



Laura Paglia
President & Chief Executive Officer

VIA EMAIL

February 14, 2022

The Honourable Peter Bethlenfalvy
Finance Minister
Ministry of Finance
Frost Building North, 7th Floor
7 Queen's Park Cres.
Toronto ON M7A 1Y7
Minister.fin@ontario.ca

Dear Minister Bethlenfalvy:

Re: Financial Professionals Title Protection (“FPTP”) Framework

The Investment Industry Association of Canada (“IIAC”) is the leading national association representing investment firms that provide products and services to Canadian retail and institutional investors.

We understand that the government is currently reviewing rules put forward by Financial Services Regulatory Authority of Ontario (“FSRA”), pursuant to enabling legislation not yet proclaimed in force.

There is no debate that *unlicensed* individuals should not refer to themselves as financial advisors or financial planners. Individuals who use these titles should be registered to provide investors with financial advice.

The Canadian Securities Administrators (“CSA”) and its self-regulatory organizations (“SROs”), currently the Investment Industry Regulatory Organization of Canada (“IIROC”) and the Mutual Fund Dealers’ Association (“MFDA”), provide an extensive regulatory framework for those licensed to provide financial and planning advice including governing the use of titles across Canada.

Titling requirements for CSA and SRO registrants are imposed uniformly across Canada by National Instrument 31-103.

On November 18, 2021, the CSA, SROs, and investor protection funds established a 2022 timeline for a new self-regulatory framework. Amongst its benefits, the new SRO will have a nuanced proficiency-based registration that would retain the high standards of professionalism in the industry. The new SRO will be able to continue to approach titling from a harmonized and national perspective

Ontario's "title protection framework" has raised multiple concerns. It either takes over or duplicates the role of the CSA and the current and new SROs, all of whom have clear national jurisdiction in respect of titling and address investor protection concerns. Ontario's approach also leads to investor confusion.

FSRA has been encouraged to exempt CSA, IIROC and MFDA registrants. FSRA has stated that if any exemptions are to be considered, the policy rationale must ensure that the interest of the public continues to be maintained. An exemption for registrants would achieve the stated intention of consumer protection without introducing unnecessary regulatory burden.

We would be pleased to meet with you and your staff to further discuss.

Yours sincerely,



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