



**DELIVERED BY EMAIL:** [Comments@osc.gov.on.ca](mailto:Comments@osc.gov.on.ca), [consultation-en-cours@lautorite.qc.ca](mailto:consultation-en-cours@lautorite.qc.ca)

Alberta Securities Commission  
Autorité des marchés financiers  
British Columbia Securities Commission  
Manitoba Securities Commission  
Financial and Consumer Services Commission of New Brunswick  
Office of the Superintendent of Securities, Digital Government and Services, Newfoundland and Labrador  
Office of the Superintendent of Securities, Northwest Territories  
Nova Scotia Securities Commission  
Office of the Superintendent of Securities, Nunavut  
Ontario Securities Commission  
Prince Edward Island Office of the Superintendent of Securities  
Financial and Consumer Affairs Authority of Saskatchewan  
Office of the Yukon Superintendent of Securities

The Secretary  
Ontario Securities Commission  
20 Queen Street West 22nd Floor  
Toronto, Ontario M5H 3S8

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

Dear Sirs and Mesdames,

**Re: CSA Staff Notice and Request for Comment 25-304 *Application for Recognition of New Self-Regulatory Organization***

Thank you for the opportunity to provide comments on CSA Staff Notice and Request for Comment 25-304 *Application for Recognition of New Self-Regulatory Organization* (the “New SRO Consultation”). We support the streamlined approach and flexibility that the New SRO framework will provide for dealer firms, advisors and clients.



At Sun Life, our Purpose is to help Clients achieve lifetime financial security and live healthier lives. Our Clients' needs are at the heart of everything we do. Sun Life's registered mutual fund dealer, Sun Life Financial Investment Services (Canada) Inc., shares this Purpose.

Sun Life Financial Investment Services (Canada) Inc. is also a member of the Investment Funds Institute of Canada (IFIC). We support IFIC's submission on the New SRO Consultation. To that end, we want to take this opportunity to reiterate IFIC's position and provide our input on one issue outlined in the New SRO Consultation, to ensure that the New SRO framework can meaningfully deliver on its policy objectives.

#### Proficiency requirements for mutual fund advisors

As currently proposed in the New SRO Consultation, we understand that advisors who deal exclusively in mutual funds and who are licensed with a firm registered solely as a mutual fund dealer will not be required to meet any additional proficiency requirements. Conversely, those same mutual fund-only advisors licensed with a dual-registered firm will be required to complete the Conduct and Practices Handbook Course (CPH) within 270 days of the firm becoming dually registered. We believe this distinction will create an unlevel playing field and impose a meaningful barrier to mutual fund firms wishing to become dual-registered. It also creates an inequity without any meaningful basis: the requirements imposed on advisors will be dictated by the category of registration of their firm rather than on the nature of the products, services and advice provided to Clients.

We believe that it is unnecessary for advisors licensed to sell only mutual funds to take the CPH. The course was not developed for advisors who sell only mutual funds and therefore much of the content would not apply to this group. The course is also expensive and requires a significant time commitment. For mutual fund dealers such as Sun Life Financial Investment Services (Canada) Inc. with a large advisor population, this additional proficiency requirement will serve as a significant impediment to becoming dual-registered and undermine certain policy and regulatory objectives of the New SRO intended to benefit investors. In addition, it

will undermine the flexibility and simplified operating environment that the New SRO framework is intended to provide.

It is not clear to us that the additional proficiency requirement proposed for mutual fund only dealers licenced with a dual-registered firm is based on any gap in the existing proficiency requirements for mutual fund only advisors. If in fact there is a perceived proficiency gap for advisors licensed to sell only mutual funds as it relates to ethical and/or professional conduct standards, we recommend that it be addressed through existing educational offerings that are applicable to the mutual fund-specific business context, such as the Ethics and Standard of Conduct Course offered by IFSE. In addition, any such new/additional proficiency requirement should allow at least one year for completion.

We thank you for the opportunity to provide input on this important initiative and would be happy to provide further information or answer any questions. Please feel free to contact me

[Redacted contact information]

Sincerely,

[Redacted signature]

Karen Woodman

President

Sun Life Financial Investment Services (Canada) Inc.