

Fruitful updates in CIRO's Annual Report

September 27, 2024

On September 19, 2024, the Canadian Investment Regulatory Organization (CIRO) released its [Annual Report for 2023-2024](#) (the Annual Report), alongside the inaugural [Investor Advisory Panel \(IAP\) Annual Report](#) (the IAP Report). These reports provide a comprehensive update on the activities of CIRO over the last year.

The Annual Report includes enforcement, financial, and governance information that will be of interest to all CIRO stakeholders. The Annual Report opens with an indication that in fiscal year 2025, CIRO will focus on publishing Phase 4 of the Rule Consolidation Project, complete its consultation on the Integrated Fee Model (for implementation in the 2026 fiscal year), and develop proposals to harmonize continuing education regimes, among other things.

In a discussion measuring its progress against its priorities, it is noted that CIRO will continue the project it has begun to develop rules to expand the group of Approved Persons that are permitted to conduct activities for Dealer Members through a **corporation (i.e. directed commissions)**. Under “business as usual”, CIRO intends to finish their sweep on CFR Phase 2, deal with public comments on its fully paid lending and financing arrangement rule amendments, develop surveillance tools to review over-the-counter trading activity of crypto assets, and implement the first phase of a Public Analytics Data Portal to provide access to aggregate trading information. CIRO will also issue a survey to members to elicit feedback on its regulatory effectiveness and efficiency.

The Annual Report also mentions CIRO's intention to propose changes to its Arbitration Program to make it available to clients of both investment dealers and mutual fund dealers along with enhancing accessibility, efficiency and transparency of the arbitration process. CIRO will also be proposing amendments to existing rules to accommodate the structure of exchange traded funds, recognizing the role of the Authorized Participants and the relationship between the primary and secondary markets.

The IAP Report discusses the activities of the IAP in its first year, including its participation in a variety of consultations such as CIRO's strategic initiatives, the future direction of CIRO's arbitration program, and CIRO's new proposed proficiency model.

By

[William Donegan](#)

Expertise

[AUM Law](#)

BLG | Canada's Law Firm

As the largest, truly full-service Canadian law firm, Borden Ladner Gervais LLP (BLG) delivers practical legal advice for domestic and international clients across more practices and industries than any Canadian firm. With over 800 lawyers, intellectual property agents and other professionals, BLG serves the legal needs of businesses and institutions across Canada and beyond – from M&A and capital markets, to disputes, financing, and trademark & patent registration.

blg.com

BLG Offices

Calgary

Centennial Place, East Tower
520 3rd Avenue S.W.
Calgary, AB, Canada
T2P 0R3

T 403.232.9500
F 403.266.1395

Ottawa

World Exchange Plaza
100 Queen Street
Ottawa, ON, Canada
K1P 1J9

T 613.237.5160
F 613.230.8842

Vancouver

1200 Waterfront Centre
200 Burrard Street
Vancouver, BC, Canada
V7X 1T2

T 604.687.5744
F 604.687.1415

Montréal

1000 De La Gauchetière Street West
Suite 900
Montréal, QC, Canada
H3B 5H4

T 514.954.2555
F 514.879.9015

Toronto

Bay Adelaide Centre, East Tower
22 Adelaide Street West
Toronto, ON, Canada
M5H 4E3

T 416.367.6000
F 416.367.6749

The information contained herein is of a general nature and is not intended to constitute legal advice, a complete statement of the law, or an opinion on any subject. No one should act upon it or refrain from acting without a thorough examination of the law after the facts of a specific situation are considered. You are urged to consult your legal adviser in cases of specific questions or concerns. BLG does not warrant or guarantee the accuracy, currency or completeness of this publication. No part of this publication may be reproduced without prior written permission of Borden Ladner Gervais LLP. If this publication was sent to you by BLG and you do not wish to receive further publications from BLG, you may ask to remove your contact information from our mailing lists by emailing unsubscribe@blg.com or manage your subscription preferences at blg.com/MyPreferences. If you feel you have received this message in error please contact communications@blg.com. BLG's privacy policy for publications may be found at blg.com/en/privacy.

© 2026 Borden Ladner Gervais LLP. Borden Ladner Gervais LLP is an Ontario Limited Liability Partnership.