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SENT BY WEBSITE SUBMISSION

October 28, 2020

Financial Services Regulatory Authority of Ontario
130 Adelaide Street West, Suite 800
Toronto ON M5H 3P5

Dear Sir or Madam,

Re: Proposed 2021-2022 FSRA Statement of Priorities (the “Priorities”)

We are the Ontario Teachers’ Pension Plan Board (“Ontario Teachers”), the administrator of the Ontario Teachers’ Pension Plan, a jointly-sponsored defined benefit pension plan with over 300,000 active, former and retired members and, as of June 30, 2020, approximately \$204.7 billion in assets. Ontario Teachers’ Pension Plan is Canada’s largest single-occupation pension plan and we are a significant institutional investor at home and around the world.

Thank you for the opportunity to provide our comments on the Priorities. As noted in the Environmental Scan, we understand that COVID-19 has introduced unanticipated challenges for everyone and we appreciate FSRA’s efforts to address them.

As further set out below, we agree with and support the Priorities.

1. 2021-2022 Budget

We support FSRA’s proposed 2021-2022 expense budget to further its goal of building the resources it needs to continue its transformation into a principles-based, independent and transparent regulator.

2. Cross-Sectoral Priorities

We support FSRA's cross-sectoral priorities, particularly FSRA's continued transition to a principles-based and outcomes-focused approach, with its focus on updating guidance to ensure alignment with principles-based regulation.

As FSRA points out in the Priorities, the financial services landscape is changing rapidly and FSRA needs to move away from 'one-size fits all' solutions. We appreciate FSRA's continued engagement with stakeholders as it shifts its activities and oversight from the traditional prescriptive method of regulation to a principles-based approach.

3. Pensions Sector Priorities

Ontario Teachers' supports all three of FSRA's Pension Sector Priorities.

With respect to Priority 9.1, *Support plan flexibility, evolution and principles-based applications within the existing regulatory and legislative regime*, we believe there is a great opportunity to simplify prescribed communications in the context of the proposed special purpose Technical Advisory Committee to enhance member understanding and engagement.

With respect to Priority 9.2, *Develop and consult on prudential supervision framework*, we support FSRA's engagement with large-public sector pension plans to develop best practice recommendations regarding identifying and monitoring investment risk.

With respect to Priority 9.3, *Refocus pension regulation to improve regulatory efficiency and effectiveness*, we support FSRA's shifting its guidance on family law matters to a more principles-based document with a plain-language guide for plan members. In our experience, the family law regime has been a particularly challenging one for our members to navigate.

We appreciate the continued dialogue with FSRA and look forward to continuing to work closely in the future.

Yours truly,



Rossana Di Lieto

Senior Managing Director, Chief Compliance Officer & Associate General Counsel