

**January 12, 2026**

**VIA E-MAIL:** [comments@osc.gov.on.ca](mailto:comments@osc.gov.on.ca)

The Secretary  
Ontario Securities Commission  
20 Queen Street West, 22nd Floor  
Toronto, Ontario M5H 3S8

**Re: OSC Notice 11-7101 – Statement of Priorities - Request for Comments Regarding Statement of Priorities for Fiscal Year 2026-2027**

Dear Sirs & Mesdames,

The Responsible Investment Association (RIA) welcomes the opportunity to provide feedback on certain aspects of the Ontario Securities Commission (OSC) Statement of Priorities for the fiscal year 2026-2027 (the “SoP”) that are of importance to RIA members. Our comments relate to climate-related disclosures in Key Priority 10 under Goal 3 “Dynamically right-size regulation informed by changing needs, risks, and practices in Ontario and globally”, as well as the Diversity-Related Disclosure and Action Plan for Truth and Reconciliation comments under “Comments regarding ongoing initiatives and monitoring Efforts”.

The RIA is a Canadian investment industry association comprising more than 160 institutional members and over 400 individual members who practice and support responsible investing (RI)—defined as investments that incorporate environmental, social and governance (ESG) factors. Our mandate is to drive the growth and development of RI in Canada’s institutional and retail markets. The RIA’s membership includes asset managers, asset owners, advisors and service providers. Institutional members collectively manage over C\$45 trillion in assets globally.

### **Comment on Goal 3, Priority 10**

#### **Climate-Related Risk Disclosure under Existing Securities Law**

The RIA supports the Ontario Securities Commission’s focus, under Priority 10, on assessing compliance with existing securities law requirements related to the disclosure of material climate-related risks, and on deepening its understanding of current disclosure practices in Canada. Climate-related risks are now widely recognized as a mainstream financial risk, encompassing physical, transition, liability, and systemic dimensions, and are material for a growing number of issuers and, therefore, investors in these issuers. As such, the OSC’s supervisory attention to climate-related disclosure under existing securities legislation is both appropriate and aligned with its investor protection mandate. Given the importance of the Climate-related Disclosures (CSDS 2) published by the Canadian Sustainability Standards Board (CSSB), alignment with at least governance and risk disclosures should be prioritized to ensure growing momentum around these standards. It is worth noting that the International Accounting Standards Board (IASB) recently published illustrative examples on reporting climate-related and other uncertainties under the existing IFRS Accounting Standards. We encourage the OSC to consider this guidance in the context of this review.

Findings of compliance reviews of the current state of climate-related disclosure practices in Canada should be published for review.

## **Principles-Based Oversight and Regulatory Clarity**

Consistent with the principles-based approach, we encourage the OSC to use this assessment as an opportunity to enhance regulatory clarity and investor confidence through the development of clear regulatory expectations. In the absence of a mandatory, standardized disclosure framework, issuer practices remain uneven, resulting in limited comparability for investors, increased reliance on estimates and proxy data, and heightened legal and reputational risk for issuers. Prolonged reliance on inconsistent voluntary disclosure risks undermining investor protection and market efficiency, particularly as peer jurisdictions advance standardized climate disclosure regimes.

## **Safe Harbour Provisions and Civil Liability Considerations**

We support the OSC's commitment to consider stakeholder feedback on the adequacy of existing safe harbour provisions and civil liability protections related to climate-related disclosures. This consideration is especially important in light of amendments to the Competition Act under Bill C-59 announced in June 2024, which have materially expanded liability related to environmental and sustainability-related claims. While the most recent proposed amendments to the Competition Act announced in the federal budget on November 4, 2025, may reduce certain litigation risks, they also underscore the continued need for clear, coordinated guidance across securities and competition law regimes. Without such coordinated guidance, issuers face growing uncertainty regarding how to provide decision-useful climate disclosures—particularly forward-looking information, transition plans, and scenario analysis—without incurring disproportionate litigation or enforcement risk. Appropriately calibrated safe harbour protections are therefore critical to encourage meaningful, decision-useful disclosure while preserving accountability for misleading statements.

International experience demonstrates that clear safe harbour frameworks improve disclosure quality and consistency and strengthen investor confidence. Clarity in legal protections supports both issuer compliance and investor protection, particularly where climate disclosures intersect with anti-greenwashing provisions.

## **Competitiveness and Capital Formation**

From a capital markets competitiveness perspective, delayed alignment on climate disclosure creates increasing friction for Canadian issuers seeking global capital. Global investors increasingly view standardized climate-related disclosure as a baseline expectation. Inconsistent disclosure practices may raise the cost of capital, discourage foreign investment, and weaken Canada's competitive position.

Mandatory, interoperable disclosure aligned with International Sustainability Standards Board (ISSB)/Canadian Sustainability Standards Board (CSSB) standards, combined with appropriate safe harbour protections, would reduce reporting burden over time, enhance comparability and market confidence, and support fair, efficient, and competitive capital markets, consistent with the OSC's mandate.

## **Comments regarding Ongoing Initiatives and Monitoring Efforts**

### **Diversity-Related Disclosure**

The RIA also acknowledges the OSC's statement that it is actively monitoring regulatory developments related to diversity disclosures and the disclosure practices of non-venture (TSX-listed) issuers. We support continued monitoring and transparency in this area, noting that diversity-related information, particularly at the board and senior management level, is increasingly relevant to investors' assessment of governance quality, human capital management, and long-term

performance. As with climate-related disclosure, inconsistent or voluntary-only approaches have resulted in uneven practices and limited comparability across issuers. Consideration of how diversity disclosure intersects with broader governance and competitiveness objectives would support investor decision-making.

Reiterating comments from our letter submitted to the Canadian Securities Administrators (CSA) dated May 14, 2025, amendments to the existing diversity-related disclosure requirements would support efforts to ensure Canadian markets remain competitive. These disclosures will also help drive more transparency and potential success related to Indigenous economic reconciliation, which is critical for our global competitiveness.

### **Action Plan for Truth and Reconciliation**

The RIA welcomes the OSC's commitment to continued engagement with Indigenous communities and organizations on Indigenous participation in capital markets. We support the integration of Indigenous perspectives into regulatory work through respectful, collaborative, and outcomes-focused approaches. Enhanced transparency, meaningful engagement, and the thoughtful integration of Indigenous economic participation considerations into capital markets policy can contribute to investor confidence, long-term competitiveness, and reconciliation objectives, while supporting issuers and investors seeking to engage responsibly in Indigenous-related economic opportunities.

### **Conclusion**

The RIA supports the OSC's intention to monitor domestic and international developments and to engage stakeholders on climate-related disclosure expectations and liability considerations. We also encourage continued coordination with CSA members, Office of the Superintendent of Financial Institutions (OSFI), and international standard setters to consider alignment of disclosures in a global context in efforts to enhance the competitiveness of Canada's capital markets. In the interim, assessments of compliance with existing disclosure obligations should be accompanied by clear communication of expectations, transparency regarding enforcement approaches, coordination with Competition Act enforcement developments, and consideration of phased or proportional approaches to implementation.

The RIA stands ready to continue constructive engagement with the OSC by convening investors, sharing research insights, and supporting efforts to strengthen disclosure quality, investor confidence, and Canadian capital market competitiveness. If you have any questions regarding the above, please feel free to contact Patricia Fletcher, Chief Executive Officer ([patricia@riacanada.ca](mailto:patricia@riacanada.ca)) or Glen Pichanick, Head of Advocacy and Industry Insights ([glen@riacanada.ca](mailto:glen@riacanada.ca)).

Yours truly,



Patricia Fletcher, ICD.D  
Chief Executive Officer