



*Making Insurance Simple And Accessible For Canadians!*

March 20, 2013

Mr. Nicolas Burbidge  
Senior Director, AML and Compliance Division  
Office of the Superintendent of Financial Institutions Canada  
121 King Street West  
Toronto, ON M5H 3T9

Dear Mr. Burbidge:

I am writing on behalf of the Canadian Association of Financial Institutions in Insurance (CAFII) in regard to the recently amended Proceeds of Crime (Money Laundering) and Terrorist Financing Regulations (PCMLTFR).

CAFII members are involved in all lines of insurance and our Association was pleased to participate in the consultations on the proposed revisions. The dialogue with OSFI permitted CAFII to explain

- the benefits of the existing AML/ATF exemptions to a sizeable segment of the Canadian population which constitutes an under-served market for life insurance and related products;
- the negligible AML/ATF risk associated with retention of the exemptions; and
- the significant risks to product distribution – and hence, consumer protection – associated with their removal.

We appreciate very much your willingness to engage with the industry and to listen to stakeholder concerns, with a view to achieving the best possible outcome that balances AML/ATF risk with both consumer protection and business efficiency considerations.

Thank you again for undertaking this important consultation. Whenever OSFI is dealing with similar policy or regulatory issues in the future, please don't hesitate to consult with CAFII through our Executive Director, Brendan Wycks. Mr. Wycks can be reached at [brendan.wycks@cafii.com](mailto:brendan.wycks@cafii.com) or 647-218-8243.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J. Hines', written over a white rectangular area.

Jennifer Hines  
Chair, Executive Operations Committee

cc: Leah Anderson, Director, Financial Sector Division, Department of Finance  
Brendan Wycks, Executive Director, CAFII

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