

MARCH 2025

# 2025/26 Regulatory Roadmap

# Contents

---

<b>Introduction</b>	<b>1</b>
<b>Year in Review</b>	<b>5</b>
<b>Sector Engagement &amp; Communications</b>	<b>11</b>
<b>Credit Unions</b>	<b>14</b>
Summary of Regulatory Priorities	17
Regulatory Framework Modernization	17
Crisis Preparedness	19
Digitalization Risk	20
Natural Catastrophe and Climate Risk	20
<b>Real Estate Services</b>	<b>21</b>
Summary of Regulatory Priorities	23
Regulatory Framework Modernization	23
Natural Catastrophe and Climate Risk	24
<b>Real Estate Development Marketing</b>	<b>25</b>
Summary of Regulatory Priorities	27
Regulatory Framework Modernization	27
<b>Mortgage Services</b>	<b>29</b>
Summary of Regulatory Priorities	31
Regulatory Framework Modernization	31



Production of this document included environmentally friendly best practices.  
Please reduce, reuse and recycle.

Copyright © 2025, BCFSA · All Rights Reserved

<b>Insurance Companies</b>	<b>33</b>
Summary of Regulatory Priorities	35
Regulatory Framework Modernization	35
Digitalization Risk	36
Natural Catastrophe and Climate Risk	36
<b>Pension Plans</b>	<b>37</b>
Summary of Regulatory Priorities	39
Regulatory Framework Modernization	39
Digitalization Risk	39
Natural Catastrophe and Climate Risk	40
<b>Trust Companies</b>	<b>41</b>
Summary of Regulatory Priorities	43
Regulatory Framework Modernization	43
Digitalization Risk	43
<b>Money Services Businesses</b>	<b>45</b>
Summary of Regulatory Priorities	47

## INTRODUCTION

The Regulatory Roadmap (the “Roadmap”) lays out BCFSa’s anticipated regulatory priorities for the next three fiscal years. It is intended to increase transparency and enable regulated entities to prepare for consultations and implementation of upcoming regulatory initiatives. It should be read in the context of commitments outlined in [BCFSa’s Service Plan](#).

### **BCFSa’s mission is to instill confidence in British Columbia’s financial services sector by focusing on the safety and soundness of regulated entities and consumer protection.**

BCFSa is dedicated to protecting the public and ensuring fair treatment for consumers of financial services in the province and is focused on ensuring British Columbians receive the information and advice they need to make informed decisions.

### **Regulatory Priorities Tied to Areas of Risk**

As B.C.’s financial services sector regulator, BCFSa continuously monitors risks to regulated entities and the broader financial system in the province. The regulatory priorities outlined in the 2025/26 Roadmap continue to directly respond to identified risks, which are complex and dynamic in their scope and impact. While the key risks identified in the 2024/25 Roadmap remain largely the same, the macroeconomic environment has continued to shift and the 2025/26 Roadmap introduces some new regulatory priorities in response to this changing risk environment.

BCFSa is currently tracking several key cross-sector risks in the following areas:

#### **Macroeconomic Environment**

The macroeconomic environment and broader health of the economy remains a key risk for the financial services sector. Over the past year, population gains continued to support an expansion in the Canadian economy at a time when high borrowing costs weighed on households and businesses. Price pressures have moderated across a broad range of goods and services, bringing overall inflation back towards the two per cent target. In response, the Bank of Canada reduced its policy interest rate by 225 basis points in 2024/25 to 2.75 per cent as at the end of March 2025.

In B.C., an indebted household sector and a lack of large investment projects continues to pressure the provincial economy. Employment growth stagnated in the second half of 2024, contributing to a moderate increase in the unemployment rate. Amid persistent affordability challenges, the housing market has been slow to respond to lower mortgage rates with sales remaining subdued through most of the year.



While rate cuts are expected to stimulate spending and housing activity, considerable uncertainties remain in the economic outlook. Tariff threats from the new U.S. administration as well as ongoing geopolitical conflicts are disruptive for global supply chains and trade and may keep inflation higher while weighing on economic activity. BCFSa continues to actively monitor the macroeconomic environment and impacts on consumers and regulated entities and continues to liaise with government as a trusted partner and source of market intelligence.

### **Regulatory Framework Modernization**

BCFSa continues to look for ways to modernize and enhance the efficiency and effectiveness of the regulatory framework for the financial services sector. BCFSa's Capital Modernization Project will ensure credit unions maintain capital levels commensurate with international standards and best practices established through the Basel regulatory framework. Work on this multi-year project will continue in 2025/26 with a focus on new capital rules.

In addition, BCFSa is working on the implementation of two significant regulatory frameworks. BCFSa continues to work with government on the implementation of a new legislative framework for the regulation of mortgage services as outlined in the *Mortgage Services Act* ("MSA"). The first major overhaul of regulations governing mortgage services in 50 years, the framework will modernize the oversight of mortgage services in the province for decades to come.

BCFSa is also working closely with government on the implementation of a new regulatory framework for money services businesses in alignment with the *Money Services Businesses Act* ("MSBA"). A key recommendation of the Honourable Austin Cullen's Commission of Inquiry into Money Laundering in British Columbia ("Cullen Commission"), this new regulatory framework will require money services businesses to register with BCFSa in order to do business in British Columbia.

With respect to the important priority of combatting financial crime, including money laundering, BCFSa continues to work closely with government and other regulators on initiatives to strengthen anti-financial crime efforts in the financial services sector. Recommendations from the Cullen Commission are included as part of broader regulatory projects, where appropriate.

### **Crisis Preparedness**

As demonstrated by the collapse of a number of international banks in 2023, a financial stress event can emerge quickly and spread rapidly, impacting not only an individual financial institution and its consumers, but also the broader financial system and the economy within which it operates. BCFSa works to ensure the safety and soundness of individual financial institutions and to ensure confidence in the system as a whole.

Key to minimizing and preventing financial crises is proactively engaging in crisis preparedness planning and implementing a broad and comprehensive crisis preparedness framework covering BCFSAs regulated financial institutions. BCFSAs will continue to work with regulated entities to enhance their operational resiliency and readiness should a financial stress event arise. At the same time, BCFSAs will ensure it is prepared to deal with the potential for a financial stress event at a provincially regulated financial institution through strengthening of internal programs and controls designed to enhance BCFSAs readiness and coordination with financial safety-net partners.

### **Digitalization Risk**

Transformative technology and the continued increased digitalization of financial products and services have the potential to bring significant benefits to British Columbians through the development of new and efficient services but also come with significant risks. These risks include the increasing threat of cyber attacks on participants in the financial services sector and disruption to traditional business and regulatory models through increased competition from non-traditional actors.

BCFSAs are actively monitoring and working with regulatory partners and government to address a changing digital environment. From consumer-driven banking (also known as open banking) and the regulation of digital currencies and crypto assets to payments modernization and artificial intelligence, BCFSAs are actively working to understand how these technological innovations will impact consumers and what safeguards might be needed to ensure consumers are protected.

### **Natural Catastrophe and Climate Risk (“NCCR”)**

In July 2024, BCFSAs released a Natural Catastrophes and Climate-Related Risks Consultation Summary Report, building on the 2023/24 discussion paper, which outlines BCFSAs phased, risk-based and proportionate approach to NCCR with the objective of increasing the resilience of both financial services providers and consumers. The four priorities identified are:

- Enhancing climate risk governance;
- Addressing physical risk;
- Improving consumer awareness; and
- Monitoring insurance availability.

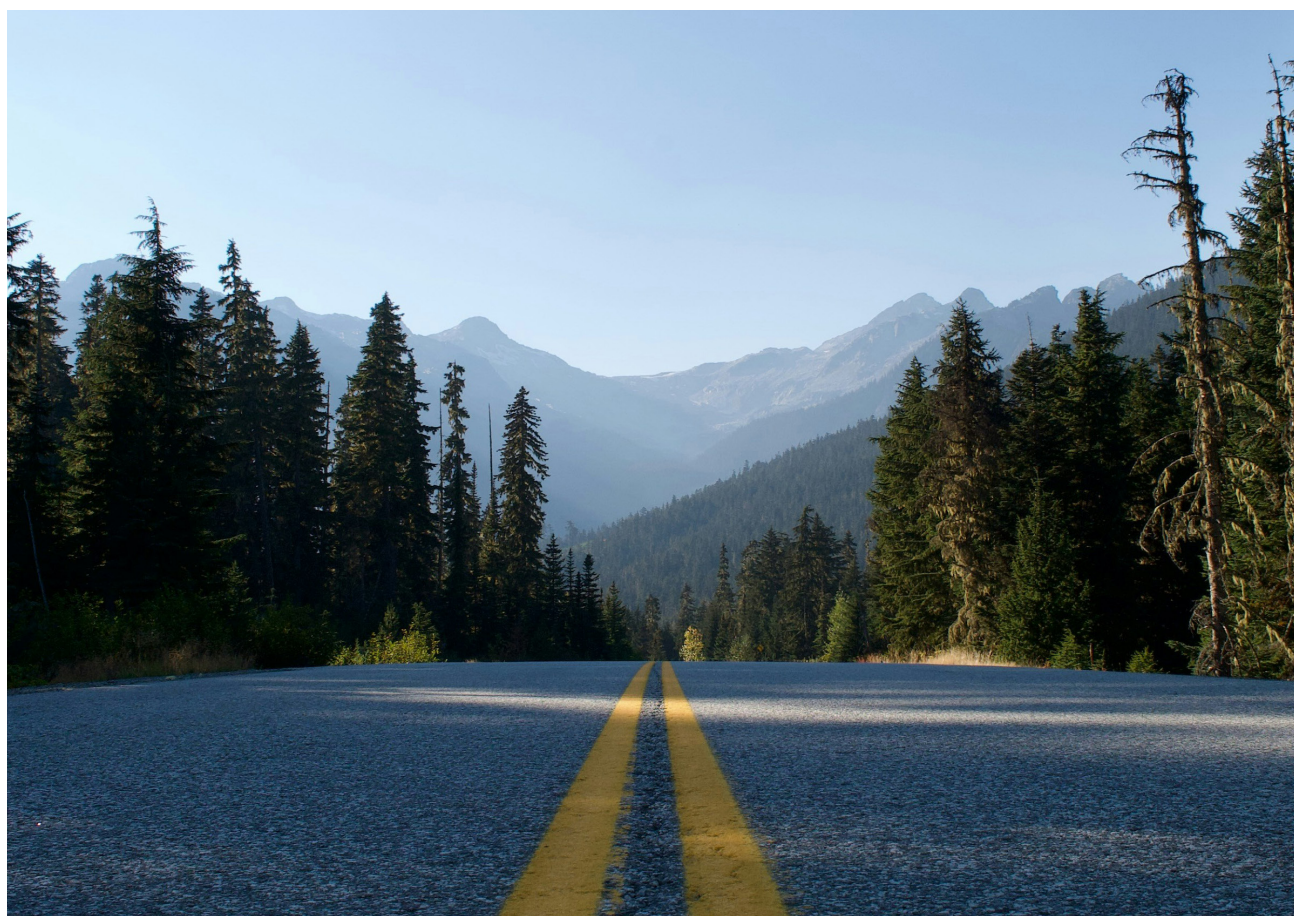
This approach signals alignment with national initiatives and a commitment to begin working with industry and key stakeholders to address issues and challenges specific to financial service providers in B.C. BCFSAs will continue to work with regulatory partners on measures to address these priorities in 2025/26.

## Regulatory Roadmap Overview

As an integrated regulator with responsibility across B.C.'s financial services sector, the Regulatory Roadmap that follows outlines planned initiatives for the next three fiscal years in the following segments that BCFSa has regulatory oversight:

- Credit Unions;
- Real Estate Services;
- Real Estate Development Marketing;
- Mortgage Services;
- Insurance Companies;
- Pension Plans;
- Trust Companies; and
- Money Services Businesses.

As risks evolve, BCFSa may change its approach or priorities to remain effective and efficient. BCFSa will also continue to evolve how it communicates its regulatory priorities through the Roadmap.



# Year in Review

---

## Regulatory Roadmap Activities

Over the past year, BCFSA achieved significant progress toward fulfilling its mission to instill confidence in B.C.'s financial services sector by delivering on the activities outlined in the 2024/25 Regulatory Roadmap. Throughout the year BCSFA focused on key risk drivers in each regulated segment, prioritizing significant initiatives such as the Capital Modernization Project for credit unions and preparations for the implementation of the *Mortgage Services Act* ("MSA").

The summary below outlines activities undertaken to deliver on the 2024/25 Regulatory Roadmap, including engagement with regulated entities and other key stakeholders.

### Proactive Engagement on Regulatory Initiatives

Transparent and open engagement and communications with our regulated entities is central to BCFSa's approach to planning and implementing its regulatory priorities. Over the past year, we reached out to financial sector participants and key stakeholders to seek feedback on a number of initiatives. We have appreciated these opportunities to listen to different perspectives in the course of our regulatory consultations and to incorporate this feedback as appropriate into published guidance. Highlights of our engagement activities in 2024/25 include:

- Five consultations launched, engaging stakeholders in the credit union, insurance, trust, pension, real estate and real estate development segments.
- Eighty-seven per cent of the planned regulatory initiatives set out in the 2024/25 Regulatory Roadmap were launched within two quarters of the anticipated timeline outlined in the Regulatory Roadmap.
- Eight virtual information sessions hosted, building awareness of proposed regulatory changes, addressing questions and seeking feedback from impacted stakeholders.
- One thousand four hundred and forty-seven participants registered to attend information sessions and webinars.
- Eighteen technical working and focus group meetings held, convening 97 external subject matter experts invited to provide their perspectives on proposed regulatory initiatives.

Further details of the consultations undertaken by BCFSa are available on our [Consultations and Engagement webpage](#).

BCFSa thanks all those who participated in consultations over the past year by sharing their perspectives and feedback on proposed regulatory measures. Stakeholder contributions have strengthened BCFSa's regulatory responses to key risk drivers in the financial services sector, helping to continue to build a regulatory framework that protects British Columbians. BCFSa looks forward to continued active stakeholder participation in the regulatory initiatives planned for the year ahead.

### Credit Unions

The Capital Modernization Project continued to be a major focus for the credit union segment in 2024/25, to help ensure that capital adequacy requirements for credit unions reflect underlying risks and reflect developments in international standards and best practices. In 2024/25 BCFSa:

- Concluded the public consultation on the Capital Modernization Discussion Paper released in July 2023, by publishing a Consultation Summary Report and holding an information session to highlight adjustments made to the proposed approach in response to stakeholder feedback.
- Initiated drafting of new Capital Rules, which will be consulted on in 2025/26.
- Convened a Technical Working Group as part of its consultation on proposed loan data reporting (“LDR”) requirements for B.C.’s credit unions, to enhance regulatory reporting and enable increased in-depth risk assessment of credit unions’ loan books. Working group members were invited to provide input on LDR requirements and a proposed implementation timeline, to ensure that final requirements are appropriate and well-defined for credit union reporting.
- Launched a public consultation on a draft Commercial Lending Guideline for B.C. credit unions, intended to promote financial stability and consumer protection by helping to ensure that credit unions follow prudent commercial lending practices and appropriately manage risk.

### Real Estate Services

BCFSa’s regulatory priorities for the real estate services segment in 2024/25 focused on continued modernization of the regulatory framework. In 2024/25 BCFSa:

- Implemented updates to BCFSa’s Administrative Penalty Framework through Rules amendments that took effect July 1, 2024. The updates enable BCFSa to use administrative penalties to resolve a wider range of matters, including contraventions of the *Real Estate Services Act* (“RESA”) and the Real Estate Services Regulation (“RESR”), in a fair, consistent, and proportionate manner.
- Published a summary of the results of the 2024 Real Estate Brokerage Data Call, which achieved a 95 per cent participation rate from trading services brokerages. The summary also included preliminary information on uptake of the Home Buyer Rescission Period, based on annual brokerage filings received as of April 30, 2024.
- Held the 2025 Real Estate Brokerage Data Call for residential real estate sales between February 16, 2025 and March 15, 2025. The 2025 data call also sought information on the uptake of the Home Buyer Rescission Period in the 2024 calendar year.

- As part of the multi-year development of Applied Practice Courses for managing brokers, strata property managers, and rental property managers, BCFSa:
  - Held Technical Working Group meetings with industry members and experts to review course outlines and gather feedback; and
  - Published an Interim Progress Report on consultation activities undertaken and next steps in the development process.

### **Real Estate Development Marketing**

BCFSa's regulatory priorities for the real estate development marketing segment in 2024/25 focused on continued modernization of the regulatory framework.

In 2024/25 BCFSa:

- Amended Policy Statement 14 to require real estate developers to provide a Summary of Pre-Sale Risks and Buyer Rights Form ("summary form") to purchasers. The summary form, which provides consumers with information on the key risks of purchasing a pre-sale development unit as well as their contractual rights under the *Real Estate Development Marketing Act* ("REDMA"), was developed in conjunction with a Technical Working Group of key stakeholders, including appraisers, real estate professionals, developers, strata property owner representatives, notaries, and lawyers, and was publicly consulted on prior to finalizing.
- Released a new, web-based Consumer Guide to Pre-Sale Real Estate Purchases, explaining the pre-sale purchase process and highlighting the risks and statutory consumer protections of entering into a pre-sale purchase agreement.
- Initiated a new pilot initiative under REDMA that extended the early marketing period for developments of 100 or more units from 12 to 18 months. The pilot will assess the effects of REDMA's early marketing period on real estate developments and will help clarify how the early marketing period impacts developers' ability to achieve their sales targets and the market viability of larger projects.

### **Mortgage Services**

In 2024/25, BCFSa continued to support the provincial government in the development of the new *Mortgage Services Act* ("MSA"), the first major update to the regulatory framework for mortgage services in 50 years. Passed by the provincial legislature in Fall of 2022, this legislation will modernize the regulatory framework for the provision of mortgage services in the province. In 2024/25 BCFSa held technical working group meetings with industry association leaders and subject matter experts to review and provide feedback on the process for the transition to the MSA.



On October 11, 2024, mortgage brokers in B.C. became subject to the federal Proceeds of Crime (Money Laundering) and Terrorist Financing Act ("PCMLTFA") and the oversight of the Financial Transactions and Reports Analysis Centre of Canada ("FINTRAC") in relation to establishing a compliance program and adhering to other legislative requirements intended to combat money laundering and terrorist financing. BCFSA issued numerous advisories as well as an Anti-Money Laundering Guideline to support mortgage brokers in meeting their new FINTRAC obligations.

### **Insurance Companies**

In 2024/25, BCFSA's regulatory priorities for insurance companies focused on regulatory framework modernization, digitalization risk, and natural catastrophe and climate risk. In 2024/25 BCFSA:

- Implemented the Insurer Code of Market Conduct, which came into force April 1, 2024.
- Hosted a tabletop exercise with financial services stakeholders to simulate the impact of a major earthquake in British Columbia on insurance companies. This was part of efforts to enhance crisis preparedness, ensure effective governance and decision-making during crises, and improve information sharing between industry and government.
- Consulted on and published a new Information Security Incident Reporting Guideline for Extraprovincial Insurance Corporations and Extraprovincial Trust Corporations.

### **Pension Plans**

In 2024/25, BCFSA's regulatory priorities for pension plans focused on regulatory framework modernization and digitalization risk. In 2024/25 BCFSA:

- Consulted on and published a revised Information Security Guideline for Pension Plan Administrators, which includes expectations for the reporting of material information security incidents.
- Engaged defined contribution pension plan fundholders through a data call to generate insights on trends and opportunities and gather information for analysis to support ongoing oversight and supervision.

### **Trust Companies**

In 2024/25, BCFSA's regulatory priorities for trust companies focused on regulatory framework modernization and digitalization risk. Activities and initiatives in 2024/25 included consulting on and publishing a new Information Security Incident Reporting Guideline for Extraprovincial Insurance Corporations and Extraprovincial Trust Corporations.



### Money Services Businesses

In 2024/25, BCFSA's regulatory priorities for the money services business segment focused on the implementation of the *Money Services Businesses Act* ("MSBA"). Activities in 2024/25 included supporting the provincial government in the development of the Regulations for the new MSBA. Passed by the provincial legislature in 2023, this legislation will bring money services businesses carrying on business in British Columbia under the regulatory purview of BCFSA once in force.



# Sector Engagement & Communications

---

BCFSA protects the rights of British Columbians by promoting high standards of conduct within the financial services segments it regulates. As a modern, effective, and efficient regulator, BCFSA is committed to providing oversight that ensures fair, transparent, and accountable regulation, and to building and maintaining consumer confidence in the financial services sector.

Effective and ongoing stakeholder engagement and communication is a key element of our regulatory role, one that is vital to our ability to understand risks, promote confidence in the financial services sector, and to help protect consumers. As part of our decision-making process, BCFSA is committed to engaging in transparent and meaningful dialogue with our stakeholders, including individuals, firms, and organizations affected by our actions as we carry out our regulatory mandate and develop regulatory guidance and requirements.

To ensure our stakeholders have confidence that their input is valued and meaningfully considered, the initiatives outlined in this Regulatory Roadmap for each regulated segment are carefully planned to include opportunities for constructive engagement.

BCFSA's Advisory Group Framework is designed to enable BCFSA to receive and consider input at both strategic and technical levels, through the establishment of Industry Roundtables and Technical Working Groups. These forums enable BCFSA to obtain feedback and insights on its regulatory agenda directly from industry members.

In addition to the activities undertaken to engage with industry stakeholders on specific regulatory initiatives, BCFSA also takes a cross-financial services sector approach to promote consistent and purposeful engagement and communication with stakeholders.

### **Summary of Sector Engagement & Communication Priorities**

BCFSA's plans for engaging and communicating with its stakeholders over the coming year includes the following activities:

#### **Sector Insights Survey**

BCFSA's biennial Sector Insights Survey is part of BCFSA's commitment to regularly evaluate its progress in engaging transparently and purposefully with stakeholders. The survey provides an opportunity for sector participants to share their perspectives on BCFSA's activities, communications and processes. Survey results inform future planning and enable BCFSA to focus its efforts to engage consistently and effectively. The 2025 Sector Insights Survey was distributed in Q4 of 2024/25 and results will be published in Q1 of 2025/26.

#### **Financial Services Sector Forum**

Building on the success of BCFSA's inaugural cross-sector event in June 2023, BCFSA anticipates holding the Financial Services Sector Forum every two years. This is an opportunity to increase broad awareness among sector participants of risks and trends emerging in the financial services landscape, and to promote connections between segments. The next Financial Services Sector Forum is planned for Q3 of 2025/26.

#### **Industry Roundtables**

To gather strategic input on emerging risks and trends, BCFSA will convene annual roundtables of industry leaders to discuss strategic and emerging issues within their segment. BCFSA will consider these perspectives as one of the inputs into the development of BCFSA's priorities for the Regulatory Roadmap. In 2025/26, BCFSA will convene Roundtables in the credit union, real estate, pensions and mortgage services segments, with further roundtables to be convened in future years.





# Credit Unions

---

BCFSA's regulatory priorities for provincially regulated credit unions are categorized into four main areas:

1. Regulatory Framework Modernization;
2. Crisis Preparedness;
3. Digitalization Risk; and
4. Natural Catastrophe and Climate Risk.

The graphic below outlines BCFSA's anticipated regulatory priorities over the next three fiscal years and identifies priorities from the previous year for which work is ongoing. Items in Year 1 identify the quarter in which a consultation, publication, or implementation is expected to occur. For Years 2 and 3, the graphic notes that BCFSA anticipates doing work on the priority during the year with the specific quarter to be named later.

As BCFSA is responsible for administering the Credit Union Deposit Insurance Corporation of British Columbia ("CUDIC"), the credit union roadmap includes CUDIC's anticipated regulatory priorities.

In addition, where appropriate, BCFSA adopts regulatory guidance issued by the Office of the Superintendent of Financial Institutions ("OSFI") for financial institutions, including credit unions.

Consultation	Publication	Implementation
	●	◆

	YEAR ONE FY 2025/26				YEAR TWO FY 2026/27	YEAR THREE FY 2027/28
Topic						
Previous Year's Items in Progress	Q1 Apr 1-Jun 30	Q2 Jul 1-Sept 30	Q3 Oct 1-Dec 31	Q4 Jan 1-Mar 31	Q1-Q4 Apr 1-Mar 31	Q1-Q4 Apr 1-Mar 31
AML Guideline				●	◆	
Loan Data Reporting Requirements	●				◆	
Commercial Lending Underwriting Guideline	●			◆		
Capital Modernization						
Capital Modernization: Capital Rule				●	◆	◆
Future Updates to Capital Rule (Market Risk - Interest Rate in the Banking Book and Interest Rate in the Trading Book)						
Reporting Templates					●◆	
Internal Capital Adequacy Assessment Process ("ICAAP") Guideline						
Other Regulatory Framework Modernization Initiatives						
Operational Risk & Resilience Guideline						
Revised Outsourcing Guideline (Third Party Risk)						
Revised Residential Mortgage Underwriting Guideline						
Liquidity Modernization						

Consultation	Publication	Implementation
	●	◆

	YEAR ONE FY 2025/26				YEAR TWO FY 2026/27	YEAR THREE FY 2027/28
Topic						
	Q1 Apr 1-Jun 30	Q2 Jul 1-Sept 30	Q3 Oct 1-Dec 31	Q4 Jan 1-Mar 31	Q1-Q4 Apr 1-Mar 31	Q1-Q4 Apr 1-Mar 31
<b>Crisis Preparedness</b>						
CUDIC Comprehensive Fund Size Review					◆	
CUDIC Differential Premium System (DPS) Methodology Review						
Resolution Plan Guideline					●◆	
<b>Digitalization Risk</b>						
Revised Information Security Guideline for PRFIs		◆				
<b>Natural Catastrophe and Climate Risk</b>						
Natural Catastrophe and Climate Risk Guideline (OSFI B-15 Chapter 1 – Governance & Risk Management Expectations)						

## SUMMARY OF REGULATORY PRIORITIES

### Regulatory Framework Modernization (Including Capital Modernization)

As part of its ongoing work, BCFSa looks to continually enhance and modernize all aspects of its regulatory framework, including its supervisory approach and guidance to regulated entities and regulatory requirements. In 2025/26, BCFSa will continue its modernization efforts focusing on capital modernization, crisis preparedness and sustainability of the segment.

Additional details on BCFSa's modernization efforts are outlined below:

**Capital Modernization Project.** The Capital Modernization Project ("the Project") is a multi-year initiative to modernize B.C.'s capital framework and will continue to be a top priority for BCFSa. The changes that will be implemented by the Capital Modernization Project will ensure that capital adequacy requirements align with underlying risks, clarify BCFSa's expectations, and reflect, as appropriate, developments in international standards and best practices. The Project aims to improve risk management practices, strengthen the loss-absorbing capacity of credit unions, and replace portions of the existing Capital Requirements Regulation respecting credit unions with a new Capital Rule. Building on feedback received from the discussion paper released in 2023/24, BCFSa continued its extensive stakeholder engagement and published a [Summary Report](#) in the 2024/25 fiscal year as well as hosted an information session to review the Summary report.

In 2025/26 BCFSa is conducting Quantitative Impact Study ("QIS") exercises with credit unions that will help in finalizing the proposed approach to market risk under capital.

In 2025/26, focus will continue to be on the drafting of the new capital requirements and working with government towards publication of a new Rule. Implementation of any new capital requirements is targeted to begin in January 2027, subject to the approval of the Rule by the Minister of Finance.

As part of the Capital Modernization Project, BCFSa plans to develop a Capital Management Guideline that includes updates to the existing Internal Capital Adequacy Assessment Process ("ICAAP") Guide, Internal Capital Target ("ICT"), and regulatory reporting requirements. Consultation on ICAAP will begin in 2026/27.

**Loan Data Reporting Requirements.** BCFSa has been working with industry on the implementation of new loan data reporting requirements intended to allow for better monitoring and assessment of risk in credit union loan portfolios. Analysis of collected data is a crucial component of BCFSa's risk-based supervision.



The consultation and proposed implementation of this project has been split into two components in order to manage the scope of the data reporting requirements under consultation. Loan Data Reporting Requirements consultation for the first part continued in 2024/25 and focused on data currently collected by BCFSa, in addition to data fields that are largely in support of the Capital Modernization Project. Publication of the final requirements is targeted for Q1 of 2025/26 with implementation of any new reporting requirements in 2026/27.

The final part of consultation for the Loan Data Reporting Requirements will be revisited in 2026/27 and will mainly focus on data related to natural catastrophe and climate risks.

**Commercial Lending Guideline.** The proposed Guideline, which was consulted on in Q4 of 2024/25, codifies BCFSa's expectations for credit unions to manage risks associated with commercial lending and clarify expectations for participation in syndicated lending. Publication of the Guideline is expected in Q1 of 2025/26 with implementation in Q4 of 2025/26.

**Residential Mortgage Underwriting Guideline.** BCFSa will update its existing Residential Mortgage Underwriting Guideline to reflect changes from capital modernization and the evolving macro-economic environment. BCFSa anticipates consulting on the Guideline in 2026/27.

**Anti-Money Laundering ("AML") Guideline.** Credit unions in British Columbia are subject to the federal *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* ("PCMLTFA") and must maintain robust compliance programs to deal with AML and terrorist financing. The Financial Transactions and Reports Analysis Centre of Canada ("FINTRAC") is responsible for monitoring adherence to PCMLTFA. While BCFSa already maintains high expectations of credit unions to adhere to FINTRAC and PCMLTFA requirements, BCFSa will codify these expectations in a guideline targeted for consultation beginning in Q2 of 2025/26.

**Operational Risk and Resiliency Guideline.** BCFSa does not currently have a Guideline that codifies expectations for the management of operational risks. Federally, the Office of the Superintendent of Financial Institutions ("OSFI") is in the process of updating its guidance to federally regulated financial institutions to include operational resiliency, which is seen as an outcome of effective operational risk management. Leveraging OSFI's E-21 guideline, BCFSa is targeting consultation on its own guideline in 2026/27.

**Liquidity Modernization.** The Liquidity Modernization Project aims to align B.C. credit unions with Basel III liquidity standards through implementation of Liquidity Adequacy Requirements in line with global best practices. BCFSa published its [Liquidity Management Guideline](#) in 2020 and has subsequently updated its reporting templates to include modern liquidity ratios. Further engagement with industry is anticipated in 2027/28. Stress testing, model risk management, and expected credit loss provisioning are areas that BCFSa will examine and assess to determine if any regulatory statements are to be put in place until the requisite guidelines are developed in the future.

**CUPSA Complaints Handling and Product Suitability.** CUPSA's sub-working group is developing principles and better practices for complaints handling procedures and product suitability assessments. It intends to consult with Canadian Credit Union Association ("CCUA") and other stakeholders before it publishes related principles and better practices in 2026/27. BCFSa will determine how to embed these principles and better practices into its own regulatory framework in 2026.

### **Crisis Preparedness**

Effective crisis preparedness can minimize the effects of events that threaten the ongoing viability of a financial institution. BCFSa issues Guidelines, such as the Recovery Plan Guideline, to communicate its expectations for effective risk management and crisis preparedness, based on international and national standards. These expectations are meant to increase the resilience, relevance, and sustainability of credit unions in financial stress events. In the event of a credit union failure, BCFSa is responsible for ensuring that a sustainable and effective deposit insurance program is in place. As part of maintaining the deposit insurance fund and guarantee, CUDIC proactively plans for credit union failures, which may require depositors to be paid out from the deposit insurance fund. BCFSa and CUDIC are committed to working collaboratively with stakeholders to maintain preparedness and confidence in the credit union system in the face of changes such as consolidations and federal continuances, innovative technologies, natural catastrophe and climate impacts, and economic disruption.

**CUDIC Comprehensive Fund Size Review.** Reflecting international best practices, BCFSa is committed to reviewing the CUDIC Fund target size every four years, or after a shock event, to ensure the Fund size is credible and contributes to depositor confidence and system stability. The next comprehensive Fund size review is planned for 2025/26.

**CUDIC Differential Premium System ("DPS").** The CUDIC DPS is a risk-based premium assessment methodology for credit unions in B.C. In connection with the Capital Modernization Project and BCFSa's regular assessment of credit union premiums, BCFSa will review the CUDIC DPS methodology beginning in 2026/27.

**Resolution Plan Guideline.** Building on the work undertaken with credit unions on the Recovery Plan Guideline, BCFSa will develop and consult on resolution plans, which are implemented when a credit union is insolvent or approaching insolvency. The Resolution Guideline will outline BCFSa's expectations for credit unions that will be required to have resolution plans. BCFSa anticipates consulting on this Guideline in Q4 of 2025/26.

### **Digitalization Risk**

Technology continues to be a major driver of changes in the financial services sector and BCFSa continues to monitor risks related to digitalization and engage with regulatory and government counterparts on addressing these risks. BCFSa is actively working with provincial counterparts and the federal government on the roll out of consumer driven banking (open banking). Canada's Consumer-Driven Banking Framework was published along with Budget 2024 with implementation targeted for 2026.

As additional information on implementation becomes available, BCFSa will communicate with credit unions and British Columbians on this important topic.

**Information Security Guideline.** Reporting of material information security incidents in a timely manner is of critical importance to BCFSa. BCFSa plans to implement updates to its existing guidance and expectations for the reporting of information security incidents in Q2 of 2025/26 leveraging work done in 2024/25.

### **Natural Catastrophe and Climate Risk**

Natural catastrophe and climate change is a critical risk that BCFSa is actively monitoring across the financial services sector. Building on the feedback BCFSa received as part of its public consultation in 2023/24, and the direction outlined in the July 2024 Consultation Summary Report, BCFSa will continue to explore ways to work with government and the sector to identify next steps to manage this important risk.

**Natural Catastrophe and Climate Risk Guideline.** Natural catastrophes, including earthquakes, floods, and wildfires, pose a significant risk to British Columbians and the financial services sector in B.C. BCFSa will consult on proposed expectations for credit unions with respect to natural catastrophes and climate risk in 2026/27 following further engagement and planning work.

## Real Estate Services

---

BCFSA's regulatory priorities for the real estate services segment is categorized into two main areas:

1. Regulatory Framework Modernization; and
2. Natural Catastrophe and Climate Risk.

The graphic below outlines BCFSA's anticipated work on these priorities over the next three fiscal years. Items in Year 1 identify the quarter in which consultation, publication, or implementation is expected to occur. For Years 2 and 3, the graphic notes that BCFSA anticipates doing work on the priority during the year with the specific quarter to be named later.

BCFSA's regulatory priorities will continue to focus on ensuring consumers are informed and protected throughout the real estate transaction process, including monitoring areas of emerging risk.

Consultation	Publication	Implementation
	●	◆

	YEAR ONE FY 2025/26				YEAR TWO FY 2026/27	YEAR THREE FY 2027/28
Topic						
Previous Year's Items in Progress	Q1 Apr 1-Jun 30	Q2 Jul 1-Sept 30	Q3 Oct 1-Dec 31	Q4 Jan 1-Mar 31	Q1-Q4 Apr 1-Mar 31	Q1-Q4 Apr 1-Mar 31
Education Enhancements – Applied Practice Course for Real Estate Licensees				◆		
Annual Data Call	●			◆	●◆	●◆
<b>Regulatory Framework Modernization</b>						
Enhanced Consumer Protection Discussion Paper			●			
Develop/Deliver Annual Legal Update Course				◆		
Brokerage Governance Discussion Paper				●		

## SUMMARY OF REGULATORY PRIORITIES

### Regulatory Framework Modernization

BCFSA continuously looks for ways to strengthen consumer protection in the real estate market, working with government and industry to identify emerging issues and opportunities to enhance regulatory oversight.

**Real Estate Data Collection.** BCFSA will continue to engage the British Columbia Real Estate Association (“BCREA”) and local real estate boards on formal information sharing to support regulatory needs. Regulator access to real estate transaction information, among other data sources, will enhance the evidence base for BCFSA’s policy and market conduct work. Building on these engagements and the results of BCFSA’s annual brokerage data calls, BCFSA will re-examine the scope of its data collection activities including the merits of collecting additional transaction level information. Consistent with past years, BCFSA anticipates requesting data from industry in Q4 2025/26.

**Education Enhancements – Applied Practice Course (“APC”) for Real Estate Licensees.** BCFSA established technical working groups and consulted with managing brokers and strata and rental property managers in 2023/24 on the development of new APCs for managing brokers as well as the strata and rental property management industries. BCFSA will use feedback received to inform the development of these courses, which are planned for implementation in Q4 of 2025/26 following extensive development work in 2024/25 and 2025/26.

**Enhancing Consumer Protections in Real Estate Transactions.** BCFSA intends to publish a discussion paper for public and licensee consultation in relation to potential consumer protection enhancements that could be implemented using BCFSA’s regulatory authorities. BCFSA is tracking the legal developments in Canada and the U.S. related to real estate competition and commissions; among other topics, the discussion paper will explore potential regulatory requirements related to written service agreements with buyer clients. BCFSA will also publish a summary of consultation feedback received. Depending on the consultation outcomes, further public consultation may be undertaken in 2026/27 if BCFSA decides to pursue the development of new Real Estate Services Rules.

**Brokerage Governance Project.** BCFSA intends to undertake a consultation on real estate brokerage governance, including whether to introduce new requirements for brokerages to develop plans to help strengthen regulatory compliance and support risk-based decision making and oversight across all facets of a brokerage’s operations. This is a key regulatory priority and has taken additional time to its original target in previous roadmaps, as it is expected to impact BCFSA’s overall compliance and enforcement approach in real estate services.

As part of its review of Cullen commission recommendations, and in connection with its work on brokerage governance, BCFSa intends to explore new rules requiring real estate licensees to report unregistered mortgage brokering activity to BCFSa. BCFSa will use the opportunity to consult on additional changes to real estate licensee duties to report misconduct to their managing broker and the regulator.

### **Natural Catastrophe and Climate Risk**

Natural catastrophe and climate change is a critical risk that BCFSa is actively monitoring across the financial services sector. Building on the feedback BCFSa received as part of its public consultation in 2023/24 and direction outlined in the July 2024 Consultation Summary Report, BCFSa will continue to explore ways to work with government and the sector to identify next steps to manage this important risk.

**Natural Catastrophe and Climate Risk Disclosures.** Natural catastrophes, including earthquakes, floods, and wildfires pose a significant risk to British Columbians purchasing real estate. In many cases, consumers lack information to make informed decisions to mitigate financial loss and real estate licensees struggle with understanding their role in mitigating these risks. Pending further work to identify reliable and readily available information for licensees on natural catastrophes and climate risks, BCFSa will continue to monitor the reliability and availability of such data and possible regulatory implications.

# Real Estate Development Marketing

---

BCFSA's regulatory priorities for the real estate development marketing segment are focused on Regulatory Framework Modernization.

The graphic below outlines BCFSA's anticipated work on these priorities over the next three fiscal years. Items in Year 1 identify the quarter in which consultation, publication, or implementation is expected to occur. For Years 2 and 3, the graphic notes that BCFSA anticipates doing work on the priority during the year with the specific quarter to be named later.

BCFSA's regulatory priorities will continue to focus on ensuring consumers are informed and protected when purchasing pre-sale strata units in British Columbia.



Consultation	Publication	Implementation
	●	◆

	YEAR ONE FY 2025/26				YEAR TWO FY 2026/27	YEAR THREE FY 2027/28
Topic						
Previous Year's Items in Progress	Q1 Apr 1-Jun 30	Q2 Jul 1-Sept 30	Q3 Oct 1-Dec 31	Q4 Jan 1-Mar 31	Q1-Q4 Apr 1-Mar 31	Q1-Q4 Apr 1-Mar 31
REDMA Consumer Disclosure Enhancements	◆					
Regulatory Framework Modernization						
REDMA Pilot – Extended Early Marketing Period	◆					●

## SUMMARY OF REGULATORY PRIORITIES

### Regulatory Framework Modernization

BCFSA is committed to working with government and industry to explore opportunities to strengthen consumer protection in the pre-sale real estate development market.

**REDMA Consumer Disclosure Enhancements.** BCFSA implemented enhanced consumer disclosure materials for pre-sale purchasers in Q4 2024/25 with a new pre-sale disclosure summary form. The summary form is intended to make consumer disclosure statements, which are often lengthy and complex, more accessible and meaningful for purchasers by highlighting key risks and information.

**REDMA Early Marketing Extension Pilot.** BCFSA will continue to implement an extended early marketing period for large developments of 100 or more units. BCFSA will also collect data through the pilot to gain insight into the pre-sale market and intends to publish a high-level summary of findings from the pilot in 2027/28.



## Mortgage Services

---

BCFSA's regulatory priorities for the mortgage services segment are focused on Regulatory Framework Modernization.

The graphic below outlines BCFSA's anticipated regulatory priorities for mortgage brokers over the next three fiscal years. Items in Year 1 identify the quarter in which a consultation, publication or implementation is expected to occur. For Years 2 and 3, the graphic notes that BCFSA anticipates doing work on the priority during the year with the specific quarter to be named later.

The priority objective for the 2025/26 fiscal year continues to focus on providing support to the Government of British Columbia in enabling implementation of the *Mortgage Services Act* ("MSA"). This includes working with government on their development of Regulations and Rules under the MSA and engaging directly with the mortgage services segment on transitioning to the new Act. The MSA will modernize the mortgage services regulatory framework in B.C. and enable BCFSA to provide greater public protection through new regulatory tools and authorities.

Consultation	Publication	Implementation
	●	◆

	YEAR ONE FY 2025/26				YEAR TWO FY 2026/27	YEAR THREE FY 2027/28
Topic						
Implementation of <i>Mortgage Services Act (MSA)</i> Framework	Q1 Apr 1-Jun 30	Q2 Jul 1-Sept 30	Q3 Oct 1-Dec 31	Q4 Jan 1-Mar 31	Q1-Q4 Apr 1-Mar 31	Q1-Q4 Apr 1-Mar 31
Support Government to develop Regulations, Rules and other regulatory requirements to enable MSA implementation						
MSA Readiness Survey						

## SUMMARY OF REGULATORY PRIORITIES

### Regulatory Framework Modernization

The MSA received Royal Assent on November 3, 2022. The MSA will modernize the mortgage broker industry in B.C. and greatly expand BCFSa's tools to regulate the mortgage broker segment. BCFSa will have the ability to set standards of conduct and enhance disclosure and reporting obligations through new rule-making powers. BCFSa will also be able to leverage enhanced compliance and enforcement processes and issue greater penalties for misconduct or other forms of non-compliance. The MSA is responsive to several recommendations set out in the Final Report of the Cullen Commission, which was released on June 15, 2022. BCFSa anticipates that full implementation of the MSA will occur over several years.

**Support government to develop Regulations, Rules and other regulatory requirements to enable MSA implementation and engage with the mortgage services segment on transitioning to the new Act.** In 2025/26, BCFSa will continue to work with the provincial government in their development of Regulations and Rules under the MSA. In addition, BCFSa will develop related regulatory instruments, such as Regulatory Statements and Guidelines, to help bring the regulatory framework into force. As part of this work, BCFSa will engage with the mortgage services segment on transitioning to the new Act. All together, these activities will enable an effective and efficient implementation of the MSA in a phased approach. Implementation of the MSA is not expected until 2026/27 at the earliest, subject to the framework being finalized and brought into force by government.

**MSA Readiness Survey.** In 2025, a MSA Implementation Readiness Survey ("the Survey") will be released. Directed to Designated Individuals, the key purposes of the Survey are to:

- Assess the readiness of the segment to implement new requirements under the MSA to support compliance activities during the implementation period;
- Raise awareness of the upcoming MSA, including future data and reporting requirements; and,
- Explore key compliance risk areas and trends.

Results will be published within three months following completion of the Survey.





# Insurance Companies

---

BCFSA's regulatory priorities for insurance companies are categorized into three main areas:

1. Regulatory Framework Modernization;
2. Digitalization Risk; and
3. Natural Catastrophes and Climate Risk.

The graphic below outlines BCFSA's anticipated regulatory priorities over the next three fiscal years. Items in Year 1 identify the quarter in which a consultation, publication or implementation is expected to occur. For Years 2 and 3, the graphic notes that BCFSA anticipates doing work on the priority during the year with the specific quarter to be named later.

BCFSA is an active participant in the Canadian Council of Insurance Regulators ("CCIR"), an association of Canadian insurance regulators. The mandate of CCIR is to facilitate and promote an efficient and effective insurance regulatory system in Canada to serve the public interest. CCIR members work together to develop solutions to regulatory issues and emerging risks identified by its members and industry. CCIR members strive to harmonize approaches to regulatory issues and CCIR releases guidance which BCFSA considers and adopts as appropriate.

In addition, where appropriate, BCFSA adopts regulatory guidance issued by OSFI.



Consultation	Publication	Implementation
	●	◆

	YEAR ONE FY 2025/26				YEAR TWO FY 2026/27	YEAR THREE FY 2027/28
Topic						
Previous Year's Items in Progress	Q1 Apr 1-Jun 30	Q2 Jul 1-Sept 30	Q3 Oct 1-Dec 31	Q4 Jan 1-Mar 31	Q1-Q4 Apr 1-Mar 31	Q1-Q4 Apr 1-Mar 31
CCIR Work on Segregated Funds			●			
Information Security Incident Reporting – New Guideline for Extraprovincial Financial Institutions				◆		
Revised Information Security Guideline for PRFIs		◆				
<b>Natural Catastrophe &amp; Climate Risk</b>						
Natural Catastrophe and Climate Risk Guideline (OSFI B-15)					●	
<b>Digitalization Risk</b>						
Artificial Intelligence (AI) Guideline						
<b>Regulatory Framework Modernization</b>						
OSFI B-2 (Property and Casualty Large Insurance Exposures and Investment Concentration)		●			◆	
OSFI B-3 (Sound Reinsurance Practices and Procedures)		●				◆
OSFI B-10 (Third Party Risk)		●		◆		
OSFI E-21 (Operational Risk and Resilience)		●			◆	

## SUMMARY OF REGULATORY PRIORITIES

### Regulatory Framework Modernization

BCFSA actively works with industry, regulatory and government partners to modernize the regulatory framework for insurance companies doing business in British Columbia. Through proactive market conduct supervision, including data collection and reporting requirements, thematic reviews of products or business practices, and targeted monitoring of specific regulated entities and individuals, BCFSA identifies and intervenes to address harmful business practices. BCFSA promotes high standards of market conduct within the insurance industry by providing the information and guidance necessary to enable regulated entities to comply with legislative requirements and best practices.

**Insurer Code of Market Conduct.** Per changes to the *Financial Institutions Act* ("FIA"), and after extensive engagement with industry, insurance companies were required to adopt the [Insurer Code of Market Conduct](#) ("Code") as of April 1, 2024.

The introduction of the Code provides BCFSA with an updated framework for introducing guidance to industry on expectations for complying with provisions identified within the Code. As issues arise, BCFSA may introduce market conduct guidelines, leveraging the work of its compliance and examination activities and CCIR to draw industry attention to key matters. BCFSA will engage industry on the implementation of these guidelines as appropriate.

To ensure compliance with the Code, BCFSA will survey B.C. authorized insurance companies in 2025 to assess whether they have adopted the Code's principles into existing business processes and practices. Consolidated, anonymized survey results will be published and will inform market conduct supervisory activities.

**CCIR Guideline Implementation.** Related to the above, BCFSA may adopt CCIR guidance from time to time as this work is advanced at a national level. CCIR continues to work on guidance related to segregated funds among other topics. As required, BCFSA will communicate with insurance companies on how it intends to implement CCIR guidance in B.C.

**OSFI Guideline Implementation.** As the prudential regulator of provincially incorporated insurance companies, BCFSA adopts OSFI guidelines from time to time as these guidelines are consulted on and released. Leveraging OSFI's Third-Party Risk Management ("B-10"), Operational Risk Management and Resilience ("E-21"), Property and Casualty Large Insurance Exposures and Investment Concentration ("B-2"), and Sound Reinsurance Practices and Procedures ("B-3") Guidelines, BCFSA is targeting publication of its own Guidelines in Q2 of 2025/26 following industry consultation in Q1. In Q4, leveraging OSFI's Natural Catastrophe and Climate Risk Guideline ("B-15"), BCFSA is targeting consultation on its own Guideline, with publication expected in 2026/27.

**Insurer Market Conduct Supervisory Approach.** To adjust to the pace of change and uncertainty in the insurance industry and to ensure insurers' successful implementation of the principles included in the Insurer Code of Market Conduct, BCFSA is in the process of assessing and revamping its approach to market conduct supervision of insurers. The objective of the new supervisory approach is to be more forward looking and allow BCFSA to be more proactive in regulating the industry, in addition to being more transparent with regulated entities to allow more predictability into regulatory priorities. This work will continue through 2025/26 and result in the development of a new market conduct supervisory framework.

### **Digitalization Risk**

Technology continues to be a major driver of changes in the financial services sector and BCFSA continues to monitor risks related to digitalization. BCFSA is engaging with regulatory and government counterparts on addressing these risks.

**Information Security Incident Reporting.** Reporting of material information security incidents in a timely manner is of critical importance to BCFSA. BCFSA consulted on guidance and expectations for the reporting of information security incidents in 2024/25 for extraprovincial insurance corporations and plans to implement these requirements in Q2 of 2025/26.

**Artificial Intelligence Guideline.** In recent years, the use of artificial intelligence ("AI") in the insurance industry has significantly increased, with some insurance companies being earlier adopters of the technology. AI can deliver important benefits but also brings new challenges and risks. To provide guidance on how to address these issues with a balanced approach considering factors such as innovation and responsible use, BCFSA intends to publicly consult on an AI guideline in 2026/27.

### **Natural Catastrophe and Climate Risk**

Natural catastrophe and climate change is a critical risk that BCFSA is actively monitoring across the financial services sector. Building on the feedback BCFSA received as part of its public consultation in 2023/24 and direction outlined in the July 2024 Consultation Summary Report, BCFSA will continue to explore ways to work with government and the sector to identify next steps to manage this important risk.

**Natural Catastrophe and Climate Risk Disclosures.** Natural catastrophes, including earthquakes, floods, and wildfires, pose a significant risk to British Columbians. In many cases, consumers lack information to make informed decisions about insurance to mitigate financial loss. In addition to consulting on a Natural Catastrophe and Climate Risk Guideline mentioned above, BCFSA will continue to work with CCIR and key industry partners to advance a dialogue on potential enhanced disclosures to consumers.

# Pension Plans

---

BCFSA's regulatory priorities for B.C. pension plans are categorized into three main areas:

1. Regulatory Framework Modernization;
2. Digitalization Risk; and
3. Natural Catastrophe and Climate Risk.

The graphic below outlines BCFSA's anticipated regulatory priorities over the next three fiscal years and identifies priorities from the previous year for which work is ongoing. Items in Year 1 identify the quarter in which a consultation, publication or implementation is expected to occur. For Years 2 and 3, the graphic notes that BCFSA anticipates doing work on the priority during the year with the specific quarter to be named later.

Among several updates planned to ensure effective oversight of B.C. pension plans, BCFSA will release its updated Risk-Based Supervision Framework for Pension Plans.

BCFSA is an active participant in the Canadian Association of Pension Supervisory Authorities ("CAPSA"), an association of Canadian pension regulators. The mandate of CAPSA is to facilitate an efficient and effective pension regulatory system in Canada. CAPSA members strive to harmonize approaches to regulatory issues and CAPSA releases guidance from time to time that BCFSA may adopt provincially.

Consultation	Publication	Implementation
	●	◆

	YEAR ONE FY 2025/26				YEAR TWO FY 2026/27	YEAR THREE FY 2027/28
Topic						
Previous Year's Items in Progress	Q1 Apr 1-Jun 30	Q2 Jul 1-Sept 30	Q3 Oct 1-Dec 31	Q4 Jan 1-Mar 31	Q1-Q4 Apr 1-Mar 31	Q1-Q4 Apr 1-Mar 31
Revised Information Security Guideline		◆				
Regulatory Framework Modernization						
Pension Administrators Guide: Roles and Responsibilities			●			
Financial Statement Disclosure Guideline					●◆	
Fee Review					●◆	
Revisions to Annual Information Return						

## SUMMARY OF REGULATORY PRIORITIES

### Regulatory Framework Modernization

BCFSA oversees the administration and enforcement of the *Pension Benefits Standards Act* ("PBSA") and the Pension Benefits Standards Regulation ("PBSR"). As part of its oversight responsibilities, BCFSA ensures that there is an appropriate regulatory framework in place to oversee pension plans in a comprehensive and forward-looking manner.

**Update to Risk-Based Supervision Framework for Pension Plans.** In 2025/26, BCFSA will release an update to the Risk-Based Supervision Framework document originally published in 2014. The document will describe the principles, concepts, and core processes that make up our Risk-Based Regulatory Framework. Ongoing updates to the supervision framework for pension plans help to maintain public confidence in the regulatory oversight of plans in B.C. After publication, BCFSA will work to operationalize the updated framework in its oversight of the segment.

**Pension Administrators Guide: Roles and Responsibilities.** BCFSA is working on a guide for pension plan administrators that provides BCFSA's interpretation of the role and responsibilities of pension plan administrators. Consultation on the guide is expected in Q1 of 2025/26.

**Financial Statement Disclosure Guideline.** In Q3 of 2025/26, BCFSA plans to consult with industry on the development of a new financial statement disclosure guideline. This disclosure is a required filing with respect to pension plan audited statements under section 38(1)(c) of the PBSA and section 47 of the Pension Benefits Standards Regulation. The guideline will set out BCFSA's expectations regarding the required disclosures.

**Revisions to Annual Information Return.** Administrators of B.C. pension plans are required to file a comprehensive Annual Information Return with BCFSA including information on pension plan assets, membership, and key changes to the plan in the preceding year. BCFSA plans to review and update the Annual Information Return beginning in 2026/27, including consultation with plan administrators on proposed changes.

### Digitalization Risk

Technology continues to be a major driver of changes in the financial services sector. BCFSA continues to monitor risks related to digitalization and engage with regulatory and government counterparts on addressing these risks.

**Information Security Incident Guideline.** Reporting of material information security incidents in a timely manner is of critical importance to BCFSA. BCFSA consulted and published a new information security guideline in 2024/25, and intends to implement the final guideline in Q2 2025/26.

**Natural Catastrophe and Climate Risk**

Natural catastrophe and climate change is a critical risk that BCFSa is actively monitoring across the financial services sector. Building on the feedback BCFSa received as part of its public consultation in 2023/24 and direction outlined in the July 2024 Consultation Summary Report, BCFSa will continue to explore ways to work with government and the sector to identify next steps to manage this important risk.

**Natural Catastrophe and Climate Risk Guideline.** Natural catastrophes, including earthquakes, floods, and wildfires, pose a significant risk to British Columbians and the financial services sector in B.C. In many cases, pension plan members lack information about plan investments and exposure to climate risks. BCFSa is continuing work to determine the need for further guidance to pension plans following the release of CAPSA's Guideline for Risk Management for Pension Plan Administrators in Q2 of 2024/25 and anticipates further engagement in 2025/26, including a Pensions Roundtable that will be convened in Q1 of 2025/26. Additional details on the Pension Roundtable is available on the [BCFSa website](#).

# Trust Companies

---

BCFSA's regulatory priorities for the trust segment are categorized into two main areas:

1. Regulatory Framework Modernization; and
2. Digitalization Risk.

The graphic below outlines BCFSA's anticipated regulatory priorities for trust companies over the next three fiscal years and identifies priorities from the previous year for which work is ongoing. Items in Year 1 identify the quarter in which a consultation, publication or implementation is expected to occur. For Years 2 and 3, the graphic notes that BCFSA anticipates doing work on the priority during the year with the specific quarter to be named later.

In addition, where appropriate, BCFSA adopts regulatory guidance issued by OSFI.



Consultation	Publication	Implementation
	●	◆

	YEAR ONE FY 2025/26				YEAR TWO FY 2026/27	YEAR THREE FY 2027/28
Topic						
Previous Year's Items in Progress	Q1 Apr 1-Jun 30	Q2 Jul 1-Sept 30	Q3 Oct 1-Dec 31	Q4 Jan 1-Mar 31	Q1-Q4 Apr 1-Mar 31	Q1-Q4 Apr 1-Mar 31
Revised Information Security Guideline for PRFIs		◆				
Information Security Guideline – Guideline for Extrapro Trust Companies				◆		
Regulatory Framework Modernization						
Internal Capital Guideline						

## SUMMARY OF REGULATORY PRIORITIES

### Regulatory Framework Modernization

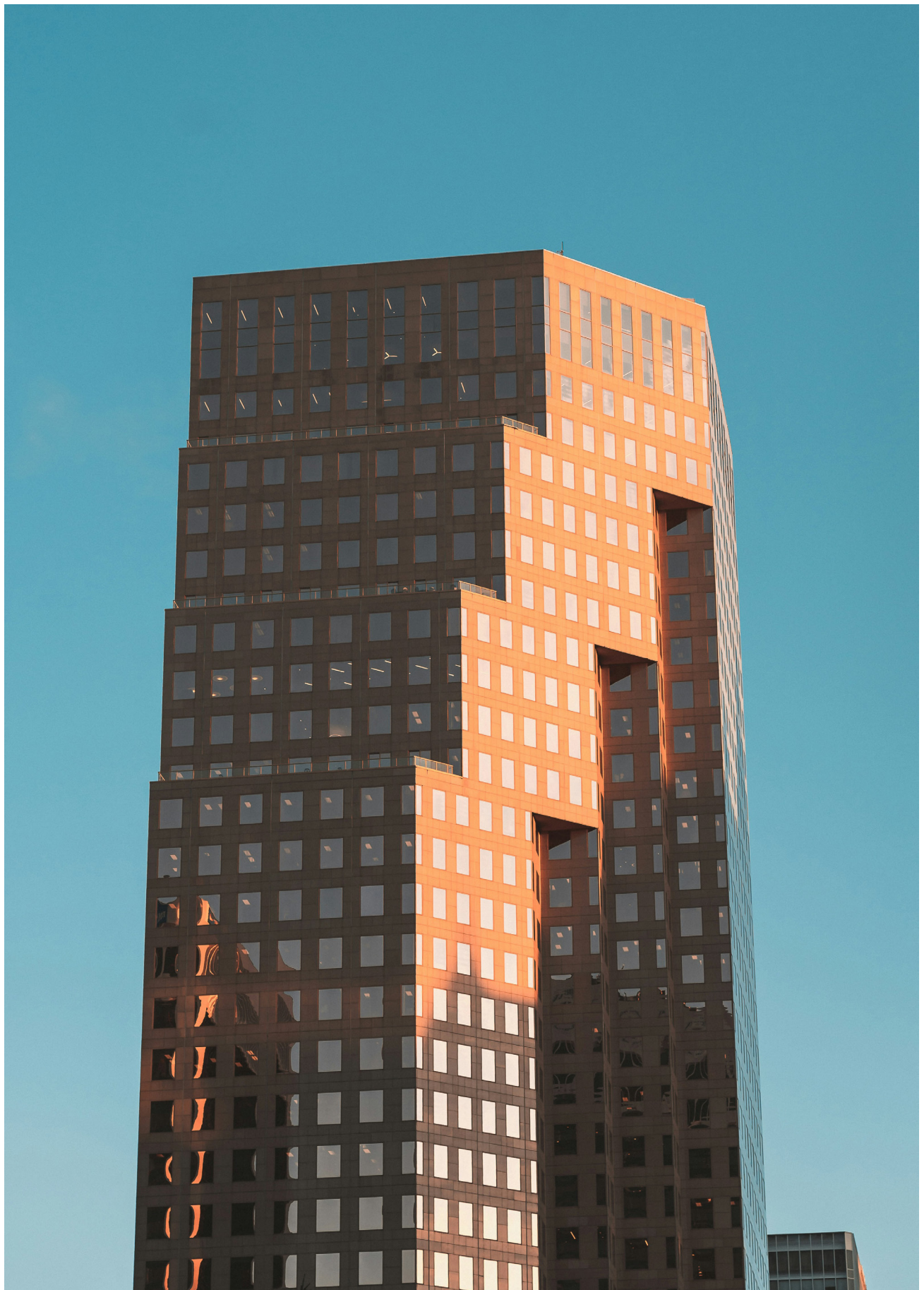
BCFSA actively works with industry, regulatory and government partners to modernize the regulatory framework for trust companies doing business in British Columbia. Through proactive market conduct supervision, including data collection and reporting requirements, thematic reviews of business practices, and targeted monitoring of specific regulated entities and individuals, BCFSA identifies and intervenes to address harmful business practices. BCFSA promotes high standards of market conduct within the trust industry by providing the information and guidance necessary to enable regulated entities to comply with legislative requirements and best practices.

**Internal Capital Guideline.** BCFSA intends to develop a guideline outlining expectations for trust companies to maintain adequate internal capital levels based on their unique risk profiles, aiming to strengthen institutional resilience through forward-looking capital planning practices. BCFSA plans to consult with industry on this new internal capital guideline in 2026/27, with the aim to publish and implement in 2027/28.

### Digitalization Risk

Technology continues to be a major driver of changes in the financial services sector and BCFSA continues to monitor risks related to digitalization and engage with regulatory and government counterparts on addressing these risks.

**Information Security Incident Reporting.** Reporting of material information security incidents in a timely manner is of critical importance to BCFSA. BCFSA consulted and published guidance and expectations for the reporting of information security incidents for extraprovincial corporations in 2024/25. BCFSA plans to implement this guideline in Q4 of 2025/26.



# Money Services Businesses

---

BCFSA's regulatory priorities for the money services business segment are focused on the implementation of the *Money Services Business Act* ("MSBA"), which received Royal Assent in 2023. In 2025/26, BCFSA will continue to support the provincial government to develop the Regulations to the MSBA, which, once approved, will bring the MSBA into force and formally establish BCFSA as the authority responsible for regulating money services businesses in British Columbia. The regulation of money services by BCFSA was a key recommendation set out in the Final Report of the Cullen Commission.

The graphic below outlines BCFSA's anticipated regulatory priorities for money services businesses over the next three fiscal years. BCFSA anticipates that full implementation of the MSBA will take place over several years.

Consultation	Publication	Implementation
	●	◆

	YEAR ONE FY 2025/26				YEAR TWO FY 2026/27	YEAR THREE FY 2027/28
Topic						
Implementation of <i>Money Services Businesses Act</i> (MSBA) Framework	Q1 Apr 1-Jun 30	Q2 Jul 1-Sept 30	Q3 Oct 1-Dec 31	Q4 Jan 1-Mar 31	Q1-Q4 Apr 1-Mar 31	Q1-Q4 Apr 1-Mar 31
Support Government to develop Regulations to enable MSBA Implementation					◆	

## SUMMARY OF REGULATORY PRIORITIES

The priority objective for the 2025/2026 fiscal year is to provide support to the provincial government in its development of the Regulations under the MSBA. BCFSa will publish regulatory instruments, such as Regulatory Statements and Guidelines, to clearly articulate the legislative requirements and regulatory expectations applicable to money services businesses.

BCFSa plans to communicate extensively with stakeholders to ensure an effective transition process to the new regulatory regime.









600-750 West Pender Street  
Vancouver, BC V6C 2T8

604 660 3555  
Toll free 866 206 3030  
[info@bcfsa.ca](mailto:info@bcfsa.ca)