

## **Summary of CAFII Meeting with the Insurance Council of BC**

### **Background**

The Insurance Council of BC CEO Janet Sinclair and her Director, Governance and Stakeholder Engagement Brett Thibault, recently requested an in-person meeting with Keith Martin. That meeting was held on March 19, 2025 from 2.30-3.30pm at an office generously made available at the Canada Life head office on University Street by CAFII Board member Louie Georgakis.

### **Summary of Meeting**

A presentation deck was recently circulated from the Insurance Council on its intention to review training materials of those offering products covered by the incoming Restricted Insurance Agency (RIA) regime. That presentation deck moved the Council in a direction we were trying to veer them away from, as it outlined some of the expectations around reviewing training material and “accrediting” it in order for a corporate RIA regime to be issued.

CAFII, CLHIA, and THIA have all been pressing the case that this is an unnecessary additional burden. At the meeting, Keith Martin began by reiterating the key messages (see “Summary of Points Made”) and Janet Sinclair, who did nearly all of the talking for the Insurance Council, listened carefully and said she understood our perspective, but that she felt she needed to clarify how the Insurance Council intended this regime to work.

Ms. Sinclair was very friendly, open, and engaged and reiterated that this was still a consultation and that she wanted to work with us to arrive at a spot that CAFII’s members felt comfortable with. She explained that the RIA regime was rooted in a legislative requirement that would set out the expectations on the Insurance Council, and that the Council was waiting on the legislation. She did not know when that would happen, but she emphasized that upon arrival, **there would be a minimum period of one year to consult with industry on the specifics of the regime.** Unlike the other insurance licensing authorities in the other western provinces, the Insurance Council of BC has rule-making authority, and so changes to the way the regime is implemented do not require going back to legislation, giving the Council the power to make changes much more easily. The initial rule will not be perfect, and the one-year consultation period is intended to provide ample opportunity for industry and the Council to get it right before it is implemented.

Ms. Sinclair said that other jurisdictions in the west said that they felt that if they were redoing their RIA regimes they would seek more oversight about how industry players were offering some insurance products, but that these jurisdictions were constrained by the reality that they did not have rule-making authority and as such changes would require legislation, which was an onerous and time-consuming task. She said as well that people overseeing her Council were emphatic that there needed to be some way to ensure that unlicensed representatives offering insurance had some “basic, minimum” knowledge of the products they were offering. She felt that the performance indicators were intended to outline those minimum requirements and the review of training materials was intended to confirm that—“trust but verify.”

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She mentioned that if the training material review was onerous, such that CAFII members would have a material new burden, how could the council deal with the multiple small players who would have to go through the same exercise? Ms. Sinclair repeated that this was not meant to be onerous, but she had to demonstrate some level of knowledge among representatives offering insurance to clients. She specifically called out her concerns with some sectors, like auto dealerships and car rental companies. Keith Martin suggested that if some of these sectors are the real concern, perhaps an exception could be made for companies above a certain employee threshold who would have more sophisticated training programs. Ms. Sinclair was sympathetic to the concept, but in practice she said it would be problematic as it would imply different classes of companies: “I can’t say to some sectors that these CAFII members are exempted because I know they are the good guys, I have to treat everyone the same way.”

Ms. Sinclair said that when CAFII members actually see how the process works much of the concern should go away, as it will be a straightforward process. She then gave the example of an accreditation test case that the Insurance Council recently engaged in “with a large insurance company with a mortgage broker department that offers credit protection insurance.” The insurance company provided examples of their training material; **the Insurance Council of BC formally completed the review and provided accreditation in half a day.** “This is not intended to be a detailed examination of your training materials, it is just a checklist to ensure the company is providing rudimentary training.”

Ms. Sinclair was receptive to the points about Canadian society needing to be more efficient and she said she is absolutely committed to harmonization, but that there are legislative realities in BC that she must adhere to. However, in a very interesting comment, she said that in her conversations with the other RIA regimes in Canada, there was agreement that if any others eventually would require accreditation, there was a commitment to either have CISRO implement this for everyone, or, if that was not possible, any of the regimes that accredited training materials would then be accepted by all the other regimes. “If another province accredited a company in future, the Insurance Council of BC would accept that and not require you to undergo this exercise again with us.”

She added that smaller companies may have programs through their associations (she understood that was not the case with CAFII), and in those cases the association training program could be accredited and any company that took that program would not have to be separately accredited. She gave the example of the THIA TRIP course—if that is accredited, any travel agent who passed that course would not need to be separately accredited.

### **Next Steps**

Keith Martin was at an Advocis Conference the next day, March 20, 2025 and had further conversations with Janet Sinclair and Brett Thibault. There is a virtual presentation on Monday, March 24 at which EOC and Market Conduct & Licensing members have been invited. Ms. Sinclair said she had reached out to the presenters to ensure that they were clearer about the intentions of this exercise, and she or a senior member of the Council will attempt to be at the opening of the meeting to make some clarifying comments. In that connection, I have received the following message from Galen Aker, who with Jerlyn Nathan will be presenting the deck on Monday:

*Hi Keith,*

*I’m sending a heads up regarding the meeting with your members on Monday. As it’s the second meeting on this topic and a wider audience we’re going to expand on some*

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*concepts for the Education Program for the Restricted Insurance Agency Licence as a whole. We'll provide more context, rationale and the vision for the program while also touching on the components of accreditation we discussed previously.*

*Only sending so you're not surprised if the presentation doesn't look the same. Looking forward to our chat Monday.*

*Thank you,*

*Galen Aker*

I propose to raise some general questions and comments at Monday's meeting, but I think this is mostly an opportunity for further clarity from the Council. **The presenters are not decision-makers and I recommend against advocating for a different model at that meeting.**

**Confirmed Attendees, March 24, 2025 Meeting with Insurance Council of BC**

**CAFII Members**

Karyn Kasperski (RBC Insurance)  
John Burns (Securian Canada)  
Rob Dobbins (Assurant)  
Rebecca Saburi (BMO Insurance)  
Deirdre Kennedy (CUMIS / The Co-Operators)  
Janet Pacini Thibodeau (Manulife)  
Sharon Murrell (Manulife)  
Sushil Masih (RBC Insurance)  
Andrea Stuska (TD Insurance)  
Fay Coleman (TD Insurance)  
Peter Thorn (TD Insurance)  
Wayne Kirsh (Scotiabank)  
Joanna Dybel (Scotiabank)  
Anthony Ricci (TD Insurance)  
Matt Zulak (RBC Insurance)  
Suzanne Blanchard (Manulife)  
Carmelina Manno (Manulife)  
Nichad Goulamhousen (Securian Canada)  
Petrina Johnson (CIBC Insurance)  
Samina Ashraf (TD Insurance)

**CAFII Staff**

Keith Martin, Executive Director  
Lara Doig, Senior Operations Manager  
Robyn Jennings, Research Analyst

## Appendix

### **Summary of Points Made to Janet Sinclair and Brett Thibault at the March 19, 2025 Meeting**

- The original Performance Indicators have not materially changed from the original problematic version. They continue to feel like requirements for a licensed individual that are far more onerous than required for an unlicensed individual. Some of the requirements are advise-type requirements that fully feel like what a licensed individual would be expected to offer, and which are not applicable to an unlicensed agent.
- CCIR already requires “...relevant information and training to Intermediaries to ensure they understand the target market, such as information related to the target market itself, as well as the characteristics of the product”, so if insurers are effectively aligning to Fair Treatment of Consumers in this way, why does BC need these additional processes?
- We continue to feel that this is a new process that is seeking to solve a problem that does not exist. We have three western RIA regimes and one in New Brunswick; none have this level of prescriptive requirements nor any accreditation of training materials, and we have not received concerns from the licensing authorities nor complaints. Why is it necessary in that context to add an entirely new process that will make BC an outlier?
- More generally, this would make our process more onerous at a time when government and Canadian society is emphasizing the need for Canada to focus on what really matters and eliminate unnecessary and inefficient processes—burden reduction, focus on efficiency, removing internal trade barriers. This is not aligned with this societal priority at a time when Canada faces so many economic and societal risks.
- **We would therefore again ask the Insurance Council of BC to consider whether an approach that is principles-based and aligned with the other RIA regimes could be taken instead.**
- Some practical considerations:
  - What happens if the Insurance Council of BC does not approve the training? Can insurance still be offered by agents in the interim? Is a reassessment fee to be levied?
  - Is the Insurance Council of BC prepared for the resources required for this activity? Insurers may have different training modules for each channel (in-person, call centre, online) and each distributor, and they are multi-dimensional with components including individual training, embedded processes, scripts, and technology prompts among other elements. This will be an onerous and potentially very time-consuming task for everyone engaged.
  - If the Insurance Council of BC insists on accreditation, we would suggest that a better approach would be an attestation from those offering the training that they meet the performance requirements.