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February 19, 2025

**Delivered by email:** [comment@osc.gov.on.ca](mailto:comment@osc.gov.on.ca)

The Secretary  
Ontario Securities Commission  
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Toronto, ON M4H 3S8  
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Me Philippe Lebel  
Corporate Secretary and Executive Director, Legal Affairs  
Autorité des marchés financiers  
Place de la Cité, tour PwC  
2640, boulevard Laurier, bureau 400  
Québec, Québec G1V 5C1  
[Consultation-en-cours@lautorite.qc.ca](mailto:Consultation-en-cours@lautorite.qc.ca)

Dear Sirs:

**Re: Proposed Amendments to Multilateral Instrument 13-102 System Fees**

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On behalf of IGM Financial Inc. ("IGM"), we are providing a response to the request for comments and feedback by the Canadian Securities Administrators ("CSA") on Proposed Amendments to Multilateral Instrument 13-102 *System Fees* (the "Proposed Amendments").

### **Our Company**

IGM, a member of the Power Financial group of companies, is a leading wealth and asset management company supporting financial advisors and the clients they serve in Canada, and institutional investors throughout North American, Europe and Asia. Through its operating companies, IGM provides a broad range of financial planning and investment management services to help Canadians meet their financial goals. Our services are carried out principally through our subsidiaries; IG Wealth Management ("IGWM") and Mackenzie Investments ("Mackenzie"). Each company operates distinctly within the wealth asset management segments of the financial services industry.

IGWM is a diversified financial services company and one of Canada's largest managers and distributors of mutual funds, including the exclusive distributor of its own products. We carry out our distribution activities through our subsidiaries Investors Group Securities Inc. ("IGSI"), our investment dealer, and Investors Group Financial Services Inc. ("IGFS"), our mutual fund dealer, both of which are members of the Canadian Investment Regulatory Organization ("CIRO"). The principal regulator of our product manufacturer, I.G. Investment Management Inc. ("IGIM"), is the Manitoba Securities Commission ("MSC").

Mackenzie is a leading investment management firm providing investment advisory and related services to retail and institutional clients. Mackenzie primarily distributes its retail investment products through approximately 175 dealers and more than 30,000 independent financial advisors across Canada. The principal regulator of Mackenzie is the Ontario Securities Commission ("OSC").

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## **General Comments**

We would like to express our disappointment at the proposed 60 per cent fee increase for the SEDAR + and the National Registration Database (NRD) systems in 2025, and subsequent increases in each of the following four-years. We were, frankly, quite surprised to see that registrants will be required to bear the full burden of the labour and operational costs associated with the implementation of SEDAR+ rather than the CSA sharing in the increased costs. We note that the SEDAR + project was a multi-year, multi-million dollar initiative, and for CSA staff to comment that “accelerated growth in IT labour costs for both system development and operations could not have been anticipated” is worrisome.

Although we recognize the importance of these national systems and the costs associated with operating them, we would respectfully suggest that these costs should be shared with the CSA rather than being passed on entirely to market participants, particularly given the failure of the CSA to anticipate any of the fee increases in the management of SEDAR +. We note that there are other significant cost increases on the horizon for asset and wealth managers. In particular, the proposed amendments to NI 31-103 and Companion Policy to implement Total Cost Reporting and the proposed amendments to NI 81-106 and Companion Policy to replace the existing annual and interim MRFPs with new Fund Reports. If the SEDAR + increases are to remain solely the burden of market participants we would strongly encourage CSA staff to consider how to pace the implementation of other policy initiatives to alleviate some immediate costs. We kindly ask that the CSA bear that in mind when considering our request.

## **Conclusion**

Thank you for the opportunity to provide comments on the Proposed Amendments.

We would be pleased to engage further with you on this important initiative. Please feel free to contact Sarah McKinnon at [sarah.mckinnon@ig.ca](mailto:sarah.mckinnon@ig.ca) or myself if you wish to discuss our feedback further or require additional information.

Yours truly,

**IGM FINANCIAL INC.**



**Keith Potter**  
EVP & Chief Financial Officer  
IGM Financial Inc.

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