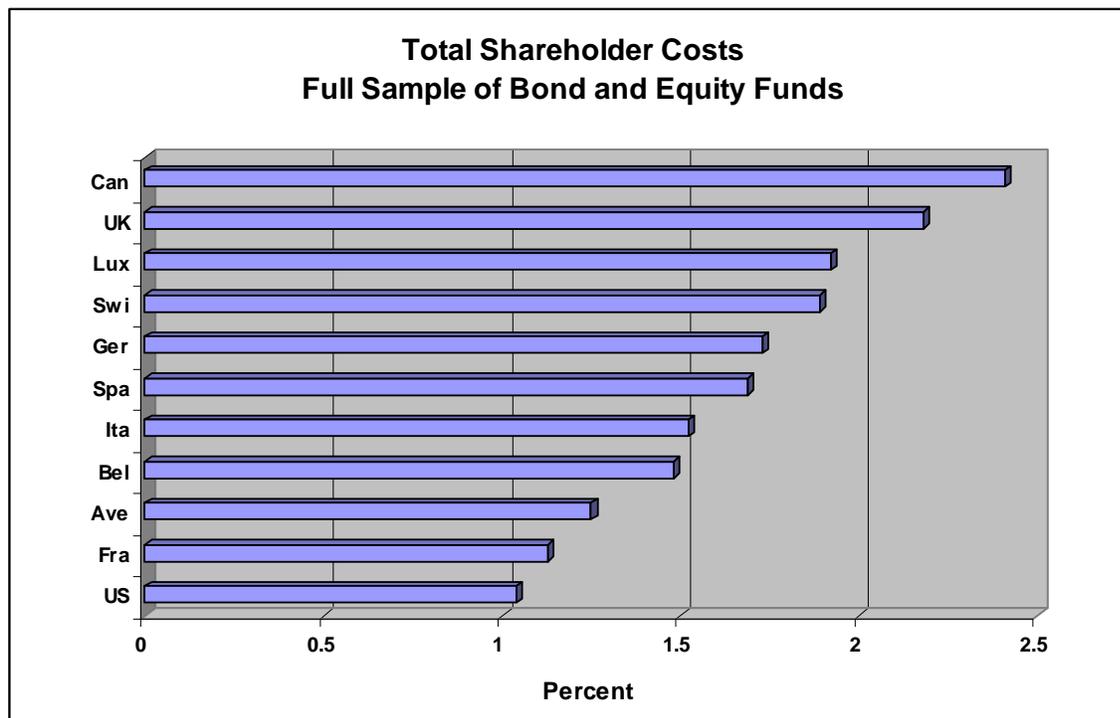
Total **\$762.9**

As reported by Wikipedia based on data from Investment Funds Institute of Canada

APPENDIX II

Total shareholder costs of full sample of bond and equity funds for 10 countries with largest number of surveyed funds

Khorana et al, 2007



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