

## CSA Notice of *Amendments and Changes to Implement an Access Model for Certain Continuous Disclosure Documents of Non-Investment Fund Reporting Issuers*

June 25, 2026

### Introduction

The Canadian Securities Administrators (the **CSA** or **we**) are publishing in final form amendments to

- National Instrument 51-102 *Continuous Disclosure Obligations (NI 51-102)*, and
- National Instrument 54-101 *Communication with Beneficial Owners of Securities of a Reporting Issuer*

(collectively, the **Amendments**)

and changes to

- Companion Policy 51-102CP to National Instrument 51-102 *Continuous Disclosure Obligations*, and
- Companion Policy 54-101CP to National Instrument 54-101 *Communication with Beneficial Owners of Securities of a Reporting Issuer*

(collectively, the **Changes**, and together with the Amendments, the **Final Amendments**).

Provided all necessary ministerial approvals are obtained, the Final Amendments will come into force on **September 22, 2026**.

The text of the Final Amendments is contained in Annexes B through E of this notice and will also be available on websites of CSA jurisdictions, including:

[www.lautorite.qc.ca](http://www.lautorite.qc.ca)

[www.asc.ca](http://www.asc.ca)

[www.bcsc.bc.ca](http://www.bcsc.bc.ca)

[nssc.novascotia.ca](http://nssc.novascotia.ca)

[www.fcnb.ca](http://www.fcnb.ca)

[www.osc.ca](http://www.osc.ca)

[www.fcaa.gov.sk.ca](http://www.fcaa.gov.sk.ca)

[www.mbsecurities.ca](http://www.mbsecurities.ca)

## Substance and Purpose

The Final Amendments implement an access model (the **Access Model**) for annual financial statements, interim financial reports and related management's discussion & analysis (**MD&A**) of non-investment fund reporting issuers (**CD documents**).

The Access Model provides alternative procedures whereby electronic access may be provided to CD documents instead of following the delivery requirements currently found in securities legislation.

The Final Amendments stipulate that electronic access to a CD document has been provided if

- the issuer has filed the document on SEDAR+,
- not more than one calendar day after the filing of the document, the issuer has issued and filed a news release on SEDAR+ announcing that
  - the document is accessible electronically,
  - the SEDAR+ notification functionality is available,
  - an electronic or paper copy of the document can be obtained upon request,
  - any standing instructions to receive the document in electronic or paper form will continue to be followed, and
- not more than two calendar days after the filing of the document, if the issuer has a website, the issuer has posted on its website the document or a hyperlink that leads directly to the document filed on SEDAR+.

The SEDAR+ notification functionality allows a person or company to subscribe, through SEDAR+, to receive an email notification when the CD documents that they subscribed for have been filed by the issuer on SEDAR+.

In addition, the Final Amendments require the issuer to disclose how to access CD documents electronically, that the SEDAR+ notification functionality is available, how to obtain a copy of a CD document and that standing instructions can be provided. The required disclosure must be made

- in a news release before using the Access Model if, during the previous financial period, the issuer complied with subsection 4.6(1) or met the conditions in subsection 4.6(5) of NI 51-102,
- annually in (i) the proxy-related materials (such as its notice of meeting, form of proxy or voting instruction form or information circular), (ii) the notice under the notice-and-access model, or (iii) a separate document sent with the issuer's proxy-related materials or its notice under the notice-and-access model, and
- if applicable, on its website in the same location where the issuer posts its CD documents or a hyperlink that leads directly to the documents filed on SEDAR+.

We recognize that information technology is an important and useful tool in facilitating communication with investors. The Access Model is consistent with the general evolution of our capital markets and recognizes that investors are increasingly accessing and consuming information electronically. The Access Model will further enhance investors' awareness of the availability of CD documents and how they can access them electronically.

The Access Model does not impact an investor's ability to request CD documents in electronic or paper form. If an investor has provided standing instructions to an intermediary to receive the documents in electronic or paper form, the documents will continue to be sent based on those instructions even if the issuer has selected to provide electronic access to its documents in accordance with the Access Model.

## Background

On January 9, 2020, we published CSA Consultation Paper 51-405 *Consideration of an Access Equals Delivery Model for Non-Investment Fund Reporting Issuers*. The purpose of the consultation was to provide a forum for discussion on the appropriateness of implementing an access model in the Canadian market. We solicited views on whether an access model should be introduced, the types of documents to which the model should apply and its mechanics.

At that time, a significant majority of commenters expressed general support for implementing an access model in Canada. In light of the comments received and our analysis, we considered it appropriate to prioritize implementing an access model for prospectuses and CD documents.

On April 7, 2022, we published for comment proposed amendments and proposed changes to implement an access model for prospectuses and for CD documents of non-investment fund reporting issuers (the **Initial Proposals**). During the comment period, we received submissions from 29 commenters. The Initial Proposals for prospectuses were generally well received by commenters. On January 11, 2024, we published final amendments and changes implementing an access model for prospectuses. These final amendments and changes generally came into force on April 16, 2024.

However, several commenters expressed concerns about implementing the Initial Proposals for CD Documents, including potential negative effects on retail investors. Following this feedback, the CSA further considered ways to enhance the Initial Proposals from an investor protection perspective. On November 19, 2024, we republished for a second comment period proposed amendments and proposed changes to implement an access model for CD documents of non-investment fund reporting issuers (the **Proposed Amendments**).

## Summary of Written Comments Received and Responses by the CSA

During the second comment period, we received submissions from 15 commenters, and we noted that all commenters expressed general support for the Proposed Amendments. We have considered the comments received and thank all of the commenters for their input. The names of commenters and a summary of their comments, together with our responses, are contained in Annex A of this notice.

## Summary of Changes to the Proposed Amendments

We made changes to the Proposed Amendments after considering the comments received and the Final Amendments reflect certain of the comments and improve or clarify the requirements, including the following:

1. *Electronic access disclosure*

We revised the proposed requirement to include an annual reminder to investors that an issuer is using the Access Model in a separate document with the proxy-related materials, or if the issuer is using the notice-and-access model, with the notice, sent to investors.

The Final Amendments provide greater flexibility by allowing issuers to include the access-related disclosure (i) in an existing document among their proxy-related materials, (ii) in their notice under the notice-and-access model, (iii) or in a separate document that accompanies the issuers' proxy-related materials or its notice under the notice-and-access model.

In our view, this change strikes an appropriate balance between the potential regulatory burden or costs on issuers and benefits for investors.

## 2. *Issuance and filing of a news release*

We revised the proposed requirement for issuers to issue and file their news release on SEDAR+ on the same day that they filed their CD documents on SEDAR+.

The Final Amendments allow issuers to issue and file a news release on SEDAR+ not more than one calendar day after the filing of their CD documents on SEDAR+.

We concluded that this change will provide issuers with more flexibility while still alerting investors that the documents are accessible electronically on a timely basis.

## 3. *Issuer's website*

We revised the proposed requirement for an issuer that has a website to post its CD documents on its website on the same day the issuer has filed the documents on SEDAR+.

The Final Amendments provide more flexibility by allowing issuers to post their CD documents on their website not more than two calendar days after the filing of the documents on SEDAR+.

The Final Amendments also allow issuers to comply with the requirement by posting on its website a hyperlink that leads directly to the CD documents filed on SEDAR+. To assist issuers, we added guidance to clarify where to obtain technical guidance related to generating the appropriate SEDAR+ hyperlink.

## 4. *Ceasing to provide electronic access to CD documents*

We removed the proposed requirement for issuers to issue and file a news release on SEDAR+ at least 25 calendar days before ceasing to use the Access Model, which was intended to provide advance notice to investors that an issuer would no longer be using the Access Model.

We think that removing this proposed requirement will not prejudice investors and will avoid creating unnecessary regulatory burden or costs on issuers.

5. *News releases*

We added guidance to clarify that the Access Model does not require a stand-alone news release. An issuer may choose to combine the disclosure required under the Final Amendments along with other information disclosed in a news release.

6. *Certain financial statements*

The Final Amendments allow an issuer to use the Access Model to provide electronic access to the financial statements required under section 4.10 of NI 51-102. We also added guidance to clarify that an issuer may use the Access Model for the financial statements required under section 4.7 of NI 51-102.

As we do not consider these to be material changes, we are not republishing the Final Amendments for a further comment period.

## **Local Matters**

Where applicable, an additional annex is being published in any local jurisdiction that is making related changes to local securities legislation, local notices or other policy instruments in that jurisdiction. It also includes any additional information that is relevant to that jurisdiction only.

## **Contents of Annexes**

This notice contains the following annexes:

- Annex A: List of Commenters and Summary of Comments and CSA Responses
- Annex B: Amendments to National Instrument 51-102 *Continuous Disclosure Obligations*
- Annex C: Changes to Companion Policy 51-102CP *Continuous Disclosure Obligations*
- Annex D: Amendments to National Instrument 54-101 *Communication with Beneficial Owners of Securities of a Reporting Issuer*
- Annex E: Changes to Companion Policy 54-101CP to National Instrument 54-101 *Communication with Beneficial Owners of Securities of a Reporting Issuer*
- Annex F: Local Matters (if applicable)

## Questions

Please refer your questions to any of the following:

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