

**25 October 2022**

## **DBP Contributors Scheme - Reporting by Employers**

The **two letters** are attached which are relevant to any employers contributing to and required to comply with international financial reporting standards in respect of the DBP Contributors Scheme.

**Letter A** applies to public benefit entities which adopt Public Benefit Entity International Public Sector Accounting Standard 39 Employee Benefits (**PBE IPSAS 39**).

**Letter B** applies to for-profit entities which adopt the current New Zealand Equivalent to International Accounting Standard 19 Employee Benefits (**NZ IAS 19**).

**Please ensure you use the correct disclosure.**

## LETTER A – PBE IPSAS 39

25 October 2022

### **DBP Contributors Scheme – Reporting by Employers**

The attached information is relevant to any employer contributing to and required to comply with international financial reporting standards in respect of the DBP Contributors Scheme.

If you would like to receive an email advising you of new updates, please email [enquiries@npf.co.nz](mailto:enquiries@npf.co.nz) with the words “IFRS Updates Request” in the subject line.

**The following disclosure applies to public benefit entities which adopt Public Benefit Entity International Public Sector Accounting Standard 39 Employee Benefits (PBE IPSAS 39). Specifically, the standard issued May 2017 incorporating amendments to 31 January 2022 and effective for reporting periods beginning on or after 1 January 2021.**

Separate disclosures, which are provided on our website, apply to for-profit entities.

**Please ensure that you use the correct disclosure.**

## LETTER A – PBE IPSAS 39 - continued

### DBP Contributors Scheme – Reporting by Employers

#### PBE IPSAS 39

The objectives of Public Benefit Entity International Public Sector Accounting Standard 39 Employee Benefits (**PBE IPSAS 39**) are to prescribe the accounting and disclosure for employee benefits by employers. It requires an employer to recognise:

- a liability, when an employee has provided service in exchange for employee benefits to be paid in the future; and
- an expense, when the employer consumes the economic benefit arising from service provided by an employee in exchange for employee benefits.

NPF has sought advice from the Actuary to the DBP Contributors Scheme, Christine D A Ormrod of PricewaterhouseCoopers, as to her understanding of the requirements of PBE IPSAS 39, as they relate to the DBP Contributors Scheme. This advice is based on PBE IPSAS 39 issued in May 2017 and incorporating amendments to 31 January 2022. Based on her advice, NPF now confirm as follows:

- Under the standard, the DBPC Scheme is categorised as a “defined benefit plan” and as a “multi-employer plan”. Various sections of PBE IPSAS 39, which relate to multi-employer plans, are reproduced in [Appendix 1](#).
- Multi-employer defined benefit schemes (such as the DBPC Scheme) must be reported on as defined benefit schemes unless “sufficient information is not available”. The possible reasons for this are set out in paragraph 36 of PBE IPSAS 39, as either:
  - (a) the scheme exposes the participating entities to actuarial risks associated with the current and former employees of other participating employers, with the result that there is no consistent and reliable basis for allocating the obligation, scheme assets and cost to individual entities participating in the plan; or
  - (b) the entity does not have access to the necessary information.

In the Actuary’s view, (a) applies to the DBP Contributors Scheme.

This means defined contribution style reporting should be used, and employers must disclose the information required under paragraph 34 of PBE IPSAS 39.

Sample wording for these two disclosures is shown in [Appendix 2](#).

## APPENDIX 1 – Sections of PBE IPSAS 39 relating to Multi-employer Plans

### PBE IPSAS 39

32. An entity shall classify a multi-employer plan as a defined contribution plan or a defined benefit plan under the terms of the plan (including any constructive obligation that goes beyond the formal terms).
33. If an entity participates in a multi-employer defined benefit plan, unless paragraph 34 applies, it shall:
- (a) Account for its proportionate share of the defined benefit obligation, plan assets, and cost associated with the plan in the same way as for any other defined benefit plan; and
  - (b) Disclose the information required by paragraph 137–150 (excluding paragraph 150(d)).
34. When sufficient information is not available to use defined benefit accounting for a multi-employer plan that is a defined benefit plan, an entity shall:
- (a) Account for the plan under paragraphs 53 and 54 as if it were a defined contribution plan; and
  - (b) Disclose the information required by paragraph 150.
36. Where sufficient information is available about a multi-employer defined benefit plan, an entity accounts for its proportionate share of the defined benefit obligation, plan assets, and post-employment benefit cost associated with the plan in the same way as for any other defined benefit plan. However, an entity may not be able to identify its share of the underlying financial position and performance of the plan with sufficient reliability for accounting purposes. This may occur if:
- (a) The plan exposes the participating entities to actuarial risks associated with the current and former employees of other entities, with the result that there is no consistent and reliable basis for allocating the obligation, plan assets, and cost to individual entities participating in the plan; or
  - (b) The entity does not have access to sufficient information about the plan that satisfies the requirements of this Standard.
- In those cases, an entity accounts for the plan as if it were a defined contribution plan, and discloses the additional information required by paragraph 150.
37. There may be a contractual agreement between the multi-employer plan and its participants that determines how the surplus in the plan will be distributed to the participants (or the deficit funded). A participant in a multi-employer plan with such an agreement that accounts for the plan as a defined contribution plan in accordance with paragraph 34 shall recognise the asset or liability that arises from the contractual agreement, and the resulting revenue or expense in surplus or deficit.
150. If an entity participates in a multi-employer defined benefit plan, it shall disclose:
- (a) A description of the funding arrangements, including the method used to determine the entity's rate of contributions and any minimum funding requirements.
  - (b) A description of the extent to which the entity can be liable to the plan for other entities' obligations under the terms and conditions of the multi-employer plan.
  - (c) A description of any agreed allocation of a deficit or surplus on:
    - (i) Wind-up of the plan; or

- (ii) The entity's withdrawal from the plan.
- (d) If the entity accounts for that plan as if it were a defined contribution plan in accordance with paragraph 34, it shall disclose the following, in addition to the information required by (a)-(c) and instead of the information required by paragraphs 141-149:
  - (i) The fact that the plan is a defined benefit plan.
  - (ii) The reason why sufficient information is not available to enable the entity to account for the plan as a defined benefit plan.
  - (iii) The expected contributions to the plan for the next annual reporting period.
  - (iv) Information about any deficit or surplus in the plan that may affect the amount of future contributions, including the basis used to determine that deficit or surplus and the implications, if any, for the entity.
  - (v) An indication of the level of participation of the entity in the plan compared with other participating entities. Examples of measures that might provide such an indication include the entity's proportion of the total contributions to the plan or the entity's proportion of the total number of active members, retired members, and former members entitled to benefits, if that information is available.

RDR 150.1 A Tier 2 entity is not required to disclose the basis used to determine the deficit or surplus in the plan that may affect the amount of future contributions and the implications, if any, for the entity as required by paragraph 150(d)(iv).

## Appendix 2 – Disclosures

### Paragraph 53

- (a) Liability/Asset – Overdue/prepaid contributions at balance date.
- (b) Expense – contributions due in respect of the financial year.

### Paragraph 150

- (a) The funding arrangements are governed by the requirement of Section 44 of the National Provident Fund Restructuring Act 1990, which requires that any increase or decrease to the employer contribution rate should:

*“...result in contributions being at a level which, on reasonable assumptions, is likely to achieve neither a surplus or a deficit in the trust fund of the DBP contributors’ scheme... at the time that the last contributor to that scheme ceases to so contribute.”*

and by the Trust Deed, which requires the employers to contribute such amount as the Board of Trustees of the National Provident Fund, after consultation with the Actuary, may direct.

In practice, at present, a single contribution rate is determined for all employers which is expressed as a multiple of the contributions of members of the Scheme who are employees of that employer.

There is no minimum funding requirement.

- (b) The employer contribution rate is determined by the Board of Trustees of the National Provident Fund (the **Board**) following consultation with the Actuary. Current practice is for the employer to contribute a multiple of its members’ contributions.
- (c)
  - (i) The Trust Deed specifies that immediately before the DBP Contributors Scheme (the **DBPC Scheme**) is wound up, the assets and the interests of all contributors in the DBPC Scheme will be transferred to the DBP Annuitants Scheme (**DBPA Scheme**).
  - (ii) Employers have no right to withdraw from the plan.
- (d)
  - (i) The Scheme is a multi-employer defined benefit scheme.
  - (ii) Insufficient information is available to use defined benefit accounting, as it is not possible to determine, from the terms of the Scheme, the extent to which the deficit will affect future contributions by employers, as there is no prescribed basis for allocation.
  - (iii) The current employer contribution rate is four times contributor contributions, inclusive of Employer Contribution Withholding Tax. The Actuary has recommended the employer contribution rate of four times contributor contributions continues.
  - (iv) As at 31 March 2022, the DBPC Scheme had a past service deficit of \$0.6 million (1.7% of the past service liabilities). This amount is exclusive of Employer Superannuation Contribution Tax. This deficit was calculated using a discount rate equal to the expected return on the assets but otherwise the assumptions and methodology were consistent with the requirements of PBE IPSAS 39.

The key assumptions in the review were:

- the difference between the future investment returns and the rates of CPI inflation assumed when calculating future factors for transfers from the DBPC Scheme to the DBPA Scheme;

- the future investment returns assumed for the DBPC Scheme over the next ten years.

The following table shows the DBPC Scheme investment return over the next ten years, and the difference between investment return and CPI inflation assumed when calculating future factors for transfers from the DBPC Scheme to the DBPA Scheme.

Valuation date	31 March 2022	31 March 2021
	%	%
DBPC Scheme future investment return, next 10 years	3.1	2.3
Transfer factors: Difference between investment return and CPI inflation		
First year	(2.1)	0.2
Second year	0.2	0.2
Third year	0.6	0.2
4th-10th years	1.0	0.2
Thereafter	1.0	1.1

- (v) The DBPC Scheme had 64 members at 31 March 2022. XXX of these are employees of XYZ.

## LETTER B

25 October 2022

### **DBP Contributors Scheme – Reporting by Employers**

The attached information is relevant to any employers contributing to and required to comply with international financial reporting standards in respect of the DBP Contributors Scheme.

If you would like to receive an email advising you of new updates please email [enquiries@npf.co.nz](mailto:enquiries@npf.co.nz) with the words “IFRS Updates Request” in the subject line.

**The following disclosure applies to for-profit entities which adopt New Zealand Equivalent to International Accounting Standard 19 Employee Benefits (NZ IAS 19). Specifically, the standard issued November 2012, incorporating amendments to 31 January 2021 and effective for reporting periods beginning 1 January 2019. The disclosures are also applicable for reporting periods beginning on or after 1 January 2023.**

Separate disclosures, which are provided on our website, apply to public benefit entities.

**Please ensure that you use the correct disclosure.**



## LETTER B

### DBP Contributors Scheme – Reporting by Employers

#### NZ IAS 19

The objectives of New Zealand Equivalent to International Accounting Standard 19 (**NZ IAS 19**) are to prescribe the accounting and disclosure for employee benefits by employers. It requires an employer to recognise:

- a liability, when an employee has provided service in exchange for employee benefits to be paid in the future; and
- an expense, when the employer consumes the economic benefit arising from service provided by an employee in exchange for employee benefits.

NPF has sought advice from the Actuary to the DBP Contributors Scheme, Christine D A Ormrod of PricewaterhouseCoopers, as to her understanding of the requirements of NZ IAS 19, as they relate to the DBP Contributors Scheme. This advice is based on NZ IAS 19 issued November 2012, incorporating amendments to 31 January 2021 and effective for reporting periods beginning 1 January 2019. The disclosures are also applicable for reporting periods beginning on or after 1 January 2023. Based on her advice, NPF now confirm as follows.

- Under the standard, the DBP Contributors Scheme is categorised as a “defined benefit plan” and as a “multi-employer plan”. Various sections of NZ IAS 19, which relate to multi-employer plans, are reproduced in [Appendix 1](#).
- Multi-employer defined benefit schemes (such as the DBP Contributors Scheme) must be reported on as defined benefit schemes unless “sufficient information is not available”. The possible reasons for this are set out in paragraph 36 of NZ IAS 19, as either:
  - (a) the scheme exposes the participating employers to actuarial risks associated with the current and former employers of other participating employers, with the result that there is no consistent and reliable basis for allocating the obligation, scheme assets and cost to individual participating employers; or
  - (b) the participating employer does not have access to sufficient information.

In the Actuary’s view, (a) applies to the DBP Contributors Scheme.

This means defined contribution style reporting should be used, and employers must disclose the information required under paragraph 148 of NZ IAS 19.

Sample wording for this disclosure is shown in [Appendix 2](#).

## APPENDIX 1 – Sections of NZ IAS 19 relating to Multi-employer Plans

### NZ IAS 19

32. An entity shall classify a multi-employer plan as a defined contribution plan or a defined benefit plan under the terms of the plan (including any constructive obligation that goes beyond the formal terms).
33. If an entity participates in a multi-employer defined benefit plan, unless paragraph 34 applies, it shall:
  - (a) account for its proportionate share of the defined benefit obligation, plan assets and cost associated with the plan in the same way as for any other defined benefit plan; and
  - (b) disclose the information required by paragraphs 135-148 (excluding paragraph 148(d)).
34. When sufficient information is not available to use defined benefit accounting for a multi-employer defined benefit plan, an entity shall:
  - (a) account for the plan in accordance with paragraphs 51 and 52 as if it were a defined contribution plan; and
  - (b) disclose the information required by paragraph 148.
36. Where sufficient information is available about a multi-employer defined benefit plan, an entity accounts for its proportionate share of the defined benefit obligation, plan assets and post-employment cost associated with the plan in the same way as for any other defined benefit plan. However, an entity may not be able to identify its share of the underlying financial position and performance of the plan with sufficient reliability for accounting purposes. This may occur if:
  - (a) the plan exposes the participating entities to actuarial risks associated with the current and former employees of other entities, with the result that there is no consistent and reliable basis for allocating the obligation, plan assets and cost to individual entities participating in the plan; or
  - (b) the entity does not have access to sufficient information about the plan to satisfy the requirements of this Standard.
  - (c) In those cases, an entity accounts for the plan as if it were a defined contribution plan and discloses the information required by paragraph 148.
37. There may be a contractual agreement between the multi-employer plan and its participants that determines how the surplus in the plan will be distributed to the participants (or the deficit funded). A participant in a multi-employer plan with such an agreement that accounts for the plan as a defined contribution plan in accordance with paragraph 34 shall recognise the asset or liability that arises from the contractual agreement and the resulting income or expense in profit or loss.
148. If an entity participates in a multi-employer defined benefit plan, it shall disclose:
  - (a) a description of the funding arrangements, including the method used to determine the entity's rate of contributions and any minimum funding requirements.
  - (b) a description of the extent to which the entity can be liable to the plan for other entities' obligations under the terms and conditions of the multi-employer plan.
  - (c) a description of any agreed allocation of a deficit or surplus on:
    - (iii) wind-up of the plan; or

- (iv) the entity's withdrawal from the plan.
- (d) if the entity accounts for that plan as if it were a defined contribution plan in accordance with paragraph 34, it shall disclose the following, in addition to the information required by (a)-(c) and instead of the information required by paragraphs 139-147:
  - (i) the fact that the plan is a defined benefit plan.
  - (ii) the reason why sufficient information is not available to enable the entity to account for the plan as a defined benefit plan.
  - (iii) the expected contributions to the plan for the next annual reporting period.
  - (iv) information about any deficit or surplus in the plan that may affect the amount of future contributions, including the basis used to determine that deficit or surplus and the implications, if any, for the entity.
  - (v) an indication of the level of participation of the entity in the plan compared with other participating entities. Examples of measures that might provide such an indication include the entity's proportion of the total contributions to the plan or the entity's proportion of the total number of active members, retired members, and former members entitled to benefits, if that information is available.

RDR 148.1 A Tier 2 entity is not required to disclose the basis used to determine the deficit or surplus in the plan that may affect the amount of future contributions and the implications, if any, for the entity as required by paragraph 148(d)(iv).

## Appendix 2 – Disclosures

### Paragraph 51

- (e) Liability/Asset – Overdue/prepaid contributions at balance date.
- (f) Expense – contributions due in respect of the financial year.

### Paragraph 148

- (g) The funding arrangements are governed by the requirement of Section 44 of the National Provident Fund Restructuring Act 1990, which requires that any increase or decrease to the employer contribution rate should:

*“...result in contributions being at a level which, on reasonable assumptions, is likely to achieve neither a surplus or a deficit in the trust fund of the DBP contributors’ scheme... at the time that the last contributor to that scheme ceases to so contribute.”*

and by the Trust Deed, which requires the employers to contribute such amount as the Board of Trustees of the National Provident Fund, after consultation with the Actuary, may direct.

In practice, at present, a single contribution rate is determined for all employers which is expressed as a multiple of the contributions of members of the Scheme who are employees of that employer.

There is no minimum funding requirement.

- (h) The employer contribution rate is determined by the Board of Trustees of the National Provident Fund (the Board) following consultation with the Actuary. Current practice is for the employer to contribute a multiple of its members’ contributions.
- (c)
  - (i) The Trust Deed specifies that immediately before the DBP Contributors Scheme (the **DBPC Scheme**) is wound up, the assets and the interests of all contributors in the DBPC Scheme will be transferred to the DBP Annuitants Scheme (**DBPA Scheme**).
  - (ii) Employers have no right to withdraw from the plan.
- (d)
  - (i) The Scheme is a multi-employer defined benefit scheme.
  - (ii) Insufficient information is available to use defined benefit accounting, as it is not possible to determine, from the terms of the Scheme, the extent to which the deficit will affect future contributions by employers, as there is no prescribed basis for allocation.
  - (iii) The current employer contribution rate is four times contributor contributions, inclusive of Employer Contribution Withholding Tax. The Actuary has recommended the employer contribution rate of four times contributor contributions continues.
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### Contributors

- (i) The DBPC Scheme had 64 members at 31 March 2022. XXX of these are employees of XYZ company.