

**CSA NOTICE REGARDING  
COORDINATED BLANKET ORDER 81-930  
EXEMPTIONS FROM CERTAIN REPURCHASE TRANSACTIONS  
REQUIREMENTS FOR INVESTMENT FUNDS**

July 24, 2025

## Introduction

The Canadian Securities Administrators (the **CSA** or **we**) are publishing substantively harmonized exemptions from certain repurchase transaction requirements in National Instrument 81-102 *Investment Funds* (**NI 81-102**) to allow investment funds to access the Bank of Canada's repurchase facility, the Contingent Term Repo Facility (**CTRF**).

Every member of the CSA is implementing the relief through a local blanket order entitled Coordinated Blanket Order 81-930 *Exemptions from Certain Repurchase Transactions Requirements for Investment Funds* (the **Coordinated Blanket Order**). Although the outcome is the same in all CSA jurisdictions, the language of the Coordinated Blanket Order issued by each province or territory may not be identical because each jurisdiction's blanket order must fit within the authority provided for in local securities legislation.

The text of the Coordinated Blanket Order is contained in Annex A of this notice and will also be available on websites of the following CSA jurisdictions:

[www.bcsc.bc.ca](http://www.bcsc.bc.ca)  
[www.asc.ca](http://www.asc.ca)  
[www.fcaa.gov.sk.ca](http://www.fcaa.gov.sk.ca)  
[www.mbsecurities.ca](http://www.mbsecurities.ca)  
[www.osc.ca](http://www.osc.ca)  
[www.lautorite.qc.ca](http://www.lautorite.qc.ca)  
[www.fcncb.ca](http://www.fcncb.ca)  
[nssc.novascotia.ca](http://nssc.novascotia.ca)

## Substance and Purpose

The purpose of the Coordinated Blanket Order is to provide investment funds with exemptions from certain repurchase transaction requirements in NI 81-102 (collectively, the **certain repurchase transaction requirements**) to facilitate access to the CTRF offered by the Bank of Canada should it become activated in the future. The Bank of Canada has developed the CTRF to support the stability of the Canadian financial system by assisting market participants to address liquidity issues that may arise if there are severe market-wide liquidity stresses.<sup>1</sup> Under

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<sup>1</sup> <https://www.bankofcanada.ca/markets/market-operations-liquidity-provision/market-operations-programs-and-facilities/contingent-term-repo-facility/>

the CTRF, the Bank of Canada will repurchase certain eligible fixed income securities issued or guaranteed by the Government of Canada or a provincial government. The CTRF offers Canadian-dollar funding for a term of up to 30 days to eligible participants.

The Bank of Canada has recently revised its eligibility criteria to provide greater clarity on the eligibility of investment funds that may access the CTRF.<sup>2</sup>

## **Background**

### ***CTRF***

The application, access and settlement requirements for the CTRF are solely determined by the Bank of Canada. An investment fund must submit an application to the Bank of Canada to become an approved counterparty and the Bank of Canada then reviews the application to confirm the investment fund meets the eligibility requirements. Once approved, the investment fund must sign the Bank of Canada's master repurchase agreement prior to accessing the CTRF.

The CTRF may be activated and deactivated by the Bank of Canada, at its discretion. Currently, the CTRF is not activated.

### ***Exemptions***

We recognize that during times when the CTRF is activated, an investment fund with exposure to Canadian dollar money markets and/or fixed income securities may need to access the CTRF to manage its liquidity during periods of severe market-wide liquidity stresses in the Canadian dollar money markets and/or fixed income markets. However, accessing the CTRF would result in an investment fund being unable to comply with the certain repurchase transaction requirements.

The Coordinated Blanket Order provides investment funds with exemptive relief to facilitate access to the CTRF on the conditions that:

- it would be in the best interest of the investment fund to do so;
- the cash delivered to the investment fund as consideration for sold securities in the CTRF is used for liquidity management of the investment fund; and
- certain reporting requirements are complied with.<sup>3</sup>

The CSA is of the view that it would not be prejudicial to the public interest to grant the exemptions from the certain repurchase transactions requirements.

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<sup>2</sup> <https://www.bankofcanada.ca/2025/03/bank-canada-announces-planned-changes-contingent-term-repo-facility/>.

<sup>3</sup> The reporting requirements exclude any operational tests that may be conducted by the Bank of Canada during the onboarding process for the CTRF.

## Effective Date

The Coordinated Blanket Order will come into effect on July 24, 2025 (the **Effective Date**).

Under securities legislation, the Coordinated Blanket Order is not subject to an expiration date in any of the CSA jurisdictions, except in Ontario. In Ontario, the term of the Coordinated Blanket Order is 18 months and it will cease to be effective on January 24, 2027, unless it is extended or revoked. In Ontario, the Coordinated Blanket Order may be extended for a further period of up to 18 months by way of rule.

## Content of Annex A

This Notice contains Annex A: Coordinated Blanket Order 81-930 *Exemptions from Certain Repurchase Transactions Requirements for Investment Funds*.

## Questions

Please refer your questions to any of the following:

### *British Columbia Securities Commission*

Noreen Bent  
Chief  
Corporate Finance Legal Services  
Phone: 604-899-6741  
Email: [nbent@bcsc.bc.ca](mailto:nbent@bcsc.bc.ca)

James Leong  
Senior Legal Counsel  
Corporate Finance  
Phone: 604-899-6681  
Email: [jleong@bcsc.bc.ca](mailto:jleong@bcsc.bc.ca)

### *Alberta Securities Commission*

Chad Conrad  
Senior Legal Counsel, Investment Funds  
Phone: 403-297-4295  
Email: [chad.conrad@asc.ca](mailto:chad.conrad@asc.ca)

### *Financial and Consumer Affairs Authority of Saskatchewan*

Graham Purse  
Legal Counsel  
Phone: 306-787-5867  
E-mail: [graham.purse2@gov.sk.ca](mailto:graham.purse2@gov.sk.ca)

### *Manitoba Securities Commission*

Patrick Weeks

Deputy Director, Corporate Finance  
Phone: 204-945-3326  
E-mail: [patrick.weeks@gov.mb.ca](mailto:patrick.weeks@gov.mb.ca)

*Ontario Securities Commission*

Frederick Gerra  
Senior Legal Counsel  
Investment Management Division  
Phone: 416-204-4956  
Email: [fgerra@osc.gov.on.ca](mailto:fgerra@osc.gov.on.ca)

Stephen Paglia  
Vice-President  
Investment Management Division  
Phone: 416-593-2393  
E-mail: [spaglia@osc.gov.on.ca](mailto:spaglia@osc.gov.on.ca)

Irene Lee  
Senior Legal Counsel  
Investment Management Division  
Phone: 416-593-3668  
E-mail: [ilee@osc.gov.on.ca](mailto:ilee@osc.gov.on.ca)

Neeti Varma  
Associate Vice-President  
Investment Management Division  
Phone: 416-593-8067  
E-mail: [nvarma@osc.gov.on.ca](mailto:nvarma@osc.gov.on.ca)

*Autorité des marchés financiers*

Philippe Lessard  
Investment Funds Analyst  
Investment Products Oversight  
Tel: 514 395-0337 # 4364  
Email: [Philippe.Lessard@lautorite.qc.ca](mailto:Philippe.Lessard@lautorite.qc.ca)

Robin Marcoux  
Senior Investment Fund Analyst  
Investment Products Supervision  
Tel: (514) 395-0337 # 4426  
Email: [robin.marcoux@lautorite.qc.ca](mailto:robin.marcoux@lautorite.qc.ca)

*Financial and Consumer Services Commission of New Brunswick*

Ray Burke  
Manager, Corporate Finance  
Phone: 506-643-7435  
Email: [ray.burke@fcnb.ca](mailto:ray.burke@fcnb.ca)

*Nova Scotia Securities Commission*

Jack Jiang  
Securities Analyst  
Phone: 902-424-7059  
Email: [jack.jiang@novascotia.ca](mailto:jack.jiang@novascotia.ca)



## APPENDIX A

THE SECURITIES ACT

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Section 20(1)

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National Instrument 81-102

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July 24, 2025

### MANITOBA SECURITIES COMMISSION COORDINATED BLANKET ORDER 81-930

#### Re: Exemptions from Certain Repurchase Transactions Requirements for Investment Funds

##### Definitions

1. Terms defined in *The Securities Act* (Manitoba) (the **Act**), Multilateral Instrument 11-102 *Passport System* (**MI 11-102**) and National Instrument 81-102 *Investment Funds* (**NI 81-102**) have the same meaning as in this Order.
2. In this Order:

“certain repurchase transactions requirements” means the requirements in paragraphs 2.13(1)2, 5 and 6, subsection 2.13(2) and paragraphs 2.17(1)(a)(b)(c) of NI 81-102 that apply to repurchase transactions.

##### Background

3. Investment funds that are reporting issuers are subject to the NI 81-102 requirements for repurchase transactions.
4. The Bank of Canada (**Bank**) has developed a facility to support the stability of the Canadian financial system by assisting market participants to address liquidity issues that may arise if there are severe market-wide liquidity stresses. The Contingent Term Repo Facility (**CTRF**) is a facility under which the Bank will repurchase certain eligible fixed income securities issued or guaranteed by the Government of Canada or a provincial government. The CTRF offers Canadian-dollar funding for a term of up to 30 days to eligible participants.
5. The Commission recognizes that investment funds with exposure to Canadian dollar money markets and/or fixed income securities may need to access the CTRF to manage



their liquidity during periods of severe market-wide liquidity stresses in the Canadian dollar money markets or fixed income markets.

6. NI 81-102 sets out requirements that investment funds that want to engage in repurchase transactions must follow, including those set out in certain repurchase transactions requirements. An investment fund that accesses the CTRF would not be able to comply with certain repurchase transactions requirements for the reasons set out below:
- (a) the cash to be delivered to the investment fund at the beginning of the CTRF will be less than an amount equal to at least 102% of the market value of the sold securities as required by paragraph 2.13(1)5 of NI 81-102;
  - (b) the sold securities will be marked to market on each business day, but the amount of sale proceeds in the possession of the investment fund will not be adjusted on each business day, as applicable, as required by paragraph 2.13(1)6 of NI 81-102;
  - (c) given (a) and (b) above, the Bank's master repurchase agreement for the CTRF would not implement all the requirements of section 2.13(1) of NI 81-102 as required by paragraph 2.13(1)2 of NI 81-102;
  - (d) the cash delivered to an investment fund as consideration for sold securities would be used for liquidity management of the investment fund which is not permitted under subsection 2.13(2) of NI 81-102; and
  - (e) to promptly manage liquidity during periods of severe market-wide liquidity stresses in the Canadian dollar money markets and/or fixed income markets,
    - (i) mutual funds, other than exchange-traded mutual funds not in continuous distribution, may not have sufficient time to provide disclosure required for accessing the CTRF as required by paragraph 2.17(1)(a) of NI 81-102;
    - (ii) exchange-traded mutual funds that are not in continuous distribution or non-redeemable investment funds may not have sufficient time to provide a news release of the required prospectus disclosure and the date on which the investment funds intend to begin entering the CTRF as required by paragraph 2.17(1)(b) of NI 81-102; and
    - (iii) investment funds may not have sufficient time to provide their securityholders with 60 days written notice prior to accessing the CTRF as required by paragraph 2.17(1)(c) of NI 81-102.

## Order

7. The Commission, considering that it would not be prejudicial to the public interest to do so, orders under section 20(1) of the Act that investment funds that are reporting issuers are exempt from certain repurchase transactions requirements for the purpose of accessing the CTRF, provided that:
- (a) the manager has determined that accessing the CTRF is in the best interest of the investment fund;
  - (b) the cash delivered to an investment fund as consideration for sold securities in the CTRF is used for liquidity management of the investment fund;
  - (c) as soon as practicable, and in any event within 5 business days after an investment fund's application to become an eligible counterparty to the CTRF is approved by the Bank, the investment fund provides notification to their principal regulator by email as set out in Annex B that the investment fund's CTRF application has been approved and the investment fund intends to rely on this Order;
  - (d) as soon as practicable, and in any event within 5 business days after each instance an investment fund accesses the CTRF, the investment fund provides notification to their principal regulator by email as set out in Annex B that the investment fund has accessed the CTRF; and
  - (e) as soon as practicable after each instance an investment fund accesses the CTRF, the investment fund provides the information required in Annex A in an Excel document to their principal regulator by email as set out in Annex B.

#### **Effective Date**

8. This Order comes into effect on July 24, 2025.

#### **FOR THE COMMISSION**

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Chris Besko  
Executive Director