

April 1st, 2015

Re: Category Change Proposal; issue for comment

The CIFSC continuously monitors and analyses the categorization of funds, the current category definitions and structures, as well as any new and developing trends in the investment funds industry. The purpose of the review is to ensure the logical, consistent categorization of investment funds and to maximize the similarity of investment strategies and risk-return profiles within each category.

As a result of the most recent review the committee is publishing, for a 30 day comment period, the following proposals. After the 30 day comment period the committee will review the comments and determine, by private vote, whether or not to proceed with the changes. To submit comments please use the 'Contact' link on the home page or click [here](#).

1. Proposal: New Target Date category segmentation

In order to create more relevant groupings for the Target Date funds the committee is proposing the following categories:

- Short-term Target Date
 - These are target-date funds that mature in 2020 or earlier. This includes any target date funds that are passed their target date but remain active.
- 2025 Target Date
 - These are target-date funds that mature in 2025 or earlier and after 2020.
- 2030 Target Date
 - These are target-date funds that mature in 2030 or earlier and after 2025.
- 2035 Target Date
 - These are target-date funds that mature in 2035 or earlier and after 2030.
- 2035+ Target Date
 - These are target-date funds that mature after 2035.

2. Proposal: Eliminate the Synthetic Money Market category

The few remaining funds in this category would be moved to Miscellaneous – Income & Real Property unless they meet the definition for another category.

3. Proposal: Create a Global Infrastructure Equity category

The Global Equity category, and infrastructure funds in particular, have been analyzed extensively over the past few years. The conclusion is that infrastructure funds in general behave differently than typical Global Equity funds in terms of risk-return profile and that segmenting them would create more relevant comparisons for the investor.

The category definition would include a requirement to have a mandate to invest in infrastructure related companies, as well as a broad description of the sectors that would be included in infrastructure. Such sectors would be consistent with the major index providers and may include: Telecom Infrastructure, Utilities, Energy Infrastructure, Transportation Infrastructure, and Diversified (multiple sectors).

A list of funds that would move to the proposed category can be found in **Appendix A**

4. Proposal: Adjust the requirements for the Alternative Strategies category

In order to be consistent with National Instrument 81-102, the committee is proposing to increase the threshold of total short positions to 20% of the portfolio and 5% in any one issuer.

There are no funds that would move immediately as a result of this change to the definition.

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APPENDIX A:

Proposed Global Infrastructure Equity Funds	
Fund	Current Category
BMO Global Infrastructure Fund	Global Equity
BMO Global Infrastructure Index ETF	Global Equity
CAN Global Infrastructure Equity (LC)	Global Equity
Desjardins Global Infrastructure Fund	Global Equity
DFS BlackRock Global Infrastructure Index Fund	Global Equity
Dynamic Global Infrastructure Fund	Global Equity
Global Infrastructure Dividend Fund	Global Equity
Investors Global Infrastructure Class	Global Equity
iShares Global Infrastructure Index ETF	Global Equity
Manulife Global Infrastructure Fund	Global Equity
Middlefield Global Infrastructure Fund	Global Equity
Renaissance Global Infrastructure Fund	Global Equity
Russell Global Infrastructure Pool	Global Equity
Sentry Global Infrastructure Fund	Global Equity
Sprott Global Infrastructure Fund	Global Equity