



July 6<sup>th</sup>, 2016

Jean-François Girard

Chief Securities Policy Department of Finance Canada

Via email: [jean-francois.girard@canada.ca](mailto:jean-francois.girard@canada.ca), [comment@ccmr-ocrmc.ca](mailto:comment@ccmr-ocrmc.ca) and [chad.ladouceur@canada.ca](mailto:chad.ladouceur@canada.ca)

Dear Mr. Girard,

Thank you for the opportunity to comment on the revised Consultation Draft of the Capital Markets Stability Act (CMSA.) AIMCo is a Crown Corporation with over \$90 billion of assets under management invested on behalf of 27 clients, including Albertan pension plans and government funds. AIMCo considers the CMSA to be an important contribution to Canada's regulatory framework, serving to protect, enhance and instill investor confidence. We support the efforts of the Authority to promote regulatory alignment and co-ordination between the Authority and other regulators to facilitate well-functioning financial markets.

As a fiduciary investor and a UNPRI signatory, AIMCo is committed to advocating for financial system stability and to reduce systemic risk. We appreciate the CMSA's definition of systemic risk related to capital markets as having the potential to have a material adverse effect on the Canadian economy, in alignment with international regulatory definitions used by entities such as the Financial Stability Board.

AIMCo broadly supports the efforts of the Authority to reduce the burden of unnecessary and duplicative corporate reporting, especially to the extent entities are already regulated with requisite reporting which is publically available. We support the principle of transparency and promoting appropriate corporate disclosure while also protecting the ability of companies and investors to maintain confidentiality necessary to remain competitive in the marketplace. When designing processes to instruct data gathering and collection we further caution that data quality ultimately hinges on data relevance, and the comparability of data across reporting entities.

With respect to urgent orders in section 24(6), it may be appropriate to determine which processes the Authority will use to identify stakeholders in order to consider their respective viewpoints. AIMCo further supports the addition of a hearing by tribunal to facilitate procedural fairness.

With respect to Part 2, we broadly support the ability of the Authority to impose requirements and restrictions regarding the determination of credit ratings as per section 23. AIMCo has supported recent UNPRI- led advocacy efforts requesting that credit ratings agencies consider the potential materiality of environmental, social and governance factors in bond ratings.

Thank you again for the opportunity to provide commentary. Please feel free to reach out with any questions for clarification.

Regards,

Alison Schneider

Director, Responsible Investment