

Law & Policy Group

Global Legislative Update

By Stephanie Rosseau and Fiona Webster
October 2024



In this document

Mercer’s *Global Legislative Update* covers legal developments affecting retirement, health, executive rewards, talent, diversity and inclusion, and other HR programs that affect local and/or expatriate employees. Links to developments with upcoming effective dates covered in past updates are also included to remind employers of impending deadlines. These icons indicate whether employer action is required.

-  Employer action required
-  Potential implications for employers
-  Developments to monitor

Please note: Mercer is not a law firm and therefore cannot provide legal advice. Please consult legal counsel before taking any actions based on the commentary and recommendations in this report.

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Asia Pacific	
Australia	Superannuation contributions on paid parental leave legislation enacted Privacy bill introduced Anti-money laundering, counterterrorism measures introduced Further details on Payday Super announced Regulator responds to Phase 2 consultation on super data transformation Option to exit legacy pensions, reserve allocation changes proposed
China	Statutory retirement age to gradually increase
Japan	Minimum wage to increase Social insurance enrollment expanded to smaller employers
Singapore	New Platform Workers Bill introduced
Taiwan	Minimum wage to increase
Europe, Middle East and Africa (EMEA)	
European Union	Analysis of Pan-European Pension Product published
Hungary	Compulsory medical suitability assessments ends
Ireland	Changes to the Standard Fund Threshold announced Launch date for automatic enrolment pension system delayed PRSI contributions, salary contributions to increase
Isle of Man	Changes to employment rights proposed
Latvia	Minimum wage increase proposed
Lithuania	Minimum wage to increase
Luxembourg	Labor code changed to benefit employees' working conditions
Netherlands	Government proposes to reverse reduction of expatriate 30% ruling
Poland	Minimum wage to increase
Serbia	Minimum wage to increase
Sweden	Employer compensation for high sick-pay costs ends
United Kingdom	Consultation launched on value for money framework for defined contribution schemes rights Government considers ways to boost investment, increase retirement outcomes Guidance issued on statement of strategy under the new DB funding regime Employers have new duty to prevent workplace sexual harassment

Section 2


Global

Artificial Intelligence	
Status	 Ongoing initiatives
Development	Career Roundup: Global employer resources on artificial intelligence Artificial Intelligence (AI) has become more of a permanent feature of the workplace for many employees and employers around the world and poses numerous challenges and considerations as it reshapes work. To help employers consider the issues associated with AI, the roundup cited below provides links to general information about ongoing legislative and governance initiatives and trends. Sources include Marsh McLennan, organizations, government websites, third-party analysis, news articles and viewpoints.
Resources	Roundup , regularly updated
Minimum wage	
Status	 Ongoing initiatives
Development	Career Roundup: Global employer resources on minimum wage increases To help multinational employers address the different minimum wage rates around the world, the roundup cited below provides links to resources from organizations, government websites, third-party resources, and news articles.
Resources	Roundup , regularly updated
Remote working	
Status	 Ongoing initiatives
Development	Career — Health — Wealth Roundup: Countries address remote-working issues Remote working has become a more of permanent feature for many employees and employers after various countries introduced COVID-19 measures. Remote working poses challenges and considerations for employers devising or adjusting policies. Issues to consider include the definition of remote work, eligibility criteria, hybrid working arrangements, employee engagement and performance, cybersecurity, health and safety, the right to disconnect, the impact of employees relocating to a different country or state, and the post-pandemic return to the workplace. Several jurisdictions have introduced remote-working legislation that clarifies post-pandemic employer and employee requirements, and others are expected to follow suit. To help employers consider the issues associated with remote working, the roundup cited below provides links to resources from Marsh McLennan, organizations, government websites, third-party analysis, news articles and viewpoints.
Resources	Roundup , regularly updated

Reproductive rights	
Status	 Ongoing initiatives
Development	<p>Health</p> <p>Roundup: Global employer resources on reproductive rights post <i>Dobbs</i> ruling</p> <p>In June 2022, the US Supreme Court's <i>Dobbs v. Jackson Women's Health Organization</i> decision overturned <i>Roe v. Wade</i>, finding no federal constitutional right to abortion and allowing states to regulate and ban abortions at all stages of pregnancy. To provide multinational employers some information on countries' positions on reproductive rights and the varying employee health benefit plan issues involved, the roundup cited below provides links to organizations, government websites, third-party analysis, news articles and viewpoints.</p>
Resources	<p><u>Roundup</u>, regularly updated</p>

Section 3

Americas

Argentina (new)	
Status	 Currently effective
Development	Career — Health Labor measures revised Law 27742 published in Argentina’s Official Gazette on July 8, 2024, includes employment-related provisions. Further regulations that clarify certain measures will be issued. Highlights of the law include: <ul style="list-style-type: none">• The total length of maternity leave remains unchanged at 90 days, but individuals can now request to start their leave a minimum of 10 days before the birth with 80 days taken after the birth. Previously, individuals were required to start their maternity leave 45 days before the medical due date, with the remaining 45 days taken after that date.• The introduction of a simplified electronic procedure for registering employment contracts.• The probation period is extended to six months (up from three). Collective agreements can extend the period to eight months in companies with seven to 100 employees, and up to one year for companies that have up to five employees. During this period, either party may terminate the employment relationship without an entitlement to severance pay.• Increased compensation will be paid for dismissals that are based on discriminatory acts — the amount can range from 50% to 100% of the severance compensation, depending on the court’s evaluation of the severity of the facts. Also, courts can no longer nullify the dismissal decision.• Some employer penalties are repealed for noncompliance with certain requirements, such as employee registration and the delivery of work certificates.• Joint liability is retained for labor and social security obligations. Furthermore, individuals will be classified as employees of the entity that registers the employment relationship, even if the workers are outsourced to a third party.• The classification of “independent worker” is established and allows for up to three independent workers to be hired for certain types of projects, without establishing an employment relationship.
Resources	dolores.liendo@mercer.com Law 27742 (Spanish) (Official Bulletin, July 8, 2024)

Argentina (new)

Status



Currently effective

Development

Wealth

Pension mobility proposal vetoed

The government vetoed the pension mobility project that had been previously approved by both Chambers of Congress, saying the measures would entail costs that had not been included in the budgets for 2024 or 2025. The proposed measures aimed to help pensioners address the impact of inflation and would have established a formula for calculating pension mobility based on the previous month's Consumer Price Index (IPC). An additional increase would have been added annually each March to the previous year's IPC — this amount would have been equivalent to 50% of the average remuneration of insured workers (RIPTE), together with a compensatory increase that was included in the Decree of Necessity and Urgency.

Resources

dolores.liendo@mercer.com
[Decree 782/2024](#) (Spanish) (Official Bulletin, Aug. 30, 2024)

Argentina (new)

Status



Currently effective

Development

Health

Reduced coverage for medicine costs impacts retirees

Changes to the coverage of medicine costs by the PAMI (the “Comprehensive Medical Attention Program”) will impact retirees. Medicines that were previously fully covered by PAMI are now reduced to 40% or 50%. Some retirees could still benefit from 100% coverage if they meet certain conditions, but in practice they will be few. Some retirees have sought more affordable alternative coverage. The adjusted coverage could lead to increased healthcare costs in the future.

Resources

dolores.liendo@mercer.com
[Notice](#) (Spanish) (Provisional Journal, Sept. 2, 2024)

Argentina (new)**Status****Currently effective****Development****Health — Wealth****Regulations on social and prepaid health insurance expand**

Three decrees regulate the implementation of the DNU 70/23, which addresses private medical insurance and social security-labor union-managed health insurance systems. Beneficiaries can now switch online between prepaid health plans and social security providers, without using an intermediary and at no cost. This change allows for a greater diversity of medical coverage options and eliminates the previous restrictions that reduced the freedom of choice. However, certain limitations and requirements apply to switching providers, and not all workers are eligible. Eligibility is restricted to employees subject to a collective agreement, self-employed workers that have specific types of social security plans, domestic service workers and individuals enrolled in the simplified tax regime ("Monotributistas") across all categories. Eligible individuals can switch once per year and they must have a minimum one year of membership in the new chosen entity. Certain groups — such as retirees, pensioners, and personnel from specific organizations — must fulfill additional requirements and procedures to complete the switch.


Resourcesdolores.liendo@mercer.com[Decree 170/2024](#) (Spanish) (Government, Feb. 21, 2024); [Decree 171/2024](#) (Spanish) (Government, Feb. 21, 2024);[Decree 172/2024](#) (Spanish) (Government, Feb. 21, 2024) and [Decree 70/2023](#) (Spanish) (Government, Dec. 21, 2023)**Argentina (new)****Status****Currently effective****Development****Health — Wealth****Employers required to pay social security contributions for probationary employees**



Under a new law, employers must now pay social security contributions for employees during their probationary period, entitling those employees to benefits in case of work-related accidents or illnesses.


Resourcesdolores.liendo@mercer.com[Law](#) (Spanish) (Government, May 30, 2024)**Argentina (new)****Status****Currently effective****Development****Health****Employers' contribution to the occupational disease fund increases**

From Sept. 1, 2024, the employers' fixed sum contributions to the occupational disease fund (FFEP) for each employee increased to AR\$928, up from AR\$874.

Resourcesdolores.liendo@mercer.com[Disposition 7/2024](#) (Spanish) (Government, Aug. 21, 2024)

Aruba (new)	
Status	 Effective Jan. 1, 2025
Development	<p>Career</p> <p>Minimum wage to increase</p> <p>Effective Jan. 1, 2025, the monthly minimum wage will be 2,007.05 AWG (up from 1,986.20 AWG) for employees aged 18 or older. The monthly wage will be 2,257.93 AWG (up from 1,986.20 AWG) for employees working 45 hours/week.</p>
Resources	Announcement (Dutch) (Government, Sept. 16, 2024)
British Virgin Islands (previously covered, with upcoming effective date)	
Development	<p>Career</p> <ul style="list-style-type: none">Minimum wage to increase — key date: Nov. 30, 2024

Canada (new)	
Status	 Slated to take effect in 2025.
Development	<p>Career — Health</p> <p>Right to disconnect established for employees</p> <p>Federally regulated employers subject to the Canada Labour Code must establish a right-to-disconnect policy that will restrict work-related communication outside of their employees' scheduled working hours.</p> <p>The measures are slated to take effect in 2025, and are included in Budget Implementation Act, 2024, No. 1, (Bill C-69) that will amend the Canada Labour Code. The measures received Royal Assent on June 20, 2024 and aim to improve employees' work-life balance. The measures include:</p> <ul style="list-style-type: none"> • Employers must introduce a right-to-disconnect policy within one year of becoming subject to the requirement. The policy must include certain information, such as exempted employees and the rationale for the exclusion, and must be reviewed and updated every three years. • Consultation with employees or unions when employers develop or update their right-to-disconnect policy, including a mandatory 90-day period for employees to provide their comments. • Employers must keep records of their right-to-disconnect policy and related consultations • Employers must post the policy in the workplace and provide it in paper or electronic form to employees within 30 days of the policy applying to them. • Prohibition on employers from intimidating, dismissing, penalizing, disciplining or otherwise taking reprisals against an employee about the right to disconnect. • Permitted exemption from the right to disconnect for certain employees. Employees subject to collective bargaining agreements (CBA) can agree to their exemption if the CBA meets minimum requirements. <p>The government will issue further information, tools and resources to help employers and employees prepare for implementation of the right to disconnect.</p>
Resources	Budget Implementation Act, 2024, No. 1 (Bill C-69)
Canada — Ontario (previously covered, now effective)	
Status	 Currently effective
Development	<p>Career</p> <p>Minimum wage increased</p> <p>The minimum wage increased to CA\$17.20/hour on Oct. 1, 2024 — up from CA\$16.55/hour. This 3.5% increase is calculated on the consumer price index and brings Ontario's minimum wage to the second highest in Canada.</p>
Resources	Ontario raising minimum wage to support workers (Government, March 28, 2024)

Canada — Prince Edward Island (new)**Status**  **Currently effective****Development****Career****Minimum wage increased**

Prince Edward Island's government increased the minimum wage to C\$16/hour (up from C\$15.40) on Oct. 1, 2024 — the second of two minimum wage increases in 2024 announced by the government.

Resources

[Two minimum wage increases expected in 2024](#) (Government, Oct. 4, 2023)

Canada — Prince Edward Island (previously covered, now effective)**Status**  **Currently effective****Development****Career — Health****Paid sick leave expanded**

From Oct. 1, 2024, employees in Prince Edward Island can take up to three days of paid sick leave per year depending on their length of employment, under amendments to the Employment Standards Act. Employees are entitled to one day of paid sick leave per year after 12 continuous months with an employer, to two days after 24 continuous months, and three days after 36 continuous months. Unused days do not carry over to the next year, and employees must use the paid leave before they use unpaid leave. The number of days of paid sick leave entitlement must be shown on pay statements, and the number of days of paid sick leave accrued and used included in payroll records. Previously, employees were allowed one day of paid sick leave per year after five continuous years of employment with their employer.

Resources

[Province proclaims paid sick leave](#) (Government, March 22, 2024) and [An act to amend the Employment Standards Act, SPEI 2023, c. 41](#) (Government, Nov. 29, 2023)

Canada (previously covered, with upcoming effective date)**Development****Career**

- [Employers face required disclosures regarding pay in Ontario](#) — key date: Effective upon proclamation

Wealth

- [Pension super priority federal legislation enacted](#) — key date: April 27, 2027

Colombia (previously covered, with upcoming effective date)**Development****Wealth**

- [Pension reforms issued](#) — key date: July 1, 2025

Dutch Caribbean — Bonaire, Saba and Sint Eustatius (new)**Status**  **Currently effective****Development****Career****Minimum wage increased**

The statutory monthly minimum wage in Bonaire, Saba and Sint Eustatius increased on July 1, 2024, to US\$1,750.67 for a 40-hour work week.

Resources

[Announcement](#) (Dutch) (Government, Sept. 16, 2024)

Peru (previously covered, with upcoming effective date)

Development

Career

- [Temporary early withdrawal of length-of-service compensation fund allowed](#) — key date: Dec. 31, 2024

Saint Lucia (previously covered, now effective)

Status



Effective Oct. 1, 2024

Development

Career

Minimum wage increased

Effective Oct. 1, 2024, Saint Lucia's monthly minimum wage increased to XCD\$1,130. The daily and hourly wage rates are XCD\$52 and XCD\$6.52 respectively. The minimum wage was introduced for the first time on Aug. 1, 2024, and a transition period for employers was given until Oct. 1, 2024.

Resources

[Announcement](#) (Ministry of Finance, Economic Development and the Youth Economy, Aug. 2, 2024)

United States (US) (new)

Status



Effective dates vary.

Development

Health

Mental health parity rules issued

Final mental health parity rules have been released that significantly overhaul existing regulations. The final rules establish a “meaningful” benefits standard, add new standards for nonquantitative treatment limitations (NQTLs), and outline the required content for an NQTL comparative analysis. Although litigation challenging these rules is expected, employers sponsoring self-funded plans have significant compliance obligations to consider, and in short order.

- Most content requirements for the NQTL comparative analysis apply for plan years beginning on or after Jan. 1, 2025, including a new requirement that a plan fiduciary certify that the vendor responsible for preparing the analysis was prudently selected and monitored as required by ERISA.
- Other changes intended to reduce barriers to behavioral health services by focusing on benefit coverage and network adequacy take effect for plan years beginning on or after Jan. 1, 2026. One example — the final rules require plans to collect and evaluate relevant data to assess an NQTL's impact on access to behavioral health benefits as compared to medical and surgical benefits and take action to address material differences.

Resources

katharine.marshall@mercer.com and jennifer.wiseman@mercer.com
[GRIST](#), Sept. 13, 2024

US (new)	
Status	 Comments can be submitted until Dec. 30, 2024.
Development	<p>Career — Health</p> <p>Standard to protect indoor/outdoor workers from extreme heat’s dangers proposed</p> <p>The Department of Labor’s Occupational Safety Health Administration (OSHA) recently proposed a new standard intended to protect workers in indoor and outdoor work settings from the health risks of extreme heat. The standard would:</p> <ul style="list-style-type: none"> • Apply to all employers in all general industry, construction, maritime, and agriculture sectors where OSHA has jurisdiction, with some exceptions. • Be a programmatic standard that would require employers to create a plan to evaluate and control heat hazards in their workplace. • More clearly set forth employer obligations and the measures necessary to effectively protect employees from hazardous heat. OSHA requests comments on all aspects of the proposed rule. <p>Comments can be submitted until Dec. 30, 2024, and OSHA plans on holding a public hearing after the close of the comment period.</p>
Resources	Biden-Harris administration’s proposed rule to protect indoor, outdoor workers from extreme heat’s dangers opens for public comment (OSHA, Aug. 30, 2024) and Heat injury and illness prevention in outdoor and indoor work settings (Federal Register, Aug. 30, 2024)
US (new)	
Status	 Currently effective
Development	<p>Wealth</p> <p>Plan sponsor may let employees flex their benefits under new ruling</p> <p>A recent Internal Revenue Service private letter ruling (PLR) paves the way for a 401(k) plan sponsor to give employees flexibility to allocate an employer nonelective contribution — among other tax-favored benefit options. These alternatives include employees’ health savings accounts (HSAs), retiree health reimbursement arrangements (HRAs) and educational assistance benefits. However, employees can’t receive the contribution in cash or as another taxable benefit. Only the recipient of a PLR can rely on it, so employers interested in exploring a similar design may want to seek their own IRS ruling to mitigate risk.</p> <p>That said, because PLRs provide insight into how IRS would analyze similar plan designs, some employers may decide to proceed without obtaining their own ruling.</p>
Resources	matthew.calloway@mercer.com , dorian.smith@mercer.com and brian.kearney@mercer.com GRIST , Sept. 24, 2024

US (previously covered, now effective)**Status**  **Currently effective****Development****Wealth****Final regulations on minimum present values now effective**


Final regulations under Internal Revenue Code (IRC) Section 417(e) issued in January 2024 update procedures for defined benefit (DB) plans to calculate minimum values for lump sums and other accelerated forms of payment. The regulations — issued without fanfare more than seven years after IRS first proposed the rules in late 2016 — have a few changes from the proposal. Notably, the final rules include new and welcome flexibility for DB plan sponsors to change Section 417(e) rates used for other purposes. The changes are generally optional and unlikely to have a significant effect on participant benefits. Accordingly, many plan sponsors may simply decide to leave their plan administration unchanged. However, certain contributory plans and plans that haven't been treating Social Security level-income options (SSLIOs) as subject to Section 417(e) may need to change procedures. Sponsors could immediately rely on the regulations, and they generally apply to distributions starting Oct. 1, 2024.

Resources margaret.berger@mercerc.com, brian.kearney@mercerc.com and bruce.cadenhead@mercerc.com
[GRIST](#), Feb. 20, 2024

US**Status**  **Currently effective****Development****Career — Health****Domestic partner benefits remain popular but present challenges**

Domestic partner benefits continue to be common among many employers. However, compliance complexities present challenges for employers. The GRIST cited below (with minor updates and clarifications) reviews the major issues, particularly related to taxation and documentation, and provides useful tools, including a tax dependent flow chart, employer domestic partner checklist and two tables summarizing applicable state laws.

Resources rich.glass@mercerc.com and patty.cartwright@mercerc.com
[GRIST](#), regularly updated

US	
Status	 Currently effective
Development	<p>Health</p> <p>Group fixed-indemnity plans pose legal, tax issues</p> <p>Concerns that fixed-indemnity plans may too easily be mistaken for comprehensive medical coverage or may improperly treat some benefit payments as tax free has led to a final rule from the departments of Labor, Treasury, and Health and Human Services. The rule requires fixed-indemnity plans to supply a new consumer notice beginning in 2025, but omits more sweeping proposals that would have required many employers to redesign their fixed-indemnity coverage. Treasury proposals to clarify the tax treatment of employer-provided accident and health plans — particularly the tax treatment of fixed-indemnity plans — also were left out of the final rule. The GRIST cited below provides background information about group fixed-indemnity plans, details about the new consumer notice, an overview of proposals left out of the final rule, and a summary of IRS guidance identifying a variety of fixed-indemnity designs (often paired with a wellness program) as improper “double dipping” schemes. This article also summarizes provisions in the rule addressing individual fixed-indemnity plans and short-term limited duration insurance.</p>
Resources	<p>jennifer.wiseman@mercerc.com and cheryl.hughes@mercerc.com</p> <p>GRIST, Aug 27, 2024</p>

US**Status****Currently effective****Development****Career — Health****Roundup: Employer resources on DOL's final independent contractor rule**

On Jan. 9, 2024, the DOL announced a final rule that revises how to determine if an individual is an independent contractor or an employee entitled to minimum wage, overtime and other protections under the federal Fair Labor Standards Act. The controversial rule took effect on March 11, 2024.

To provide employers with some information about the rule and the varying aspects and issues to consider, this roundup provides links to government information, third-party analyses, news articles and viewpoints. The aggregated content in each section is organized in reverse chronological order and is by no means comprehensive. The content also does not necessarily reflect Mercer's or the authors' point of view on the subject.

Resources

[Roundup: Employer resources on DOL's final independent contractor rule](#) (Mercer, regularly updated)

US**Status****Effective dates vary.****Development****Wealth****User's guide to SECURE 2.0**

A dizzying array of legislation affecting defined contribution (DC) and defined benefit (DB) plans became law on Dec. 29, 2022, as part of a fiscal 2023 government spending package. Capping several years of congressional efforts, the SECURE 2.0 Act of 2022 (Div. T of Pub. L. No. 117-328) is intended to build on changes made by the Setting Every Community Up for Retirement Enhancement (SECURE) Act of 2019 (Div. O of Pub. L. No. 116-94).

Navigating SECURE 2.0 is a formidable challenge. The statute consists of 120 pages of text and 90 individual sections — with no table of contents. To help employers and plan sponsors understand the legislation's implications, this guide provides a high-level summary of SECURE 2.0 provisions grouped topically, including separate treatment of provisions specific to DC and DB plans.

The six tables in this guide describe statutory changes and their effective dates, identify whether the changes are mandatory or optional for employers, and provide initial observations, including implementation challenges for which agency guidance would be helpful. The act also includes several apparent drafting errors for which Congress intends to introduce technical corrections legislation. Those errors are noted in the relevant sections of the guide.

This guide doesn't address SECURE 2.0's employee stock ownership plan (ESOP) provisions and a handful of other nonbenefit-related provisions. When referring to the original SECURE Act, this guide uses the term "SECURE 1.0" to avoid any confusion between the laws.

This guide will be updated periodically to reflect additional information and guidance.

Resources

margaret.berger@mercer.com, matthew.calloway@mercer.com and brian.kearney@mercer.com
[User's guide to SECURE 2.0](#), periodically updated

US

Status



Effective dates vary.

Development

Career — Health**Transportation plans offer valued benefits, but pose compliance issues**

Since 1998, employees have been able to pay for qualified transportation fringe benefits through pretax salary reductions under Internal Revenue Code (IRC) § 132(f), and these benefits have become quite popular. (Employers could provide this benefit on a tax-advantaged basis as early as 1992.) The tax exemption extends to commuting expenses for transit passes, qualified parking, van pools, and in certain years, bicycles.

While these benefits are not subject to cafeteria plan or ERISA rules, compliance difficulties exist, and a 2018 tax law that will expire at the end of 2025 added complexities. The federal monthly limits are adjusted every year, most recently for 2024. Some state and local jurisdictions have imposed employer mandates — including one that applies to Chicago-area employers starting in 2024 — leveraging the tax advantage of commuter benefits; other jurisdictions provide tax-related incentives.

Resources

rich.glass@mercer.com and cheryl.hughes@mercer.com
[GRIST](#), regularly updated

US

Status



Effective dates vary.

Development

Career**Roundup: Employer resources on noncompete restrictions**

Noncompete agreements prevent former employees from working for a competing employer or starting a competing business for a certain time period after their employment ends. At the federal level, President Biden, the FTC, the NLRB and Congress have recently attempted to ban or limit the use of noncompete agreements. The FTC's final rule banning noncompetes was scheduled to be effective Sept. 4, 2024, but on Aug. 20, 2024, a federal judge in Texas blocked the rule from taking effect nationwide. The decision means the FTC rule will remain on hold until a future judicial decision either permanently blocks the rule or upholds it as lawful. That decision, which could permanently invalidate the rule, may take several months.

At the state level, several states have generally banned noncompete agreements. Numerous other states have enacted restrictions, such as only allowing noncompete agreements for employees above a certain salary threshold. This roundup focuses on recent federal and state actions to restrict noncompete provisions and provides links to federal and state resources from organizations, government websites, third-party resources and news articles.

Resources

[Roundup](#), regularly updated

US

Status



Currently effective

Development

Career

Roundup: Employer DEI resources after SCOTUS' ruling on affirmative action

On June 29, 2023, the US Supreme Court, in *Students for Fair Admissions, Inc. v. President and Fellows of Harvard College*, ruled colleges' use of race as a factor in student admissions is unconstitutional under the Fourteenth Amendment's Equal Protection Clause.

Since the decision, there have been various viewpoints on the effect of this ruling on companies' DEI programs. For example, the EEOC announced that the decision "does not address employer efforts to foster diverse and inclusive workforces or to engage the talents of all qualified workers, regardless of their background." The EEOC said "[i]t remains lawful for employers to implement diversity, equity, inclusion, and accessibility programs that seek to ensure workers of all backgrounds are afforded equal opportunity in the workplace." In July, state attorneys general wrote to Fortune 100 CEOs about the decision and took different positions based on political affiliation.

To provide employers with some information about the decision and the varying aspects and issues to consider with respect to employers' DEI programs, this roundup provides links to government information, third-party analyses, news articles and viewpoints. The aggregated content in each section is organized in reverse chronological order and is by no means comprehensive. The content also does not necessarily reflect Mercer's or the authors' point of view on the subject.

Resources

[Roundup](#), regularly updated

US

Status



Currently effective

Development



Career




Roundup: Employer resources on DOL's expansion of overtime protections

On April 23, 2024, the Department of Labor (DOL) issued a final rule for determining if certain salaried employees are exempt from minimum wage and overtime requirements under the Fair Labor Standards Act. The rule will expand overtime protections beginning July 1, 2024 — guaranteeing overtime pay for most salaried workers earning less than \$844 week or \$43,888/year (up from \$684/week or \$35,568 per year). This amount is down from the proposed rule, announced on Aug. 30, 2023, which would have guaranteed overtime pay for most salaried workers earning less than \$1,059/week, or about \$55,000/year. To provide employers with some information about the proposed rules and the varying aspects and issues to consider, this roundup provides links to government information, third-party analyses, news articles and viewpoints. The aggregated content in each section is organized in reverse chronological order and is by no means comprehensive. The content also does not necessarily reflect Mercer's or the authors' point of view on the subject.

Resources

[Roundup](#), regularly updated

US — States	
Status	 Effective dates vary.
Development	Wealth Resources for tracking state and local retirement initiatives This article summarizes state and local retirement initiatives for private-sector workers and rounds up relevant Mercer and third-party resources. This listing is updated periodically and may not always reflect the latest development in every locality.
Resources	margaret.berger@mercer.com and brian.kearney@mercer.com GRIST , regularly updated
US — States	
Status	 Effective dates vary.
Development	Career Roundup: Employer resources on states' recent equal pay laws The federal Equal Pay Act of 1963 requires that men and women in the same workplace receive equal pay for equal work. In recent years, many states have taken further efforts to address equal pay, such as enacting laws that prohibit employers from asking job applicants about salary history, requiring disclosure of salary ranges and pay data, protecting employees who disclose their pay, expanding equal pay protections for characteristics other than sex, and broadening comparisons of work and pay. In 2023, New Jersey and Illinois expanded equal pay protections to temporary workers. Stronger federal legislation — the Paycheck Fairness Act — was first introduced in 1997 but has not passed after numerous attempts — most recently in June 2021. On March 15, 2022, the Biden administration also announced commitments to advance pay equity. This roundup primarily focuses on recent state legislative initiatives pertaining to salary history bans and salary range disclosure requirements that affect private sector employers, and provides links to state resources from organizations, government websites, third-party resources and news articles. Certain cities have also acted, but they are generally beyond the scope of this roundup.
Resources	Roundup , regularly updated

US — States	
Status	 Effective dates vary.
Development	Career Roundup: Employer resources on states' recreational marijuana laws <p>Twenty-four states, plus Guam and Washington, DC, have legalized the possession and personal use of marijuana for recreational purposes. To provide employers with some information on states' actions and the varying employment considerations involved, this roundup provides links to organizations, government websites, third-party analysis, news articles and viewpoints on marijuana usage for recreational purposes. Thirty-eight states, plus Guam, Puerto Rico, the US Virgin Islands and Washington, DC, have legalized marijuana use for medical purposes, but this roundup focuses on legal recreational marijuana use and its implications for employers. The aggregated content in each section is organized in reverse chronological order and is by no means comprehensive. It also does not necessarily reflect Mercer's or the authors' point of view on the subject.</p>
Resources	Roundup , regularly updated
US — States	
Status	 Effective dates vary.
Development	Career Roundup: Employer resources on minimum wage increases <p>On Jan. 1, 2024, the minimum wage rate for federal contracts increased to \$17.20/hour — up from \$16.20/hour in 2023. This minimum wage rate applies to nontipped and tipped employees alike, as this executive order eliminated the lower cash wage that contractors may pay tipped employees. Several states have also acted to gradually increase the minimum wage to at least \$15/hour for most employees. To help employers prepare and address related issues, this roundup provides links to federal and state resources from organizations, government websites, third-party analysis, news articles and viewpoints.</p>
Resources	Roundup , regularly updated
US — States	
Status	 Effective dates vary.
Development	Career Roundup: Employer resources on hairstyle nondiscrimination laws <p>The Creating a Respectful and Open World for Natural Hair (CROWN) Act movement in the United States aims to prohibit discrimination based on natural hair texture or hairstyles normally associated with race, such as braids, locks, twists, curls, cornrows, Afros, head wraps or bantu knots. The official campaign of the CROWN Act is led by the CROWN Coalition. Federal legislation, supported by the Biden administration, passed the House during the last session of Congress — but was not enacted. Many states have already passed CROWN Acts, and many others are considering legislation. To help employers ensure their employee handbooks and appearance policies are nondiscriminatory and comply with federal, state, and local laws, the roundup cited below provides links to federal and state resources from organizations, government websites, third-party analysis, news articles and viewpoints.</p>
Resources	Roundup , regularly updated

US — Alaska (new)

Status  **Effective for plans issued or renewed on or after Jan. 1, 2025.**

Development

Health

Pharmacy benefit manager reform law enacted

Alaska enacted a law that restricts pharmacy benefit manager (PBM) activities for fully insured plans. Per 2024 Ch. 61 (HB 226), registered PBMs will be subject to these limitations:

- 100% pass-through of all manufacturer volume- or market share-based payments to the plan sponsor
- A duty of care to the plan sponsor, benefits administrator and participants, based on standards of prudence and acting in the best interest of those entities and individuals
- An extensive list of insurers' unfair trade practices related to administering prescription drug benefits
- Transparency requirements owed to the plan sponsor.

The law will take effect for plans issued or renewed on or after Jan. 1, 2025. Alaska generally applies its insurance laws on an extraterritorial basis to state residents covered by fully insured plans issued in another state. The law does not affect self-funded ERISA plans.

Resources

rich.glass@mercer.com
[2024 Ch. 61](#) (HB 226) (Legislature, Sept. 24, 2024)

US — Alaska

Status  **Effective Oct. 16, 2024**

Development

Health

Telehealth law enacted

A new Alaska law (2024 Ch. 13, SB 91) allows out-of-state members of a physician's multidisciplinary team to provide healthcare services, if the service is not reasonably available in the state. The scope of services includes ongoing treatment and follow-up care. Previously, this allowance only applied to out-of-state physicians.

Resources

rich.glass@mercer.com
[2024 Ch. 13](#), SB 91 (Legislature, July 19, 2024)

US — Arkansas (new)

Status  **Comments can be submitted until Nov. 11, 2024.**

Development

Health

Pharmacy benefit manager rules would regulate pharmacy reimbursements

The Arkansas Insurance Department (AID) has proposed a rule that would require pharmacy benefit managers (PBMs) to pay a “fair and reasonable” dispensing fee to pharmacies with the purpose of ensuring network adequacy.

AID’s rulemaking authority is permitted “without limitation” under the Arkansas PBM Licensure Act, which is the statute that was upheld in the Rutledge decision. Specifically, the Act authorizes AID to issue rules in 10 areas, including the two that are the focus of Rule 128: compensation and network adequacy.

The rule would apply to health benefit plans (i.e., fully insured plans) issued in Arkansas and in any other state, as well as healthcare payers, defined by law to include any “entity that provides or administers a self-funded health benefit plan, including a governmental plan.”

The rule would require PBMs to include a “fair and reasonable cost to dispense” in the administration of Rx benefits, prohibiting this cost from being passed on to participants. The rationale is that unfair and unreasonable dispensing fees negatively impact network adequacy and sustainability. Further, the proposed rule states that reimbursement rates based on National Average Drug Acquisition Cost (known as NADAC) or Maximum Allowable Cost (known as MAC) are insufficient to reasonably account for dispensing costs.

PBMs would need to report this information to the Insurance Department, which would have the power to review and approve the compensation program. The first report would be due Jan. 1, 2025. The “fair and reasonable cost to dispense” requirement would apply to the 2025 plan year. Reporting thereafter would have a March 1 deadline. The rule would have a penalty scheme (\$5,000 per violation) with possible license suspension/revocation for repeated violations.

A public hearing is Oct. 22, 2024, and the comment deadline is Nov. 11, 2024.

Resources

rich.glass@mercercor.com

[Proposed rule](#) (Register, Sept. 10, 2024); [Pharmacy benefits manager licensure act](#) (Government); Ark. [Code Section 23-92-509](#) (Government) and [GRIST](#), Dec. 10, 2020

US — California (new)**Status**  **Effective dates vary.****Development****Health****Multiemployer welfare arrangements laws enacted**

California enacted two laws related to multiple-employer welfare arrangements (MEWAs). They are:

- 2024 Ch. 398 (AB 2434). Previously, state law allowed association health plans (AHPs) — a type of MEWA — with large group coverage to offer coverage to employers in the small group market if the AHP met certain requirements, including establishment of the AHP before March 23, 2010. The law — applicable to healthcare service plans (including HMOs) — was set to expire on Jan. 1, 2026. The new law changes the establishment date to Jan. 1, 1966. The new law also requires MEWA registration by June 1, 2025. These provisions are set to expire on Jan. 1, 2030.
- 2024 Ch. 374 (AB 2072). This bill authorizes the Departments of Managed Health and Insurance to analyze the impact of MEWAs on the small group market and publish a report by July 1, 2026. Authorization for approved MEWAs — set to expire on Jan. 1, 2026 — will also be extended to Jan. 1, 2030.

Resources

rich.glass@mercerc.com

[2024 Ch. 398 \(AB 2434\)](#) (Legislature, Sept. 22, 2024) and [2024 Ch. 374 \(AB 2072\)](#) (Legislature)

US — California (San Francisco)**Status**  **Effective Jan. 1, 2025****Development****Health****Contractor-lessee health plan, pay rules updated**

Starting in 2025, San Francisco contractors and lessees (and their subcontractors and subtenants) must comply with new health plan standards for covered employees under the Health Care Accountability Ordinance (HCAO). The GRIST cited below includes other recent HCAO changes posters, along with information on the Healthy Airport Ordinance and Minimum Compensation Ordinance. The Roadmap for employers with San Francisco-area employees has also been updated.

Resources

rich.glass@mercerc.com

[GRIST](#), Sept. 3, 2024 and [Roadmap for employers with San Francisco-area employees](#) (Mercer, Sept. 3, 2024)

US — California (updated)**Status**  **Effective Oct. 16, 2024****Development****Career — Health****Increased minimum wage for healthcare workers takes effect Oct. 16, 2024**

California's Department of Industrial Relations announced in its Health Care Worker Minimum Wage Frequently Asked Questions that the increased minimum wage rate will begin on Oct. 16, 2024. The law was enacted in October 2023, but the effective date had been delayed. On Oct. 16, the minimum wage rate for workers at large healthcare facilities will be \$23/hour and then \$24/hour on July 1, 2025 and \$25/hour on July 1, 2026. Beginning Jan. 1, 2028, the minimum wage will be adjusted for inflation each year. For the remaining healthcare workers, the minimum wage will more gradually increase to \$25/hour. The FAQs include all the different rates.

Resources

[Health Care Worker Minimum Wage Frequently Asked Questions](#) (Department of Industrial Relations, October 2024) and [SB 525](#) (Legislature)

US — Connecticut (previously covered, generally effective)

Status	 Effective Oct. 1, 2024, other than the annual report deadline.
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Development**Career — Health****Minor changes to paid family medical and family violence leave laws enacted**

Pub. Act No. 24-5 (SB 222) made several changes to its leave laws. Highlights include:

- **Payments.** Employees may receive concurrent income replacement benefits from a state victim compensation fund; otherwise, paid family and medical leave (PFML) benefits do not run concurrently with any other state or federal income-replacement program. Employers must register and submit payments to the PFML Insurance Authority (the Authority). Failures are now subject to penalty.
- **Employer annual report.** Starting in 2024, the deadline moved from July 1 to Sept. 1.
- **Disclosures.** Healthcare providers were required to display an informational poster, developed by the Authority, no later than Oct. 1, 2024.
- **Employee overpayments.** The law sets up a penalty/interest scheme for overpayments and attempted fraud.
- **Tribes.** Federally recognized tribes may participate in PFML by entering a memorandum of understanding with the governor.
- **Family Violence Leave Act change.** The law currently requires up to 12 days of unpaid leave related to family violence. The scope was expanded to include victims of sexual assault.

Resources

rich.glass@mercer.com

Pub. Act No. 24-5 (SB 222) (Legislature, May 9, 2024)

US — Delaware (new)

Status	 Effective for plan years starting on or after Jan. 1, 2026
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Development**Health****Abortion coverage required**

The new law (2024 Ch. 84 (HS 2 for HB 110)) requires individual, group and blanket health insurance, Health Maintenance Organizations (HMOs) and Medicaid to cover abortion-related services without cost sharing up to a \$750 annual maximum per participant. A similar requirement applies to the state employee health plan, except the \$750 cap does not apply. A plan may not require a referral or require prior authorization. The law has an exclusion for religious employers and Health Savings Account-qualifying high-deductible health plans.

The insurance and HMO provisions of the law will take effect for plan years starting on or after Jan. 1, 2026. The provisions applicable to Medicaid and the state employee health plan will take effect on Jan. 1, 2025. It is unclear if Delaware applies its insurance laws on an extraterritorial basis to fully insured plans issued in another state. The law does not affect self-funded ERISA plans.

Resources

rich.glass@mercer.com

2024 Ch. 84 (HS 2 for HB 110) (Legislature, Sept. 9, 2024)

US — Hawaii (new)	
Status	 Effective Jan. 1, 2025
Development	Health Prepaid Health Care Act Form HC-5 for 2025 posted Hawaii's Prepaid Health Care Act (PHCA) requires employers to offer health coverage to all eligible employees in the state. An employee may waive coverage under the employer's health plan if certain conditions apply, including having other health coverage. To claim an exemption, the employee must complete and provide Form HC-5 (Employee Notification to Employer) to the employer. This notice is binding for only one year, so exempt employees must annually complete a new form by Dec. 31, using the current calendar year's form. The employer must keep this form on file.
Resources	rich.glass@mercer.com Form HC-5 (Government, July 2024)
US — Maryland (previously covered, now effective)	
Status	 Currently effective
Development	Career — Health Paid family medical leave contributions for employers begin Employers participating in the state plan must start making contributions on wages paid to employees from Oct. 1, 2024. The total rate of 0.9% of covered wages up to the Social Security wage base (currently \$160,200) is evenly split between employees and employers, who each contribute 0.45%. Small businesses with 14 or fewer employees are exempt from the employer's portion of the contributions, but employees will continue to contribute their 0.45% share. The contribution rate announced will continue through at least June 30, 2026. Starting in 2026, Maryland workers will receive job protection and up to \$1,000 a week for up to 12 weeks to take time away from work to care for themselves or a loved one, to bond with a child, and for certain military-related events.
Resources	katharine.marshall@mercer.com Maryland Department of Labor announces contribution rate for the forthcoming Family and Medical Leave Insurance system (DOL, Sept. 29, 2023)
US — Maryland (previously covered, now effective)	
Status	 Currently effective
Development	Career — Health — Wealth Employers required to disclose certain wage and benefits information in job postings On April 25, 2024, Maryland's governor signed legislation (HB 649/SB 525) that requires employers to disclose certain wage and benefits information in job postings under amendments to its Equal Pay for Equal Work Law. The revisions took effect on Oct. 1, 2024, and makes Maryland the seventh state (and Washington, DC) to require pay disclosures in job postings.
Resources	GRIST , May 14, 2024

US — Massachusetts (new)

Status  **Currently effective**

Development

Career — Health

Court rules on paid family medical leave accrual issue

The Massachusetts Supreme Court ruled that the state's paid family and medical leave (PFML) law does not require employers to accrue vacation and sick time during paid family and medical leave.

In *Bodge v. Commonwealth*, the state supreme judicial court considered an appeal by state troopers who argued that vacation and sick time should accrue during protected leave. The state government has a policy that denies accrual of benefits — including seniority, length-of-service credit, and vacation and sick time — while on PFML. The court reviewed § 2 of the statute and § 2.16 of the regulations, concluding that the law “does not require an employer to guarantee the accrual of vacation and sick time” during PFML.

Resources rich.glass@mercer.com
[Decision](#) (Government, Sept. 13, 2024)

US — New Jersey (new)

Status  **Currently effective**

Development

Career — Health

Rules issued on temporary worker bill of rights law

New Jersey's Division of Wage and Hour Compliance finalized rules related to its Temporary Worker Bill of Rights law TWBR law, which took effect on Aug. 5, 2023. The law requires temporary laborers to be paid at least the average rate of pay and cost of benefits (or the cash equivalent) of employees working at the recipient organization. Effective Sept. 16, 2024, the final rules define benefits broadly as “employee fringe benefits, including but not limited to, health insurance, life insurance, disability insurance, paid time off (including vacation, holidays, personal leave and sick leave in excess of what is required by law), training, and pension.”

Resources rich.glass@mercer.com
[Rules](#) (Labor and Workforce Development, Sept. 16, 2024)

US — Puerto Rico (new)**Status**  **Effective on or about March 10, 2025.****Development****Health****Cybersecurity insurance rules adopted**

The Oficina del Comisionado de Seguros (OCS) issued Rule 108, establishing cybersecurity standards in the insurance industry and standards for the investigation and notification to OCS for incident reporting. The rule applies the general framework of the National Institute of Standards and Technology (NIST). HIPAA security standards are also based on NIST. Specifically, the rule requires licensed insurers to:

- Develop, implement, and maintain a specified cybersecurity program
- Investigate cybersecurity events
- Notify OCS of cybersecurity events

OCS is permitted to issue penalties of up to \$10,000 per violation.

Resources

[Rule 108](#) (Spanish) (Government)

US — Puerto Rico**Status**  **Currently effective****Development****Career — Health****Benefit and leave laws sometimes differ from others**

Puerto Rico is an unincorporated territory within the US. With a separate tax code and constitution, Puerto Rico has its own tax, benefit and insurance laws. Nonetheless, many (but not all) US laws apply to this territory of a little more than three million residents. The GRIST cited below summarizes major requirements and special issues, including an overview of complicated tax-related health and fringe benefit rules, leave laws, the ACA and more.

Resources

rich.glass@mercer.com
[GRIST](#), Aug. 12, 2024

US — Washington (new)**Status**  **Effective Jan. 1, 2025****Development****Career — Health****2025 paid family medical leave benefit limits issued**

Washington's Employment Security Department has posted its paid family and medical leave (PFML) maximum weekly benefit amount for 2025.

PFML benefits are calculated at 90% of an employee's average weekly wage (AWW) up to 50% of the state AWW (updated to \$1,714 for 2025, almost a 6% increase from \$1,618 in 2024), and 50% for AWW over 50% of the state's AWW. As a result, the maximum weekly benefit amount for 2025 will be \$1,543, up from \$1,456; the minimum weekly benefit amount will stay at \$100 for 2025.

Employee and employer contributions rates for 2025 should be announced in October.

Resources

[Washington's average wage increases 5.9% in 2023](#) (Employment Security Department, June 13, 2024)

US (previously covered, with upcoming effective dates)

Development

Career

- [Law requiring pay transparency in job postings enacted in Illinois](#) — key date: Jan. 1, 2025
- [Law bans employers' captive audience meetings in Illinois](#) — key date: Jan. 1, 2025
- [Salary disclosures, wage data reporting to be required in Massachusetts](#) — key date: July 31, 2025
- [Salary disclosures to be required in job advertisements in Vermont](#) — key date: July 31, 2025
- [Hourly minimum wage to increase to \\$18 in Hawaii](#) — key date: Jan. 1, 2026
- [Artificial Intelligence law focused on employment laws enacted in Illinois](#) — key date: Jan. 1, 2026
- [Artificial intelligence law enacted; will significantly affect employers in Colorado](#) — key date: Feb. 1, 2026

Career — Health

- [Paid sick and safe leave law expanded in Connecticut](#) — key date: Jan. 1, 2025
- [2025 paid family medical leave rates effective in New Jersey](#) — key date: Jan. 1, 2025
- [Prenatal leave enacted in New York](#) — key date: Jan. 1, 2025
- [2025 paid family medical leave rates effective in New York](#) — key date: Jan. 1, 2025
- [Temporary caregiver insurance coverage increased in Rhode Island](#) — key date: Jan. 1, 2025
- [Paid family medical leave effective dates delayed in Maryland](#) — key date: July 1, 2025
- [Paid family and medical leave mandated in Minnesota](#) — key date: Jan. 1, 2026

Health


- [New rule increases HIPAA privacy protections for reproductive healthcare](#) — key date: Dec. 23, 2024
- [Telehealth parity requirement extended in New Jersey](#) — key date: Dec. 31, 2024
- [Law provides temporary tax credit for employers that make payments to employees' child care facilities in Alabama](#) — key date: 2025–2027 tax years
- [High-deductible health plan COVID-19 testing predeductible flexibility ends](#) — key date: Jan. 1, 2025
- [Maternal and infant health equity program required in California](#) — key date: Jan. 1, 2025
- [Law requires a unified healthcare financing system study in California](#) — key date: Jan. 1, 2025
- [New law to require dental plan disclosures in California](#) — key date: Jan. 1, 2025
- [Minimum standards for health plans complying with the Health Care Accountability Ordinance revised in San Francisco, California](#) — key date: Jan. 1, 2025
- [2025 healthcare expenditure rates announced in San Francisco, California](#) — key date: Jan. 1, 2025
- [Third-party prescription drug payment law enacted in Colorado](#) — key date: 2025 plan year
- [Health coverage mandates enacted in Colorado](#) — key date: Jan. 1, 2025
- [Paid family medical leave program legislation enacted in Delaware](#) — key date: 2025
- [Pharmacy benefit manager law enacted in Idaho](#) — key date: Jan. 1, 2025
- [Law bans prior authorization for OB/GYN services in Illinois](#) — key date: Jan. 1, 2025
- [Short-term, limited-duration insurance prohibited in Illinois](#) — key date: Jan. 1, 2025

US (previously covered, with upcoming effective dates) (continued)

Development


Health (continued)

- [Artificial Intelligence in utilization review law enacted in Illinois](#) — key date: Jan. 1, 2025
- [Telehealth physical therapy permitted in Illinois](#) — key date: Jan. 1, 2025
- [Insulin cost-sharing law enacted in Illinois](#) — key date: July 1, 2025
- [Telehealth law effective for existing plans in Louisiana](#) — key date: Jan. 1, 2025
- [Pharmacy benefit manager law bans spread pricing in Louisiana](#) — key date: Jan. 1, 2025
- [Medically necessary fertility preservation law effective in Louisiana](#) — key date: earlier of renewal or Jan. 1, 2025
- [Law enacted that addresses fully insured plans' use of prior authorization in Maryland](#) — key date: Jan. 1, 2025
- [2025 individual mandate coverage dollar limits set in Massachusetts](#) — key date: Jan. 1, 2025
- [Gender-affirming care coverage mandate adopted in Minnesota](#) — key date: Jan. 1, 2025
- [Salary range and benefit disclosures required in job postings in Minnesota](#) — key date: Jan. 1, 2025
- [Two-tiered minimum wage system mostly eliminated; employer record-keeping requirements increased in Minnesota](#) — key date: Jan. 1, 2025
- [Prescription cost-sharing limits law enacted in Minnesota](#) — key date: Jan. 1, 2025
- [Prior authorization law enacted in New Hampshire](#) — key date: Jan. 1, 2025
- [Ancillary plan exception finalized in New Mexico](#) — key date: Jan. 1, 2025
- [Insurance law restricting prior authorization enacted in Mississippi](#) — key date: Jan. 1, 2025
- [Prescription benefit law enacted in North Dakota](#) — key date: Jan. 1, 2025
- [Fully insured plan reimbursement rates for ground ambulance services established in Oklahoma](#) — key date: Jan. 1, 2025
- [Fertility coverage to be required in certain circumstances in Oklahoma](#) — key date: Jan. 1, 2025
- [Prescription drug law enacted in Oregon](#) — key date: Jan. 1, 2025
- [Employer child-care tax credit law enacted in Pennsylvania](#) — key date: 2025 tax year
- [Prescription law enacted in Rhode Island](#) — key date: Jan. 1, 2025
- [Cost-sharing caps imposed on specialty drugs and EpiPens in Rhode Island](#) — key date: 2025 plan year
- [Data protection law enacted in Tennessee](#) — key date: July 1, 2025
- [Prescription drug requirements enacted in Texas](#) — key date: Jan. 1, 2025
- [Telehealth law enacted in Vermont](#) — key date: Jan. 1, 2025
- [Prior authorization law enacted in Vermont](#) — key date: Jan. 1, 2025
- [Benefit law enacted in Washington](#) — key date: Jan 1, 2025
- [Health expenditure rates for hotel employees published in Seattle, Washington](#) — key date: Jan. 1, 2025
- [Fertility treatment law enacted in Washington, DC](#) — key date: Jan. 1, 2025
- [Prescription drug law enacted in Virginia](#) — key date: July 1, 2025
- [Law applies balance billing restrictions to ground ambulance providers in Texas](#) — key date: expires Sept. 1, 2025
- [Telehealth law to expire in Hawaii](#) — key date: Dec. 31, 2025
- [Telehealth law enacted in Colorado](#) — key date: Jan. 1, 2026
- [New law focuses on prior authorization practices for fully insured plans in Colorado](#) — key date: Jan. 1, 2026
- [Colonoscopy coverage mandate enacted in Illinois](#) — key date: Plan years starting in 2026
- [Dependent coverage law enacted in Illinois](#) — key date: Plan years starting in 2026

US (previously covered, with upcoming effective dates) (continued)	
Development	<div><div>Health (continued)</div><ul style="list-style-type: none">• Fertility-related insurance laws enacted in Illinois — key date: Plan years starting in 2026• Pregnancy-related services coverage mandate enacted in Illinois — key date: Jan. 1, 2026• Paid family and medical leave law enacted in Minnesota — key date: Jan. 1, 2026• Pharmacy benefit manager law enacted in Pennsylvania — key date: Jan. 1, 2026• Telehealth laws enacted in Washington — key date: Jan. 1, 2026• Pharmacy benefit manager law enacted in Washington — key date: Jan. 1, 2026• Prior authorization insurance law enacted in Wyoming — key date: July 1, 2026• State-based exchange delivery to change in Oregon — key date: Nov. 1, 2026<div>Wealth</div><ul style="list-style-type: none">• IRS sets 2025 for final required minimum distribution rules, extends 10-year rule relief — key date: 2025• Eagerly awaited defined benefit mortality tables issued — key date: 2025• IRS delays SECURE 2.0's Roth catch-up mandate — key date: 2026</div>
Uruguay (new)	
Status	<div><div></div>Currently effective</div>
Development	<div><div>Career</div><div>Minimum wage increased</div><p>Effective July 1, 2024, the monthly minimum wage increased to 22,751 UYU, up from 22,268 UYU. A further increase is slated for January 2025.</p></div>
Resources	<div>Law (Spanish) (Government, Jan. 30, 2024)</div>

Section 4

Asia Pacific

Australia (new)	
Status	 Effective July 1, 2025
Development	<p>Career — Health — Wealth</p> <p>Superannuation contributions on paid parental leave legislation enacted</p> <p>Superannuation contributions will be payable on government Paid Parental Leave Payments from July 1, 2025, under measures included in the Paid Parental Leave Amendment (Adding Superannuation for a More Secure Retirement) Bill 2024 that received Royal Assent on Oct. 1, 2024.</p> <p>Eligible parents with babies born or adopted on or after July 1, 2025, will receive an additional payment at the Superannuation Guarantee rate (by then 12%) of their Paid Parental Leave payment, as an annual lump sum contribution to their nominated superannuation fund. The payment will be paid following the end of each financial year, including an interest component, for recipients of Paid Parental Leave.</p>
Resources	<p>paul.shallue@mercer.com</p> <p>Paid Parental Leave Amendment (Adding Superannuation for a More Secure Retirement) Bill 2024</p>

Australia (new)	
Status	 Proposal
Development	<p>Career — Health — Wealth</p> <p>Privacy bill introduced</p> <p>The government introduced the Privacy and Other Legislation Amendment Bill 2024 to Parliament that aims to implement the first tranche of agreed recommendations from the Privacy Act Review. The measures include:</p> <ul style="list-style-type: none">• A new statutory tort to address serious invasions of privacy• Increased transparency for individuals regarding automated decisions that affect them• Streamlined information sharing in the event of an emergency or eligible data breach that would ensure the appropriate protection of information• Development of a Children's Online Privacy Code to better protect children from a range of online harms, supported by an additional AU\$3 million over three years to the Office of the Australian Information Commissioner to develop this Code• Stronger enforcement powers for the Australian Information Commissioner• New criminal offences to outlaw “doxing” (the malicious release of personal data online). <p>The bill has been referred to the Senate Legal and Constitutional Affairs Legislation Committee for review and inquiry, with the report due Nov. 14, 2024.</p>
Resources	<p>paul.shallue@mercer.com</p> <p>Privacy and Other Legislation Amendment Bill 2024 (Legislature)</p>

Australia (new)

Status



Proposal

Development

Career — Wealth

Anti-money laundering, counter-terrorism measures introduced

The government has introduced the Anti-Money Laundering and Counter-Terrorism Financing Amendment Bill 2024 that aims to reform Australia’s anti-money laundering and counter-terrorism financing (AML/CTF) regime and align Australia with international requirements. The bill would build on Australia’s existing regulatory framework for combatting money laundering, terrorism financing and other serious financial crimes and follows the publication of a second round of consultation on AML/CTF reforms in May-June 2024. The bill was referred to the Senate Legal and Constitutional Affairs Legislation Committee for review and inquiry, with the report due Nov. 13, 2024.

A key measure would expand Australia’s AML/CTF regime to certain high-risk services provided by “gatekeeper professions” (including real estate professionals, dealers in precious metals and precious stones, and professional service providers, including lawyers, conveyancers, accountants and trust and company service providers — these are also known as “tranche two” entities). These types of services are recognized globally as “high risk” for money laundering, but they are not currently captured by the AML/CTF regime.

Other reforms in the bill aim to:

- Improve the effectiveness of the AML/CTF regime by making it simpler and clearer for businesses to comply with their obligations, and
- Modernize the regime to reflect changing business structures, technologies and illicit financing methodologies.

Resources

paul.shallue@mercer.com

[Anti-Money Laundering and Counter-Terrorism Financing Amendment Bill 2024](#) (Legislature, Sept. 11, 2024)

Australia (new)

Status



Fact sheet about upcoming proposals

Development

Wealth

Further details on Payday Super announced

Employers would be required to pay their employees' Superannuation Guarantee (SG) contributions at the same time as their salary and wages under measures published in a fact sheet by the government, effective July 1, 2026. The legislative design will progress through the second half of 2024, before consultation on draft legislation. The Australia Taxation Office (ATO) will engage industry about the administrative design. Highlights of the proposed key policy design decisions include:

- Employer SG contributions would have to be paid into the employee's superannuation fund within seven calendar days of payday, or the employer would be become liable for a revised SG charge.
- The deadline for superannuation funds to allocate or return contributions would be reduced to three business days, down from 20.
- The SuperStream data and payment standards would be revised to allow payments via the New Payments Platform and improve error messaging to enable employers and intermediaries to quickly address errors.
- Revised choice of fund rules would make it easier for employees to nominate their superannuation fund when they start a new job. Employers would be able to show employees their existing "stapled" fund during onboarding.
- The advertising of superannuation products during onboarding would be limited to MySuper products that have passed the most recent performance test to protect employees from poor outcomes.
- The ATO's Small Business Superannuation Clearing House would be retired from July 1, 2026.

Resources

paul.shallue@mercer.com

[Payday Super](#) (Treasury, Sept. 17, 2024)

Australia (new)

Status



Response to consultation

Development

Wealth

Regulator responds to Phase 2 consultation on super data transformation

The Australia Prudential Regulation Authority (APRA) has released its response to a recent Superannuation Data Transformation (SDT) Phase 2 consultation on enhancements to superannuation data collections that concern indirect investment costs and trustee financial statements. APRA's response is divided into two releases, prioritizing the data required on investment costs and financial statements, with a second response package expected later in 2024 that will cover the remaining topics (investments, Registrable Superannuation Entity (RSE) licensee profile and RSE profile). Following significant feedback about the structure and scope of the proposed indirect investment costs collection, APRA has amended the reporting standard to reduce the reporting burden, and to capture total investment fees and total transaction costs. APRA has also aligned the reporting year to a June 30 year-end (consistent with annual reporting under SRS 705.0) and has extended the annual reporting due date by 2.5 months — from Sept. 30 to Dec. 15.

The trustee financial statements collection are retained and the reporting requirements for related party transactions would align with the financial statements.

APRA intends to consult on confidentiality of the new data collections, with publication from 2026 of the data that will be determined nonconfidential.

Resources

paul.shallue@mercero.com
[APRA releases response to consultation on enhancements to superannuation data collections and Phase 2 Depth](#) (APRA, September 2024)

Australia (new)

Status



Proposal

Development

Wealth

Option to exit legacy pensions, reserve allocation changes proposed

Individuals would be allowed a five-year grace period to exit certain legacy retirement pension and annuity products under draft regulations issued for consultation. The measures are included in Treasury Laws Amendment Instrument 2024: Self-managed superannuation funds — legacy retirement product conversions and reserves. They would provide more favorable tax treatment for some types of allocations from a superannuation fund reserve to a member's account; enable individuals to exit products that are no longer suitable for their circumstances; remove barriers that currently prevent the closure of obsolete funds and legacy products; and allow for the allocation of reserves that no longer serve an ongoing purpose.

The inclusion of “self-managed superannuation funds” in the title of the draft instrument is somewhat confusing as the draft regulations do not appear to restrict the changes to self-managed superannuation funds (SMSFs).

Under the draft regulations, the five-year exit option would apply to full commutations of legacy lifetime, life expectancy and market-linked superannuation income stream products that fulfill certain criteria. Other measures include proposed changes to the tax treatment of allocations from a reserve.

Resources

paul.shallue@mercero.com
[Legacy retirement product conversions and reserves — draft regulations](#) (The Treasury, Sept. 17, 2024)

Australia (previously covered, with upcoming effective dates)**Development****Career — Health — Wealth**

- [Paid parental leave superannuation contribution details included in federal budget](#) — key date: July 1, 2025
- [Paid parental leave scheme expanded](#) — key date: July 1, 2025

Wealth

- [Final rules and guidance for Financial Accountability Regime issued](#) — key date: March 15, 2025
- [Updated guidance on strategic planning and member outcomes issued](#) — key date: July 1, 2025
- [New operational risk management standard to apply](#) — key date: July 1, 2025
- [Operational resilience guidance finalized](#) — key date: July 1, 2025
- [Extension of superannuation disclosure relief confirmed](#) — key date: Jan. 1, 2026

China (new)**Status****Phase-in begins in 2025****Development****Wealth****Statutory retirement age to gradually increase**

China will gradually increase the statutory retirement age for both men and women over a 15-year period starting in 2025, according to a decision adopted on Sept. 13, 2024, by the Standing Committee of the 14th National People's Congress. These measures will be the first increase to retirement age since 1978, and they follow an analysis of average life expectancy, health conditions, population structure, education levels and workforce supply. Highlights include:

- The statutory retirement age for men will gradually increase to 63, up from 60. Women working in white collar jobs will retire at age 58 (up from 55), and women working in blue collar roles will retire at age 55 (up from 50).
- From 2030, the minimum contribution period required to receive monthly pension benefits will increase by six months annually to 20 years, up from 15.
- Voluntary retirement will be permitted but no earlier than three years prior to achieving the minimum number of contribution years. Individuals cannot take early retirement before their previous statutory retirement age.
- Individuals can postpone their retirement by up to three years beyond their statutory retirement age, subject to their employers' agreement.
- Other policy measures will address the old-age insurance incentive mechanism, implement the employment-first strategy, ensure the basic rights and interests of workers who have passed their statutory retirement age and improve elder- and child-care services. specific provisions on the welfare of unemployed old-age workers and on earlier retirement for those in special professions are also included.

Resources

[China to gradually raise retirement age](#) (Government, Sept. 13, 2024)

China (previously covered, with upcoming effective date)**Development****Career**

- [Preferential taxation policy for expatriates expanded](#) — key date: Dec. 31, 2027
- [Preferential taxation policy for annual one-time bonus extended](#) — key date: Dec. 31, 2027

Hong Kong (previously covered, with upcoming effective date)**Development****Career**

- [Number of statutory holidays increased](#): key date: Dec. 26, 2024
- [Gender board diversity, corporate governance required](#) — key date: Dec. 31, 2024
- [Statutory minimum wage to be reviewed annually](#) — key date: January 2025

Wealth

- [Mandatory pension fund offsetting to end](#) — key date: May 2025

India (previously covered, with upcoming effective date)**Development****Career — Health — Wealth**

- [Labor and employment laws reformed](#) — key date: effective date delayed

Indonesia (previously covered, with upcoming effective date)**Development****Career**

- [Details of public housing savings program, contributions and registration issued](#) — key date: May 20, 2027

Japan (previously covered, now effective)**Status****Effective between Oct. 1 and Nov. 1, 2024****Development****Career****Minimum wage to increase**

The average minimum hourly wage will increase in Japan's prefectures by ¥ 51, effective between Oct. 1, and Nov. 1, 2024. The new national weighted average is 1,055¥, up from 1,004¥ — the largest increase ever awarded. The Central Minimum Wages Council proposed a 5% increase that would increase the hourly minimum wage to ¥1,054. Of the 47 prefectures, 27 have decided to increase their minimum hourly wages by more than 50¥.

Resources

[Announcement](#) (Japanese) (Ministry of Health, Labour and Welfare, Aug. 29, 2024)


Japan (previously covered, now effective)**Status****Currently effective****Development****Health — Wealth****Social insurance enrollment expanded to smaller employers**

From Oct. 1, 2024, employers with more than 50 employees must enroll their employees in social insurance (this covers health insurance and welfare pension).

Previously, companies with more than 100 employees had to enroll full-time and most part-time employees who worked at least 75% of the full-time working hours. Some part-time workers who worked less than 75% of full-time working hours had to be enrolled if they met certain criteria.

Resources

[Information on Social Insurance](#) (Japanese) (Government)

Japan (previously covered, with upcoming effective date)	
Development	Wealth <ul style="list-style-type: none"> Defined contribution reforms enacted — key date: Dec. 1, 2024
Malaysia (previously covered with upcoming effective dates)	
Development	Career <ul style="list-style-type: none"> Progressive wage policy to be implemented — key date: expected in 2024
Singapore (new)	
Status	 Proposal
Development	Career — Health — Wealth New Platform Workers bill introduced <p>Singapore’s parliament recently introduced the Platform Workers Bill that would increase the rights and protections given to platform workers. Highlights include:</p> <ul style="list-style-type: none"> The bill would apply to platform workers who are under the management of a “platform service” providing on-demand delivery and ride-hailing services and would create a distinct third category of worker. Highlights include: Requirement for platform service providers and their workers to contribute to the Central Provident Fund (CPF). Currently, platform workers — like self-employed individuals — contribute up to 10.5% of their income to the CPF, but platform service providers do not have to contribute. Increased CPF contributions by both platform workers and platform operators would be phased-in over a five-year period to align with the current CPF rates for employees and employers. Platform workers would be compensated for injuries “arising out of and in the course of their provision of platform services for platform operators.” The Ministry of Manpower would provide conciliation to resolve collective disputes before their referral to the Industrial Arbitration Court. Platform workers would be allowed to join representative bodies, but not trade unions because they do not have employee status.
Resources	Platform Workers Bill 2024 (Legislature) and Press release (Government, Sept. 9, 2024)

Singapore (previously covered with upcoming effective dates)	
Development	<p>Career</p> <ul style="list-style-type: none"> • Legislation to combat discrimination will be issued — key date: second half of 2024 • Employment Pass salary threshold to increase in 2025 — key date: Jan. 1, 2025 <p>Career — Health</p> <ul style="list-style-type: none"> • Guidelines for flexible work arrangements issued — key date: Dec. 1, 2024 • Parental leave entitlement expanded — key date: April 1, 2025 <p>Career — Wealth</p> <ul style="list-style-type: none"> • Retirement and reemployment ages to increase — key date: July 1, 2026 <p>Wealth</p> <ul style="list-style-type: none"> • Central Provident Fund monthly salary cap for calculating contributions increased — December 2024
South Korea (previously covered, with upcoming effective date)	
Development	<p>Wealth</p> <ul style="list-style-type: none"> • Minimum wage to increase — key date: Jan. 1, 2025
Taiwan (new)	
Status	<p> Effective Jan. 1, 2025</p>
Development	<p>Career</p> <p>Minimum wage to increase</p> <p>Effective Jan. 1, 2025, the monthly minimum wage will increase to NT\$28,590 (up from NT\$27,470), and the hourly minimum wage will be NT\$190 (up from NT\$183).</p>
Resources	<p>Announcement (Chinese) (Government, Sept. 19, 2024)</p>
Taiwan (previously covered, with upcoming effective date)	
Development	<p>Career — Wealth</p> <ul style="list-style-type: none"> • Employees and employers can negotiate post-retirement age employment — key date: Effective date not yet known

Section 5

Europe, Middle East and Africa (EMEA)

European Union (EU) (new)

Status



Staff paper issued

Development

Wealth

Analysis of Pan-European Pension Product published

A staff paper issued by European Insurance and Occupational Pensions Authority (EIOPA) assesses the reasons for the limited uptake of the Pan-European Pension Product (PEPP) that launched in 2022. EIOPA suggests improvements that would expand the PEPP's potential market, boost its attractiveness for pension savers and providers and “breathe new life into supplementary pensions” across the European Union (EU).

The EU's launch of the PEPP aimed to complement public and occupational pensions and increase retirement savings choices for all individuals, especially mobile workers. It was designed to offer “a simple, transparent, cost-efficient and mobile retirement savings option” that would also supply capital to finance economic growth in EU, including green and digital transitions. Highlights of the staff paper include:

- Supply side difficulties because the fee cap of 1% of the accumulated capital per year does not create sufficient scale to make the PEPP commercially viable.
- Delayed implementation of the PEPP by some member states and the lack of uniform tax treatment across the EU.
- Contribution of the cost-of-living crisis to low consumer awareness of, and participation in, supplementary pension schemes, resulting in reduced demand for the PEPP.

EIOPA's suggested improvements include:

- Focus on value-for-money considerations instead of a hard cap on costs
- Combine the occupational and personal PEPP into a single product that would allow for tax-efficient employer contributions within one PEPP
- Apply PEPP labels to national products that fulfill the EU's common rules
- Make sub-accounts voluntary so that the cross-border feature of PEPP is optional, and thus reduce the administrative burden
- Allow funds from other personal pension products to transfer into the PEPP
- Provide a single place to enable savers to view their pension entitlements
- Introduce “indispensable” national and EU-wide measures that include the same favorable tax treatment of the PEPP as applies to national pension products, and the introduction of “pension dashboards” to increase pension adequacy transparency.

EIOPA plans to engage with stakeholders on the proposals and to develop specific policy proposals prior to the scheduled evaluation of the PEPP regulation in 2027.

Resources

[EIOPA staff paper on the future Pan-European Pension Product \(EIOPA, Sept. 11, 2024\)](#) and [EIOPA proposes a broad reform of the PEPP to tackle Europe's pension gap and support the digital and green transitions \(EIOPA, Sept. 11, 2024\)](#)

EU (previously covered, with upcoming effective dates)

Development

Career

- [Directive on promoting statutory minimum wages finalized](#) — key date: Nov. 15, 2024
- [Reforms to Blue Card coming for highly skilled workers](#) — key date: Nov. 18, 2024
- [Rights of platform workers finalized](#) — key date: 2026
- [Law to improve gender balance on company boards approved](#) — key date: June 7, 2026
- [Pay transparency law must be transposed into national law](#) — key date: June 7, 2026
- [Corporate sustainability, human rights due diligence directive finalized](#) — key date: July 26, 2026

Career — Health — Wealth

- [Sustainability reporting standards issued](#) — key date: 2025

Austria (previously covered, with upcoming effective date)

Development

Career — Health

- [Teleworking law revised](#) — key date: Jan. 1, 2025

Belgium (previously covered, with upcoming effective date)

Development

Wealth

- [Blue- and white-collar pension harmonization postponed](#) — key date: Jan. 1, 2027
- [Federal government agrees on pension reforms](#) — key date: Jan. 1, 2028

Czech Republic (previously covered, with upcoming effective date)

Development

Career

- [Labor code revised](#) — key date: Jan. 1, 2025

Denmark (previously covered, with upcoming effective date)

Development

Career

- [Additional employment deduction to be implemented](#) — key date: Jan. 1, 2025

France (previously covered, with upcoming effective date)

Development	Career <ul style="list-style-type: none">• Mandatory profit sharing measures expanded — key date: Jan. 1, 2025• New gender quotas imposed for senior execs/management teams — key date: March 1, 2026
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Hungary (previously covered, now effective)

Status	 Currently effective
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Development	Career — Health <p>Compulsory medical suitability assessments end</p> <p>From Sept. 1, 2024, employers generally no longer have to conduct compulsory medical suitability assessments before employees start work. However, some occupations/roles will still require a medical suitability assessment to determine an employee's fitness for work, and employers could still choose to require a medical examination. The changes are included in the amended Act XCIII of 1993 on occupational safety and health.</p>
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Resources	kinga.korein@mercermarshbenefits.com Act XCIII of 1993 on occupational safety and health (Hungarian) (Government)
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Ireland (new)**Status****The threshold will begin to increase in 2026.****Development****Wealth****Changes to the Standard Fund Threshold announced**

Changes to the Standard Fund Threshold (SFT) for pensions were announced on Sept. 18, 2024, in a statement by the minister for finance and follows an independent review of the SFT. The SFT is the maximum amount of pension benefits that an individual can accrue from Irish pension arrangements. The current maximum is set at €2 million and has remained unchanged since 2014. Highlights of the measures include:

- Beginning in 2026, the SFT will be increased in increments of €200,000 until it reaches €2.8 million by 2029. The maximum SFT will then increase by an applicable growth rate annually. These changes will be included in the Finance Bill 2024 expected in December 2024.
- The maximum retirement lump sum that is taxed at 20% will remain unchanged at €500,000. Previously, the maximum sum was 25% of the SFT, but the minister announced that the Finance Bill 2024 will remove that link and retain the €500,000 maximum.
- The chargeable excess tax rate (CET) remains unchanged but will be reviewed again before 2030. The CET is the additional rate of tax paid on pension benefits exceeding the SFT.
- An independent actuarial evaluation of the age-related factors applicable to defined benefit schemes will be conducted — the independent SFT review recommended that the current age-related factors should be materially decreased.

The statement did not refer to the treatment of previous pension benefits that have already been drawn. However, current legislation states that these benefits must increase in line with future SFT increases. If this policy is retained, then members who have already drawn benefits up to the previous maximum will not benefit from the increase.

An interdepartmental government working group will be established to consider the other recommendations in the report.

Resources

lorna.white@mercero.com

[Opening statement by Minister Chambers on changes to Standard Fund Threshold](#) (Government, Sept. 19, 2024) and [Examination of the Standard Fund Threshold — Dr. Donal de Buitléir](#) (Government, Sept. 18, 2024)

Ireland (updated)**Status****Launch date is delayed until Sept. 30, 2025.****Development****Wealth****Launch date for automatic enrolment pension system delayed**

The new Automatic Enrolment (AE) regime has been delayed until Sept. 30, 2025 — the delay was announced by the Minister of Social Protection and then included in Budget 2025. The Automatic Enrolment Retirement Savings System Act 2024 was signed into law by the president on July 9, 2024. All employees within the scope will be automatically enrolled into a new central retirement savings system unless they contribute to an occupational pension plan or Personal Retirement Savings Account (PRSA). Employers that want to use their plan or PRSA for AE purposes must ensure that all AE eligible employees are contributing to it before the law's commencement date.

Resources

lorna.white@mercero.com

[Budget 2025](#) and [Automatic Enrolment Retirement Savings System Act 2024](#) (Legislature, July 9, 2024)

Ireland (previously covered, now effective)**Status**  **Currently effective****Development****Health — Wealth****PRSI contributions, salary contributions to increase**

Employer and employee contributions to the Pay-Related Social Insurance (PRSI) will increase annually beginning Oct. 1, 2024 until 2028. The increase is included in the Social Welfare (Miscellaneous Provisions) Act 2024 signed on July 15, 2024, which aims to fund the new Jobseeker's Pay-Related Benefit. PRSI is charged on employment income, including taxable noncash benefits. Highlights include:

- The lower employer PRSI contribution will increase to 9.5% by 2028 — up from 8.8%.
- The higher employer PRSI contribution will increase to 11.75% by 2028 — up from 11.05%.
- The employee PRSI contribution will increase to 4.7% by 2028 — up from 4%.
- The first increase on Oct. 1, 2024, is 0.1 percentage points for both employers and employees (8.9% or 11.15% respectively for employers, and 4.1% for employees). Thereafter, the increases will be 0.1 percentage points in 2025; 0.15 percentage points in 2026 and 2027; and 0.2 percentage points in 2028.
- The weekly wage threshold that triggers the higher PRSI employer rate increased on Oct. 1, 2024, to €496, up from €441. No further increases will be introduced during the period 2024 to 2028.
- Employers must also pay an additional 1% for the National Training Fund.

Resources

[Social Welfare \(Miscellaneous Provisions\) Act 2024](#) (Government, July 15, 2024)

Isle of Man**Status**  **Consultation is open through Oct. 29, 2024.****Development****Career — Health****Changes to employment rights proposed**



The government issued seven consultations on employment rights and invites comments through Oct. 29, 2024. Topics covered include:

- Proposed increase to annual leave entitlement (to 28 days, up from 20)
- Qualifying periods for complaints of unfair dismissal) and maximum awards for these complaints
- Trade union legislation (including ballot threshold requirements)
- Employment status and the rights of agency workers
- The operation of the Minimum Wage Act 2001
- Parental and caring rights, including redundancy protections, carer's leave and neo-natal leave
- The licensing of employment agencies and businesses.

In addition to the consultations, the Employment (Amendment) Bill 2023 will be introduced in April 2025 and includes the right to shared parental leave and whistleblowing procedures.

Resources

[Employment rights consultations](#) (Government)

Israel (previously covered, with upcoming effective date)	
Development	Health <ul style="list-style-type: none"> Health insurance contributions to increase — key date: Jan. 1, 2025
Kenya (previously covered, with upcoming effective date)	
Development	Career <ul style="list-style-type: none"> Minimum wage hike announced — key date: Effective date unknown
Latvia (new)	
Status	 Proposal
Development	Career <p>Minimum wage increase proposed</p> <p>The Ministry of Labor has proposed that the 2025 minimum wage rates will increase to €740/month, up from €700/month. Further increases are proposed — to €780 euros in 2026, €820 in 2027 and €860 euros in 2028.</p>
Resources	Announcement (Latvian) (Government, Sept. 9, 2024)
Lithuania (new)	
Status	 Effective Jan. 1, 2025
Development	Career <p>Minimum wage to increase</p> <p>The monthly minimum wage will increase to €1,038 (up from €924), effective Jan. 1, 2025. The minimum gross hourly wage will increase to €6.35, up from €5.65.</p>
Resources	Announcement (Lithuanian) (Government)

Luxembourg (new)

Status



Currently effective

Development

Career

Labor code changed to benefit employees' working conditions

Changes to Luxembourg's labor code were approved on July 24, 2024, and aim to implement the European Union's directive on transparent and predictable working conditions. Highlights of the changes include:

- Employment contracts signed on or after Aug. 4, 2024, must include provisions concerning termination, probationary periods, overtime and any training rights. Employees with contracts signed before then can request their employer to update their contract — employers have two months to comply.
- Trial periods for workers on fixed-term contracts are capped at between two weeks and a quarter of the contract's duration.
- Workers on fixed-term contracts who have six months or more seniority with the same employer can request a transfer to an indefinite contract. Employers must reply within one month, or face fines.
- Employees are allowed to have other employment outside their normal working hours, provided it does not conflict with their primary employment.

Resources


[Law](#) (French) (Official Journal, July 24, 2024) and [Directive 2019/1152](#) (Europa, June 20, 2019)




Namibia (previously covered, with upcoming effective date)

Development

Career

- [National minimum wage to be introduced](#) — key date: Jan. 1, 2025

Netherlands (new)	
Status	 Proposal
Development	<p>Career</p> <p>Government proposes to reverse reduction of expatriate 30% ruling</p> <p>The Dutch government proposed on Sept. 13, 2024, to reverse the gradual scaling back of the 30% ruling because it had negatively impacted the Dutch economy. The proposed reversal is included in the presentation letter to the Budget Plan and could be subject to further change — the budget must now be discussed by the parliament.</p> <p>The 30% ruling is a tax measure that allowed for specialized foreign employees to work in the Netherlands, and for up to 30% to be paid tax-free for up to five years. The 30% ruling was scaled back starting in January 2024. Currently, the 30% allowance can be paid in the first 20 months of an individual's employment in the Netherlands, calculated on a capped salary amount; after this period, the allowance is reduced to 20% for a further 20 months, and then to 10% for the remaining 20 months of their term.</p> <p>Highlights of the proposals include:</p> <ul style="list-style-type: none"> • For the years 2025 and 2026, the flat rate would be 30% of the capped salary. As of Jan. 1, 2027, the flat rate would be reduced to 27%. • Transitional rules would apply to employees who already had used the 30% ruling before 2024. • The eligible salary threshold that would allow the 30% ruling to be used would increase to €50,436 (up from €46,107) and would be indexed. The eligible salary for employees younger than age 30, and who have a master's degree, will increase proportionately. • The capped wage used to calculate the 30% ruling, and which was introduced on Jan. 1, 2024, would be unchanged.
Resources	charlotte.oudshoorn@mercer.com Proposal (Dutch) (Legislature)
Netherlands (previously covered, with upcoming effective date)	
Development	<p>Wealth</p> <ul style="list-style-type: none"> • Parliament agrees to significant occupational pension reforms — key date: Jan. 1, 2025
Nigeria (previously covered, with upcoming effective date)	
Development	<p>Health</p> <ul style="list-style-type: none"> • Health insurance coverage to significantly expand — key date: unknown
Oman (previously covered, with upcoming effective date)	
Development	<p>Career — Health</p> <ul style="list-style-type: none"> • Social protection for foreign employees expanded — key date: July 2025

Poland (new)	
Status	 Effective Jan. 1, 2025
Development	Career Minimum wage to increase From Jan. 1, 2025, the monthly minimum wage rate will increase to 4,666 PLN (up from 4,300 PLN), and the hourly rate will be 30.50 PLN (up from 28.10 PLN).
Resources	Ordinance (Polish) (Government, Sept. 14, 2024)
Serbia (new)	
Status	 Effective Jan. 1, 2025
Development	Career Minimum wage to increase Effective Jan. 1, 2025, the hourly minimum wage will increase to 308 RSD, up from 271 RSD. The monthly minimum wage will be 53,592 RSD, up from 47,335 RSD.
Resources	Announcement (Serbian) (Government, Aug. 28, 2024)
South Africa (previously covered, with upcoming effective date)	
Development	Career <ul style="list-style-type: none"> Expanded remuneration and pay gap disclosures required — key date: Upon proclamation
Sweden (previously covered, now effective)	
Status	 Currently effective
Development	Career — Health Employer compensation for high sick-pay costs ends The Swedish government announced on Sept. 18, 2023, its intention to terminate the compensation for annual sick pay costs exceeding a fixed proportion of wages. The compensation scheme ceased at the end of June 2024, and the last payment will be credited to employers' accounts in 2025, based on their January to June 2024 submissions to the Tax Agency. The scheme had originally been introduced to encourage employers to hire more staff. The government contends that the compensation resulted in fewer employer initiatives to reduce absences due to illness. It also claimed that the automated procedure for claiming compensation made it difficult to verify payments, saying that employer errors amounted to 3.2% of the benefit's insurance costs. The government estimates that the scheme's phase-out will save 1,230 million SEK in 2025, and 2,638 million SEK in 2026.
Resources	malin.soederbaeck@mercer.com Announcement (Swedish) (Government, Oct. 2, 2024); Announcement (Swedish) (Government, Sept. 18, 2023) and Sick employee days 1-90 (Government)

Switzerland (previously covered, with upcoming effective date)

Development

Career

- [Hourly minimum wage to be introduced in Zurich and Winterthur](#) — key date: unknown

Career — Health

- [Paid leave introduced in Geneva](#) — key date: unknown

Wealth

- [Occupational pension reforms pass parliament](#) — key date: unknown

UAE (previously covered, with upcoming effective date)

Development

Health

- [Minimum health benefits for insurance policies updated](#) — key date: Jan. 1, 2025
- [Compulsory health insurance to expand to Northern Emirates](#) — key date: Jan. 1, 2025

United Kingdom (UK) (new)

Status



Consultation is open until Oct. 17, 2024.

Development

Wealth

Consultation launched on value for money framework for defined contribution schemes rights

The Financial Conduct Authority (FCA) launched a consultation on the detailed rules and guidance for the new value for money (VFM) framework for savers invested in default arrangements of workplace defined contribution (DC) schemes. The consultation relates to the rules for FCA-regulated firms operating contract-based schemes but is relevant for all DC schemes because the government intends to legislate for the framework to apply to trust-based schemes in the forthcoming Pension Schemes Bill. The framework is based on previous work by the Department for Work and Pensions and the Pensions Regulator to improve the value schemes deliver for members and enable comparisons to be made across the DC pension landscape. The proposed framework introduces the following measures:



- Require the consistent measurement and public disclosure of investment performance, costs and service quality information against specified metrics
- Enable those overseeing and challenging an arrangement's value — Independent Governance Committees (IGCs) and Governance Advisory Arrangements (GAAs) for contract-based schemes — to assess performance against other arrangements and requires them to do so on a consistent and objective basis
- Require public disclosure of assessment outcomes including a “red, amber, green” (RAG) VFM rating for each arrangement
- Require firms to take specified actions where an arrangement has been assessed as not providing VFM (red or amber) — those rated amber must improve and deliver VFM by the fourth assessment year, and those rated red must consider transferring members to an alternative arrangement that provides value.


The FCA intends that the framework would reduce the number of savers in pension schemes that deliver poor value, and drive better value for money through greater scrutiny and competition on long-term value rather than cost. It is designed to work in conjunction with the Consumer Duty that requires firms to deliver fair value from the products they offer.

Resources

richard.wyatt@mercer.com

[CP24/16: The Value for Money Framework](#) (FCA, Aug. 8, 2024)

UK (new)	
Status	 Proposal
Development	Wealth Government considers ways to boost investment, increase retirement outcomes A Call for Evidence under the government's first phase of its Pension Review closed on Sept. 25, 2024. The aim of the first phase is to increase investments to contribute to economic growth and improve retirement outcomes. The scope of the Call for Evidence was limited to investments in defined contribution arrangements and the Local Government Pension Scheme (LGPS); the rest of the defined benefit market is out of the scope of the review. It will examine the role of consolidation with the aim of encouraging at-scale schemes to increase returns through adopting broader investment strategies and a focus on value as opposed to costs.
Resources	richard.wyatt@mercer.com Pensions investment review: Call for evidence (Government, Sept. 4, 2024)
UK (new)	
Status	 Currently effective
Development	Wealth Guidance issued on statement of strategy under the new DB funding regime The Pensions Regulator (TPR) has confirmed the information requirements for the “statement of strategy” under the new Defined Benefit (DB) Funding Regime. Building on the DB Funding Code published in July 2024, TPR published illustrative templates for the statement of strategy that records and explains the scheme’s funding, investment strategy, and implementation. It also provided the completed valuation that is submitted to TPR under the new funding regime, and which is applicable to valuations with effective dates from Sept. 22, 2024.
Resources	richard.wyatt@mercer.com From today trustees should use TPR’s new DB funding code (TPR, Sept. 23, 2024)

UK (previously covered, soon to be effective)	
Status	 Effective Oct. 26, 2024
Development	<p>Career</p> <p>Employers have new duty to prevent workplace sexual harassment</p> <p>Effective Oct. 26, 2024, employers in the UK must show they have taken reasonable steps to prevent workplace sexual harassment under measures included in The Worker Protection (Amendment of Equality Act 2010) Act 2023. Sexual harassment is already prohibited under the Equality Act 2010, requiring employers to show that they took “all reasonable steps” to prevent the harassment. However, the new duty goes further, imposing a positive legal obligation on employers to prevent sexual harassment from happening in the first place. Highlights include:</p> <ul style="list-style-type: none">• Employers have an anticipatory duty to take “reasonable steps” to protect employees from sexual harassment during the course of their employment, including off-site events and by third parties. “Reasonable” is an objective test and will vary for each employer — taking into account the employer’s size and resources, industry sector and the working environment.• The definition of employee also includes workers and self-employed individuals.• The definition of sexual harassment is unchanged and includes unwanted conduct of a sexual nature that has the purpose of violating a person’s dignity, or that creates an intimidating, hostile, degrading, humiliating or offensive environment for the individuals.• Updated technical guidance was issued by the Equality and Human Rights Commission (EHRC) on Sept. 26, 2024.• Penalties for breaches of the new duty could include the payment of increased compensation (up to 25% more) to a successful complainant. In addition, the EHRC has wide enforcement powers, including investigation, issuance of unlawful act notices, the agreement of legally binding agreements with employers and the power to seek injunctions to restrain employers from committing unlawful acts.
Resources	The Worker Protection (Amendment of Equality Act 2010) Act 2023 (Legislature) and Sexual Harassment and Harassment at Work: technical guidance (EHRC, Sept. 26, 2024)
UK (previously covered, with upcoming effective date)	
Development	<p>Career — Health</p> <ul style="list-style-type: none">• Paternity leave to be expanded to bereaved partners — key date: Effective date not yet known• Employees to be allowed neonatal care leave — key date: expected April 2025• Benefits-in-kind digitization reporting confirmed — key date: April 2026 <p>Wealth</p> <ul style="list-style-type: none">• Pension auto enrollment to expand, reducing eligible age and abolishing earnings threshold — key date: unknown• Guidance sets staging date for schemes to connect to Pensions Dashboard — key date: April 30, 2025



Mercer LLC

1166 Avenue of the Americas

New York, NY 10036

www.mercer.com

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