VIA E-MAIL

January 31, 2025

Alberta Securities Commission
Autorité des marchés financiers
British Columbia Securities Commission
Financial and Consumer Services Commission (New Brunswick)
Financial and Consumer Affairs Authority of Saskatchewan
Manitoba Securities Commission
Nova Scotia Securities Commission
superintendent of Securities, Nunavut
Ontario Securities Commission
Securities Commission of Newfoundland and Labrador
Registrar of Securities, Northwest Territories
Registrar of Securities, Yukon Territory
Superintendent of Securities, Department of Justice and Public Safety, Prince Edward Island

Attention:

Me Philippe Lebel
Corporate Secretary and Executive Director, Legal Affairs
Autorité des marchés financiers
Place de la Cité, tour Cominar
2640, boulevard Laurier, bureau 400
Québec (Québec) G1V 5C1
consultation-en-cours@lautorite.qc.ca

The Secretary
Ontario Securities Commission
20 Queen Street West
22nd Floor
Toronto, Ontario M5H 3S8
comments@osc.gov.on.ca

Re: CSA Notice and Request for Comment – Proposed Amendments to National Instrument 81-101 *Mutual Fund Prospectus Disclosure*, National Instrument 81-102 *Investment Funds*, National Instrument 81-106 *Investment Fund Continuous Disclosure*, National Instrument 81-107 *Independent Review Committee for Investment Funds*; and Related Proposed Consequential Amendments and Changes; *Modernization of the Continuous Disclosure Regime for Investment Funds*

OVERVIEW

The Portfolio Management Association of Canada (**PMAC**), is pleased to have the opportunity to submit the following comments regarding the CSA Notice and Request for Comment – Proposed Amendments to National Instrument 81-101 Mutual Fund Prospectus Disclosure, National Instrument 81-102 Investment Funds, National Instrument 81-106 Investment Fund Continuous Disclosure, National Instrument 81-107 Independent Review Committee for Investment Funds; and Related Proposed Consequential Amendments and Changes; Modernization of the Continuous Disclosure Regime for Investment Funds (**Consultation**).

PMAC represents over 320 investment management firms registered to do business in Canada as portfolio managers (**PMs**) with the members of the Canadian Securities Administrators (**CSA**). In addition to this primary registration, approximately 70% of our members are also registered as investment fund managers (**IFMs**) and/or exempt market dealers (**EMDs**). PMAC's members encompass both large and small firms and manage total assets in excess of $3.5 trillion as fiduciaries for institutional and private client portfolios.

PMAC's mission statement is "advancing standards". We are consistently supportive of measures that elevate standards in the industry, enhance transparency, improve investor protection and benefit the capital markets.

KEY RECOMMENDATIONS

1. **Introduce the Fund Report changes to come into effect concurrently with or subsequent to the TCR Amendments coming into force, with initial reports being provided in 2027 at the earliest**

   Many IFMs will rely on third party service providers to create the report, which requires a longer timeframe to make necessary changes. This is especially the case for firms that have a large number of funds. Aligning the timing of the Fund Report and the TCR report will be less confusing to investors.

2. **Remove or revise the sample disclosure table provided on page 1 of the sample Fund Report to remove references to future outcomes**

   There should not be a requirement for IFMs to provide a future outlook on "factors that may impact its ability to satisfy the fund objectives." The current requirement to disclose why the fund has performed as it has does not rely on forward-looking information. Creating a new requirement that IFMs include forward-looking information in Fund Reports would introduce significant risk to IFMs and would not be useful to investors. The table on page 1 also inappropriately conflates fund objectives with fund value. This will be confusing to investors. It is also not clear what "success" is intended in terms of achieving investment objectives.

3. **Provide performance information for all series of funds**

   We believe that presenting performance information for only certain series of funds will be confusing to investors and misleading, given that it will only be relevant and useful to investors holding that series. The highest and lowest fee series are not often the most widely used, and will misrepresent what most securityholders are actually invested in.

4. **Remove the proposed liquidity disclosure**

   We do not believe that the proposed liquidity disclosure will be useful to investors, and it may cause confusion. Most funds are sufficiently diversified to allow investors to redeem on demand, as set out in the prospectus. Investors would require a detailed explanation to understand the proposed data, which should not be included in the Fund Report.

These recommendations are discussed in greater detail below.

GENERAL COMMENTS

PMAC supports the work of the CSA to modernize the continuous disclosure regime for investment funds, and its efforts to improve the quality of disclosure provided to investors, while reducing regulatory burden. As a preliminary comment, some of our members question the ongoing need for the Fund Report, especially as more information becomes available through other means, such as on IFMs' websites. Although eliminating the Fund Report altogether may not be desirable in the immediate term, we believe that moving towards an access-based disclosure model would be preferable, and that some IFMs may prefer to provide information online.

Workstream One – Fund Report

We are pleased to see that the CSA has consulted with behavioural experts and tested sample reports before suggesting changes to the Management Report of Fund Performance (**MRFP**), including the renaming to "Fund Report". We also applaud the decision to make the testing methodology and outcomes public in the Investor Testing Report. It is important for stakeholders to have this transparency in order to better understand the reasoning behind the proposals and the impact these changes will have on investors. We encourage the CSA to continue to study the impact of any changes to determine whether they achieve the desired outcomes and to keep abreast of investor trends and preferences in terms of the type of information that is disclosed to investors, as well as the methods of dissemination.

We are concerned with the sample table and disclosure provided on the first page of the sample Fund Report in the Consultation, under the heading "1. Investment Objectives and Investment Strategies." We believe this example inappropriately conflates fund objectives with fund performance. The sample disclosure provided would be confusing to investors.

Given that it includes forward-looking information, it would also present significant risk to IFMs. As is discussed further below, we believe the table should be removed or revised.

With respect to performance reporting, we object to the selection of the highest fee series as the choice of metric to report to investors. As described in more detail below, we believe this would be misleading and confusing to investors, especially those whose investments are held in a managed account.

We agree with the proposed alignment of the use of the Fund Expense Ratio (**FER**) in the Fund Report and pursuant to the Total Cost Reporting (**TCR**) amendments.

Workstream Two – Conflicts Reports

We agree with the proposed elimination of duplicate reporting of certain related party transactions. This change, together with the reduced filing frequency, will reduce burden for market participants, and we agree that this will not have a negative investor protection impact.

Workstream Three – Financial Statements

We agree that the class- and series-level disclosures identified in this section can be lengthy, and generally agree that eliminating these disclosures will not negatively impact investors, especially given that some of the disclosure is available to investors elsewhere.

While we have no specific objection to maintaining the existing requirements with respect to the Statement of Investment Portfolio together with annual and interim financial reporting, we would support allowing IFMs to provide these reports on their designated websites, if they choose to do so. We believe that most investors could access this information on a fund company’s website, and that providing access instead of delivery of these reports would reduce regulatory burden for IFMs.

We suggest that an exemption should be included such that IFMs that post portfolio holdings data, including at least the same information as required under the Consultation, on fund designated websites, would be exempt from having to produce quarterly portfolio disclosures (**QPDs**) and the Statements of Investment Portfolio. An exemption in this circumstance is appropriate as the portfolio holdings data posted to the website is equivalent, or in some cases, more complete than the QPD, and the information will be readily available to a securityholder.

Responses to Consultation Questions

General

1. **Other Areas for Modernization**. Are there any other areas of the continuous disclosure regime for investment funds that should be modernized, and which have not been addressed as part of this project? Please provide detailed rationale for each suggestion.

PMAC is supportive of moving towards a greater emphasis on access instead of delivery. In addition to improving delivery of more accurate and timely information to investors, directing investors to fund designated websites will encourage them to seek out the information they require and to familiarize themselves with the type of information that is available online.

We believe that the information contained in the Fund Report that would be meaningful to investors could be made available on the IFM's website, which may be updated more frequently than the publishing of the Fund Report. If the CSA determines that the Fund Report is required, then an optional "access equals delivery" model should be adopted. By posting the Fund Report on the IFM's website, investors would have access to this information more readily, it would be available in an easy to navigate format, and in a manner that is environmentally friendly.

IFMs that post portfolio holdings data on fund designated websites should be exempt from having to produce QPDs and the Statements of Investment Portfolio. This portfolio holdings data posted to the website is equivalent or more complete than the QPD.

2. **Effective Dates and Exemptions**. As described in the Notice, the CSA is proposing that the final amendments and final changes have an effective date of three months following final publication. However, the CSA is also proposing time-limited exemptions from compliance with the final amendments and final changes. In particular, we are proposing to provide an exemption from compliance in respect of each Workstream and the FER Revisions, for approximately a 9-month period following the effective date. (See also the transition provisions at the end of each amending instrument, which have been drafted with the intention to give effect to these arrangements.)

   a. In respect of each Workstream and the FER Revisions, please comment on whether the proposed effective date is appropriate and whether the proposed length of the exemption from compliance is sufficient to enable investment funds to prepare for the new requirements. If not, provide alternative timelines and an explanation of how any additional time would be used.

Although we appreciate that the CSA has provided a total of 12 months for firms to make these changes, we do not believe this will be sufficient. Our members estimate that they would need up to two years and potentially longer, especially given that they are simultaneously working to implement the TCR Amendments. Many firms will rely on third party providers to build the new format for the Fund Report and the timeframes tend to be long for these types of significant changes. Some firms have a large number of funds that would need to move to the new format. Our members indicate that once it is created, testing the new Fund Report would take approximately three months.

Provided that the CSA publishes the final rules well in advance so that firms have ample time to implement the changes, we believe that it would be preferable for the Fund Report changes to align with the initial reports being provided under the TCR framework in 2027. A January 2027 implementation date will mean that the interim Fund Report will reflect the period ended June 30, 2027, and the first annual Fund Report will reflect the period ended December 31, 2027. With respect to Workstream Three – Financial Statements, this would also be in line with the new IFRS 18 – *Presentation and Disclosure in Financial Statements*, which comes into effect in January 2027.

Allowing sufficient time to implement the final rules would: (i) permit the regulators and the industry to educate investors, advisers and dealing representatives with respect to what information is being provided and where it can be found, at the same time, and (ii) be less confusing to investors for several reasons – both the TCR report and Fund Report refer to the FER, and if the Fund Report must disclose the highest fee series only (which we do not support), the TCR report will give the investor information about the fees they actually paid.

We also note that an 18–24-month implementation timeframe would be in line with the recently established Tailored Shareholder Report rule that was implemented in the United States, which involves a similar reporting requirement and system build.

b. In respect of Workstream One – Fund Report, please comment on whether an investment fund that prepared an interim MRFP using the requirements set out in the Current Form 81-106F1 should be able to file its subsequent annual MRFP also using the requirements set out in the Current Form 81-106F1, even where the currently envisioned exemption period has ended. If yes, please explain why.

We agree with this proposal, but as noted above, we suggest that the effective date be extended to 24 months to allow all fund issuers sufficient time to implement the changes. We are concerned that investors may be confused if some IFMs provide the new Fund Report while others continue to issue the MRFP. To the extent possible, it would be preferable to align implementation to allow all IFMs to provide the Fund Report at the same time.

Workstream One – Fund Report

3. **Frequency of Preparation**. Currently, an investment fund that is a reporting issuer must file an annual MRFP and an interim MRFP (see section 4.2 of NI 81-106) and an investment fund that is a reporting issuer and a scholarship plan must file an annual MRFP but is not required to file an interim MRFP (see section 4.3 of NI 81-106). We are proposing that these filing requirements would remain unchanged for the Fund Report. Please

comment on whether this proposed approach meets investor needs for remaining current as to the status of their reporting issuer investment fund holdings.

We believe that the annual Fund Report would be sufficient for most investors, and recommend eliminating the interim report. Our members noted that the request for the interim report by investors is typically low. Eliminating the requirement to prepare the interim report would achieve a burden reduction for issuers, while not disadvantaging investors as most interim information (e.g. performance, top holdings, management fee, investment objectives, etc.) is typically available on the IFM's website and/or the QPD, which are also typically updated more frequently than the interim Fund Report.

Furthermore, the TCR report will only be provided annually. Providing both reports on an annual basis will make it easier for the investor to understand the disclosure provided in each of these reports, especially with respect to their investment costs. We believe that it is important not to look at investor disclosure in isolation – it is more meaningful to evaluate the reports in tandem to determine how they will be collectively used and understood by investors.

4. **Forward Looking Information**. The Proposed Form 81-106A will require standardized language regarding forward looking information to be placed towards the beginning of a Fund Report (see proposed Item 3 of Part A), with an option to provide additional disclosure in the Other Material Information section at the end of the Fund Report. The standardized language is intended to be more easily understood by investors, and the option to provide additional disclosure later in the document is intended to provide investment funds with the flexibility to supplement the required language. Please comment on whether this proposed approach to forward looking information disclosure in the Fund Report meets investor needs for transparency around the forward-looking information, and the needs of investment funds. If not, please propose an alternative approach along with detailed rationale as to why the alternative approach would represent an improvement.

We agree with the requirement to include standardized language regarding forward looking information, but question its placement at the beginning of the report. We believe the "forward-looking" disclaimer should be moved to a later part of the document or into a footnote to the forward-looking information.

We are concerned with the type of forward-looking information that would be included in the new Fund Report, and urge the CSA to reconsider the disclosure that is being requested. We strongly recommend retaining the disclosure that is currently in the MRFP, which provides a summary of prior period performance, as this information is more meaningful to investors. Currently, IFMs are reporting on the past 6-month period or year, as indicated in the 2nd column of the sample table on page 1. It would be more useful to the reader to have commentary on the past period, rather than a market outlook of the future, to align to the period actually being reported on.

The requirement to disclose the "Fund's satisfaction of its investment objectives…" and the "Factors that may impact the fund's satisfaction of its investment objectives…" as set out in the table on page 1 of the sample Fund Report is problematic, as it requires IFMs to provide a future outlook, which may introduce unnecessary risk for the IFM, while not providing value to investors. For example, it is impossible to predict events such as pandemics, environmental phenomena, political and other changes that could significantly impact the fund's performance. If the fund manager's predictions turn out to be inaccurate, there could be significant consequences in terms of investor behaviour (such as redemptions from the fund) and legal liability to the fund manager. The current requirement to disclose why the fund has performed as it has does not rely on this forward-looking information and does not raise these concerns.

If the proposals are adopted as drafted, this will introduce significant uncertainty for fund managers and investors, and would not promote market stability. If the CSA were to retain these columns in the table, the headings should be revised such that the information provided would be the fund's investment objectives and strategies as set out in the prospectus.

5. **Years of FER Disclosure**. The Costs section of the Proposed Form 81-106A includes a requirement to provide FER information for only one year, with a statement regarding any increase from the previous year in the summary, where such a summary is provided (see proposed Item 6 of Part A). Please comment on whether additional FER information should be required (e.g., two years' worth of information). Alternatively, please comment on whether increases or decreases in FER as compared to the last prepared Fund Report should be identified in their own column in the table that appears in the Costs section, with the corresponding removal of such information from the summary. If writing in support of a particular approach, please describe how the approach selected would support making the Fund Report easier to read and understand, easier to use, and easier to navigate, for investors, than the MRFP.

PMAC members prefer the current MRFP reporting to that being proposed. We believe that reporting two years of fee information would be preferable, particularly in the case of equity funds where TER may change from year to year. This will provide the investor with more information and context with respect to fees. A minimum of one comparable year ratio will assist the securityholder in determining the fluctuation in expenses year over year, which is useful information in making an investment decision. For example, the FER may be higher in the earlier years of a fund but may level out over time; for alternative asset classes, performance fees could be higher in a given year (reflecting better performance). Demonstrating that fees can increase or decrease year over year will be more meaningful to investors and improve the investor's understanding of the overall average fees as related to investment performance.

When providing year over year changes in FER, we recommend either: (i) adding a new column in the table in the "Costs" section of the new Fund Report showing the change; or (ii) including a table similar to the current "Ratios and Supplemental Data" table set out in the current MRFP for all series, each with five years of FER data. We also recommend removing the last column in the table "Fund expenses ($) per $1,000 invested" as investors will be provided with similar information under TCR, and including a commentary box below the table that would enable IFMs to provide an explanation for any changes in the data.

6. **MER Without Waivers or Absorptions**. The Proposed Form 81-106A requires the presentation of MER in the Costs section. No space has been included within the Costs section to disclose MER without waivers or absorptions, where expenses have been waived or absorbed. Instead, instructions have been provided to disclose MER without waivers or absorptions in the Other Material Information section, along with a cross-reference, in the Costs section, to that information (see proposed Item 6 of Part A). This approach to presenting MER without waivers or absorptions is being proposed because we are of the view that it assists in making the Fund Report easier to read and understand. Please comment on whether the proposed disclosure is effective in achieving this aim. If not, please propose an alternative approach (e.g. presenting MER without waivers or absorptions as a new column within the table in the Costs section) and explain why it would represent an improvement.

We are of the view that separating MER without waivers or absorptions from the MER information in the table under "Costs" section and placing it in the "Other Material Information" section would be confusing to investors. Presenting the MER both with or without waivers and absorptions as a new column within the table in the Costs section or next to the table in a note, would eliminate the need to navigate the Fund Report, making it more user-friendly. Alternatively, the additional information could be presented in a footnote on the same page. That way the investor does not have to look to another section in the document to find the relevant information.

Our members indicated that their practices differ in terms of presenting the MER with or without waivers or absorptions. For this reason, we believe that there should be flexibility to show variants of MER, with the explanation of the information included in the table, or close to the table, rather than in a separate section.

Some members indicated that MERs without waivers and absorption should not be included in the Fund Report. They prefer that in line with Part II, Item 1.3 of Form 81-101F3, instruction (1), the following statement, if applicable, be included in a footnote under the table in the Costs section: *"[Insert name of the manager of the mutual fund] waived and/or absorbed some of the fund's expenses. If it had not done so, the MER would have been higher."*

7. **ESG-Specific Disclosure**. The Proposed Form 81-106A includes a requirement that an investment fund provide a brief summary of the IFM's assessment of the investment fund's

success in achieving its investment objectives and using its investment strategies to achieve those investment objectives, during the period covered by the Fund Report (see proposed Item 4 of Part A). Detailed instructions are also provided regarding how the disclosure should be completed in the case of an investment fund that has ESG-related aspects to its investment objectives or investment strategies. These instructions are not intended to create any additional burden for such investment funds. Rather, they are intended to clarify how those investment funds can appropriately satisfy the requirements that apply to all investment funds in that section. Please comment on whether these detailed instructions would make it challenging to provide concise disclosure in the Investment Objectives and Investment Strategies section of the Fund Report. If a challenge is identified, please provide details and suggest an alternative approach.

The inclusion of ESG-specific instructions results in ESG-related funds being treated differently than non-ESG funds, which represents an additional burden for issuers of ESG-related funds. We do not believe that ESG-related funds should be subject to this additional burden, given that these funds are not currently regulated differently than other investment funds. The existing guidance with respect to ESG-Related Fund Disclosure (CSA Staff Notice 81-334 (Revised) *ESG-Related Investment Fund Disclosure* (**SN 81-334**)) has recently been revised and standards continue to evolve. Changes to this section should be reviewed in light of our response to Question 16. The ESG-specific instructions in the new Form 81-106A should be removed to be consistent with Current Form 81-106 as well as other forms that do not provide for ESG-specific instructions.

As a general comment, the proposed requirements for ESG-Specific Disclosure include the phrase, "during the period covered by the Fund Report." For example, reporting of impact and climate data is still in its early stages, and even though progress is being made, data availability, collection, analysis and standardization is not yet consistent. Our members do not believe it will be possible to report those data points from within the period covered by the Fund Report on the expected publication deadlines. The impact and climate data members publish for investors is on a significant lag compared to other relevant financial and ESG-related data.

PMAC members also indicated that the detailed instructions in this section would make it challenging to provide concise disclosure in the Investment Objectives and Investment Strategies section of the Fund Report for the following reasons:

A. The instructions in Item 4(2) of Proposed Form 81-106A do not distinguish between "ESG Objective Funds," "ESG Strategy Funds" and "ESG Limited Consideration Funds" (as such terms are defined in SN 81-334). We believe the instructions could be improved by clarifying which ESG-related fund category, or categories, each instruction applies to.

   Further, ESG Limited Consideration Funds should not be subject to these new reporting requirements, as the likelihood that an investment decision is solely based on ESG-related criteria would only occur in exceptional circumstances. We believe these exceptional circumstances are already captured by instruction (2)(e), which is in practice today. If ESG is considered to a limited extent, it would be inconsistent to instruct the IFM to regularly disclose quantitative ESG-related metrics, for example, when this is not part of the guidance in SN 81-334.

The instructions often refer to both investment objectives and investment strategies. We believe these instructions are more appropriate for ESG Objective Funds and not appropriate or meaningful to investors for funds where ESG is only listed as part of the investment strategies.

Current guidance in SN 81-334 states "Staff encourage ESG Objective Funds that intend to generate a measurable ESG outcome to report in their MRFPs on whether the fund is achieving that outcome." We would expect the new Fund Report requirement to be similar.

B. The instructions may lead to unintended overemphasis on ESG considerations, potentially giving rise to greenwashing and/or greenhushing. ESG Objective Funds may also have financial objectives in addition to their ESG-related objectives. Additional disclosure requirements on the ESG-related aspects of the investment objective risk overemphasis compared to the financial objectives. The same is true for ESG Strategy Funds where the investment objective is not an ESG objective, but ESG forms part of the investment strategies. Under an ESG integration investment strategy, which we believe is the most common ESG investment strategy for ESG-related funds, quantitative ESG metrics are typically considered amongst many other factors in fundamental investment strategies. Isolating specific ESG metrics for enhanced disclosure in the Fund Report may unintentionally lead to disproportionate disclosure compared to the role the ESG factor plays.

C. Instruction 4(2)(b), "*key quantitative metrics used by the investment fund manager to assess whether the investment fund has satisfied the stated ESG-related aspects of the investment objectives of the investment fund*" may be appropriate specifically for ESG Objective Funds. As such, we believe it would be helpful to provide more information on how IFMs are expected to disclose this information in a concise manner and which key quantitative metrics should be used. We also believe there is an opportunity to clarify the need and value of quantitative metrics depending on the nature of the ESG investment objective. While this instruction would be more appropriate for ESG Objective Funds with ESG-related targets (e.g., having a carbon footprint below the benchmark), for other ESG Objective Funds, like those applying ESG-related exclusions, this quantitative information may not be meaningful for unitholders (e.g., a fund that does not invest in tobacco disclosing it is 0% invested in the tobacco sector).

D. Instruction 4(2)(c) "*key quantitative metrics used by the investment fund manager to assess whether the investment fund has satisfied the stated ESG-related criteria for the investment strategies of the investment fund*" applies too broadly, will not be useful for the majority of ESG-related strategies in the market, and will not be relevant for ESG-related strategies where ESG is included in the investment strategies but not the fund's investment objective.

Moreover, not all funds, including ESG-related funds, have key quantitative metrics. Using quantitative metrics selected by issuers to assess whether the investment fund has satisfied the stated ESG-related aspects of the investment objectives/strategies of the investment fund does not help with comparability, as each issuer can select different metrics and it does not provide a standard in allowing investors to compare ESG funds because ESG metrics used by each IFM is different. ESG-related data quality also remains mixed, with poorer data quality in certain asset classes, such as fixed income.

ESG integration is the most common ESG-related strategy in the market. SN 81-334 defines ESG integration as an investment strategy, including the consideration of "ESG-related factors within an investment analysis and decision-making process with the aim of improving risk-adjusted returns." In our view, this means a fund applying ESG integration will not necessarily display stronger ESG metrics than a non ESG-related fund. Therefore, the value of the chosen metric compared to a benchmark, for example, may not be a meaningful consideration for the IFM.

When incorporating material ESG factors, an IFM may be investing in issuers with greater ESG risks if it believes it is being compensated for those risks. Under an ESG integration strategy, there typically is not a single, consistent, ESG-related metric used for an entire portfolio. A quantitative metric considered for an Information Technology holding may not be material for a Financials holding. Rolling up a small number of quantitative metrics may not be representative of the portfolio. Quantitative metrics may be considered at the issuer level, but not be material at the portfolio level.

There is currently no standard for rolling up quantitative ESG metrics at the portfolio level. We believe this could lead to confusion and lack of comparability.

E. With respect to Instruction 4(2)(d) "*how the investment fund's use of proxy voting, shareholder engagement and issuer engagement, as applicable, as principal investment strategies satisfied the stated ESG-related aspects of the investment fund's investment objectives or the stated ESG-related criteria for the investment strategies*", stewardship is listed as a potential investment strategy in SN 81-334. It is unclear how stewardship, which itself is an investment strategy, would satisfy the "ESG-related criteria for the investment strategy." It should be clarified that when proxy voting and/or engagement are used and are not a principal investment strategy, there is not an expectation for disclosure, unless the IFM identifies an event it considers material to the unitholder for the purposes of the Fund Report. Equity funds, for instance, will typically participate in proxy voting as part of their fiduciary duty, but it may not be listed as an investment strategy. We believe that the ESG disclosure in the Fund Report should be aligned with SN 81-334.

PMAC members also expressed a concern that the necessary information may not be available for all ESG-related funds, in particular for impact funds. The information for the specific timeframe may not be available, because the data comes from a third party. This is especially the case if the fund is sub-advised. Our members expressed a concern that they would not be able to comply with the requirements to obtain data with respect to the specific timeframe contemplated by the proposals.

8. **Classes/Series of Performance Information**. The Proposed Form 81-106A includes a requirement that performance information be disclosed in respect of the class or series of the investment fund with the highest management fee, and any other class or series for which performance would vary based on a characteristic besides management fees (see proposed Item 7 of Part A). This varies from the Current Form 81-106F1, which requires that performance information for all classes or series be provided (see Item 4 of Part B of the Current Form 81-106F1). We are of the view that the proposed requirements for presenting performance information will generally reduce the number of classes or series for which performance information will need to be provided in a Fund Report. We are also of the view that this will have the effect of making the Performance section of the Fund Report easier to navigate for an investor, while presenting the most essential performance information for an investor to be aware of (i.e. the class or series of the investment fund with the highest management fee, and any other class or series for which performance would vary based on a characteristic besides management fees).

a. Please comment on whether this proposed approach for determining which classes or series of an investment fund for which performance information should be provided, meets investor needs for a Fund Report that is easy to navigate but which also contains sufficient information for an investor to make decisions. If not, please describe an alternative approach in detail that would meet the same objectives. In particular, provide specific criteria that might be used to determine which class or series of performance information should be included.

We disagree with the proposal to present the information only with respect to the highest management fee series, regardless of which series the investor owns. In many cases this will overstate the fees being paid by the investor and will not align with the disclosure provided in the TCR report. As noted in the Consultation, many investors are moving to Series F, given the increased use of managed account solutions. If the disclosure only includes the fund with the highest management fee, the Fund Report will only be useful for those investors who hold that particular series. Series A is typically the series with the highest management fee and not a series that is held by most investors. The highest fee series is actually often not widely used and will therefore misrepresent what most investors are actually invested in, leading to investor confusion. Moreover, only showing the performance of one series is not ideal, since the highest fee series could change from one year to the next and would not be consistent; the client receiving the report may not be a holder of that series; and the highest fee series may not have the longest track record compared to other series, which could skew the data for the reporting period.

To provide sufficient information to investors to make a decision, it would be prudent to provide the performance data for all series. Showing all performance numbers in a single table would be a logical approach; although this may not achieve the desired simplification of the reporting, it would provide the investor with the most accurate information for their series. An alternative could be to eliminate the requirement of year-by-year returns chart and just show the Annual Compound Returns table. This could free up additional space for all series of the Fund.

Some IFMs currently provide more comprehensive performance information on their website. As noted below, we believe that IFMs should have the option to provide this information on the website, but should not be required to do so.

b. Should the proposed requirements for which classes or series of performance information be provided, be modified to also require the disclosure of performance information for the class or series with the lowest management fee that is available for purchase by a retail investor? We are particularly interested in feedback on this issue given the increasing popularity of no-load classes or series and fee-based accounts.

Similar to our comments above regarding the highest fee series, reporting performance of a series with the lowest management fee may not be meaningful to investors if they are not holding that particular series. Series O or Series I are often the lowest fee series offered by an IFM as the fees are charged outside the fund, but these series are not widely held. They are typically held by institutional investors and are not available to retail investors via a prospectus offering. Information related to these higher-fee series would not be useful to retail investors.

Presenting all series may assist investors in understanding the different levels of service available. To provide sufficient information to investors for them to make an informed decision, it would be prudent to provide the performance data for all series.

Some IFMs currently provide more comprehensive performance information on their website. As noted below, we believe that IFMs should have the option to provide this information on the website, but should not be required to do so.

We also suggest removing the bar chart in the “Year-by-Year Returns” section and replace it with a table which more clearly displays the performance data.

c. For situations where a particular class or series of an investment fund has the highest management fee but no performance information that can be disclosed, please propose an alternative form of disclosure.

We propose including performance data for all series, and where performance is not available, the Fund Report should include standard disclosure that the Fund did not complete a year of operating activities.

d. Please comment on whether investment funds should be required to present performance information on their designated website for any class or series that does not have its performance information included in a Fund Report, together with a cross-reference to such information in the Fund Report. If yes, provide detailed comments on the challenges that an IFM would face in meeting this requirement.

We do not believe that investment funds should be required to provide performance information on their website, but they should be given the option to do so if they choose. Some IFMs currently provide detailed performance information on their websites.

9. **Related Party Transactions**. The Proposed Form 81-106A does not include a section requiring disclosure pertaining to related party transactions. Instead, a different requirement has been developed and added as an appendix (to be prepared by the IFM) to the annual report to securityholders that an investment fund's IRC must prepare pursuant to section 4.4 of NI 81-107. This contrasts with the Current Form 81-106F1 which includes a section entitled "Related Party Transactions" (see Item 2.5 of Part B of the Current Form 81-106F1). Please comment on whether this proposed approach to disclosure regarding related party transactions is an effective method of providing this information to investors while ensuring that the Fund Report contains the appropriate amount of information and is easy to navigate.

In our view, including disclosure of related party transactions would be duplicative of the related party transaction disclosure in financial statements required by IFRS. We believe that disclosure in the financial statements is sufficient. Given that the mandate of the IRC is to oversee the processes the IFM has in place to manage conflicts of interest, we do not believe this information should be added to the IRC's report to securityholders.

If the disclosure were to be retained, we note that the proposed amendments expand the scope of the definition of "related party to an investment fund" and may cause confusion, as the definition is contained in both the Handbook and the proposed definition in NI 81-107. This addition would not reduce regulatory burden to IFMs. If the proposal is adopted, firms will need additional time to review the requirements and to make any necessary changes to their IRC reporting processes.

10. **Liquidity**. Investment fund liquidity risk management is an area of increasing regulatory focus. We are of the view that investors should have access to in-depth yet understandable disclosure regarding the liquidity of the investments held in the investment portfolio of their investment fund. For this reason, the Proposed Form 81-106A includes a Liquidity Profile section (see Item 11 of Part A of the Proposed Form 81-106A). The Current Form 81-106F1 does not contain a comparable requirement. Please comment on whether the disclosure proposed for the Liquidity section of the Fund Report is understandable to investors and contains the appropriate amount of information for them. If not, please describe in detail an alternative approach.

We do not support the proposed Liquidity disclosure due to (i) the additional burden it would impose on issuers, as the requirement extends to each fund; and (ii) we do not believe this information will be useful to investors. Most of our members already adhere to the guidance provided in CSA Staff Notice 81-333 *Guidance on Effective Liquidity Risk Management for Investment Funds* (**SN 81-333**). While liquidity risk data is required to be reported in the annual OSC Investment Funds Survey, and would therefore be available to IFMs, we do not believe that this data would be meaningful to investors.

Given that not all funds may have the same liquidity schedule and where many funds can be easily liquidated, this disclosure requirement would not provide any additional value to investors. For example, for many funds, the assets of that fund can be disposed of in the market within a few days without creating a liquidity risk. Whereas such funds may hold illiquid assets, the funds are sufficiently diversified that it would not prohibit the funds from meeting unitholder redemption needs. Additionally, liquidity disclosure should be based on qualitative factors to be provided on an as needed basis.

For investors to understand the meaning of this data, a detailed explanation and context would need to be provided. The prospectus notes that funds are redeemable on demand, and that redemptions may only be suspended with securities regulatory approval. In addition, the data provided in the Fund Report would be at a point in time, which may not be reflective of the fund's actual liquidity risk.

We are of the view that the pie chart on page 5 of the sample Fund Report does not provide value to the investor and occupies a relatively large amount of space in the Fund Report that can be better utilized to include more helpful information or better formatting.

We have concerns about the accuracy of the second statement under the heading "How to Read this Information:" specifically, "…and the easier it will be to sell your holdings at a fair price". This statement would require further clarity and may contradict the disclosure in the prospectus, which states that a client can redeem on demand. The example suggests that the trade date is equal to settlement date – see Instructions 2(d)(ii). A security that has an extended settlement date would still be sold at T. Ultimately only truly illiquid securities would be sold on a basis other than T. As noted above, we believe that this disclosure may be confusing and lead investors to believe that their redemption proceeds may not be paid on a T+1 basis and rather be paid based on the liquidity pie chart.

We also believe that the proposed changes would be difficult to implement alongside other changes being proposed, within the proposed timeline.

11. **Scholarship Plan MER**. The Proposed Form 81-106A requires that a scholarship plan provide its MER, and where applicable, its MER without waivers and absorptions (see Item 6 of Part A of the Proposed Form 81-106A). In contrast, the Current Form 81-106F1 does not require that a scholarship plan provide such information (see Item 3.2 of Part B of the Current Form 81-106F1).

a. Please comment on whether an investor in a scholarship plan would find this information less useful than an investor in another type of investment fund. If yes, please provide a detailed explanation.

b. Please comment on whether scholarship plans will experience any unique challenges in preparing this information for a Fund Report. If so, describe the challenges in detail and explain whether there are any ways through which scholarship plans can address those challenges.

[We have no comments]

12. **Other Material Information**. The Proposed Form 81-106A includes a section entitled "Other Material Information" (see Item 13 of Part B of the Proposed Form 81-106A). A similar section is also present in the Current Form 81-106F1 (see Item 6 of Part B of the Current Form 81-106F1). Please comment on whether there are alternative methods for presenting the information that might currently be placed in this section. When responding, please consider not only the disclosure requirements of the section itself but also any places in the Proposed Form 81-106A where cross-references to the Other Material Information section are a possibility (e.g. the Forward Looking Information section for supplementary disclosure an investment fund wishes to provide, and the Costs section for information on MER without waivers and absorptions – see Items 3 and 6, respectively, of Part A of the Proposed Form 81-106A).

Our members indicated a preference for this requirement to remain unchanged. Reporting material information such as a sub-advisor change, fund merger, etc., in this section highlights key material developments to the investor. Adding cross-references would be less user-friendly and would require investors to navigate through the document, causing possible confusion.

13. **Designated Website Disclosure**. Under subsection 16.1.2(1) of NI 81-106, an investment fund must designate one qualifying website on which the fund intends to post disclosure as required by securities legislation. Please comment on whether any disclosure

from the Fund Report should be removed and, instead, replaced with a requirement to place that disclosure on the designated website of an investment fund. If yes, please provide details regarding any challenges that an IFM might face with respect to such placement and comment on whether such disclosure should be subject to a separate filing requirement.

PMAC is supportive of moving towards access instead of delivery. In addition to improving delivery of more accurate and timely information to investors, directing investors to the website will encourage them to seek out the information they require and to familiarize themselves with the type of information that is available on the IFM website.

We believe that the Fund Report may be redundant for those investors who can access the information on a designated website, as most of the information contained in the MRFP may already be disclosed on the firm's website and is updated at more frequent intervals than annually (i.e., monthly or quarterly). However, we are aware that IFMs' practices differ, and that they should have flexibility in terms of what information they choose to include on their websites.

As noted above, we believe that performance reporting could be provided on the designated website rather than in the Fund Report, if the IFM chooses to do so. This would allow the information to be presented for each of the IFM's funds, in one place.

We also believe that an exemption to produce QPDs and the Statements of Investment Portfolio should be provided where the information is available on the IFM's website.

14. **Cross-References to Designated Website**. The Proposed Form 81-106A includes several cross references to information that may be available on the designated website of an investment fund (see Item 5 of Part A of the Proposed Form 81-106A which references Quarterly Portfolio Disclosure, and Item 7 of Part A of the Proposed Form 81-106A which references performance information where it is available). Please comment on whether any other information that is, or may be, disclosed on the designated website of an investment fund, should also be cross-referenced in the Fund Report.

We are of the view that no other information that is, or may be, disclosed on the designed website should also be cross-referenced in the Fund Report as this would be cumbersome for investors and may lead to investor confusion. As noted above, IFMs should be given flexibility to determine what information to include on their websites.

15. **Modifications for Specific Investment Funds**. The Proposed Form 81-106A has been prepared in such a way that it will be applicable to all types of reporting issuer investment funds, with modifications for scholarship plans where appropriate (see Item 9 of Part A of Form 81-106F1). This mirrors the approach taken in the Current Form 81-106F1. Please comment on whether any additional modifications to the Proposed Form 81-106A are required for certain types of investment funds. We are particularly interested in types of investment funds that are less commonly held than conventional mutual funds and ETFs.

Identify specific situations where additional instructions would be beneficial, as well as sample instruction language. Please also comment on whether any proposals would create concerns around maintaining a Fund Report that is easy to read and understand, as well as easy to use in making decisions.

We do not believe that additional modifications to Proposed Form 81-106A are required.

16. **Additional Suggestions**. Please comment on whether the content and format of the Fund Report can be further enhanced to support the needs of investors and other stakeholders, to the extent such comments have not already been provided as part of responses to earlier questions. Please support any comments with reference to findings in the Investor Testing Report or other applicable research. Where other research is referenced, please provide citations.

1) Fund Report, Section 1 – Investment Objectives and Investment Strategies

Summary of fund's investment objectives and strategies

We do not believe that the table in the Sample Fund Report, page 1, item 1 answers the question whether the fund met its objectives or not. The sample response is an analysis of the fund's AUM. The table does not include the correct information for investors and will be confusing. While the item refers to "Investment Objectives" and "Investment Strategies", the table seems to conflate performance with objectives and strategies. According to NI 81-102, the "Objectives" of a fund refer to its Fundamental Investment Objectives, which define the fundamental nature and features of the fund. These are required to be disclosed in the prospectus, and a change to the objectives would be considered a material change requiring securityholder approval. This does not refer to an increase or decrease in value, which is what is described in the example on p. 1. We believe that the type of disclosure outlined in the example will cause confusion among investors.

The fund's objectives should not be conflated with performance. A fund should almost always meet its objectives; if it doesn't, this would be a serious matter for the IFM that goes beyond disclosure to investors. Therefore, it is difficult to understand what is intended by the table heading "Fund's satisfaction of its investment objectives and use of investment strategies during the last 12 months". For example, if the fund objectives are to invest in a balanced equities strategy, and it does that, the objectives will have been satisfied. It would be unusual for a fund not to invest according to its objectives.

For example, many funds' objectives consistent of "long/mid-term capital appreciation/income by investing in [asset class/geographic region]." It is impossible for a fund to meet its long term objectives (5-10 years) within 6 months or a year. Essentially, we do not believe that the requested information is possible to provide, and the sample is not, in our view, a proper response to the question. For ETFs, most state an objective of tracking an index, which would be less of a concern.

Fund's satisfaction of its investment objectives and use of investment strategies during the last 12 months

The sample report also refers to an increase in NAV in the second column. A NAV increase (or decrease) doesn't speak to the fund achieving its objectives. Further, NAV isn't just a reflection of fund performance, but also a primary market activity (as alluded to in the table). We do not consider information related to the increase or decrease in NAV of the fund to be meaningful information for investors to assess the performance of a fund, as the NAV may change for purposes other than performance.

Factors that may impact the fund's satisfaction of its investment objectives and use of investment strategies going forward

The same is true with respect to the third column, "Factors that may impact the fund's satisfaction of its investment objectives and use of investment strategies going forward." It would be unusual for the investment objectives and strategies to change, especially from one interim period to the next. This disclosure would simply be repetitive of information contained in the prospectus and would not be helpful to investors. The response in the example again refers to performance, which is a separate issue. It is also forward-looking, which, as described above, is difficult and risky for the IFM to predict.

Furthermore, the Consultation is not specific with respect to what "success" would be in terms of achieving the investment objectives. There is a risk that IFMs would not apply the same thresholds; i.e., for an index tracking fund, one measure of "satisfying the investment objective" could be how closely the fund is able to track the index. Different IFMs could apply different thresholds in terms of whether the investment objective is being satisfied.

Performance is discussed under section 4, including "detractors from performance". Performance should not be discussed under "objectives" or "strategies", as this would be confusing to investors.

In our view this table and example disclosure should be removed or revised. It is confusing and unhelpful for investors and gives rise to significant risk for IFMs if forward-looking information is expected to be provided.

As an alternative, we suggest changing the second column by using a heading similar to the current Form 81-106F1 to provide information that will allow investors to better assess the fund's performance during the period, such as "Factors which impacted Fund's performance over the last 12 months" or "Results of Fund Operations over the last 12 months" in column two. Factors such as material changes in investments, risks, events, or trends that had a material effect on past performance, would more directly allow investors to evaluate their fund's performance. Instead of projecting forward-looking information for column three, we would suggest a section similar to the existing "Recent Developments" section in the current Form 81-106F1 as this is easier for an IFM to discuss. Some consistency with current Form 81-106F1 in these sections would also provide investors who are used to this existing document with greater familiarity with the new Fund Report.

2) Total Net Assets (NAVPU)

There are no longer sections for total net assets, or NAVPU. Some of our members were of the view that these would be helpful data points for a reader. They indicated that comparative data on portfolio turnover should be included, as it is important information to a securityholder to see this ratio compared year over year. Some of our members currently provide several years of portfolio turnover data, which we believe would be more useful to investors than the one year of data proposed for the new Fund Report.

Other members viewed the proposed one-year disclosure of the portfolio turnover rate (**PTR**) as sufficient, or suggested that it could be excluded from the Fund Report altogether. In the current MRFP, the requirement is to provide 5 years of the Fund's PTR, which represents the portfolio adviser's management of the investments in the Fund for a period. Although a higher PTR may indicate greater trading costs payable, this may or may not reflect additional costs to unitholders. Given this information is not always linear and varies by Fund, it may not be as useful to an investor in their decision-making process. It is further unclear how the inclusion of comparative data would be of usefulness to the investor. If the intent is to provide investors with data related to the changes in trading costs, this information would be reflected in the Trading Expense Ratio, which would be part of the Cost section.

3) Fund Report, Section 2 – Portfolio Holdings section

With respect to the Portfolio Holdings section, IFMs must provide a brief description in a tabular format with respect to issuers, geographic locations or industry that the investment fund materially increased its investment portfolio exposure to during the period covered by the annual report, which is similar information to what is currently be provided under "Results of Operation" in the current MRFP. The recommendation is that the requirement for this section maintain the following requirements from Item 2.3(1)(a) and (b) under "Results of Operations" in the current MRFP, to provide a discussion of:

"(a) any material changes in investments in specific portfolio assets and overall asset mix from the previous period;

(b) how the composition and changes to the composition of the investment portfolio relate to the investment fund's fundamental investment objective and strategies or to changes in the economy, markets or unusual events;"

The rationale is that IFMs already have established processes and procedures for preparing this existing disclosure requirement in the MRFP. We believe that it would make sense to move this section to the "Results of Operation over the last 12 month" discussion, as it will provide investors with more context. In this case, the proposed Portfolio Holdings section in the Fund Report could be removed.

4) Fund Report, Section 5 – Statistics Section

We are of the view that characteristics of distributions, (i.e., return of capital, dividends, ordinary income, net realized capital gains) should not be included in the Fund Report as this information is typically not known until the end of each taxation year and also would not be relevant for a non-taxable client (e.g. investors in a registered plan).

We recommend that no further additions be made to the Fund Report, beyond what is currently being proposed by the Consultation, taking into consideration stakeholder comments.

5) Preparation Date

The requirement to disclose the "Preparation Date" in the new Fund Report is not relevant and is not meaningful to investors and as such should not be required. Since IFMs prepare the MRFPs over a period of time, it would be difficult to provide a specific and accurate Preparation Date. If "Preparation Date" is intended to mean the date that the document is filed on SEDAR+, this should be clearly indicated.

17. **Investor Education**. The CSA wants to ensure that investors understand why the MRFP is being replaced with the Fund Report. The CSA also wants to ensure that investors understand the new features and content within the document. Several avenues are being considered to achieve these aims, including a digital campaign and an annotated Fund Report.

a. Please comment on whether these types of educational tools would be sufficient to support investor understanding of the Fund Report. If not, please provide detailed suggestions regarding additional measures that the CSA should consider.

If the CSA adopts a digital campaign, IFMs could direct investors to the regulators' websites for more information. IFMs could provide notice to investors using the opt-in card and inserting a link to the regulators' websites. IFMs could also prepare a notice to dealers. The CSA could prepare a standardized letter / explanatory note that could be sent by the IFM to investors with the first Fund Report to provide the necessary information and to have consistency across the industry.

b. Please comment on how IFMs and investment fund dealers can play a role in supporting efforts to help investors understand the Fund Report. Please also comment on how the CSA can facilitate IFM and dealer efforts in this regard.

We suggest that the CSA could send reminders to dealers that the MRFP is changing to a new Fund Report and provide details of the changes. The CSA could also prepare separate educational campaigns for dealers and advisers to better equip them to speak to investors about the Fund Report and the changes from the MRFP.

Workstream Two - Conflicts

18. **Additional Disclosure Elements**. The Proposed Form 81-107A will serve as a new, standardized form to be used for the filing of related party transaction reports under subsections 6.2(2), 6.3(3) and 6.4(2) of NI 81-107. The types of transactions to which the Proposed Form 81-107A applies, include purchases by an investment fund but not transactions where the investment fund took part in the sale of securities. Please comment on whether any stakeholders would be disadvantaged by sale information being left out of the Proposed Form 81-107A. If any stakeholders are identified, please provide details on how they would use the sale information, if provided.

We do not believe that any stakeholders would be disadvantaged by sale information being left out of proposed Form 81-107A. Most IFMs, either through exemptive relief or exemptive relief that has been codified, do not report sales transactions.

In order to reduce regulatory burden, we recommend that the CSA reconsider changes that would require funds to report information that is not currently being provided to investors in the MRFP.

This includes with respect to the form requirements set out in Proposed Form 81-107A:

A. Item 3(1) - Report Date and Period Covered: We suggest that the requirement to provide the date on which the report was prepared be removed from the form requirement. This information is not relevant nor meaningful to investors. IFMs prepare the related party transaction reports over a period of time, and as such it would be difficult to provide a specific and accurate preparation date. However, if the CSA intended that the date under this subsection (1) should be the date on which the report is filed on SEDAR+, then this should be clearly noted.

B. Item 4(h) – Related Issuer Investments: an IFM is required to, in the case of an investment in a debt security, list "each source of any independent quote or independent pricing used to determine the price per security in which the investment is made". We recommend that the CSA reconsider the requirement for IFMs to report on this item as the utility of this information to an average investor is questionable, and this would not contribute to burden reduction.

C. Item 4(j) – Related Issuer Investments: an IFM is required to list "the name of any related person or company that has received, or will receive, a fee in respect of the investment made". If this requirement is adopted, we suggest that the CSA clearly define the term "fee," and note that this requirement would not apply to transactions involving fixed income securities, as there is no fee or commissions paid in such transactions by the IFM; there is only a spread (i.e., the price that dealer purchased the security and the price the dealer will sell such security). An IFM would not have access to any information relating to the "spread" in any event.

Workstream Three - Financial Statements

19. **Stakeholders that would Benefit from Maintaining Disclosure**. As part of the Proposed Amendments for this Workstream, we are proposing to eliminate certain class- or series-level disclosure requirements under Part 3 of NI 81-106 that are not required by IFRS. Please comment on whether any stakeholders would benefit from these disclosure requirements remaining in place. If any stakeholders are identified, please provide details on how they currently use such information and comment on whether any alternative sources of information are available.

Our members did not express any significant concerns with the proposal to eliminate certain class or series level disclosure. With respect to timing, we suggest that any changes made to the required disclosure be aligned with the timing of the new IFRS rules that come into force on January 1, 2027.

Additional Initiative - Implementation of Fund Expense Ratio into Fund Facts and ETF Facts

20. **Timing Considerations**. The Proposed Amendments implement the FER into the Fund Facts and ETF Facts, namely the "Quick facts" and the "How much does it cost?" sections of those documents. Please comment on whether there are any timing issues that should be considered with respect to the implementation of these Proposed Amendments, given that the TCR Project amendments are expected to come into effect on January 1, 2026, subject to certain transition periods. When commenting, please consider that the effective date of the amendments and changes being proposed as part of this initiative have not yet been finalized.

As noted above, we believe that the proposed changes should come into effect together with or following the TCR amendments. This will allow the information in the Fund Report to coincide with information provided with the TCR report information.

Some PMAC members noted that they have no concerns with the timing of the proposed amendments to the Fund Facts and ETF Facts to implement "FER", as the FER is already effectively disclosed in the Fund Facts/ETF Facts documents. The proposed amendment would require minimal changes to the templates used to generate Fund Facts/ETF Facts.

CONCLUSION

We appreciate the opportunity to provide comments on this Consultation. We urge the CSA to consider the implementation timing for these proposals, and to align the effective date to be concurrent with or subsequent to the TCR Amendments. We ask the CSA to reconsider the sample disclosure table provided on page 1 of the sample Fund Report, and to remove any requirement for IFMs to comment on their ability to satisfy the fund objectives in future. We believe that presenting performance information for all series of funds will provide the most accurate information to investors. Finally, we do not believe that the proposed liquidity disclosure will be useful to investors, and recommend that it be removed.

If you have any questions regarding the comments set out above, please do not hesitate to contact Katie Walmsley at (416) 504-7018 or Victoria Paris at (416) 802-4347.

Yours truly,

PORTFOLIO MANAGEMENT ASSOCIATION OF CANADA

"*Katie Walmsley*"	"*Warren M. Rudick*"
Katie Walmsley President	Warren M. Rudick Director Chair of Industry, Regulation & Tax Committee; Chief Counsel, Wealth and Asset Management Canada, & Global Chief Counsel, Distribution Law, Manulife Investment Management