

CAPITAL

May 9, 2016

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Sent via electronic mail

Mr. Robert Day
Senior Specialist Business Planning
Ontario Securities Commission
20 Queen Street West, 22nd Floor
Toronto, Ontario M5H 3S8

Dear Mr. Day:

Subject: OSC Notice 11-774 *Statement of Priorities for 2016-2017*

We have reviewed the Chair's Statement of Priorities for the Commission for the year commencing April 1, 2016 and we thank you for the opportunity to provide our comments.

Addenda Capital Inc. is a privately owned investment management firm responsible for investing more than \$25 billion in assets for pension funds, insurance companies, foundations, endowment funds, third party mutual funds of major financial institutions and high net worth clients.

We support the comments submitted by the Canadian Coalition for Good Governance dated April 25, 2016 that highlight a number of shareholder democracy matters of significant importance.

Addenda Capital remains committed to increasing many types of diversity among corporate directors and executive officers and as such, we are supportive of the OSC's continued focus on monitoring progress on disclosure related to women on boards and in executive officer positions.

Moreover, Addenda Capital remains supportive of improving access to, and transparency in, fixed income markets generally, and particularly in the corporate bond component. Therefore, we are pleased to see that increasing transparency in the fixed income market is a priority issue for the OSC in 2016-2017.

We would like to bring to your attention something we believe is missing from the *2016-2017 Statement of Priorities*. We believe environmental reporting requirements, with particular emphasis on climate change related disclosure, should be a priority.

Working with the Financial Stability Board ("FSB") is specifically referenced in relation to the regulatory goal to promote financial stability through effective

oversight and as such, we recommend the OSC find ways to work with the FSB's Task Force on Climate-related Financial Disclosures and consider how the OSC can encourage adoption of the Task Force's recommendations (including possible regulation of required disclosure).

It has been more than five years since the Canadian Securities Administrators ("CSA") published CSA Staff Notice 51-333 *Environmental Reporting Guidance*. In light of growing investor interest in climate change related disclosure and increasing issuer attention to climate change related risks and opportunities, we encourage the OSC, ideally in conjunction with the CSA, to evaluate the adequacy of the guidance and evaluate issuers' adherence to National Instrument 51-102 *Continuous Disclosure Obligations*. Efforts that may be supportive of these evaluations may already be underway as we understand that Chartered Professional Accountants of Canada will release an assessment of climate change related disclosure by Canadian issuers during the OSC's fiscal year.

In closing, I would like to thank you for undertaking the consultation regarding the Chair's Statement of Priorities for the Commission for the year commencing April 1, 2016 and for providing us with the opportunity to comment.

For further information or clarification on our comments, please do not hesitate to contact me directly at +1 647-253-1029 or b.minns@addenda-capital.com.

Best regards,



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