

February 24, 2016

Ms. Elizabeth Cole  
Executive Director, Strategic Projects  
BC Ministry of Finance  
PO Box 12116 Stn Prov Govt  
Vancouver, BC  
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Dear Ms. Cole:

Peter McCarthy, Kelly Tryon, Brendan Wycks, and I appreciated the opportunity to meet with you and your Ministry colleagues, Brian Dillon and Kari Toovey, to discuss the issues being examined in the 10-Year Review of the Financial Institutions Act.

As we highlighted in our written submission, CAFII believes that the current system of insurance retailing and licensing exemptions is working well and we do not see a compelling need for change. Our members adhere to the market conduct and consumer protection provisions of the province's Financial Institutions Act, Insurance Act, and Personal Information Protection Act. In addition, the distribution of creditor insurance products is federally regulated in the case of most CAFII members, and consumers are well-protected through our members' compliance with

- the Insurance Business (Banks and Bank Holding Companies) Regulations of the federal Bank Act;
- the Canadian Bankers Association Code of Conduct for Authorized Insurance Activities;
- the Personal Information Protection and Electronic Documents Act (PIPEDA); and
- in the case of all CAFII members, compliance with CLHIA Guidelines, including Guideline G7 Creditor's Group Insurance, G9 Direct Marketing, and G5 Travel Insurance.

As the Insurance Council of BC acknowledged in its written submission, ". . . Council has not experienced complaints resulting from the sale of insurance under these types of licensing exemptions."

That said, if the province feels that additional legislation and/or regulations are required, CAFII members would be open to the introduction of a Restricted Insurance Agent (RIA) licensing regime. If that is the ultimate direction taken, we would encourage BC to work with the industry to harmonize its regime with the existing RIA regimes in Alberta, Saskatchewan and Manitoba.

We look forward to participating in the next steps in the legislative review process. If you require further information from CAFII, please contact our Executive Director, Brendan Wycks at [brendan.wycks@cafii.com](mailto:brendan.wycks@cafii.com) or 647-218-8243.

Sincerely,



Greg Grant, MBA, FLMI, ACS  
Board Secretary and Chair, Executive Operations Committee  
Canadian Association of Financial Institutions in Insurance

c.c. Brian Dillon, Director, Financial Institutions, Financial and Corporate Sector Policy Branch  
Kari Toovey, Senior Policy Advisor, Financial and Corporate Sector Policy Branch

## ABOUT CAFII

The Canadian Association of Financial Institutions in Insurance (CAFII) is a not-for-profit industry Association dedicated to the development of an open and flexible insurance marketplace. CAFII was established in 1997 to create a voice for financial institutions involved in selling insurance through a variety of distribution channels, i.e. client contact centres, agents and brokers, travel agents, direct mail, branches of financial institutions, and the internet. CAFII members offer travel, life, health, property and casualty, and creditor's group insurance across Canada.

CAFII's full members are the insurance arms of Canada's major financial institutions – BMO Insurance; CIBC Insurance; Desjardins Financial Security; National Bank Insurance; RBC Insurance; ScotiaLife Financial; and TD Insurance – along with major industry players American Express, Assurant Solutions, Canadian Premier Life Insurance Company, and The CUMIS Group Ltd.

CAFII believes consumers are best served when they have meaningful choice in the purchase of insurance products and services.