August 28, 2006

Diane Lafleur
Director, Financial Sector Division
Department of Finance
L’Esplanade Laurier
20th Floor, East Tower
140 O’Connor Street
Ottawa, Ontario
K1A 0G5

Re: Solvency Funding Relief Regulations under the Pension Benefits Standards Act, 1985

Dear Ms. Lafleur:

The Pension Investment Association of Canada (PIAC) is the representative association for pension funds in Canada in pension investment and related matters. The Member funds of PIAC collectively manage over $790 billion in assets on behalf of millions Canadians. This letter is in response to the above referenced June 2006 consultation paper. We thank you for the opportunity to comment.

PIAC is supportive of the four measures outlined in the Solvency Funding Relief Regulations. We congratulate the Department on recognizing the need for action to address the challenges facing Defined Benefit Pension plans and your speedy response. We note that these measures are consistent with those advocated in PIAC’s letter of September 9, 2005 in response to the Department’s consultation on Strengthening the Legislative and Regulatory Framework for Defined Benefit Pension Plans Registered under the Pension Benefits Standards Act, 1985.

Respectfully submitted on behalf of the Members of the Pension Investment Association of Canada.

Pierre Drolet
Chair