

# Retroactive amendments public disclosure report (December 31, 2025)

## Registered

	Summary of issue	FSRA's rationale for decision
1.	An amendment to cease contributions for the defined contribution members in a combination defined benefit/defined contribution pension plan was filed 4 days after the effective date of the amendment. The affected members joined a successor pension plan immediately after the effective date of the amendment.	The affected plan members had already joined a successor pension plan immediately after the effective date of the amendment and were notified of the change before the effective date of the amendment. The plan administrator confirmed that the late filing was due to inadvertence and the length of time between the effective date of the amendment and its filing was not egregious or of material impact in the circumstances.
2.	An amendment to cease contributions for the unionized and non-unionized defined contribution members of a combination defined benefit/defined contribution pension plan and to close the plan to new members was filed one year and 3 months after the effective date of the amendment. The affected members joined a successor pension plan	The amendment was negotiated for the unionized members and employees, and all affected members and employees joined a successor pension plan immediately after the effective date of the amendment and were notified of the change before the effective date of the amendment. Retroactively requiring the affected members to accrue benefits in the original plan while

	<p>immediately after the effective date of the amendment.</p>	<p>accruing in the successor plan from the effective date of the amendment to the date of filing could result in significant tax consequences and additional costs for those members and employees. The plan administrator confirmed that the late filing was due to inadvertence. The plan administrator subsequently sent a revised adverse amendment notice to all affected members and employees informing them of their entitlement to continue accruals in the original plan under the terms of that plan before the filing of the amendment. The notice included the rationale for registering the amendment under FSRA's Pension Plan Amendment Guidance.</p>
3.	<p>An amendment to a single employer defined contribution pension plan to remove commissions from pensionable earnings for a class of employees and to change the eligibility requirements to join the plan from 1 year to 2 years was filed 4.5 months after the effective date of the amendment.</p>	<p>The plan administrator confirmed that no employees or plan members were affected by the amendment between the amendment's effective date and the filing date. As such, the late filing of the amendment had no impact on any individuals or plan members.</p>
4.	<p>A revised amendment to a single employer defined benefit pension plan to reflect the results of a grievance arbitration decision was filed 6 months after the effective date of the amendment. The arbitration decision created a situation where</p>	<p>The original and revised amendments were negotiated as part of collective bargaining for the affected members. The revised amendment was needed to reflect the grievance arbitration decision that occurred after the original amendment was filed.</p>

	members' contributions could have been higher between the effective date of the original amendment and the date of the arbitration decision.	
<b>5.</b>	An amendment to remove a participating employer in a combination defined benefit/defined contribution pension plan was filed 1 month after the effective date of the amendment. The affected members joined a group RRSP sponsored by the employer for future service immediately after the effective date of the amendment.	The affected plan members had already joined a group RRSP immediately after the effective date of the amendment and were notified of the change before the effective date of the amendment. The plan administrator confirmed that the late filing was due to inadvertence resulting from a corporate reorganization which created logistical challenges for filing the amendment in advance of its effective date. Implementing corrective measures could result in significant tax consequences and additional costs for the affected members. In the circumstances, the late filing of the amendment was not egregious or of material impact.
<b>6.</b>	An amendment to a combination defined benefit/defined contribution pension plan to correct an omission in a previously filed restated plan text (which omitted to change the plan's early retirement factor from ninety points to age 60 and 90 points) was filed 14 years after the effective date of the amendment.	The plan administrator confirmed that no members who retired between the effective date of the amendment and the filing date who had 90 points on retirement were under age 60. As such, the late filing of the amendment had no impact on any individuals or plan members. The plan administrator subsequently sent an adverse amendment notice to all current members of the plan informing them of the amendment and the late filing.

<p><b>7.</b></p>	<p>An amendment to close the defined contribution portion of a single employer combination defined benefit/defined contribution pension plan to new members was filed approximately 2 years after the effective date of the amendment. New employees hired from the amendment effective date onwards joined a group RRSP/DPSP offered by the employer.</p>	<p>The affected employees joined a group RRSP/DPSP from the effective date of the amendment and retroactively requiring the affected employees to accrue defined contribution benefits in the original plan from the effective date of the amendment to the date of filing, could result in significant tax consequences and additional costs for those employees. The plan administrator confirmed that the late filing was due to inadvertence. The plan administrator sent an adverse amendment notice to all affected employees informing them of their entitlement to join and accrue benefits in the original plan under the terms of that plan before the filing of the amendment. The notice included the rationale for registering the amendment under FSRA's Pension Plan Amendment Guidance.</p>
<p><b>8.</b></p>	<p>An amendment to cease contributions under a single employer defined contribution pension plan was filed 3 months after the effective date of the amendment. The affected members joined a successor pension plan immediately after the effective date of the amendment.</p>	<p>The affected plan members had already joined a successor pension plan immediately after the effective date of the amendment and were provided with notices that clearly communicated the cessation of benefit accruals in the original plan and the subsequent participation in and merger with the successor plan. The plan administrator confirmed that the late filing was due to inadvertence resulting from a corporate reorganization which created logistical challenges for filing the</p>

		<p>amendment in advance of its effective date. The affected members' contribution levels and benefits remained unchanged in the successor plan with no break in service and the amendment's filing was not egregious or of material impact in the circumstances.</p>
<b>9.</b>	<p>An amendment to close a single employer defined contribution pension plan to new members was filed approximately 4.5 months after the effective date of the amendment.</p>	<p>The plan administrator confirmed that no employees would have been eligible to join the plan between the amendment's effective date and the filing date. As such, the late filing of the amendment had no impact on any individuals or plan members.</p>
<b>10.</b>	<p>Two amendments to cease contributions for members of two unions in a single employer defined contribution plan were filed 10 months and 1 year and 10 months after their effective dates, respectively.</p>	<p>The amendments were negotiated as part of collective bargaining for the affected members and supported the terms of the collective agreements.</p>
<b>11.</b>	<p>An amendment to cease contributions for the unionized and non-unionized members of a single employer defined contribution pension plan, and to close the plan to new members, was filed 1 year and 3 months after the effective date of the amendment. The affected members and employees joined a successor pension plan immediately after the effective date of the amendment.</p>	<p>The amendment was negotiated for the unionized members and employees, and all affected members and employees joined a successor pension plan immediately after the effective date of the amendment and were notified of the change before the effective date of the amendment. Retroactively requiring the affected members and employees to accrue benefits in the original plan from the effective date of the amendment to</p>

		<p>the date of filing could result in significant tax consequences and additional costs for those members and employees. The plan administrator confirmed that the late filing was due to inadvertence. The plan administrator sent a revised adverse amendment notice to all affected members and employees informing them of their entitlement to continue accruals in the original plan under the terms of that plan before the filing of the amendment. The notice included the rationale for registering the amendment under FSRA's Pension Plan Amendment Guidance.</p>
<b>12.</b>	<p>An amendment to remove two participating employers in a multi-employer defined contribution pension plan and to terminate the membership of the affected members was filed 2.5 months after the effective date of the amendment.</p>	<p>The two participating employers ceased operating as of the effective date of the amendment and the plan administrator could not collect the additional 2.5 months of contributions from the two employers. The plan administrator did not have advanced notice of the participating employers' cessations of operations and could not prepare and file the amendment before its effective date.</p>
<b>13.</b>	<p>An amendment to cease contributions for the defined contribution members in a single employer combination defined benefit/defined combination pension plan was filed 3 days after the effective date</p>	<p>The affected plan members had already joined a successor pension plan immediately after the effective date of the amendment and were notified of the change before the effective date of the amendment. The plan</p>

	<p>of the amendment. The affected members joined a successor pension plan immediately after the effective date of the amendment.</p>	<p>administrator confirmed that the late filing was due to inadvertence resulting from a corporate reorganization which created logistical challenges for filing the amendment in advance of its effective date. The affected members' contribution levels and benefits remained unchanged in the successor plan with no break in service. The length of time between the effective date of the amendment and its filing was not egregious or of material impact in the circumstances.</p>
<p><b>14.</b></p>	<p>A single employer defined benefit pension plan had been previously amended to change the normal retirement age from 60 to 65, as well as to require the plan administrator's consent to receive an unreduced early retirement pension at age 60. A restated plan text filed after those previous amendments, mistakenly omitted those previous amendments. A new amendment was then filed to restore the previous amendments that had been omitted from the restated plan text, almost 3 years after the effective date of the new amendment.</p>	<p>The plan administrator confirmed that it had consented to unreduced early retirement pensions at age 60 for all eligible plan members since the effective date of the new amendment. The administrator also confirmed that for all members who terminated employment between the effective date of the new amendment and its filing date, all commuted value payments had been calculated at the higher value (i.e., on the basis that the plan's normal retirement age was 60 and not 65). As such, the late filing of the amendment had no impact on any plan members, and the plan administrator sent notices to the affected members informing them of the issue and explaining that no members were negatively affected by the amendment.</p>

<p><b>15.</b></p>	<p>An amendment to close a single employer defined contribution pension plan to new members was filed 55 days after the effective date of the amendment.</p>	<p>The plan administrator confirmed that no employees were hired between the effective date of the amendment and its filing date, and that no employee who met the eligibility requirements to join the plan during this period was denied membership in the plan. As such, the late filing of the amendment had no impact on any individuals or plan members.</p>
<p><b>16.</b></p>	<p>An amendment to a multi-employer defined contribution pension plan to cease contributions for the members of a participating employer was filed 2 weeks after the effective date of the amendment.</p>	<p>The amendment was negotiated as part of collective bargaining for the affected members and supported the terms of the collective agreement.</p>
<p><b>17.</b></p>	<p>An amendment to remove a participating employer in a multi-employer defined contribution pension plan and to terminate the membership of the affected members was filed 3.5 months after the effective date of the amendment.</p>	<p>The participating employer ceased operating as of the effective date of the amendment and the plan administrator could not collect the additional 3.5 months of contributions from the employer. The plan administrator did not have advanced notice of the participating employer's cessation of operations and could not prepare and file the amendment before its effective date.</p>
<p><b>18.</b></p>	<p>FSRA's review of the wind up of a defined benefit pension plan revealed that 20 years previously, the plan had been amended to cease contributions and accruals for active members, but the amendment</p>	<p>The affected members joined a successor pension plan immediately after the effective date of the amendment and were notified of the change before the effective date of the amendment. Retroactively requiring the affected</p>

	<p>was filed 2 years and 10 months after its effective date. The affected members joined a successor pension plan immediately after the effective date of the amendment.</p>	<p>members to accrue benefits in the original plan from the effective date of the amendment to the date of filing could result in significant tax consequences and additional costs for those members.</p>
<p><b>19.</b></p>	<p>An amendment to close a single employer defined contribution pension plan to new members was filed 6 months after the effective date of the amendment. New employees hired from the amendment effective date onwards joined a group RRSP/DPSP offered by the employer.</p>	<p>The affected employees joined a group RRSP/DPSP from the effective date of the amendment, and retroactively requiring the affected employees to accrue defined contribution benefits in the original plan from the effective date of the amendment to the date of filing could result in significant tax consequences and additional costs for those employees. The plan administrator confirmed that the late filing was due to inadvertence, and providing both defined contribution and group RRSP/DPSP benefits to the affected employees could be perceived as inequitable in relation to other employees who accrued only defined contribution benefits. The plan administrator sent an adverse amendment notice to all affected employees informing them of their entitlement to join and accrue benefits in the original plan under the terms of that plan before the filing of the amendment. The notice included</p>

		the rationale for registering the amendment under FSRA's Pension Plan Amendment Guidance.
<b>20.</b>	An amendment to cease contributions for unionized members of a single employer defined contribution pension plan was filed 1 year after the effective date of the amendment.	The amendment was negotiated as part of collective bargaining for the affected members and supported the terms of the collective agreement. The amendment also reflected an arbitration decision related to the affected members.
<b>21.</b>	An amendment to cease contributions for non-union members of a single employer defined contribution pension plan was filed 12 days after the effective date of the amendment. The affected members joined a successor pension plan immediately after the effective date of the amendment.	The affected members joined a successor pension plan immediately after the effective date of the amendment and the employer contribution obligation under the successor plan was higher than in the original plan. The plan administrator confirmed that the late filing was due to inadvertence, and the length of time between the effective date of the amendment and its filing was not egregious or of material impact in the circumstances.
<b>22.</b>	An amendment to close a single employer defined contribution pension plan to new members was filed 1 month after the effective date of the amendment.	The plan administrator confirmed that no employees were hired between the effective date of the amendment and its filing date and the late filing of the amendment had no impact on the benefits or plan eligibility for any plan members. As such, the late filing of the amendment had no impact on any individuals or plan members.
<b>23.</b>	An amendment to remove a participating employer in a single employer defined benefit pension plan and	The affected plan members were notified of the change before the effective date of the amendment. The plan

	to terminate the membership of the affected members was filed 3 days after the effective date of the amendment.	administrator confirmed that the late filing was due to inadvertence resulting from a corporate reorganization which created logistical challenges for filing the amendment in advance of its effective date. The length of time between the effective date of the amendment and its filing was not egregious or of material impact in the circumstances.
<b>24.</b>	An amendment to change the plan membership eligibility requirements in a single employer defined contribution pension plan from 12 months of employment to 24 months was filed almost 3 months after the effective date of the amendment.	The plan administrator confirmed that no employees or plan members were affected by the amendment between the amendment's effective date and the filing date. As such, the late filing of the amendment had no impact on any individuals or plan members.
<b>25.</b>	An amendment to cease contributions under a single employer defined contribution pension plan was filed 2 years and 2 months after the effective date of the amendment. The affected members joined a successor pension plan immediately after the effective date of the amendment.	The affected plan members had already joined a successor pension plan immediately after the effective date of the amendment and were provided with notices that clearly communicated the cessation of benefit accruals under the original plan and their subsequent participation in and merger with the successor plan. The plan administrator confirmed the late filing was due to inadvertence and the affected members' contribution levels and benefits remained unchanged or were improved in the successor plan with no break in service. Retroactively requiring the affected members to accrue

		<p>benefits in the original plan from the effective date of the amendment to the date of filing could result in significant tax consequences and additional costs for those members.</p>
<p><b>26.</b></p>	<p>An amendment to cease contributions under a single employer defined contribution pension plan was filed 6 months after the effective date of the amendment. The affected members joined a successor pension plan immediately after the effective date of the amendment.</p>	<p>The affected plan members had already joined a successor pension plan immediately after the effective date of the amendment and were provided with notices that clearly communicated the cessation of benefit accruals in the original plan and their subsequent participation in and merger with the successor plan. The plan administrator confirmed that the late filing was due inadvertence resulting from a corporate reorganization which created logistical challenges for filing the amendment in advance of its effective date. The affected members' contribution levels and benefits remained unchanged in the successor plan with no break in service. Retroactively requiring the affected members to accrue benefits in the original plan from the effective date of the amendment to the date of filing could result in significant tax consequences and additional costs for those members.</p>

<b>27.</b>	An amendment to close a single employer defined contribution pension plan to new members was filed 4.5 months after the effective date of the amendment.	The plan administrator confirmed that no employees were hired between the effective date of the amendment and its filing date, and that no employee who met the eligibility requirements to join the plan during this period was denied membership in the plan. As such, the late filing of the amendment had no impact on any individuals or plan members.
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