

CSA Proposed Amendments to Modernize the Continuous Disclosure Regime for Investment Funds

February 3, 2025

The Canadian Bankers Association (**CBA**)¹ appreciates the opportunity to provide input on 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)*.

The CBA endorses the Investment Funds Institute of Canada (**IFIC**)'s January 31, 2025, submission (**IFIC submission**) on the Consultation in its entirety. Our members concur and support the specific comments and positions outlined in the IFIC submission.

Further, we wish to specifically emphasize our support for the Guiding Principles set out in the IFIC submission. In our view, adhering to these well-defined principles will help ensure a successful outcome when determining the details of any specific changes contemplated by the Consultation.

We thank you for taking the time to consider our views regarding the Consultation and would be pleased to discuss the Consultation further at your convenience.

¹ The Canadian Bankers Association is the voice of more than 60 domestic and foreign banks that help drive Canada's economic growth and prosperity. The CBA advocates for public policies that contribute to a sound, thriving banking system to ensure Canadians can succeed in their financial goals.