



CANADIAN ASSOCIATION
OF RETIRED PERSONS

64 Jefferson Ave.
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Member Regulation Policy

Canadian Investment Regulatory Organization
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Non- tailored Advice in the Order Execution Only Channel Consultation

<https://www.ciro.ca/news-room/publications/non-tailored-advice-order-execution-only-channel>

The DIY investing channel has grown rapidly in the last few years. The reasons include a preference for DIY investing, convenience, lower transaction costs, inability to meet full service broker minimum account sizes, distrust in conflicted advisors, restricted product shelves, poor service and poor resolution of a complaint.

A growing number of our Members are not satisfied with bank branch salespersons that can only recommend expensive proprietary mutual funds, cannot recommend low cost ETFs, use high pressure sales tactics and have their complaints rejected or settled for a low amount accompanied with a toxic gag order (NDA).

CARP appreciates the opportunity to comment on CIRO's initiative to enable discount brokers to provide non -tailored advice to retail clients. Non-tailored advice is taken to mean non-personalized investment advice i.e. not a specific transaction recommendation to a client.

We fully support the objective to enhance investor protection by ensuring access to reliable information from verified sources and allowing the use of tools designed to help investors make better investment decisions.

This "advice "would include analyst research reports, educational materials, model portfolios, self-assessment questionnaires, charting capabilities, portfolio analysis tools and alerts. An alert could inform the client about RRSP contribution room, money sitting idle etc.

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The new capability would allow retail DIY investors to make better investment choices for themselves. This approach would reduce dependence on social media and other non-regulated information sources.

With added regulatory clarity, discount brokers will be encouraged to develop more and better tools and service delivery. Advancing Technology and AI will add even more capability over time.

Seniors and retirees welcome such capabilities allowing them to keep transaction costs low, become better investors and control their own retirement income security.

Of course, some discount brokerage clients may also have an account with a full service broker as well or with a fee-only advisor. They may also engage with an accountant or financial planner.

Boldface disclaimers should be employed so that clients are fully aware that they are responsible for transactions made.

CARP are comfortable with the proposal and fully support empowering discount brokers with the capability to help clients help themselves.

We would add one idea. One of the account opening steps could be a self-assessment questionnaire for the applicant to determine if DIY investing is appropriate for them.

Please feel free to contact us if any questions on our Comment letter.

Yours truly,

Bill VanGorder

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The Canadian Association of Retired Persons (CARP) is a national, non-partisan, non-profit organization that advocates for financial security, improved health care and freedom from Ageism for Canadians as we age. With over 240,000 members and 25 chapters across Canada, CARP advocates on behalf of older Canadians with all levels of government and collaborates with other organizations on health, ageism, housing, ageism and financial issues.

www.CARP.ca

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