



May 7, 2024

Andrew Fung

A/Executive Vice President, Pensions
Financial Services Regulatory Authority of Ontario
25 Sheppard Avenue West, Suite 100
Toronto, ON M2N 6S6

Re: Proposed Guidance on Pension Plan Amendments (Identifier No. PE0301INT)

Dear Mr. Fung:

I write on behalf of United Steelworkers Local 2251 ("Local 2251"), which represents approximately 2,321 hourly employees of Algoma Steel ("Algoma") in Sault Ste. Marie, Ontario. A key component of our members' compensation includes participation in an employer-sponsored defined-benefit pension plan regulated by FSRA. We also have approximately 7,000 retirees.

Local 2251 strongly supports the Ontario Federation of Labour's ("OFL") April 26, 2024 submission in respect of the above-noted guidance. The steel industry has faced economic difficulties over the years. Algoma only emerged from bankruptcy protection in 2018, after a protracted CCAA proceeding. During that time, the future of our members' pensions was one of their biggest worries. In light of that experience, transparency and security of pension benefits is a top priority for Local 2251 and its members. For this reason, FSRA must ensure that its guidance strongly incentivizes pension administrators to comply with the *Pension Benefits Act's* ("PBA") requirements, including administering plans in accordance with documents on file with FSRA and timely filing amendments. Retroactive amendments beyond the date of filing do not serve the PBA's objectives or members' interests. They have a right to know the terms of their pension plans at all times.

Local 2251 disagrees with the more permissive approach to retroactive amendments being urged on FSRA by employers and their representatives. Instead, FSRA should clarify the proposed guidance as the OFL suggests and adopt an approach to retroactive amendments that subjects them to close scrutiny in order to protect beneficiaries' interests.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Mike Da Prat".

Mike Da Prat

President, USW Local 2251

cc:

David Bartucci, Head, Stakeholder Relations and Special Projects, Pensions

Marit Stiles, Leader of the Official Opposition

Teresa J. Armstrong, Critic, Pensions