

Many Nations Financial Services Ltd.

July 26, 2018

Department of Finance Canada
James Michael Flaherty Building
90 Elgin Street
Ottawa ON K1A 0G5

Re: Proposals for an Unclaimed Pension Balances Framework

We wish to thank the Department of Finance for the opportunity to submit our comments on the proposed Modernization of the Unclaimed Balances Regime and Proposals for an Unclaimed Pension Balances Framework.

We are in agreement with utilizing the Bank of Canada's infrastructure and experience to handle unclaimed pension balances. However, we are disappointed to learn that the proposal is to apply only to terminated plans. Although terminated plans may present the most immediate need, we don't believe they represent the largest need.

As the Plan Manager for a defined contribution multi-employer pension plan designed specifically for First Nations and First Nation organizations, we are continually plagued by our inability to contact pension plan members. The usual search methods often do not apply to our members, in particular those reaching the age of 71. Many live in remote areas with limited access to internet and social media and have never had credit. Their choice to live a more traditional lifestyle makes the normal search services ineffective.

We appreciate consideration may be given to include ongoing plans at a future date. Until such time as ongoing plans are included, we plead that the option of utilizing Service Canada be reinstated.

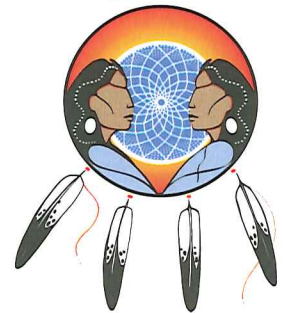
Our goal is that members receive the benefits they are entitled to and proposed changes, particularly if they include ongoing plans in the future, will contribute to achieving this goal.

Sincerely,



Corriene Logan
Vice President Finance

Many Nations



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