



ONTARIO  
SECURITIES  
COMMISSION

## OSC Staff Notice 11-784 Burden Reduction

The OSC is seeking suggestions on ways to further reduce unnecessary regulatory burden, as provided in OSC Staff Notice 11-784.

We invite your comments on the Staff Notice through the survey below. Please note that each question has a 4000 character response limit.

Closing date: March 1, 2019

Thank you for sharing your thoughts with the OSC Burden Reduction Task Force.

### \* Required

1. Please provide your name. \*

2. What is the name of your firm or company, if applicable?

3. What is your role in the capital markets? \*

4. Do you have any general comments on the topic of regulatory burden reduction related to securities regulation? If so, please enter only the legislative reference for your suggestions in the box below (for example 31-103 1.1)

5. Please use the space below to provide your general comments.

This section requires that trade confirmations be delivered promptly. For an exempt market dealer, this provides very little added benefit to clients. We believe it would be more efficient to send out the required trade confirmation in conjunction with quarterly statements, as long as the required information for trade confirmations is included as well.

Our rationale is that exempt market securities are illiquid, so receiving a prompt trade confirmation does not provide much added benefit. Even non-brokered private placements are subject to a 4-month hold period. Many issuers do not close immediately upon receiving subscription documents; in some cases, it can take up to 3 months. Providing a trade confirmation after such a lengthy period of time means that clients are receiving client statements in a timeframe that is similar to a quarterly statement anyways.

This requirement costs us significant time and money to administer. We do not believe marginal benefit to clients is proportionate to the immense regulatory burden for exempt market dealers. This time and money could be used to address other compliance matters that would have a more direct benefit to clients. We would propose this section of the legislation be changed to allow exempt market dealers to provide trade confirmation information in conjunction with quarterly statements.

We recognize this is a CSA wide matter, but would like to bring it to the OSC's attention for this consultation matter.

6. Are there operational or procedural changes that would make market participants' day-to-day interaction with the OSC easier or less costly? If so, please enter only the legislative reference for your suggestions in the box below.

Late filing fees

7. Please use the space below to provide your suggestions for operational or procedural changes.

We echo the comments on this matter from the Private Capital Markets Association's comment letter dated March 1, 2019.

8. Are there ways in which we can provide greater certainty regarding regulatory requirements or outcomes to market participants? If so, please enter only the legislative reference for your suggestions in the box below.

9. Please use the space below to provide your suggestions regarding how the OSC could provide greater certainty regarding regulatory requirements or outcomes.

10. Are there forms and filings that issuers, registrants or other market participants are required to submit that should be streamlined or required less frequently? If so, please enter only the legislative reference for your suggestions in the box below.

11. Please use the space below to provide your suggestions regarding forms and filings.

12. Are there particular filings with the OSC that are unnecessary or unduly burdensome? If so, please enter only the legislative reference for your suggestions in the box below.

13. Please use the space below to provide your comments regarding burdensome filings.

14. Is there information that the OSC provides to market participants that could be provided more efficiently?

15. Are there requirements under the OSC rules that are inconsistent with the rules of other jurisdictions and that could be harmonized? If so, please enter only the legislative reference for your suggestions in the box below.

16. Please use the space below to provide your comments and suggestions around harmonization of rules.

17. Are there specific requirements that no longer serve a valid purpose? If so, please enter only the legislative reference for your suggestions in the box below.

18. Please use the space below to provide your comments and suggestions around requirements that may no longer serve a valid purpose.

19. Are there ways to enhance and improve how investors experience disclosure provided: (i) before they invest; (ii) as part of ongoing public disclosure; and (iii) by registrants?

20. Please use the space below to provide your suggestions for modernizing information provided to investors because of regulatory requirements. For example, specific areas where we could promote the use of plain language?

21. Do you have any other comments for the OSC Burden Reduction Task Force?

22. If you don't have enough space for your response to any question above, please use the space below to continue your comments. Please indicate which question these comments relate to.