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香港信託人公會

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**Re: Submission on Increasing Employees' Control over Mandatory Provident Fund Investment**

This written submission is provided in regard to the proposal by the Mandatory Provident Fund Schemes Authority (MPFA) to increase employees' control over their Mandatory Provident Fund (MPF) investment by allowing an employee to transfer the accrued benefits derived from the employee mandatory contributions from the employer-chosen MPF scheme to an employee's personal account in a scheme of his own choice.

We have the following points to make I regard to the proposal.

1. We have previously been consulted by the MPFA in regard to this matter and are in support of the proposals.
2. We would propose that the ability of employees to choose to move accrued benefits to a scheme of their choice be limited to once per annum initially. We propose that the limit of once per annum apply for an initial two - year period to ensure the record keeping system is not overloaded and to discourage employees treating these accounts as bank accounts rather than long term retirement savings vehicles. At the end of a two year period we propose that employees be permitted to transfer their accrued benefits twice per annum.
3. We would propose that staggered transfer dates be set for schemes so that annual employee transfers do not all occur at a similar time. The annual review of the scheme should not be used as an optional transfer date.
4. We support the MPFA's proposal that the trustees and administrators will require a twelve month lead time to make the necessary adjustments to their systems to incorporate the employee choice proposals.

Yours sincerely

Carolyn Butler  
Chairman, Hong Kong Trustees' Association Ltd