The COVID-19 pandemic has created unprecedented challenges for compliance professionals around the world, including those in Canada. The following is a selection of federal and provincial legislative and regulatory actions as well as news and analysis articles compiled by the Thomson Reuters Regulatory Intelligence editorial staff. The selection includes Regulatory Intelligence and Reuters news coverage. More COVID-19 news and information can be found via the TRRI platform's search facility.

Additional COVID-19 resources are also available on the Thomson Reuters COVID-19 Resource Center. For a regularly updated list of U.S. federal regulations related to the COVID-19/novel coronavirus update, please visit the Skopos Labs Coronavirus Policy Tracker.

You can create your own custom My Updates through the Create a Custom My Updates link on the Regulatory Intelligence homepage. Select your geography and/or content types you would like resources from and include the following keyword search: covid! or coronavirus.

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1 This COVID-19 Coverage was compiled by Thomson Reuters Regulatory Intelligence editorial staff and other contributors.
COVID-19 COVERAGE - CANADA

FEDERAL AND PROVINCIAL COVID-19 LEGISLATIONS AND REGULATIONS

FEDERAL LEGISLATION

COVID-19 Emergency Response Act, No. 2, S.C. 2020, c. 6 (Bill C-14, 2020)


Part 2 of Bill C-14 amends Part IV.1 of the Financial Administration Act, R.S.C. 1985, c. F-11 to provide that certain provisions of that Act, as enacted by the COVID-19 Emergency Response Act, cease to have effect on the day after September 30, 2020.

The Bill, exception sections 8 and 11, came into force on April 11, 2020. Sections 8 and 11 come into force on October 1, 2020.

PROVINCIAL REGULATIONS

Ontario

Ont. Reg. 7/00 – Unfair or Deceptive Acts or Practices

Ont. Reg. 150/20 amended the definition of "unfair or deceptive acts or practice" in section 2 of Ont. Reg. 7/00 (Unfair or Deceptive Acts or Practices) to ensure that an insurer’s premium repayment program, whether the financial relief provided is characterized as a refund, rebate or other return or reduction of insurance premium, does not constitute an unfair or deceptive act or practice. The amendment came into force April 15, 2020.

For FSRA guidance interpreting the legal framework for premium repayment programs, including the amended section 2, see Auto Insurance – Consumer Relief during a Declared Emergency under the Emergency Management and Civil Protection Act (April 15, 2020).
Quebec

Que. Reg. O.C. 397-2020 — Regulation respecting certain financial assistance measures for borrowers under the Act respecting financial assistance for education expenses owing to the COVID-19 pandemic

Under Que. Reg. O.C. 397-2020 the Minister will pay the interest to financial institutions on behalf of borrowers on the balance of a guaranteed loan and any capitalized interest accumulated between April 1, 2020 and September 30, 2020 under the Act respecting financial assistance for education expenses. The requirement for a borrower to enter into a repayment agreement is suspended for same period, and every repayment agreement entered into between a borrower and a financial institution under the Regulation respecting financial assistance for education expenses, CQLR c. A-13.3, r. 1, is suspended for the duration of that period. The Regulation came into force April 1, 2020.

FEDERAL AND PROVINCIAL REGULATORS – COVID-19 UPDATES

FEDERAL REGULATORS

Bank of Canada

Bank of Canada asks retailers to continue accepting cash (April 13, 2020)

The Bank of Canada is strongly advocating that retailers continue to accept cash to ensure Canadians have access to the goods and services they need. Refusing cash purchases outright will put an undue burden on those who depend on cash and have limited payment options. The Bank is working with financial institutions to ensure that there is no disruption to the cash supply.

The risks posed from handling cash are no greater than those posed by touching other common surfaces. Canadians handling cash should follow the public health guidelines on COVID-19 and wash their hands often, as they would do for other activities. For more information see the link here.

Department of Finance (Canada)

Government announces relief for federally regulated pension plan sponsors (April 15, 2020)

The Department of Finance (Canada) has issued a news release stating due to the pandemic’s effects on the economy, some federally regulated pension plan sponsors are facing significant financial constraints, which are creating short-term liquidity issues and, in some cases, threatening the long-term viability of their business. To help address these issues, Finance Minister Bill Morneau announced that the government will provide immediate, temporary relief to sponsors of federally regulated, defined benefit pension plans. This relief will be in the form of a moratorium, through the remainder of 2020, on solvency payment requirements for defined benefit plans. This relief will help ensure that employers have the financial resources they need to maintain their operations and their pension plans, and to protect the retirement security of their workers and retirees. For more information see the link here.
Minister Morneau to discuss global coordination at the G7, G20 and the Spring Meetings of the IMF and the World Bank (April 14, 2020)

The Department of Finance has issued a news release stating Canada has taken immediate, significant and decisive action to help Canadians facing hardship as a result of the COVID-19 outbreak and stands ready to do more if needed. Canada is also working with international partners to discuss global economic and social stability, share information and best practices, and strengthen international co-ordination in response to the current crisis. In support of these efforts, Minister Morneau will attend the virtual meeting of the G7 Finance Ministers and Central Bank Governors and the virtual meeting of the G20 Finance Ministers and Central Bank Governors on April 15, 2020. These groups have been meeting regularly over the past weeks to discuss the evolving global impacts of the crisis as well as to develop a G20 action plan in response to COVID-19. For more information see the link here.

Minister Fortier Highlights Government Support for Businesses at Ottawa Board of Trade (April 14, 2020)

The Department of Finance has issued a news release stating that the Government of Canada is taking action to protect Canadians and businesses from the impacts of the COVID-19 pandemic. Minister Fortier addressed the virtual town hall of the Ottawa Board of Trade to discuss the challenges facing Ottawa's economy and to outline the Government of Canada’s COVID-19 Economic Response Plan. Some of the key measures, amongst other things, include:

- The Canada Emergency Wage Subsidy (CEWS), with a 75 per cent subsidy for up to 12 weeks for qualifying employers, retroactive to March 15, 2020;
- The Canada Emergency Business Account, with $25 billion of interest-free loans through private financial institutions to qualifying organizations; and
- The Small and Medium-sized Enterprise Loan and Guarantee program that will enable up to $40 billion in lending to meet operational cash-flow requirements;
- Deferral of all Goods and Services Tax/Harmonized Sales Tax (GST/HST) payments until June, as well as GST and customs duty payments owed for imports; and
- The Canada Emergency Response Benefit that will provide $2,000 monthly for up to 4 months to eligible workers who have lost employment because of the COVID pandemic.

For more information see the link here.


The Department of Finance has noted the immediate, significant and decisive action being taken by the Government of Canada to support Canadians and businesses facing hardship as a result of the global COVID-19 outbreak. Specifically, Finance Minister Bill Morneau has introduced in Parliament Bill C-14, the COVID-19 Emergency Response Act, No. 2, which, upon receiving Royal Assent, would bring this measure into law. The legislation includes additional flexibilities that would provide effective support to those eligible employers that are hardest hit by the COVID-19 pandemic and would help protect the jobs Canadians depend on. Bill C-14 includes proposed improvements to the Canada Emergency Wage Subsidy that were announced in detail on April 8, 2020 and subsequently refined as part of the legislative process. For more information see the link here.
Financial Consumer Agency of Canada (FCAC)

Updated COVID-19: How FCAC is responding (April 9, 2020)

The FCAC is monitoring the evolution of COVID-19 and continuing to assess its impacts on financial consumers as well as banks and other regulated entities (REs). The FCAC has updated its information and resources for consumers to help them protect and manage their finances, in addition to being in regular contact with REs and monitoring their responses to the crisis. For more information concerning the FCAC’s engagement with REs, oversight of bank communications with consumers, and monitoring of public commitments made to accommodate the financial hardships of consumers, see the link here.

Office of the Superintendent of Financial Institutions (OSFI)


OSFI prepared an FAQ for federally regulated financial institutions (FRFIs) about measures it has taken to address issues stemming from COVID-19. Topics include:

- Capital
- Payment deferrals
- Expected Credit Loss (ECL) capital treatment
- Market risk
- Leverage Ratio
- Margin Requirements
- Domestic implementation of Basel III
- Small bank capital and liquidity
- Liquidity
- Interest Rate Risk in the Banking Book (IRBBB)
- Covered Bonds
- Foreign Bank Branches
- Macro Stress Testing (MST)

For the full FAQ document see the link here.


OSFI prepared an FAQ for federally regulated insurers about measures it has taken to address issues stemming from COVID-19. Topics include:

- Loan Payment Deferrals
- Premium Payment Deferrals
- LICAT Smoothing of Interest Rate Risk Requirements for Participating Insurance
- IFRS 9
- Suspension of Consultations and Policy Development
- Regulatory Filings
- Restrictions on Dividends and Share Buybacks
- Margin Requirements for Non-Centrally Cleared Derivatives

For the full FAQ document see the link here.
COVID-19 Measures – FAQs on regulatory reporting for Federally Regulated Financial Institutions (FRFIs) (April 16, 2020)

OSFI prepared an FAQ on regulatory reporting requirements and the recent measures taken to offer FRFIs some flexibility to meet upcoming deadlines for filing regulatory returns. For the full FAQ document see the link here.

PROVINCIAL REGULATORS

Autorité des Marchés Financiers (Québec) (AMF)

Useful information for registrants under the Act respecting the distribution of financial products and services during the COVID-19 crisis (April 15, 2020)

The AMF has collected information to inform registrants (i.e., firms, their representatives and employees; independent partnerships; and independent representatives) about the measures taken by the AMF to assist the industry during the current period of instability. It is also being provided as a reference for the tools available and practices to be adopted to respond to the current situation while complying with regulatory requirements. For more information see the link here.

Notice specifically for insurance and financial planning representatives, firms, independent representatives and independent partnerships subject to the Act respecting the distribution of financial products and services – COVID-19 (updated April 15, 2020)

The AMF is extending the renewal deadline for certificates expiring on March 31 and April 30, 2020 to May 31, 2020 and June 30, 2020, respectively. Representatives wishing to defer the payment of fees for any applications they may have to submit to us may do so by contacting the AMF Information Centre, making a request and entering into an agreement with an agent. For more information see the link here.

COVID-19 Questions and Answers (updated 14 April 2020)

The AMF has updated its COVID-19 FAQs with an item on what to do if a client can no longer pay their insurance premium and whether providers can give an advance to prevent policies from being forfeited. For more information see the link here.

AMF introduces new measures in response to the pandemic (April 9, 2020)

The AMF has announced additional adjustments to the existing framework designed to mitigate the impact that the COVID-19 pandemic and distancing measures are having on certified representatives and money-services businesses, which, among other things, are facing a decline in business and the expiry of their certificate. These measures supplement amendments announced on March 31, 2020 and are intended for the following financial services industry participants:

- Insurance and financial planning representatives, firms, independent representatives and independent partnerships governed by the Act respecting the distribution of financial products and services (Distribution Act)
- AMF-registered money-services businesses
- Québec-chartered insurers
- Financial services cooperatives, trust companies and savings companies

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For more information see the link here.

Notice relating to additional measures for deposit institutions and trust companies concerning capital and prudential standards – COVID-19 (updated April 9, 2020)

On March 31, 2020, the AMF announced a series of measures to minimize the impact of COVID-19 on Québec’s financial system, including specific measures for deposit institutions and trust companies. As part of its assessment of the operational capacity and actions of the financial institutions concerned to respond to the current environment, the AMF announced additional measures for trust companies, savings companies and other deposit institutions, credit unions not members of a federation, member credit unions of a federation and federations of credit unions governed, respectively, by the Trust Companies and Savings Companies Act (TCSCA), as An Act respecting financial services cooperatives (FSCA) and the Deposit Institutions and Deposit Protection Act (DIDPA). These measures, retroactive to March 31, 2020 and effective in the first quarter of the financial institution concerned beginning in 2020, are intended to provide the financial institutions concerned with the flexibility needed to deal with the current conditions while maintaining their financial resilience and stability. For more information on these measures, including leverage ratio, capital floor, transitional arrangements for the treatment of ECL, and margin expectations for OTC derivatives not cleared by a central counterparty, see the link here.

Notice relating to transitional arrangements for capital treatment for expected loss provisioning published on March 31, 2020 (updated April 9, 2020)

The AMF notice that was issued on March 31, 2020 introduced a capital adjustment for expected credit loss (ECL) provisioning. This document describes the calculation of this adjustment and the related disclosure on the Basel Capital Adequacy Reporting (BCAR). For the full text of the document see the link here.

Notice relating to new measures for deposit and trust institutions to reduce the impact of issues stemming from COVID-19 (updated March 31, 2020)

On March 19, AMF announced that it was taking steps to maintain its operations and continue to fulfill its market oversight and consumer protection missions, including the immediate suspension of surveys and other public consultations relating to regulations and guidelines where the subject matter could be delayed. This notice presents measures relating to capital and liquidity standards, minimum requirements and internal targets, consultations, the application of IFRS 9 and supervision elements for the benefit of trust companies, savings companies and other deposit institutions, credit unions not members of a federation, member credit unions of a federation and federations of credit unions respectively governed by the Trust Companies and Savings Companies Act (TCSCA), the Act respecting financial services cooperatives (LFSC) and the Deposit Institutions and Deposit Protection Act (DIDPA). For more information on these measures see the link here.

British Columbia Financial Services Authority (BCFSA)

COVID-19 - Capital Treatment of Loans under the Business Credit Availability Program (April 16, 2020)

The BCFSA issued a notice advising members of the capital treatment and the regulatory reporting requirements for loans that qualify under the Business Credit Availability Program (BCAP). This program will provide interest-free loans to small businesses and not-for-
profits, to help cover their operating costs during a period when revenues have decreased temporarily due to the economic impacts of COVID-19. These loans are to be reported as commercial loans guaranteed by the government, and they are to be risk-weighted at zero per cent in the Capital Adequacy Return. For more information see the [link here](#).

Financial Services Regulatory Authority (Ontario)

**FSRA Releases Guidance to Support Insurers in Providing Emergency Relief to Auto Insurance Consumers** (April 16, 2020)

The FSRA released guidance to ensure that consumers are treated fairly, and insurers have a number of options for providing customers with financial relief during the temporary declared emergency period. The document [Auto Insurance – Consumer Relief during a Declared Emergency Under the Emergency Management and Civil Protection Act](#) provides:

- FSRA's interpretation of the legal framework for Emergency auto insurance premium repayment programs and the process for implementing such programs,
- a new use-and-file process for administering the regulatory framework for auto insurance rate regulation that will allow for the immediate introduction of premium relief to consumers during or following an Emergency; and
- examples of actions insurers can take immediately to provide financial relief to their customers during or following an Emergency without any need for FSRA review or approval.

For more information see the [link here](#).

New Brunswick Financial and Consumer Services Commission (FCNB)

**Industry Letter** (April 15, 2020)

The FCNB has released an Industry Letter broadly outlining their and various working groups' efforts to ease administrative burdens on industry so that priority can be given to servicing increased consumer needs. The FCNB thanks all members for their patience while they adjust processes to adapt to these circumstances. For more information see the [link here](#).

Saskatchewan Financial and Consumer Affairs Authority (FCAA)

**Amendments to Exemption Order 25-502 Temporary Exemption from Certain Reporting Requirements for Regulated Entities** (April 13, 2020)

The FCAA has announced that any Regulated Entity required to file, send or deliver a document or other information during the period from March 23, 2020 to June 1, 2020 as required pursuant to certain provisions established under The Securities Act, 1988 has an additional 45 days from the deadline otherwise applicable under Saskatchewan securities law to file, send or deliver the document or other information, provided that:

- A Regulated Entity relying on this Order must file, send or deliver the required document or other information, no later than 45 days after the original due date for the document or other information; and
- A Regulated Entity relying on this Order must disclose to the Director, when it provides the document or other information, that it is relying on this Order and state...
the reasons why it could not file, send or deliver the required document or other information by the original due date.

This Order came into effect on March 23, 2020 for a period of 120 days and was amended on April 13, 2020. For the full text of General Order 25-502 see the link here.

COVID-19 Alert (April 13, 2020)

The FCAA announced that it has closed its offices as a preventative COVID-19 measure. Staff are working remotely and can be contacted via phone and email. Staff contact information can be found by visiting the telephone directory, and sending mail should be avoided as the FCAA’s capacity to process mail will be temporarily reduced. This alert also contains information relating to pensions and licensing/registration fees. For more information see the link here.

Service NL – Financial Services Regulations Division

COVID-19 Update – Processing of Renewals and New Applications – Financial Services Regulation Division (March 2020)

Service NL issued a bulletin to advise stakeholders about changes to the various licenses processed by the Financial Service Regulation Division, including mortgage brokers, insurance adjusters, agents and brokers. For more information about these renewals and applications, see the link here.

SROs, Exchanges and Securities Regulators

Canadian Securities Administrators (CSA)

CSA Staff Notice 51-360 – Frequently Asked Questions Regarding Filing Extension Relief Granted by Way of a Blanket Order in Response to COVID-19 (Updated April 16, 2020)

On March 23, 2020, the CSA published substantively harmonized temporary exemptions from certain regulatory filing requirements as a result of COVID-19. The CSA has implemented the relief through local blanket orders that are substantively harmonized across the country. This notice contains CSA staff’s views on frequently asked questions (FAQs) about the exemptions from certain corporate finance requirements provided by the CSA that apply to reporting issuers and other issuers that are not investment funds in the affected local blanket orders. For the full text of the Staff Notice, including the affected local blanket order, see the link here.

Canadian Securities Administrators Provide Update on Syndicated Mortgage Regime (April 16, 2020)

The CSA is adjusting the timeline to implement changes that will harmonize the regulation of syndicated mortgages across Canada. In December 2019, the CSA published an update on its next steps related to syndicated mortgages, including an anticipated timeline and effective date. The CSA now anticipates the amendments will take effect January 1, 2021,
subject to requisite approvals. Additional details will be communicated later this year. For more information see the link here.

Canadian Securities Administrators Adjust Implementation Date for Client Focused Reforms (April 16, 2020)

The CSA published a relief order that provides registrants with an additional six months to comply with the conflicts of interest provisions in the Client Focused Reforms (CFRs). Registrants will now have until June 30, 2021 to implement these changes. The CSA also published a second relief order to provide for the relationship disclosure provisions of the CFRs to take effect on December 31, 2021, at the same time as all other remaining changes.

When the CFRs were initially published on October 3, 2019, the CSA provided for a phased transition period, with the reforms relating to conflicts of interest and the relationship disclosure provisions taking effect on December 31, 2020, and the remaining changes taking effect on December 31, 2021. Due to the pandemic, many registrants will not be able to implement the conflicts of interest reforms since they are redeploying their staff to ensure key business functions continue to operate. The CSA encourages registrants to consider the reforms when interacting with their clients now, since clients are relying on registrants more than ever to provide them with advice that puts their interests first during these challenging circumstances. Registrants can view the relief orders on CSA member websites. For more information see the link here.

For the full text of Ontario Instrument 31-511, Relief in respect of Client Focused Reforms Conflict of Interest Provisions of National Instrument 31-103 Registration Requirements, Exemptions and Ongoing Registrant Obligations, see Ontario Securities Bulletin Issue 43/16.


Investment Industry Regulatory Organization of Canada (IIROC)

IIROC Extends implementation of its Plain Language Rulebook (April 16, 2020)

IIROC announced it will revise its implementation dates for key initiatives, to coincide with plans from the Canadian Securities Administrators (CSA) to extend implementation deadlines for the first phase of the Client Focused Reforms (CFRs) as a result of the COVID-19 pandemic. IIROC will extend its implementation dates for its Plain Language Rulebook (IIROC Rules) to December 31, 2021. For more information see the link here.

COVID-19 FAQs (updated to April 15, 2020)

To help IIROC Dealer Members with compliance and the protection of their clients, IIROC is answering questions it has received relating to issues associated with the coronavirus (COVID-19) pandemic. Topics include:

- Business conduct compliance
- Finance and administration
IIROC is providing guidance and information regarding situations where temporary relief from the rules may be available (see IIROC Rules Notice 20-0063, COVID-19 Related Exemptions from IIROC Rules, March 31, 2020). This relief does not extend beyond the identified requirements noted below. IIROC is closely monitoring the situation and will determine if additional relief or guidance is necessary and these FAQs will be updated accordingly. For the full FAQ document see the link here.

IIROC Notice #20-0077 – Deferral of IIROC fees payable by small and medium-sized Dealer Members (April 14, 2020)

IIROC has announced a number of measures to support healthy capital markets and to provide relief to Dealer Members so that they can serve Canadians during these the covid-19 crisis.

Among these, it has taken steps to provide temporary financial relief on its fees to small and medium-sized Dealer Members. Deferred payment relief will apply in full to nearly 70 Dealer Members who are subject to IIROC’s minimum fee level. Additionally, approximately 80 medium-sized Dealer Members will qualify for relief on a portion of their fees, equivalent to the amount paid by the minimum fee-paying Dealer Members. Together, this group represents approximately 90% of IIROC Dealer Members. IIROC is also setting the high-risk premiums to zero for this fiscal year. For more information see the link here.

Manitoba Securities Commission (MSC)

MSC Warns of Aggressive Stock Promotion Exploiting COVID Recession Fears (April 9, 2020)

The MSC has issued an investor alert warning the public to exercise extreme caution about aggressive promotion of Crestview Exploration Inc., a British Columbia gold mining company. For more information see the link here.

Nova Scotia Securities Commission (NSSC)

Commission launches COVID-19 investing information webpage (April 9, 2020)

The NSSC has issued a press release regarding its new informational webpage and online video for COVID-19 information. The webpage compiles all COVID-19 related information such as press releases, notices, and orders by the Commission, the Canadian Securities Administrators and the North American Securities Administrators Association. For more information see the link here.
OTHER NEWS AND SUMMARIES

**Canadian legislators approve wage subsidy as coronavirus spreads**
(Reuters) - Canadian government and opposition legislators approved a wage subsidy worth C$73 billion ($52 billion) on Saturday to support the ravaged economy, in an emergency sitting in the House of Commons.²

Opposition parties had agreed prior to the sitting to support the bill. It was expected to also receive Senate approval and royal assent by Canada’s Governor General, which is usually a formality.

Prime Minister Justin Trudeau spoke for the first time in weeks in the House after self-isolating with his family as his wife Sophie was infected with the novel coronavirus.

“This situation may get worse before getting better,” Trudeau said in Ottawa, comparing it to a war. “Let us make a commitment among ourselves, to do what needs to be done for as long as it takes.”

Trudeau’s Liberals control a minority in the House of Commons and require support from the other parties to govern.

The subsidy covers 75% of a worker’s wages. Finance Minister Bill Morneau said the government may send payments within two to five weeks.

The economy lost a record 1 million jobs last month.

As of Friday, more than 5.85 million Canadians had applied for federal emergency unemployment help since March 15, government data showed.

Canada’s death toll rose 13% in the past day to 600, and total cases climbed by 6% to 22,559, health officials said.

Deaths are set to soar to as high as 22,000 by the end of the pandemic, according to government projections.

In the province of Quebec, Canada’s epicenter, Premier Francois Legault said 31 people have died in a single Montreal-area care home since March 13, prompting a police investigation.

He said authorities have so far confirmed that five of the deaths were from COVID-19, the respiratory illness caused by the new coronavirus.

Health authorities that visited the 150-bed residence in late March found “serious problems” and a severe staff shortage, Legault said.

Many deaths in Canada have occurred among elderly people, and the Liberal government released new guidelines for long-term care homes, including monitoring that all staff and visitors wear masks.

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Canada’s most populous province, Ontario, has seen declines in new cases over the past several days, which is cause for optimism, said Chief Medical Health Officer Dr. David Williams.

Ontario accounts for the second-highest numbers of cases and deaths among provinces, after Quebec.

**Canadian investment regulator defers fees for small, medium dealers**
(Regulatory Intelligence) - Canada's investment regulator will defer fees for small and medium-sized dealers, as an additional support during the COVID-19 pandemic. Approximately 150 firms will qualify for either full or partial deferral relief, accounting for roughly 90 percent of dealer firms, the Investment Industry Regulatory Organization of Canada (IIROC) said in a notice on Wednesday.³

Nearly 70 small dealers will be able to defer their entire minimum IIROC fee payments, while another 80 medium-sized firms will qualify for relief on a portion of their fees, equivalent to the minimum fee strata for small firms, the regulator said.

"We are also setting the high-risk premiums to zero for this fiscal year," IIROC added. "We will continue to be flexible in the way we regulate our dealer members while ensuring that investors and the integrity of our markets are also protected."

**Deferral details**

Small dealers, which pay C$22,500 in annual fees, will have their fiscal year 2020 payments due in two equal installments due by the first business day of October 2020 and January 2021, respectively, IIROC said. Normally, first and second quarter payments are due in July and August, respectively.

"This means that payments for the first and second quarters will be due by the first business day of October 2020," regulators noted. "In addition, the fee for the third quarter, which is normally due by the first business day of October 2020, will be deferred to the first business day of January 2021."

Medium-sized fee payers, defined as those paying over C$22,500 but less than C$500,000, will qualify for the same relief as minimum payers. These firms can therefore defer C$22,500 in the same way as the smallest firms. Fees exceeding that minimum amount will remain payable as normal for the first and second quarters of 2020, due in July and August, respectively, and in October 2020 and January 2021 for the third and fourth quarters, respectively.

Deferrals will not apply to dealers with total annual fees of C$500,000 or more, a group that totaled 16 firms last year. "The fees payable by our largest dealer members are to follow normal schedules and are unaffected by this notice," IIROC said.

Additionally, IIROC will eliminate premiums for high-risk firms in fiscal year 2020.

"We have significantly increased our monitoring of all dealer members, so it is no longer appropriate to focus on individual firms which previously required relatively more monitoring," the regulator said.

³ Daniel Seleanu, Canadian investment regulator defers fees for small, medium dealers, Thomson Reuters Regulatory Intelligence (April 15, 2020) at: http://go-ri.tr.com/fVKMqX.
IIROC's ability to provide more extensive fee relief was limited by its status as a non-profit regulator whose income derived primarily from its constituents, the notice said.

The limited fee deferrals were intended to "provide the amount of relief we can reasonably offer" to dealers for whom such relief would be most meaningful, IIROC added.