

June 1, 2020

RE: New extending filing deadlines for Annual Information Returns

An Annual Information Return (AIR) is required to be filed with the Superintendent of Pensions within six (6) months following the end of the pension plan's fiscal year along with the required fee. A memo was previously issued by the Superintendent, on April 6, 2020, outlining steps for requesting an extended AIR filing deadline. Given all non-essential businesses have yet to re-open, or are in the process of re-opening, the filing deadlines may continue to be challenging for administrators in the coming weeks.

The Superintendent is satisfied that reasonable grounds exist, as per section 6 of the *Pension Benefits Act, 1997*, to extend filing deadlines and has approved following extensions:

- AIRs with a due date of March 31, 2020 (September 30, 2019 fiscal year end) may be filed no later than September 30, 2020 (i.e., 6-month extension);
- AIRs with a due date of April 30, 2020 (October 31, 2019 fiscal year end) may be filed no later than September 30, 2020 (i.e., 5-month extension);
- AIRs with a due date of May 31, 2020 (November 30, 2019 fiscal year end) may be filed no later than September 30, 2020 (i.e., 4-month extension);
- AIRs with a due date of June 30, 2020 (December 31, 2019 fiscal year end) may be filed no later than September 30, 2020 (i.e., 3-month extension);
- AIRs with a due date of July 31, 2020 (January 31, 2020 fiscal year end) may be filed no later than September 30, 2020 (i.e., 2-month extension); and
- AIRs with a due date of August 31, 2020 (February 29, 2020 fiscal year end) may be filed no later than September 30, 2020 (i.e., 1-month extension).

A written request is not required to avail of the extensions outlined above. However, please be advised that the legislation only permits deadlines to be extended by up to six (6) months so no further extension can be approved in respect of March 31, 2020 filing requirements. Also, please note that these extensions do not apply to an AIR required on plan termination, which must be filed within three (3) months of the wind-up date.

Completed AIRs can be submitted by email, to the email address below, in order to meet filing deadlines but copies must also be sent by mail along with the required fee. Please refer to the AIR for the mailing address and for determining the appropriate fee. A copy of Form 2 – Annual Information Return can be found on the website for the Pension Benefit Standards Division: <https://www.gov.nl.ca/snl/forms/#pen>.

Please contact the Superintendent of Pensions, Michael Delaney, at MichaelPDelaney@gov.nl.ca if you have any questions.