

November 7, 2025

**Submitted via E-Mail**

Attention:

**Membership Services**

Canadian Investment Regulatory Organization  
2600-40 Temperance Street  
Toronto, ON M5H 0B4  
E-mail: [membershipservices@ciro.ca](mailto:membershipservices@ciro.ca)

Dear Sirs/Mesdames:

**RE: CIRO - PROPOSED AMENDMENT TO APPROVED PERSON FEE COMPONENT**

The Canadian Forum for Financial Markets (the “**CFFiM**”) writes in response to the Canadian Investment Regulatory Organization’s proposed amendments to the Approved Person Fee component of the Annual Fee in CIRO’s Dealer Member Fee Model (the “**Proposed Amendments**”).

**EXECUTIVE SUMMARY**

The Request for Comments indicates that CIRO intends to harmonize and simplify its approach to recovering the incremental costs that CIRO will incur as a result of having been assigned additional registration functions by provincial securities regulators. The CFFiM supports the goal of streamlining and simplifying the registration process for CIRO members to avoid unnecessary costs and duplicative regulatory structures.

However, in review of the Request for Comments, revisions and additional disclosure are required in order to ensure that the Proposed Amendments satisfy CIRO’s core principles, including the principles of transparency and proportionality. The CFFiM’s comments are summarized as follows:

1. Revisions to the Proposed Amendments are required in order to reflect CIRO’s intention to cease collecting National Registration Database (“**NRD**”) fees.
2. Further disclosure of the fee and cost sharing arrangements between CIRO and provincial securities regulators is required in order to evaluate CIRO’s proposed fee model compared to CIRO’s existing fee structure.

## FURTHER AMENDMENTS REQUIRED

With CIRO having assumed registration functions and with the costs of those functions being embedded in CIRO's annual membership fees, CIRO members should not be responsible for paying any other fees in relation to registration.

The Request for Comments states that, with the Proposed Amendments, CIRO will cease collecting NRD fees including "CIRO's activity-based fees for the initial registration of individuals, reactivation and reinstatement of individuals, adding jurisdictions or an additional sponsoring firm, changing or surrendering categories, and ending registration or permitted individual status." These changes are not reflected in CIRO's Proposed Amendments to its Fee Model, which does not require dealer members to pay any type of NRD fee. As noted in Appendix B to the Fee Model, the NRD fees that CIRO proposes to eliminate are found in Rules 2803(1)(i), 2806(1), and 2806(2)(ii) of the *Investment Dealer and Partially Consolidated Rules* and not in the body of CIRO's Fee Model.

In order to give effect to CIRO's proposal to cease collecting NRD fees, corresponding amendments need to be made to the IDPC Rules. This is particularly true given that Rules 2803(1)(i), 2806(1), and 2806(2)(ii) require dealers to pay NRD fees to *provincial securities regulators* rather than CIRO. These rules need to be removed from the IDPC Rules or substantially revised in order to account for the proposed increase in CIRO's Annual fee and to ensure that dealers are not required to pay two fees for the same NRD services.

## FURTHER DISCLOSURE REQUIRED

The Request for Comments states that CIRO will be ending its "cost recovery arrangements with certain provincial securities regulatory authorities" but will continue to collect NRD fees from the OSC through "transitional provisions" until March 31, 2027. According to the Request for Comments, CIRO collected approximately \$1.9 million in NRD fees and recoveries from provincial securities regulators in 2025. However, CIRO's Request for Comments does not include a copy of the "arrangements" between CIRO and provincial regulators regarding the collection of NRD fees. The details of those arrangements have not been made public and CIRO's receipt of NRD payments is not recorded as a separate line of revenue in CIRO's Annual Report for 2025.

In the absence of further information on the amount of fees that CIRO has previously collected as recovery for its registration functions, it cannot be determined whether CIRO's Proposed Amendments to the Fee Model satisfy CIRO's guiding principles including proportionality, practicality, and transparency.

Respectfully submitted,

***Canadian Forum for Financial Markets***

cc.

### **Trading and Markets**

Ontario Securities Commission  
2200-20 Queen Street West  
Toronto, Ontario M5H 3S8  
E-mail: [tradingandmarkets@osc.gov.on.ca](mailto:tradingandmarkets@osc.gov.on.ca)

**Capital Markets Regulation**

B.C. Securities Commission

701 West Georgia Street

Vancouver, British Columbia V7Y 1L2

E-mail: [CMRdistributionofSROdocuments@bcsc.bc.ca](mailto:CMRdistributionofSROdocuments@bcsc.bc.ca)